Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

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Gavin Newsom
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September 27, 2019

Certified Mail No.: 7018-0680-0000-9828-0108

Mr. Peter Benson
Navy Air Weapons Station China Lake
429 East Bowen Road
Ridgecrest, California 93555

NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT

Dear Mr. Peter Benson:

2019 Facility Violations Scoring Procedure (VSP) Score: 19.79
2019 Compliance Tier Assignment: Acceptable

The purpose of this letter is to provide Navy Air Weapons Station China Lake, CA2170023152, located at 1 Administration Circle., Ridgecrest, CA 93555 (hereinafter, the "Facility") with a provisional inspection violation score for each compliance inspection that was conducted during the preceding ten (10) year period beginning January 1, 2009, through December 31, 2018, the Facility's 2019 VSP Score, and compliance tier assignment pursuant to California Code of Regulations (CCR), title 22, section 66271.53, subdivision (b)(2) and section 66271.54, subdivisions (c).[1]

The provisional inspection violation scores for the Facility are provided in the enclosed Inspection Violation Scoring Matrix. A provisional inspection violation score is the sum of the initial score for each Class I violation that occurred during a compliance inspection, and any adjustment to the initial Class I violation score based on repeat violations.[2] (See 22 CCR § 66271.53, subd. (a).) The basis for the score for each Class I violation is also provided in the enclosed Inspection Violation Scoring Matrix.

[1] Pursuant to Senate Bill (SB) 673 (Stats. 2015, chapter 611), the Department of Toxic Substances Control (DTSC) adopted new hazardous waste permitting criteria regulations, which became effective on January 1, 2019. The full text of the hazardous waste permitting criteria regulations is available at https://www.dtsc.ca.gov/LawsRegsPolicies/Regs/upload/18-DTSC-SB-673-Reg-TEXT_OAL_20181023-revised.pdf. More information regarding SB 673 is available at https://www.dtsc.ca.gov/HazardousWaste/Permit_Roundtables.cfm.

[2] For purposes of calculating a facility's inspection violation score, DTSC may also consider Class II violations that meet the definition of a Class I violation as specified in CCR, title 22, section 66260.10. (See 22 CCR § 66271.50, subd. (d)(1).)

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Based on the provisional inspection violation scores for the Facility for the ten (10) year period beginning January 1, 2009, through December 31, 2018, DTSC has calculated a Facility VSP Score for the Facility of "**19.79**". A Facility VSP Score is the sum of all provisional or final inspection violation scores for each compliance inspection conducted during the preceding ten (10) years, divided by the number of compliance inspections. (See 22 CCR § 66271.54, subd. (a).)

A facility may be assigned to one of three compliance tiers based on its Facility VSP Score:

- "Acceptable." A facility that receives a Facility VSP Score of less than 20 shall be designated as having a Facility VSP Score that is "acceptable". (See 22 CCR § 66271.54, subd. (b)(1).)

- "Conditionally Acceptable." A facility that receives a Facility VSP Score equal to or greater than 20 and less than 40 shall be designated as having a Facility VSP Score that is "conditionally acceptable." Facilities that receive a final compliance tier assignment of "conditionally acceptable" are required to comply with additional requirements outlined in the regulations. (See 22 CCR § 66271.54, subd. (b)(2); 22 CCR § 66271.56.)

- "Unacceptable." A facility that receives a Facility VSP Score equal to or greater than 40 shall be designated as having a Facility VSP Score that is "unacceptable." DTSC is required to initiate permit denial, suspension, or revocation proceedings for facilities that receive a final compliance tier assignment of "unacceptable." (See 22 CCR § 66271.54, subd. (b)(3); 22 CCR § 66271.57.)

As a result of the Facility's VSP Score, DTSC has assigned the Facility to a compliance tier of "**Acceptable**". Generally, as discussed further below, a facility's compliance tier assignment becomes final after all provisional inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d).

Provisional Inspection Violation Score Disputes and Compliance Tier Assignment Challenges

An owner or operator of a facility may dispute a provisional inspection score pursuant to CCR, title 22, section 66271.53, subdivision (c) by filing a Provisional Inspection Violation Score Dispute Document (template available at https://dtsc.ca.gov/violations-scoring-procedure/) within sixty (60) calendar days of this notice. All of the following information must be enclosed with the Dispute Document cover letter:

- A statement that describes in detail the factual and legal basis of the dispute and the relief sought;

- Any claimed erroneous facts, assumptions, approaches, or conclusions of law made by DTSC;

- A statement describing in detail any efforts already made by the owner or operator to resolve the dispute with DTSC; and

- Any photographs, documents, or any other material that supports the owner's or operator's position regarding the disputed provisional inspection violation score.

The owner or operator of a facility may request a one-time extension of up to sixty (60) calendar days to submit a Provisional Inspection Violation Score Dispute Extension Document (template available at https://dtsc.ca.gov/violations-scoring-procedure/).

DTSC will issue a written decision, granting or denying, in whole or in part, the relief sought by the owner or operator of a facility disputing a provisional inspection violation score. A provisional inspection violation score will become the final inspection violation score consistent with DTSC's written decision. A provisional inspection violation score will also become the final inspection violation score if the owner or operator of a facility does not file a Dispute Document within sixty (60) calendar days of this notice.

A facility's compliance tier assignment becomes final after all inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d). Final compliance tier assignments of "acceptable" or "conditionally acceptable" are not subject to additional administrative dispute resolution. (See 22 CCR § 66271.54, subds. (e), (f).) However, owners or operators of facilities assigned to a final compliance tier of "unacceptable" may further administratively challenge their final compliance tier assignment under California Code of Regulations, title 22, section 66271.57.

Issuance of this provisional inspection violation score, Facility 2019 VSP Score, and compliance tier assignment do not constitute an enforcement action. If you have any questions regarding this notice, please contact VSP_Info@dtsc.ca.gov. If you have any questions regarding the dispute process, please contact VSP_Dispute_Inbox@dtsc.ca.gov.

Sincerely,

Keith Kihara, Chief
Enforcement and Emergency Response Division

Enclosure(s)

Violation Scoring Matrix
Proof of Service

Violation Scoring Matrix

Facility Name:	NAVAL AIR WEAPONS STATION CHINA LAKE	10 Year Date Range:	2009-2018	Permit Effective Date:	7/13/2018
Address:	1 ADMINISTRATION CIRCLE, RIDGECREST, CA 93555	Number of Inspections:	7	Permit Expiration Date:	7/12/2028
EPA ID:	CA2170023152	Total Number of Violations Scored:	12	Date VSP Completed:	8/20/2019

Link to EnviroStor (Inspection Reports, SOVs, etc.)

Inspection Date:	1/14/2009	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
												Provisional Inspection Violation Score:	0.00

Inspection Date:	10/6/2009	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
												Provisional Inspection Violation Score:	0.00

Violation Scoring Matrix

Facility Name:	NAVAL AIR WEAPONS STATION CHINA LAKE	10 Year Date Range:	2009-2018	Permit Effective Date:	7/13/2018
Address:	1 ADMINISTRATION CIRCLE, RIDGECREST, CA 93555	Number of Inspections:	7	Permit Expiration Date:	7/12/2028
EPA ID:	CA2170023152	Total Number of Violations Scored:	12	Date VSP Completed:	8/20/2019

Link to EnviroStor (Inspection Reports, SOVs, etc.)

Inspection Date:	3/1/2011	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25201(a) and 22 CCR 66262.34(a)	The facility allowed HW to accumulate on the concrete floor. The facility allowed the "Sand Blast Media" HW generated from the sand blasting operation in the machine shop located in the Michelson Lab, Building #5, to accumulate on the concrete floor, where it remained after the end of the work shift in which it was generated. The facility does not have permit or other grant of authorization from DTSC to store HW on the floor in the Michelson Lab.	Moderate	The facility representative indicated that the sand blast grit may have been contaminated with chromium. An approximate volume of sand blast grit observed on the floor was not provided. The room was secured (locked) when not in use. The metal form of chromium is of low toxicity while the hexavalent form is toxic causing skin rashes, stomach ulcers, respiratory problems, weakened immune systems, and kidney and liver damage. The wastestream in violation presented a moderate threat to human health and the environment.	Moderate	The facility representative stated that it was customary practice to have a pan placed under the sand blast unit to catch spillage from the unit during operation. However, the representative did not know why the operator did not use the pan in this instance, as pans are to be checked out before operating the units. A satellite accumulation area with a HW container of "Sand Blast Grit" was also observed about 10-15 feet away from the sand blast unit. The requirement functioned to some extent as a pan is usually used to catch the grit, but in this instance it was not used.	15	No	n/a	0	15.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25201(a) and 22 CCR 66264.34(c)	The facility stored HW on site in tanks or containers for more than 90 days without a permit or other grant of authorization from DTSC. The facility allowed solid magnesium hydroxide waste in the Acid Neutralization Unit to be stored in Tank #1, an open container, for a period of greater than 2 years.	Minimal	Magnesium hydroxide is used as medication to treat occasional constipation, but has side effects including abdominal pain, diarrhea, and colic and was a potential threat to human health if inhaled. The waste failed a fish bioassay demonstrating potential toxicity to the environment if released. The volume of magnesium hydroxide waste (non-RCRA HW) in violation was not specified, and the threat to public health and the environment from the wastestream in violation was low.	Major	In 2007 the Acid Neutralization Unit went through closure and was considered to be clean closed. Tank #1 contained Magnesium Hydroxide and at that time was considered to be product. Tank #1 did not undergo clean closure; the product was never used and that facility staff forgot the material was being stored. As a result, the HW was stored onsite for longer than two years and the function of the requirement was rendered ineffective.	15	No	n/a	0	15.00
	3	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66262.11	The facility failed to determine if the magnesium hydroxide waste in Tank #1, located in the Acid Neutralization Unit, was hazardous, by failing to test the waste or apply knowledge of the waste's characteristics. The waste was stored in Tank #1, even though the unit was considered clean closed.	Minimal	Magnesium hydroxide was a potential threat to human health if inhaled. The waste failed a fish bioassay demonstrating potential toxicity to the environment if released. Because the magnesium hydroxide waste in the tank had not been characterized, there was a greater potential for the waste to be disposed of improperly. The volume of magnesium hydroxide waste (non-RCRA HW) in violation was not specified, and the threat to public health and the environment from the wastestream in violation was low.	Major	Tank #1 was erroneously considered to be clean closed. Only Tanks #2 through #5 were rinsed clean and formally clean closed. It appeared that the product was never used and that facility staff forgot the material was there. As a result, the waste was not tested or characterized for over two years and the function of the requirement was rendered ineffective.	15	No	n/a	0	15.00
												Provisional Inspection Violation Score:	45.00

Violation Scoring Matrix

Facility Name:	NAVAL AIR WEAPONS STATION CHINA LAKE	10 Year Date Range:	2009-2018	Permit Effective Date:	7/13/2018
Address:	1 ADMINISTRATION CIRCLE, RIDGECREST, CA 93555	Number of Inspections:	7	Permit Expiration Date:	7/12/2028
EPA ID:	CA2170023152	Total Number of Violations Scored:	12	Date VSP Completed:	8/20/2019

Link to EnviroStor (Inspection Reports, SOVs, etc.)

Inspection Date:	3/12/2012	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00

Provisional Inspection Violation Score: 0.00

Inspection Date:	11/6/2012	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25189.2(c)	The facility caused the illegal disposal of used oil to the ground. During DTSC's inspection, it was observed that 105 electrical transformers were stored outside the facility equipment yard. The transformers were full of oil and one transformer stored inside a secondary containment plastic bucket that had leaked through and onto the ground, causing disposal of used oil to the ground. The facility did not have authorization to dispose of used oil at this site.	Minimal	Used oil from 106 electrical transformers (with only one leaking) represented a low threat to human health and the environment due to the wastestream in violation. The approximate volume in violation as well as the duration of time the transformers had been at the facility was unknown (facility representative stated "more than two years").	Minimal	One transformer stored in secondary containment leaked used oil to the ground out of 106 total transformers, demonstrated that the requirement functioned nearly as intended, but not as well as if all provisions had been met.	2	No	n/a	0	2.00
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25201(a)	The facility stored used oil without a permit or grant of authorization from DTSC. During DTSC's inspection, it was observed that 106 electrical transformers were stored outside the facility equipment yard. None of the transformers were labeled or had an accumulation start date to verify how long they had been stored. A facility representative stated that the transformers had been there for more than two years.	Minimal	Used oil from 106 electrical transformers represented a low threat to human health and the environment due to the wastestream in violation. The approximate volume in violation as well as the duration of time the transformers had been at the facility was unknown (facility representative stated "more than two years").	Major	106 total transformers containing used oil stored without authorization for an unknown period of time (at least two years) demonstrated the function of the requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0	15.00

Violation Scoring Matrix

Facility Name:	NAVAL AIR WEAPONS STATION CHINA LAKE	10 Year Date Range:	2009-2018	Permit Effective Date:	7/13/2018
Address:	1 ADMINISTRATION CIRCLE, RIDGECREST, CA 93555	Number of Inspections:	7	Permit Expiration Date:	7/12/2028
EPA ID:	CA2170023152	Total Number of Violations Scored:	12	Date VSP Completed:	8/20/2019

Link to EnviroStor (Inspection Reports, SOVs, etc.)

	3	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66265.173(b)	The facility failed to transfer and store used oil in a container in a manner to prevent rupture and leakage. During DTSC's inspection, it was observed that one leaking electrical transformer filled with oil was stored inside a secondary containment plastic bucket had leaked onto the ground.	Minimal	Used oil leaking from one electrical transformer represented a low threat to human health and the environment due to the wastestream in violation. The approximate volume in violation as well as the duration of time the transformer had been at the facility was unknown (facility representative stated "more than two years").	Minimal	One leaking transformer with used oil out of 106 observed during the inspection was cited in violation and demonstrated that the requirement functioned nearly as intended.	2	No	n/a	0	2.00
	4	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66262.34(a)(3)	The facility failed to label 106 electrical transformers (containers) containing HW used oil.	Minimal	Used oil represented a low threat to human health and the environment due to the wastestream in violation. The approximate volume in violation as well as the duration of time the transformers had been at the facility was unknown (facility representative stated "more than two years").	Major	106 total transformers containing used oil stored without a HW label for an unknown period of time demonstrated the function of the requirement was rendered ineffective.	15	No	n/a	0	15.00
	5	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66265.1063(a) and (d)(1-3)	The facility failed to test and determine, for each piece of equipment, including laboratory drain, pipe and underground storage tanks at the Salt Wells laboratories, whether the equipment contained or contacted HW with organic concentration that equals or exceeds 10 percent by weight.	Moderate	Because the facility failed to conduct leak detection monitoring on the Salt Wells laboratory equipment, the facility may not have contained any potential air releases that could have caused harm to human health and the environment. Solvent waste and/or volatiles after solvent cleaning (which may include acetone or methylene chloride) flowed into open-top underground storage tanks. No estimates of volume were provided. The solvent wastestreams in violation represented a moderate threat.	Major	During and after the inspection, it was determined that the facility could not supply any information or documentation on testing or test method(s) used for each piece of equipment (laboratory drain, pipe, and underground storage tank(s)), whether the equipment contained or contacted HW with organic concentration that equaled or exceeded 10 percent by weight. The requirement was therefore rendered ineffective.	20	No	n/a	0	20.00
	6	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66265.1084(a)(2)	The facility failed to conduct a waste determination at the point of origin for the average volatile organic concentration of each HW generated in the Salt Wells laboratories.	Moderate	The facility failed to determine the average volatile organic concentration of HW at the point of waste origination which could have resulted in the facility inadequately containing potential air releases. Solvent waste and/or volatiles after solvent cleaning of the laboratory (which may include acetone or methylene chloride) drained into open-top underground storage tanks. No estimates of volume were provided. The solvent wastestreams in violation represented a moderate threat to human health and the environment.	Major	During and after the inspection, it was determined that the facility could not supply any information regarding test methods, including by knowledge for the average volatile organic concentration at the point of origination of the HW generated in the Salt Wells laboratories. No monitoring had been conducted at the point of origin. The function of the requirement was completely ignored and none of its provisions were complied with	20	No	n/a	0	20.00
												Provisional Inspection Violation Score:	74.00

Violation Scoring Matrix

Facility Name:	NAVAL AIR WEAPONS STATION CHINA LAKE	10 Year Date Range:	2009-2018	Permit Effective Date:	7/13/2018
Address:	1 ADMINISTRATION CIRCLE, RIDGECREST, CA 93555	Number of Inspections:	7	Permit Expiration Date:	7/12/2028
EPA ID:	CA2170023152	Total Number of Violations Scored:	12	Date VSP Completed:	8/20/2019

Link to EnviroStor (Inspection Reports, SOVs, etc.)

Inspection Date:	11/4/2014	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.	HSC 25201(a) and HSC 25189(e)	The facility conducted unauthorized treatment of HW when it operated an unpermitted drum crushing unit in the Drum Storage Area. The Transfer Document provided by the facility confirmed that the drum crushing unit had been in use.	Minimal	Drums should be empty before they are crushed. However, if it was discovered that remaining fluids were in the container, an absorbent would be added, collected, and then disposed in the petroleum-contaminated waste bin as a non-RCRA HW. The volume of waste in violation was not specified. The wastestream in violation (non-RCRA petroleum) as well as the potential quantity of wastes generated (from empty drums) presented a minor threat to human health and the environment.	Major	An unpermitted drum crusher unit was located next to the Cool Room. The facility had been informed previously by DTSC on 5/23/2013 that the use of this unit was "considered unauthorized treatment of HW." According to a reviewed Transfer Document, empty drums were transferred through 8/28/2014. Continued use of the unpermitted unit after DTSC notification demonstrated the requirement was completely ignored.	15	No	n/a	0	15.00
Class II Violations:	2	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66262.34(f)	The facility failed to properly label HW as paint wastes were not individually labeled. Rather, each pile of paint containers on a pallet were labeled. Because the paint wastes were not properly contained, each paint waste container was required to have its own individual HW label and group labeling was improper.	Minimal	Five piles of paint wastes shrink-wrapped and placed on a wooden pallet were cited in violation. Because the paint wastes were not individually labeled, there was an increased potential for the waste to be separated from the shrink-wrapped pallet and mis-identified. No information was available regarding the toxic properties of the paint wastes. The wastestream in violation presented a minor threat to human health and the environment.	Minimal	Paint waste piles were not properly contained in containers for HW so each individual paint waste container could have its own HW label. The requirement functioned nearly as intended as the majority of the paint waste was shrink-wrapped to pallets labeled with one label per pallet.	2	Yes	11/6/2012	25	2.50
	3	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	22 CCR 66262.34(a)(1) and 22 CCR 66265.174	The facility failed to conduct weekly generator accumulation area inspections for the months of January through March 2014. Inspection records from December 2012 through November 2014 were reviewed during the inspection by DTSC inspectors.	Minimal	The volume and wastestreams in violation were not specified, but the facility was permitted to manage waste oils, explosive-contaminated wastes and wastewater, vehicle maintenance waste, Polychlorinated Biphenyl (PCB) ballasts, photo processing wastes, paints, solvents, laboratory chemicals, and universal wastes. The wastestreams in violation represented a minor threat to human health and the environment.	Minimal	Three months of weekly inspections out of the 24 total months reviewed demonstrated the requirement functioned nearly as intended.	2	No	n/a	0	2.00
												Provisional Inspection Violation Score:	19.50

Violation Scoring Matrix

Facility Name:	NAVAL AIR WEAPONS STATION CHINA LAKE	10 Year Date Range:	2009-2018	Permit Effective Date:	7/13/2018
Address:	1 ADMINISTRATION CIRCLE, RIDGECREST, CA 93555	Number of Inspections:	7	Permit Expiration Date:	7/12/2028
EPA ID:	CA2170023152	Total Number of Violations Scored:	12	Date VSP Completed:	8/20/2019

Link to EnviroStor (Inspection Reports, SOVs, etc.)

Inspection Date:	3/2/2016	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
												Provisional Inspection Violation Score:	0.00

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	0	CEI	1/14/2009	0.00
2	0	CEI	10/6/2009	0.00
3	3	CEI	3/1/2011	45.00
4	0	CEI	3/12/2012	0.00
5	6	CEI	11/6/2012	74.00
6	3	CEI	11/4/2014	19.50
7	0	CEI	3/2/2016	0.00
Sum of Provisional Inspection Violation Scores				138.50
*FACILITY VSP SCORE				19.79

***FACILITY VSP SCORE = Sum of Provisional Inspection Violation Scores/Total Number of Inspections conducted in 10 year (calendar) timeframe**

CCR = California Code of Regulations
CDI = Case Development Inspection
CEI = Compliance Evaluation Inspection
CI = Complaint Investigation
DTSC = Department of Toxic Substances Control
EPA ID = Environmental Protection Agency Identification
FCI = Focused Compliance Inspection
FRR = Financial Records Review
FSD = Facility Self Disclosure
FUI = Follow-Up Inspection
GAR = Groundwater Audit Report
GME = Groundwater Monitoring Evaluation
HSC = Health and Safety Code
HW = Hazardous Waste
HWFP = Hazardous Waste Facility Permit
n/a = Not Applicable
NFRR = Non-Financial Record Review
RCRA = Resource Conservation and Recovery Act
SOV = Summary of Violations
VSP = Violations Scoring Procedure

PROOF OF SERVICE

1. I served the NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT on Peter Benson, Navy Air Weapons Station China Lake, EPA ID Number CA2170023152.

2. I served Peter Benson, Navy Air Weapons Station China Lake, by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9828-0108, return receipt requested, in a sealed envelope addressed to:

   Mr. Peter Benson
   Navy Air Weapons Station China Lake
   429 East Bowen Road
   Ridgecrest, California 93555

3. My name, business address, and telephone number are:

   Alan Korematsu
   Department of Toxic Substances Control
   HWMP, 11th Floor
   1001 I Street
   Sacramento, California 95812-0806
   (916) 323-3706

I declare under penalty of perjury that the foregoing is true and correct and that this declaration of Proof of Service is executed on October 4, 2019 at Sacramento, California.

(Signature)