

U.S. EPA Region 8 NPDES Desk Audit Checklist

NATIONAL DATABASE INFORMATION		
Name of Facility: C. Sharps Arms Co., Inc.	NPDES ID Number: MTPF00102	
Desk Audit Date(s): 1/28/2021	Evaluation Type: Desk Audit of SIU	
Type of Facility: SIU; Metal Finishing Point Source Category (40 CFR 433)	SIC Code(s): 3484 Small Arms	
Permit Issuing Authority: EPA Region 8, Pretreatment	Name of receiving water(s): Big Timber POTW which discharges into the Boulder River	
AOC Effective Date: September 26, 2019	Expiration Date: N/A	
Evaluator and affiliation: Jessica Duggan, EPA Region 8		
Facility Location Information		
Site/Facility Location: C. Sharps Arms Co., Inc. 100 Centennial Big Timber, Montana 59011	Mailing/Email Address: Don Franklin, VP C. Sharps Arms Co., Inc. 100 Centennial Big Timber, Montana 59011 (b) (6)	
Contact Information		
	Name(s)/Title	Telephone/Email
		(b) (6)
Facility Contact(s):	Don Franklin, Vice President of C. Sharps Arms Co., Inc.	(b) (6)
State/POTW Representative(s) Contacted:	N/A	
Desk Audit Review and Signature		
Drafter Name:	Date:	Email/Phone:
Jessica Duggan	1/28/2021	U.S. EPA Region 8 Duggan.jessica@epa.gov 303-312-6195
Management Reviewer Name/Signature/Date:		Email/Phone:
MICHAEL BOEGLIN Digitally signed by MICHAEL BOEGLIN Date: 2021.02.07 10:09:11 -07'00'		U.S. EPA Region 8 Boeglin.Michael@epa.gov 303-312-6250
NPDES and Wetlands Enforcement Section Chief		

Evaluation Narrative

Facility Background

C. Sharps Arms Co., Inc. (C. Sharps Arms/facility) is a metal finishing facility that discharges wastewater to the Big Timber POTW in Big Timber, Montana. C. Sharps Arms manufactures replica Sharps rifles through a combination of fabrication, using milling and grinding machines, and assembly. Metal components of the rifles are colored through the application of a metal salt coating during the bluing process. Because the process of applying a metal salt on steel by immersion in a metal salt solution is coating (coloring) and wastewater from this process is discharged to the Big Timber POTW, the facility is subject to the Metal Finishing Point Source Category Pretreatment Standards at 40 C.F.R. Part 433, subpart A. Industrial users that discharge wastewater regulated by a categorical process, such as coating, are considered Significant Industrial Users, pursuant to 40 C.F.R. § 403.3(v). Therefore, C. Sharps Arms is a Significant Industrial User (SIU) and EPA is the pretreatment “Control Authority,” as defined by 40 C.F.R. § 403.3(f), for industrial users that discharge to the Big Timber, Montana POTW.

C. Sharps Arms and EPA entered into an Administrative Order on Consent (AOC) on September 26, 2019 (Docket No. CWA-08-2019-0011). The AOC was signed by Don Franklin, Vice President of C. Sharps Arms and required the facility to comply with the terms of the attached titled “Discharge Requirements Under General Pretreatment Regulations and Metal Finishing Point Source Category.” The attachment described facility outfall locations, effluent limitations and monitoring requirements, discharge controls plans (Solvent Management and Slug Discharge), prohibitions, reporting and notification requirements, periodic compliance reports (Discharge Monitoring Reports or DMRs), and general conditions.

C. Sharps Arms’ Discharge Control Plan, also referred to as Solvent Management Plan, was approved by EPA on April 13, 2020. Approval of the Solvent Management Plan allows C. Sharps Arms to submit a total toxic organics (TTO) certification statement with each periodic compliance report in lieu of sampling for TTOs. A signed TTO certification was included in the 6/2020 and 12/2020 DMR submittals.

According to the AOC, C. Sharps Arms was required to submit the Baseline and 90-day Compliance Report within 90-days of the effective date of the Order (12/26/2019). C. Sharps Arms submitted the required Baseline and 90-day Compliance Reports on 9/19/2019 and it was reviewed and approved by EPA on 10/2/2019. Additionally, the Slug Discharge plan was received on 9/19/2019 and it was reviewed and approved by EPA on 10/2/2019.

Data Review

According to the effective date of the AOC, C. Sharps Arms was required to submit discharge monitoring reports (DMRs) to EPA. C. Sharps Arms has submitted three DMRs for the following reporting periods:

- 12/2019 DMR for monitoring period 6/1/2019 – 12/31/2019
- 6/2020 DMR for monitoring period 1/1/2020 – 6/30/2020
- 12/2020 DMR for monitoring period 7/1/2020 – 12/31/2020

The 12/2019 DMR was submitted on 1/16/2020, but there was a discrepancy between the copper value on the DMR and the laboratory sample result collected on 12/10/2019. After a discussion with the facility, it was determined to an error and a corrected DMR was submitted on 2/3/2020. The copper value was below the monthly average and daily maximum limits. Monthly average flow of 39.53 gallons/day and daily maximum flow of 71.42 gallons/day are documented in the log sheets submitted with the DMR. Laboratory data for the samples collected and flow data was also included with the DMR package.

The 6/2020 DMR was submitted on 7/8/2020 and there was a cyanide exceedance of the monthly average and daily maximum limits (see Effluent Exceedance section below). Monthly average flow of 22.6 gallons/day and daily maximum flow of 31.7 gallons/day are documented in the log sheets submitted with the DMR. The signed TTO certification was included with the DMR, in lieu of sampling the TTOs. Laboratory data for the samples collected and flow data was also included with the DMR package.

The 12/2020 DMR was submitted on 1/4/2021. The DMR identified “2” in the Frequency of Analysis but only one (1) analytical result. An email was sent to the facility on 1/29/2021 asking if two samples had been collected during the monitoring period. On 2/1/21 Don Franklin called EPA and stated only one sample had been collected. A revised DMR was submitted to EPA on 2/1/2021 indicating the correct number of analyses. Monthly average flow of 37.28 gallons/day and daily maximum flow of 57.06 gallons/day are documented in the log sheets submitted with the DMR. The data in the DMR appears to be complete and accurate. The signed TTO certification was included with the DMR, in lieu of sampling the TTOs. Laboratory data for the samples collected and flow data was also included with the DMR package.

Effluent Exceedance

In June 2020, the sample results for cyanide at Outfall 001 exceeded effluent limits. The samples collected on 6/10/2020 were analyzed and the result for cyanide was 4.5 mg/l. The cyanide limit in the AOC has a daily maximum of 1.2 mg/l and a monthly average of 0.65 mg/l. Don Franklin called the EPA on 6/25/2020 upon becoming aware of the result and cyanide exceedance and provided a 24-hour Notification. Based on the conversation, Don Franklin had spoken to the laboratory and they were to re-run the sample which resulted in confirmation of the original analytical result. The process at the facility had not changed. Don Franklin also informed EPA that he had dropped the sample lid when he was collecting the effluent sample and was wondering if cross-contamination from the floor may have entered the sample.

On 6/29/2020, an additional sample was collected from Outfall 001 and the result for cyanide was 0.28 mg/l. The 6/2020 DMR documented the two cyanide sample results and exceedance on the monthly average limit and daily maximum limit.

	Monthly Average (mg/l)	Daily Maximum (mg/l)
Effluent Limitations for Cyanide	0.65	1.2
6/2020 DMR Results	2.39	4.5

No other effluent exceedances were noted in the data review.

Communication with Facility Contacts

Don Franklin submitted the 12/2020 DMR on 1/4/2021 via email and stated a hard copy was mailed to EPA Region 8. Jessica Duggan forwarded the email and DMR data to the data team for entry into ICIS. As previously discussed, there was confusion about the Frequency of Analysis, but it was resolved and a revised DMR was submitted on 2/1/2021.

Conclusion:

C. Sharps Arms continues to comply with the AOC and pretreatment requirements to submit period monitoring reports or DMRs. The cyanide effluent exceedance in June 2020 was reported to EPA and complied with the 24-hour Notification requirements. Flow and laboratory data continue to be reported to EPA in the DMR packages.

Data Evaluation

DMR range(s) reviewed?	12/2019; 6/2020; and 12/2020
Were the DMRs on time (AOC requirement)?	Yes
Were the DMRs submitted at AOC required frequency?	Yes
Are NODI Codes accurate? If SNC NODI codes used, was it accurate?	NODI code 9 used for TTOs, because in lieu of sampling was approved 4/13/2020.
Does sampling frequency meet the permit sampling frequency? If sampled more than permit required frequency, is all the data reported?	Yes

Does reported sample type match permit? (i.e. grab or composite)	Yes
Is there a value reported for each parameter? (Note any blank data)	Yes
Are there errors in the number of exceedances (No. Ex.) on the DMRs?	Frequency of Analysis fixed in the 12/2020 DMR. Revised DMR submitted.
Comments:	
Effluent Violations (timeframe 9/2019 – 12/2020)	
Are there effluent violations during the timeframe evaluated? Or past violations?	Yes
What parameters have been exceeded?	Cyanide exceedance of daily maximum and monthly average in June 2020
Duration and timeframe of exceedances?	Exceedance from sample collected 6/10/2020, resampled 6/29/2020 and back into compliance.
Does the data indicate the facility is back into compliance?	Yes
Laboratory data requested from facility? (i.e. Follow-up and possible onsite inspection)	Laboratory data is submitted with each 6-month DMR submittal.
Comments:	
Compliance Schedule Milestones	
What are the Compliance Schedule issues during the timeframe evaluated?	N/A
What are the Compliance Schedule milestones in the permit?	N/A
Is the data accurate?	N/A
Have the deliverables been submitted?	N/A
Have deliverables been entered into database?	N/A
Comments:	
Permit Coding (possibly remove if Desk Audit sent to facility)	
Monitoring frequency in permit?	Yes
Frequency of DMR submittals at the frequency stated in permit?	Yes
Are there other permit coding errors?	No
Are all the outfalls listed?	Yes

Comments:	
Effluent Monitoring Data (if requested from facility)	
Is monitoring for required parameters performed more frequently than required by permit? If so describe:	No
Are analytical results consistent with the data reported on the DMRs?	Yes
Is all data collected summarized on the DMRs?	Yes
Are weekly and monthly averaging calculated properly and reported on the DMRs?	Yes
Are the maximum and minimum values of all data points reported properly on the DMRs?	Yes
Is the number of exceedances column (No. Ex.) completed properly on the DMRs?	Yes
Is the frequency of analysis column completed properly on the DMRs?	Yes
Comments:	
Has any violation of a discharge limitation of the pollutants listed in the permit or an unauthorized release, including SSOs, occurred?	Yes, Cyanide
a. If yes, indicate the violation(s) and the date(s) of the violation(s)	6/10/2020
b. Did the permittee report the violation(s) within 24 hours of its occurrence?	Yes
c. Did the permittee repeat analysis performed within 30 days?	Yes, resampled 6/29/2020
IX. Miscellaneous	