



NPDES Compliance Inspection Report

Federal Cartridge Company (CCI) Lewiston, Idaho

NPDES Permit Tracking Number
IDR053178

Inspection Date: March 28, 2023

Prepared by:

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U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section

Inspector Signature/Date:

CHARISSA BUJAK	Digitally signed by CHARISSA BUJAK Date: 2023.05.25 06:57:38 -06'00'
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Supervisor Signature/Date:

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Robert Berthiaume, Ms. Rachel Imthurn, Mr. Paul Fuson, and other Facility representatives, or from observations made during the inspection.]

I. Facility Information

Facility Name:	Federal Cartridge Company – CCI
Facility Address:	2299 Snake River Avenue Lewiston, Idaho 83501
Facility Operator:	Federal Cartridge Company – CCI
Facility Owner:	Vista Outdoors is the primary holding company; Federal Cartridge Company has 2 facilities with MSGP permit coverage – Speer & CCI
Facility Contact(s):	Robert Berthiaume, Corporate Director of Compliance Legal / EHSS Supervisor Speer/CCI (208) 750-3161 Robert.Berthiaume@VistaOutdoor.com Rachel Imthurn, Environmental Supervisor Speer/CCI (208) 750-3221 Rachel.Imthurn@VistaOutdoor.com
Latitude/Longitude:	46.395904°N, -117.035754°W
NPDES Tracking Number:	IDR053178
NAICS Code(s):	332992 (Small Arms Ammunition Manufacturing)
SIC Code(s):	3482 (Metal Fabrication – Small Arms Ammunition)
Facility Size:	30 acres

II. Inspection Information

Inspection Date:	March 28, 2023
Inspector(s):	Charissa Bujak, Inspector EPA Region 10, IOO, ECAD / SWES Vanessa Oquendo

EPA Region 10, ECAD / SWES

Arrival Time:	2:00 PM
Departure Time:	5:40 PM
Weather:	Part sun, part cloud
Purpose:	To evaluate compliance with the requirements of the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities.

III. Permit Information

Federal Cartridge Company (hereinafter referred to as the “Facility”) is permitted under EPA’s Industrial Stormwater General Permit (MSGP). The permit tracking number assigned to the Facility is IDR053178.

The current version of the MSGP became effective on March 1, 2021, and is set to expire on February 28, 2026. The Facility had coverage under the previous version of the Permit (2015 MSGP). The Facility submitted a new Notice of Intent (NOI) for continued permit coverage on May 27, 2021.

Permitting authority was transferred from EPA Region 10 to the Idaho Department of Environmental Quality (IDEQ) on July 1, 2021, as IDEQ became the delegated authority for General NPDES Stormwater Permits under Phase IV of the scheduled transfer.

The Facility is subject to the sector-specific requirements of Part 8, Subpart AA – Sector AA1 of the MSGP (Metals Fabrication). The requirements include quarterly benchmark monitoring for total recoverable aluminum, total recoverable zinc, nitrate plus nitrite nitrogen, and additional biannual indicator monitoring for polycyclic aromatic hydrocarbons (PAHs).

Per Part 2.2.2 of the MSGP, the Facility is also subject to water quality-based effluent limitations as the Facility discharges into the Snake River, which is a Section 303(d) listed water, impaired for temperature. However, IDEQ has not yet established a Total Daily Maximum Loads (TMDLs) for this section of the Snake River.

IV. Facility Background

CCI (hereinafter referred to as the “Facility”) manufactures ammunition for small arms for sale/distribution. The Facility is a small arms manufacturing facility located in Lewiston, ID, operated by the Federal Cartridge Company and owned by Vista Outdoors. The location of Vista Outdoors corporate headquarters is 1 Vista Way

Anoka, Minnesota 55303. The Facility has been operating for approximately 75 years and expects to continue to operate. The Facility is staffed by approximately 805 employees, operating weekend, and weekday swing shifts. Production occurs 24 hours a day, 7 days a week, and 365 days per year. The Facility produces approximately 27-28 million center rounds per week.

According to the Facility's Stormwater Pollution Prevention Plan (SWPPP), affected stormwater areas at the Facility encompasses approximately 30 acres. Asphalt paving covers the majority of the Facility's surfaces, but some vegetated areas are present. See **Attachment A**, Aerial Photo (NAIP).

According to the SWPPP, primary industrial materials handled, and processes conducted at the Facility include aluminum forming, brass forming, plastics extrusion, copper plating (with cyanide), nickel plating, and assembly of finished ammunition. Primary structures include numerous buildings and/or covered structures under which several types of activities occur, such as manufacturing and processing, storage, maintenance, quality assurance and testing, and shipping and receiving. Additionally, the Facility operates the CCI Wastewater Treatment Plant (WWTP) on-site under a separate NPDES permit.

According to the SWPPP, stormwater on-site is composed of sheet flow from impervious surfaces such as parking lots, access roads, and roofs. Stormwater is infiltrated/evaporated within retention ponds, discharged to the wastewater treatment system, and/or discharged via catch basins to the Snake River. The Facility has identified 4 separate outfalls which discharge to the Snake River. See **Attachment B**, Site Layout Map, and **Attachment C**, Site Storm Drains and Sanitary Lines Map.

According to EPA's Enforcement and Compliance History Online (ECHO), the facility was inspected for MSGP compliance by IDEQ on November 19, 2021. The Facility has posted public signage of MSGP permit coverage.

V. Inspection Chronology

This was an announced inspection. On March 24, 2023, Ms. Vanessa Oquendo called Mr. Robert Berthiaume, Facility General Manager, and stated that we had been asked to conduct a routine on-site inspection at the CCI and Speer facilities to assess compliance with the MSGP.

Specifically, for the CCI inspection, Mr. Berthiaume agreed to meet EPA at the main office at 2:00 pm MST on March 28, 2023.

Upon arriving on-site, Ms. Oquendo and I met with Ms. Rachael Imthurn at the facility's main office building and proceeded to a conference room where we began our inspection.

The inspection consisted of an opening conference, a walk-through of the Facility's general operations and stormwater areas, a records submittal request, and ended with a closing conference. We were accompanied throughout the inspection by Mr. Robert Berthiaume, Ms. Rachel Imthurn, Mr. Paul Fusion, and other representatives from the Federal Cartridge Company.

VI. Opening Conference

The opening conference was held with Mr. Robert Berthiaume, Ms. Rachel Imthurn, Mr. Paul Fuson, and other facility representatives shortly after our arrival. We had our initial introductions; Ms. Oquendo and I introduced ourselves and I presented my inspector credentials. We then discussed the purpose and scope of the inspection.

During the opening conference Mr. Berthiaume, Ms. Imthurn, and Mr. Fuson provided a general background of Facility operations, including current staffing, and general stormwater management responsibilities.

VII. Site Review

The primary industrial activity which occurs at the Facility is the manufacturing of small arms ammunition. To produce the ammunition, the Facility conducts processes such as aluminum forming, brass forming, plastics extrusion, copper plating (with cyanide), nickel plating, and assembly of finished ammunition.

Manufacturing and processing occur generally indoors. Industrial activities exposed to stormwater include the loading and unloading of raw materials, numerous material handling and storage areas, waste storage areas, processing areas, and chemical storage areas. The Facility has a numbered system to designate the industrial activities which occur within each building.

Primary potential pollutant sources for stormwater include iron, lead, zinc, copper, nickel, aluminum, and motor/hydraulic oil. The following on-site activities are exposed to stormwater: handling and storage of containers of raw materials and chemicals, vehicle tracking, spills/leaks from industrial equipment, drums, tanks, and other containers, and tracking and/or blowing of debris, trash, and other waste materials. Materials are shipped and received in the shipping and receiving area but handled in numerous areas on-site. Materials and chemicals stored on-site include brass wire, brass ammunition cases, solvents, paints, and oil/lubricants. The materials are generally stored under a covered structure and/or within a containment berm, a drum, and/or other covered containers. Generally, containers, like dumpsters and covered drums for found metal pieces, are situated outside and in between buildings.

As mentioned earlier in this report, the Facility has identified four separate stormwater discharge points: Outfall A, Outfall B, Outfall C, and Outfall D. The four identified outfalls, as well as drainage basin PL, capture stormwater from the areas delineated on

the Site Layout Map. (**Attachment B**). A stormwater sample at Outfall C is only collected if high flow occurs. During low-volume rainfall events, stormwater from this outfall is diverted to flow into the influent sump of the CCI WWTP. Finally, stormwater is also collected within additional retention ponds and is either infiltrated and/or evaporated.

The facility has identified 5 stormwater sampling points. The sampling point for Outfall A is located between the shipping and receiving building and the machine shop. Outfall A collects flow from drainage basin A. The sampling point for Outfall B is located by the main office building and collects stormwater sheet flow from drainage basin B. The sampling point for Outfall C is located adjacent to the metal parts/plating building and collects stormwater from drainage basin B. The sampling point for Outfall D is located adjacent to the CCI WWTP and collects stormwater from drainage basin B. Lastly, the facility has another sampling point designated as PL, which is located adjacent to the staff parking lot and collects stormwater sheet flow from drainage basin PL. (**Attachment B**).

As the Facility discharges into a Section 303(d) listed water which is impaired for Temperature, the Facility is required to monitor annually for temperature at all outfalls discharging to the Snake River.

The Facility contracts with Anatek Labs located at 1282 Alturas Drive in Moscow, ID 83843 for analysis of their stormwater sampling.

All stormwater-impacted areas and outfalls were toured with the facility representatives as part of the inspection walk-through. See **Attachment D**, for a photograph log of relevant pictures taken during the site walk-through.

We began the facility walk-through at the south end of the main office building (#141). At this location, we viewed a rain gauge and sample point A located between building #143 and building # 144. Sampling point A collects the stormwater drainage from drainage basin A and discharges to outfall A (**Photos 1-2**). All paved areas generally slope towards this observed sample point.

Adjacent to building #142 we observed a spill kit. The Facility representative removed a zip tie securing the lid to allow us to observe the contents. I observed that the spill kit was stocked, and the contents of the kit were labeled (**Photos 3-4**). Between buildings #143 and #144, I observed uncovered dumpsters that contained wood, cardboard, and steel material, covered metal storage boxes containing brass cases, and covered and plastic-lined cardboard storage boxes (**Photos 5-7**). The facility calls Pacific Steel to pick up the dumpsters as needed.

We continued walking upslope in a southeast direction through drainage basin A. Adjacent to the north side of building #330, I observed uncovered dumpsters containing cardboard and a fully enclosed primer and sealant mix room. On the western side of building #230 an asphalt berm in the road directed stormwater into an infiltration basin

(Photo 8).

We continued upslope until we were at the far eastern border of the facility, located above drainage basin A and drainage basin PL. This area is composed of a mix of gravel and mulch. In this area, I observed salt stored on wooden pellets and saran-wrapped **(Photo 9)**. At this location, an unnamed tributary intersects the perimeter of the property and flows into an underground pipe. The flow from the unnamed tributary is piped under drainage basin PL to an outlet at the property's western border, adjacent to sampling point PL. Around this area, I observed the ground sloped down towards the tributary. I also observed piles of what appeared to be disused metal pieces located near the inlet of the pipe **(Photo 10)**.

We continued our walk-through into drainage basin PL. This drainage basin collects stormwater flow from the parking lots and quality assurance buildings. The sampling point for PL is located at the southwestern end of the parking lot. On the eastern side of building #361, I observed a small infiltration area **(Photo 11)**. I observed a covered fuel storage area with labeled fuel storage containers on shelves **(Photo 12)**. In this area, I observed bins of old plastic packaging that appeared to be in disuse **(Photo 13)**. I also observed an empty spill kit box ready to be filled and delivered to another location within the property **(Photos 14-15)**. Adjacent to building #440 I observed lidded mixed scrap lead bins for reclamation **(Photo 16)**. At the southern end of building #,331 I observed a plastic-lined and covered metal scrap bin **(Photo 17)**.

In the parking lot, adjacent to the area where the Facility is fenced, I observed an infiltration basin **(Photo 18)**. To the south of the infiltration basin, I observed an area used to store dumpsters before they are emptied. This area is surrounded by a concrete berm with a catch basin in the far southwestern corner. The catch basin is connected to the sanitary sewer system **(Photo 19)**. At the far southwestern end of the parking lot, I observed an infiltration basin with an outlet to the unnamed tributary. This location is where stormwater is sampled for the PL drainage basin if it fails to infiltrate. I examined the pipe outlet where the unnamed tributary flows out from under the parking lot and towards the Snake River. Upon inspection, I noticed that there was no berm or ditch to redirect stormwater runoff into the nearby infiltration basin. Additionally, I observed the flow of the unnamed tributary as it discharged into the Snake River **(Photos 20-21)**.

We continued our walk-through into drainage basin B. Drainage basin B collects stormwater from drainage basins B and C and discharges into outfall B. At high volumes of stormwater runoff, sampling point C discharges to Outfall C. At low volumes, runoff is diverted to flow into the influent sump of the CCI WWTP. I observed stormwater sampling point B located adjacent to the facility fence and the main office. In this area, I observed a polypropylene witches hat inserted into a storm drain inlet to remove debris and other pollutants from the stormwater system **(Photo 22)**. I also observed the area where stormwater runoff is collected for stormwater sampling point C.

Following our observations at stormwater sampling points B and C, we walked north along the western border of the property, and into drainage basin D. Drainage basin D is

where the CCI WWTP is located. At the facility fence, I observed the location for stormwater sampling point D. On the east side of building #122, I observed another spill kit and a stormwater spill prevention emergency shutoff valve (**Photo 23**). In this area, I also observed covered bulk storage of acetone within a concrete containment berm (**Photo 24**).

The walk-through concluded after we observed the vehicle maintenance area located at the far eastern border of the property. The surface of the vehicle maintenance area is pervious, and it contained covered storage. We proceeded back to the office building. I completed a closing conference and asked for an electronic copy of the records.

VIII. File Review

The following documents during the inspection, post-inspection communication, and additional records review identified the following areas of concern:

- Notice of Intent (NOI) – The Facility’s most recent NOI was reviewed before the inspection. It was certified by Mr. Berthiaume on 5/27/2021.
- Annual Reports – Before the inspection, annual reports were reviewed via EPA’s online Permit Lookup Tool. Additionally, annual reports were provided as part of the records request. The years reviewed include 2017, 2018, 2019, 2020, and 2022. The reports contained summarized observations, actions related to the implementation and maintenance of stormwater control measures, and sampling dates/times for the reporting year.
- Stormwater Pollution Prevention Plan (SWPPP) – A copy of the SWPPP was available for review at the time of inspection. The SWPPP was submitted to EPA electronically and reviewed post-inspection. The SWPPP was prepared by the Facility on May 4, 2021. The SWPPP documented updates up until the day before the inspection, March 27, 2021. The SWPPP was missing the following requirements: 1) site map elements, such as the locations of all stormwater control measures and the location of the outfall PL; 2) certifying date and signature; 3) documentation of an unauthorized non-stormwater discharge evaluation completed by the end of the first year under the 2021 MSGP; and 4) documentation regarding additional implementation measures taken at the facility.
- Site Inspection Reports –The Routine Facility Inspection Reports were submitted to EPA electronically and reviewed post-inspection. Based on the review of those records, the Facility documented routine facility inspections on a biannual basis starting from 2019 through the first quarter of 2023.
- Quarterly Visual Assessment Documentation – I reviewed documentation of the quarterly visual assessments conducted by the Facility. The facility documented three quarterly visual forms in 2019, two quarterly visuals in 2020, two quarterly visuals in 2021, one quarterly visual in 2022, and one quarterly visual in 2023.

- Quarterly Stormwater Monitoring Results – The benchmark monitoring and quarterly visual forms were submitted to EPA electronically and reviewed post-inspection. I reviewed analytical lab reports and compared the analytical report values to the reported DMR values. I reviewed the monitoring results of the quarterly visual assessments for outfalls A, B, C, and D. I also reviewed DMR data. EPA’s online database indicates non-receipt DMR violations for the failure to monitor and/or submit monitoring data for temperature by the end of the monitoring period on 1/31/2021. During my post-inspection records review, I observed that temperature was recorded for all outfalls on the quarterly visual assessment forms. The online database also indicates non-receipt DMR violations for the failure to monitor and/or submit indicator monitoring for PAHs for the monitoring period ending on 6/30/2022. The database also indicates the failure to monitor and/or to submit sector-specific benchmark monitoring for all outfalls on monitoring periods ending on 9/30/2019, 9/30/2020, 12/31/2020, and 3/31/2021. The review of the DMRs identified sector-specific benchmark exceedances during the following quarters (Q):

- 2018

- Outfall A

- 3 exceedances of Iron, total (as Fe) (Q1, Q2, Q4)
 - 3 exceedances of Aluminum, total (as Al) (Q1, Q2, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)
 - 2 exceedances of Nitrite Plus Nitrate (Q2, Q4)

- Outfall B

- 3 exceedances of Iron, total (as Fe) (Q1, Q2, Q4)
 - 3 exceedances of Aluminum, total (as Al) (Q1, Q2, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)
 - 1 exceedance of Nitrite Plus Nitrate (Q2)

- Outfall D

- 2 exceedances of Iron, total (as Fe) (Q1, Q4)
 - 2 exceedances of Aluminum, total (as Al) (Q1, Q4)
 - 2 exceedances of Zinc, total (as Zn) (Q1, Q4)
 - 1 exceedance of Nitrite Plus Nitrate (Q4)

- 2019

- Outfall A

- 3 exceedances of Iron, total (as Fe) (Q1, Q2, Q4)
 - 3 exceedances of Aluminum, total (as Al) (Q1, Q2, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)
 - 2 exceedances of Nitrite Plus Nitrate (Q1, Q4)

- Outfall B

- 3 exceedances of Iron, total (as Fe) (Q1, Q2, Q4)
 - 3 exceedances of Aluminum, total (as Al) (Q1, Q2, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)

- Outfall D

- 3 exceedances of Iron, total (as Fe) (Q1, Q2, Q4)
 - 3 exceedances of Aluminum, total (as Al) (Q1, Q2, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)
- 2020
 - Outfall A
 - 2 exceedances of Iron, total (as Fe) (Q2, Q4)
 - 2 exceedances of Aluminum, total (as Al) (Q2, Q4)
 - 1 exceedance of Zinc, total (as Zn) (Q2)
 - 1 exceedance of Nitrite Plus Nitrate (Q1)
 - Outfall B
 - 2 exceedances of Iron, total (as Fe) (Q2)
 - 2 exceedances of Aluminum, total (as Al) (Q2)
 - 2 exceedances of Zinc, total (as Zn) (Q2)
 - Outfall D
 - 1 exceedance of Iron, total (as Fe) (Q2)
 - 1 exceedance of Aluminum, total (as Al) (Q2)
 - 1 exceedance of Nitrite Plus Nitrate (Q2)
- 2021
 - Outfall A
 - 2 exceedances of Aluminum, total (as Al) (Q3, Q4)
 - 2 exceedances of Zinc, total (as Zn) (Q3, Q4)
 - 1 exceedance of Nitrite Plus Nitrate (Q3)
 - Outfall B
 - 2 exceedances of Aluminum, total (as Al) (Q3, Q4)
 - 2 exceedances of Zinc, total (as Zn) (Q3, Q4)
 - Outfall D
 - 2 exceedances of Aluminum, total (as Al) (Q3, Q4)
 - 2 exceedances of Zinc, total (as Zn) (Q3, Q4)
 - 2 exceedances of Nitrite Plus Nitrate (Q3, Q4)
- 2022
 - Outfall A
 - 3 exceedances of Aluminum, total (as Al) (Q2, Q3, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q2, Q3, Q4)
 - Outfall B
 - 2 exceedances of Aluminum, total (as Al) (Q3, Q4)
 - 2 exceedances of Zinc, total (as Zn) (Q3, Q4)
 - Outfall C
 - 1 exceedance of Zinc, total (as Zn) (Q4)
 - Outfall D
 - 3 exceedances of Aluminum, total (as Al) (Q2, Q3, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q2, Q3, Q4)
 - 2 exceedances of Nitrite Plus Nitrate (Q2, Q3)

IX. Areas of Concern

Observations during the inspection, post-inspection communication, and additional records review identified the following areas of concern:

A. Routine Facility Inspection Documentation

Section 3.1.4 of the 2021 MSGP describes that routine facility inspections be conducted “at least quarterly.”

Section 3.1.6 of the 2021 MSGP describes the routine facility inspection documentation requirement. The permit states that “you must document the findings of your facility inspections and maintain this report with your SWPPP.”

According to EPA’s review of the records, the Facility has documented biannual site inspections each calendar year; however, inspections are not documented every quarter. The concern is that at the time of the inspection, routine facility inspections were not documented at the required frequency.

B. Quarterly Visual Assessment Documentation

Section 3.2.1. of the 2021 MSGP describes that “once each quarter for your entire permit coverage, you must collect a stormwater sample from each discharge point.”

Section 3.2.3 of the 2021 MSGP describes the visual assessment documentation requirement. The permit states that “you must document the findings of your visual assessments and maintain this document onsite with your SWPPP.”

According to EPA’s review of the records, the Facility completed three quarterly visual forms in 2019, two quarterly visuals in 2020, two quarterly visuals in 2021, one quarterly visual in 2022, and one quarterly visual in 2023. The concern is that at the time of the inspection, the documentation did not occur at the required frequency. Post-inspection the facility has provided written documentation which states that SWPPP and stormwater sampling plan will be updated with a sampling procedure.

C. Failure to Monitor and/or Failure to Submit DMRs

Section 4.2. of the 2021 MSGP describes the monitoring requirements that may apply to “each discharge point,” including indicator monitoring and benchmark monitoring, and impaired waters monitoring. Applicable monitoring data, including reporting “no discharge” for a given quarter must be submitted to EPA/IDEQ in the form of a Discharge Monitoring Report (DMR).

EPA’s online database indicates non-receipt DMR violations for the failure to

monitor and/or submit indicator monitoring for the monitoring period ending on 6/30/2022. The database also indicates a failure to monitor and/or submit sector-specific monitoring for all outfalls on monitoring periods ending on 9/30/2019, 9/30/2020, 12/31/2020, and 3/31/2021. Lastly, the online database indicates a failure to monitor and/or submit the monitoring data for temperature by the monitoring period ending on 1/31/2021. The concern is that at the time of the inspection, the Facility failed to monitor and/or submit the discharge monitoring data for these periods.

D. Benchmark Exceedances & Additional Implementation Measures

Section 4.2.2 of the 2021 MSGP describes the benchmark monitoring requirement and states that a benchmark exceedance is not a violation of the permit. “However, if a benchmark exceedance triggers Additional Implementation Measures (AIM) in Part 5.2, failure to conduct any required measures is a permit violation.

Section 5.2.2 of the 2021 MSGP describes the additional implementation measures and states that if “an annual average exceeds an applicable benchmark threshold based on the following events, the AIM requirements have been triggered for that benchmark parameter.”

Section 5.2.2.1 of the 2021 MSGP describes one of the triggering events as “the four-quarterly annual average for a parameter exceeds the benchmark threshold.”

Section 5.2.3 through 5.2.5 of the 2021 MSGP describes the responses and deadlines for AIM Level 1 through AIM Level 3. These sections also describe how your AIM Level changes if your continued quarterly benchmark monitoring results indicate that a benchmark threshold has been exceeded for that parameter.

Section 5.3 of the 2021 MSGP describes the requirements for documenting the corrective actions and/or AIM responses you took and/or will take generally within 24 hours or 14 days.

As indicated in my review of the submitted DMRs for their 4 outfalls, from 2018 through 2022 the Facility has exceeded the annual average quarterly sector-specific benchmark limits for parameters such as total recoverable iron, total recoverable aluminum, total recoverable zinc (freshwater), and nitrate plus nitrite nitrogen for outfalls A, B, and D.

The concern is that at the time of the inspection, AIM Levels 1-3 had been triggered for select parameters and discharge points, but the required response, associated deadlines, and documentation requirements were not available. Post-inspection the Facility drafted benchmark exceedance reports and submitted this documentation to EPA. See Attachment E.

E. Non-Numeric Technology-Based Effluent Limits (BPT/BAT/BCT)

Section 2.1 of the 2021 MSGP describes the following relevant non-numeric effluent limits (except where otherwise specified in Part 8) as well as any sector-specific non-numeric effluent limits: 2.1.2.2 Good Housekeeping; and 2.1.2.6 Management of Stormwater.

During the inspection, I observed abandoned packaging, uncovered steel scrap hoppers, and relict equipment and debris adjacent to an unnamed tributary at the far eastern end of the property. I observed bits of metal debris on the ground. I also observed areas on the southwestern and western border of the property which appeared to lead to areas of lower topography to which stormwater may flow.

The concern is that at the time of the inspection, the Facility was not keeping clean all exposed areas that are potential sources of pollutants and was not diverting, infiltrating, reusing, containing, or otherwise reducing stormwater to minimize pollutants.

During the inspection, when possible, Facility representatives picked up debris. Post-inspection, the facility provided photos and written documentation of the removal of the packaging, the installation of lids for the steel scrap hoppers, and the removal and clean-up of the equipment and debris adjacent to the unnamed tributary. The Facility also submitted written and photo documentation of the installation of berms to divert stormwater away from these areas and into infiltration basins or other stormwater control measures. See Attachment E.

F. Selection and Design of Stormwater Control Measures

Section 2.1. of the 2021 MSGP states that you must “select, design, install, and implement stormwater control measures to comply with Part 2 in accordance with good engineering practices and manufacture specifications.” Section 2.1.1.1 through 2.1.1.8 of the 2021 MSGP specifically describe requirements you must consider when selecting and designing your stormwater control measures. Per Section 6.2.4, these considerations must be documented in your SWPPP.

The concern is at the time of the inspection, I observed catch basins or infiltration basins being used as a stormwater control measure. Design criteria for these basins were not available at the time of the inspection. However, post-inspection, the Facility contracted with an engineering company, Jacobs, to evaluate the hydraulic capacity of the swales, and submitted an evaluation report authored by Jacobs to EPA. See Attachment E.

G. Stormwater Pollution Prevention Plan

Section 5.2.2 of the 2021 MSGP includes the requirements for the SWPPP site map.

According to EPA's review of the records, the SWPPP was missing the following requirements: 1) site map elements, such as the locations of all stormwater control measures and the location of the outfall PL; 2) certifying date and signature; 3) documentation of an unauthorized non-stormwater discharge evaluation completed by the end of the first year under the 2021 MSGP; and 4) documentation regarding additional implementation measures taken at the facility. Post-inspection the Facility submitted written documentation stating that they are planning to update the SWPPP and stormwater sampling plan. See Attachment E.

I. Closing Conference

Following the walk-through and file review, we completed a closing conference with Mr. Robert Berthiaume, Ms. Rachel Imthurn, Mr. Paul Fuson, and other facility representatives. During the closing conference, we discussed our observations, the areas of concern, and the next steps for additional documentation and inspection report transmittal. I thanked them for their time and cooperation with the inspection. Closing conference concluded at 5:40 pm MST.

ATTACHMENT A

Aerial Imagery (NAIP)



ATTACHMENT B

Site Layout Map



ATTACHMENT C

Storm Drains and Sanitary Lines Map



ATTACHMENT D

Photograph Log

All photographs taken by Charissa Bujak on March 28, 2023

Olympus Tough TG-6/F2.0 Camera

Photo Log



Photo #:01
Description: Facing east, photo of rainfall gauge located on-site.



Photo #:02
Description: Facing east, photo of manhole for sample point A.



Photo #:03
Description: Facing north, photo of contents of spill kit.



Photo #:04
Description: Facing north, photo of the contents of the spill kit and associated log.

Photo Log



Photo #:05
Description: Facing north, photo of uncovered dumpster.



Photo #:06
Description: Facing northeast, photo of a container of brass casings.



Photo #:07
Description: Facing north, photo of plastic-lined cardboard storage containers.



Photo #:08
Description: Facing southwest, photo of infiltration basin.

Photo Log



Photo #:9
Description: Facing south, photo of piles of salt stored on wooden pallets.



Photo #:10
Description: Facing east, photo of relict metal pieces and debris at the unnamed tributary.



Photo #:11
Description: Facing west, photo of a berm and associated infiltration area located adjacent to the road.



Photo #:12
Description: Facing east, photo of fuel storage area.

Photo Log



Photo #:13
Description: Facing south, photo of abandoned plastic packaging.



Photo #:14
Description: Facing east, photo of an empty spill kit container.



Photo #:15
Description: Facing south, photo of the list of the contents of the spill kit.



Photo #:16
Description: Facing southeast, photo of mixed metal reclamation container.

Photo Log



Photo #:17
Description: Facing north, photo of a metal scrap storage container.



Photo #:18
Description: Facing south, photo of infiltration basin.



Photo #:19
Description: Facing north, photo of the area where dumpsters are stored.



Photo #:20
Description: Facing south, photo of the PL infiltration basin and sampling location.



Photo #:21
Description: Facing west, photo of pipe outlet of the unnamed tributary.



Photo #:22
Description: Facing north, photo of a witches hat in the inlet of the catch basin.



Photo #:23
Description: Facing northeast, photo of the area north of the Tape and Texture Building.



Photo #:24
Description: Facing east, photo of a covered containment berm with acetone storage containers.

ATTACHMENT E

Post Inspection Correspondence



2299 Snake River Ave.
Lewiston, ID 83501

Date: April 27, 2023

To: Charissa Bujak
Environmental Protection Agency
Idaho Operations Office
950 W Bannock Street
Boise, ID 83702

Dear Ms. Bujak,

Subject: Stormwater Inspection Update

The following is Federal Cartridge Co. - CCI/Speer Operation's update related to the MSGP stormwater compliance inspection that was conducted during the week of March 27, 2023. The following information is related to Stormwater Permit IDR053178 herein referred to as the CCI Facility. Noted inspection areas of concern are detailed below in italics. Following each area of concern is information and details regarding improvements to the system and program made by Federal Cartridge Company.

CCI FACILITY

Benchmark exceedances for Aluminum, Zinc, and Nitrates have occurred without documentation for corrective actions or Additional Implementation Measures per MSGP part 5.3.

Response: Benchmark Exceedance Reports have been drafted on 4/6/23 detailing the nature of the exceedance and detailing both completed and planned corrective actions taken to reduce the levels of analytes in the stormwater discharges at the CCI facility.

Estimated Completion Date: Completed

Steel scrap collection hoppers throughout the facility were exposed to stormwater without having lids.

Response: The steel scrap collection hoppers were measured, and lids ordered and installed.

Estimated Completion Date: Completed

Unused industrial items, and debris such as bags and paper near the off-site creek inlet on the East side of the facility. The area was also overgrown in blackberry bushes, preventing proper inspection of the area.

Response: The unused industrial items have been collected and disposed of, the blackberry bushes have been removed, and the area has been cleaned of all debris.

Estimated Completion Date: Completed

There is no documentation of hydraulic demands or drawings of swales to document they are of the proper size and construction for what is needed.

Response: CCI has reached out to Jacobs to evaluate the hydraulic capacity of the swales. The Jacobs evaluation report is attached.

Estimated Completion Date: Completed

Swale outfalls on the South side of the parking lot are not documented in the SWPPP and do not have a sampling procedure clearly defined.

Response: We will update the CCI facility SWPPP to indicate the two outfalls, and include them on the stormwater sampling plan.

Estimated Completion Date: 5-1-23.

There was an indication of soil erosion on the West side of the facility.

Response: Soil erosion wattles have been installed in the short term to alleviate the soil erosion, until permanent control measures can be implemented.

Estimated Completion Date: Completed

The parking lot near the outfall to the creek on the southwest side of the facility could lead to sheet flow stormwater flowing into the outfall.

Response: An asphalt berm has been added to prevent stormwater from entering this outfall.

Estimated Completion Date: Completed

Stormwater could potentially flow from the parking lot areas to the South.

Response: An asphalt berm has been added to the South and West sides of the facility parking lot to prevent stormwater from exiting the facility. An inflow channel has been also poured into the swale to prevent soil from eroding into the swale and reducing the efficacy of the swale capacity.

Estimated Completion Date: Completed

Abandoned plastics packaging found across from covered packaging storage area.

Response: This packaging has been disposed of.

Estimated Completion Date: Completed

CCI/SPEER failed to take indicator monitoring samples for PAHs in their first year of their MSGP stormwater permit.

Response: Two indicator monitoring samples have since been taken and reported to the NetDMR website for IDEQ, and a corrective action Indicator monitoring training document has been given to the Lewiston Stormwater Pollution Prevention Team leadership on 8-15-2022.

Estimated Completion Date: Completed

Facility Emergency Action Plan is not referenced in the SWPPP.

Response: Reference the Emergency Action Plan in the SWPPP and have a copy of the EAP available in the SWPPP folder.

Estimated Completion Date: Completed

Additionally, as part of our effort to improve our facility and its processes, we retained the consulting services of Jacobs to review our SWPPP and assess our current and planned BMPs and control measures at our CCI and SPEER facilities. Attached is their technical memo for our stormwater infiltration units, as well as the before and after photographs of the actions that we have taken.

If you have any questions regarding the actions listed above, please reach out and we would be happy to provide you with any further information required. It was a pleasure to meet you, and we would like to thank you again for your assistance and professionalism during the inspection. We certainly welcome a fresh perspective and advice on how to improve our stormwater pollution prevention program and embrace the opportunity to grow and learn.

Kindest Regards,

Paul Fuson

Environmental Engineer
Federal Cartridge Co. – CCI/SPEER

Attachments [7]

Attachment 1:
Benchmark Exceedance Report [3]

[1]

Benchmark Exceedances

Date: 4-6-23

Facility: CCI Facility – IDR053178

Pollutant Exceeded and Results: Aluminum

Sample 1 (Sample date: 5-23-21) Result: 3.49 mg/L

Sample 2 (Sample date: 9-24-21) Result: 2.38 mg/L

Sample 3 (Sample date: 10-29-21) Result: 3.13 mg/L

Sample 4 (Sample date: *No Sample) Result: *No Sample

Average Result: 3.0 mg/L

Benchmark Value: 1.1 mg/L

Sample 1 (Sample date: 6-8-22) Result: 2.62 mg/L

Sample 2 (Sample date: 9-29-22) Result: 2.19 mg/L

Sample 3 (Sample date: 11-28-22) Result: 2.99 mg/L

Sample 4 (Sample date: 3-10-23) Result: 5.01 mg/L

AIM Level Triggered (select one)

☒ **AIM Level 1** (quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

☒ **AIM Level 2** (continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

☒ **AIM Level 3** (continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

AIM Response Taken: AIM response attached Page 2

Do You Qualify for an Exception from AIM Requirements and Continued Benchmark Monitoring?

☐ Yes (indicate the exception below) ☐ No

Exception(s): (if applicable)

☐ **Solely Attributable to Natural Background Pollutant Levels**

Pollutant(s): [Insert Pollutant](#)

Maintain supporting rationale and applicable data as required in Part 5.2.6.1

☐ **Due to Run-On**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.2

☐ **Due to An Abnormal Event**

Pollutant(s): [Insert Pollutant](#)

Attach documentation required in Part 5.2.6.3

☐ **Demonstrated to Not Result in An Exceedance of Facility-Specific Value Using National Recommended Water Quality Criteria in Lieu of Applicable MSGP Benchmark Threshold (For**

Aluminum and Copper Benchmark Parameters Only)

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.4

☐ **Demonstrated Not to Result in Any Exceedance of Water Quality Standards**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.5

AIM Response

Description of Event or Condition: Annual average for Aluminum of 0.5543.0 mg/L has exceeded the benchmark value of 1.1 mg/L.

Date of Event or Condition: 11-24-21 Anatek lab results received by Federal Cartridge Co. – CCI/SPEER

Immediate Response Taken (per MSGP 5.1.3.1) : No immediate response measures taken

Subsequent Response Taken (per MSGP 5.1.3.2) : Erosion control native grasses planted on the East side of the facility to reduce erosion 6/13/21. In 2021 we modified the French drain located at the plant facilities maintenance flat, to reduce soil erosion into the D outfall conveyance location. In 2021 we added asphalt and barriers to divert water from away from the Southeast bunker location to reduce the erosion carried down toward the parking lot. In 2022 (March) we added erosion control grass around the north side of reclamation. 4-3-23 MetalZorb filtration media was ordered for the CCI facility to help with metals removal in the stormwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Facility Representative:

Signature:

Date:

Name: _

Title:

Phone:

[2]

Benchmark Exceedances

Date: 4-25-23

Facility: CCI Facility – IDR053178

Pollutant Exceeded and Results: Nitrates

Sample 1 (Sample date: 5-23-21) Result: .780 mg/L

Sample 2 (Sample date: 9-24-21) Result: 1.24 mg/L

Sample 3 (Sample date: 10-29-21) Result: .402 mg/L

Sample 4 (Sample date: *No Sample) Result: *No Sample

Average Result: .807 mg/L

Benchmark Value: .68 mg/L

Sample 1 (Sample date: 6-8-22) Result: .541 mg/L

Sample 2 (Sample date: 9-29-22) Result: .663 mg/L

Sample 3 (Sample date: 11-28-22) Result: .163 mg/L

Sample 4 (Sample date: 3-10-23) Result: .238 mg/L

AIM Level Triggered (select one)

☒ **AIM Level 1** (quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

☐ **AIM Level 2** (continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

☐ **AIM Level 3** (continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

AIM Response Taken: AIM response attached Page 2

Do You Qualify for an Exception from AIM Requirements and Continued Benchmark Monitoring?

☐ Yes (indicate the exception below) ☐ No

Exception(s): (if applicable)

☐ **Solely Attributable to Natural Background Pollutant Levels**

Pollutant(s): [Insert Pollutant](#)

Maintain supporting rationale and applicable data as required in Part 5.2.6.1

☐ **Due to Run-On**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.2

☐ **Due to An Abnormal Event**

Pollutant(s): [Insert Pollutant](#)

Attach documentation required in Part 5.2.6.3

☐ **Demonstrated to Not Result in An Exceedance of Facility-Specific Value Using National Recommended Water Quality Criteria in Lieu of Applicable MSGP Benchmark Threshold (For Aluminum and Copper Benchmark Parameters Only)**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.4

☐ **Demonstrated Not to Result in Any Exceedance of Water Quality Standards**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.5

AIM Response

Description of Event or Condition: Annual average for Nitrates of .807 mg/L has exceeded the benchmark value of .68 mg/L.

Date of Event or Condition: 11-24-21 Anatek lab results received by Federal Cartridge Co. – CCI/SPEER

Immediate Response Taken (per MSGP 5.1.3.1) : No immediate response measures taken

Subsequent Response Taken (per MSGP 5.1.3.2) : Erosion control native grasses planted on the East side of the facility to reduce erosion 6/13/21. In 2021 we modified the French drain located at the plant facilities maintenance flat, to reduce soil erosion into the D outfall conveyance location. In 2021 we added asphalt and barriers to divert water from away from the Southeast bunker location to reduce the erosion carried down toward the parking lot. In 2022 (March) we added erosion control grass around the north side of reclamation. 4-3-23 MetalZorb filtration media was ordered for the CCI facility to help with nitrate removal in the stormwater. The last 4 consecutive samples have sampled below the benchmark threshold.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Facility Representative:

Signature:

Date:

Name: _

Title:

Phone:

[3]

Benchmark Exceedances

Date: 4-25-23

Facility: CCI Facility – IDR053178

Pollutant Exceeded and Results: Zinc

Sample 1 (Sample date: 5-23-21) Result: .549 mg/L

Sample 2 (Sample date: 9-24-21) Result: .628 mg/L

Sample 3 (Sample date: 10-29-21) Result: .179 mg/L

Sample 4 (Sample date: *No Sample) Result: *No Sample

Average Result: .542 mg/L

Benchmark Value: .03 mg/L

Sample 1 (Sample date: 6-8-22) Result: .168 mg/L

Sample 2 (Sample date: 9-29-22) Result: .317 mg/L

Sample 3 (Sample date: 11-28-22) Result: .161 mg/L

Sample 4 (Sample date: 3-10-23) Result: .410 mg/L

AIM Level Triggered (select one)

☒ **AIM Level 1** (quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

☒ **AIM Level 2** (continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

☒ **AIM Level 3** (continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred)

AIM Response Taken: AIM response attached Page 2

Do You Qualify for an Exception from AIM Requirements and Continued Benchmark Monitoring?

☐ Yes (indicate the exception below) ☐ No

Exception(s): (if applicable)

☐ **Solely Attributable to Natural Background Pollutant Levels**

Pollutant(s): [Insert Pollutant](#)

Maintain supporting rationale and applicable data as required in Part 5.2.6.1

☐ **Due to Run-On**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.2

☐ **Due to An Abnormal Event**

Pollutant(s): [Insert Pollutant](#)

Attach documentation required in Part 5.2.6.3

☐ **Demonstrated to Not Result in An Exceedance of Facility-Specific Value Using National Recommended Water Quality Criteria in Lieu of Applicable MSGP Benchmark Threshold (For Aluminum and Copper Benchmark Parameters Only)**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.4

☐ **Demonstrated Not to Result in Any Exceedance of Water Quality Standards**

Pollutant(s): [Insert Pollutant](#)

Attach documentation and concurrence from EPA Regional Office required in Part 5.2.6.5

AIM Response

Description of Event or Condition: Annual average for Zinc of .542 mg/L has exceeded the benchmark value of .13 mg/L.

Date of Event or Condition: 11-24-21 Anatek lab results received by Federal Cartridge Co. – CCI/SPEER

Immediate Response Taken (per MSGP 5.1.3.1) : No immediate response measures taken

Subsequent Response Taken (per MSGP 5.1.3.2) : Erosion control native grasses planted on the East side of the facility to reduce erosion 6/13/21. In 2021 we modified the French drain located at the plant facilities maintenance flat, to reduce soil erosion into the D outfall conveyance location. In 2021 we added asphalt and barriers to divert water from away from the Southeast bunker location to reduce the erosion carried down toward the parking lot. In 2022 (March) we added erosion control grass around the north side of reclamation. 4-3-23 MetalZorb filtration media was ordered for the CCI facility to help with metals removal in the stormwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Facility Representative:

Signature:

Date:

Name: _

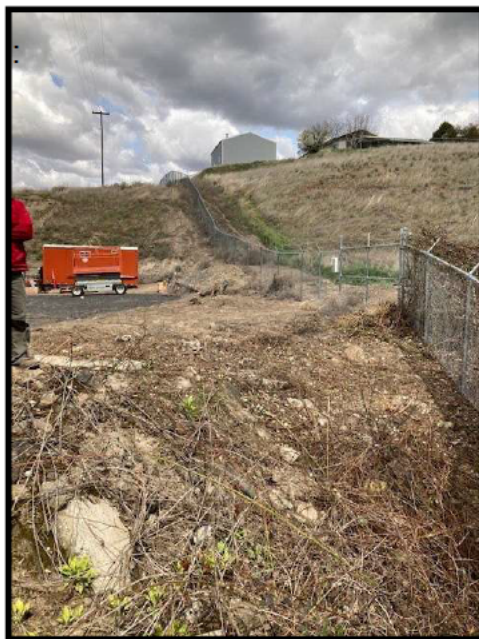
Title:

Phone:

Attachment 2:
CCI Facility Clean-up
Removal of Blackberry Bushes:



Clean-up of equipment and debris:





Attachment 3
Abandoned Packaging



Attachment 4

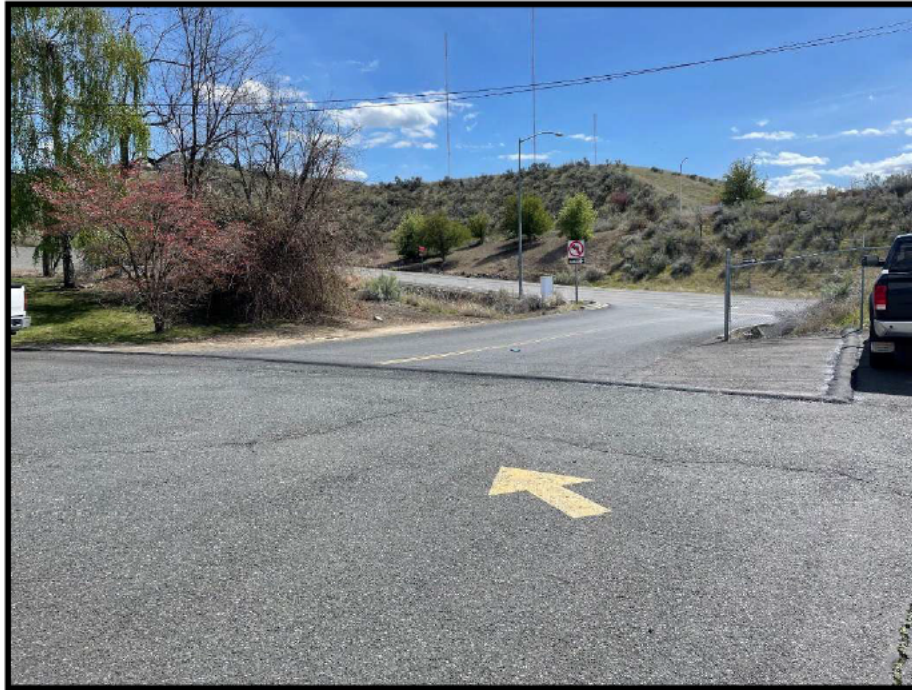
Steel Scrap Container Lids



Attachment 5:
South Parking Lot Berm



Attachment 5:
Parking Lot Berm (Cont.)



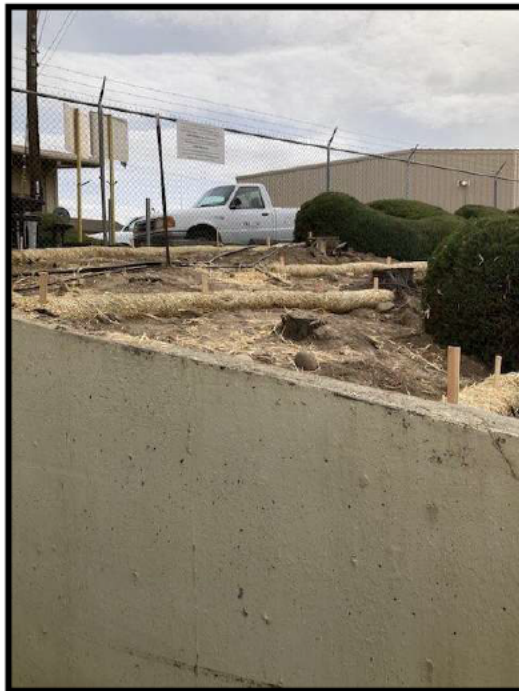
Attachment 5:
Parking Lot Berm (Cont.)



Attachment 6:
West Erosion Control Wattles
(Erosion in soil)



(Wattle application)



Attachment 6:
West Wattles (continued)



Attachment 7:
CCI/Speer Emergency Action Plan

Emergency Action Plan

1.0 Purpose/Scope

This procedure defines the framework for preparing for and responding to potential incidences involving human health or the environment at the CCI/Speer Lewiston Operations.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

EF-003-02 Corrective & Preventative Action Request (CAR)
EF-006-02 Emergency Action Plan – Call Out List

4.0 References

EP-004 Non-conformance and Corrective and Preventive Action
EP-010 Environmental Communication
29 CFR 1910.38 Emergency Action Plans
29 CFR 1910.119 Process Safety Management
40 CFR 265.30 Subpart C – Preparedness and Prevention
40 CFR 265.50 Subpart D – Contingency Plan and Emergency Procedures

5.0 Definitions

Human Health or Environmental Incident Emergency Situation: human health or environmental releases that require an emergency response

Emergency Response: actions taken by personnel outside of the immediate work area to address an environmental incident.

Non-emergency Response: This plan does not apply to small leaks and mishaps, which can be successfully covered under the site's written hazard communication program, 29 CFR 1910.1200. The key points of a hazard communication response are that total plant evacuation is not necessary and employees in the immediate work area of the spill or mishap can safely handle the situation.

6.0 Exclusions

None

7.0 Procedure

- 7.1 Potential incidences involving human health and the environment likely to occur at the facility shall be identified and reduced or eliminated when possible.
- 7.2 Methods to respond to, mitigate and prevent incidences shall be established and maintained at the facility on the Lewiston intranet, by the site's Environmental Compliance Technician and/or the Process Safety Engineer.
- 7.3 Roles and responsibilities for communications within the facility and for obtaining outside support services shall be established and maintained at the facility via this Emergency Action Plan.
- 7.4 Emergency methods and communications will be tested at least annually. The Environmental/Safety Departments shall maintain records of these tests. Methods to respond to, mitigate and prevent emergencies shall be amended as required based on the results of these tests.
- 7.5 Following an emergency, the cause of the emergency and corresponding emergency methods shall be reviewed. Corrective/preventative actions will be identified and undertaken by implementing EP-004 - Non-Conformance and Corrective and Preventive Action and/or Safety Action Request (SAR). Methods to respond to, mitigate and prevent releases that arise as a consequence of an emergency shall be amended.
- 7.6 Where applicable, regulatory agencies shall be notified by the Environmental/Safety Management Representative of incidents consistent with EP-010 – Environmental Communication.

8.0 General Rules

All emergency response activities are to be conducted within boundaries of training levels, appropriate procedures, and governmental regulations.

The facility manager shall designate an emergency coordinator.

9.0 General Facilities Information

Facility Name: - CCI Operations

Address: 2299 Snake River Avenue, Lewiston, Idaho 83501

The Company is a publicly owned corporation. The CCI facility currently produces small arms ammunition, ammunition reloading components such as bullets and primers, and industrial powerloads for recreational, law enforcement and military purposes. CCI Operation's North American Industry Classification System (NAICS) Code is 332992 (Small Arms Ammunition Manufacturing). The CCI Operation serves as the CCI-Speer Operation's central location for product final assembly, product and supply receiving and shipping, and administration.

The CCI facility has been in operation since 1953. The facility consists of the manufacturing plant located on 29 acres in Nez Perce County. While not within the city limits, the facility shares a common property boundary with the City of Lewiston, Idaho. The operation is not located on property that is within an Indian Reservation. The latitude and longitude for the CCI facility are 046 deg. 23' 045" and 117 deg. 02' 000" respectfully. The facility is owned and operated by Federal Cartridge Company.

Product testing is also conducted at the site, which consists of test firing finished ammunition. Once fired, bullets are collected and recycled for their lead content. All spent materials from testing are recycled.

The facility generates and accumulates materials that are regulated as hazardous wastes. Hazardous wastes are accumulated for no longer than 90 days and then sent off-site to an EPA approved TSD facility for treatment and/or disposal or recycling. The EPA identification number for the CCI Operation is IDD009066481. Wastewater is treated at the CCI Operations wastewater treatment plant on-site and discharged to the City of Lewiston's Department of Utilities Wastewater Treatment Plant under a Pretreatment Permit.

The CCI Operation is subject to 40 CFR Part 110, 112, 122 - Storm Water Discharges and the 40 CFR Part 112 - Spill Prevention, Control and Countermeasures (SPCC) rule.

Facility Name: Speer Operations

1023 Snake River Avenue, P.O. Box 856, Lewiston, Idaho 83501

The Speer Operation's North American Industry Classification System (NAICS) Code is 332992 (Small Arms Ammunition Manufacturing). The Speer Operation serves as the CCI-Speer Operation's location for production of bullets that are used within finished ammunition and assembled at the CCI Operations or sold as a reloading component and supply receiving and shipping, and administration.

The facility consists of the manufacturing plant located on 3.5 acres in Nez Perce County. The facility is located within the city limits of the City of Lewiston, Idaho. The operation is not located on property that is within an Indian Reservation. The latitude and longitude for the facility are 046 deg. 24'038" and 117 deg. 04'054" respectfully. The facility is owned and operated by Federal Cartridge Company.

The facility generates and accumulates materials that are regulated as hazardous wastes. Hazardous wastes are accumulated for no longer than 90 days and then are sent off-site to an EPA approved TSD facility for treatment and/or disposal or recycling. The EPA identification number for the Speer Operation is IDD984666669. Wastewater is treated on-site and is then transported as non-hazardous material to the CCI Operations wastewater treatment plant on-site and discharged to the City of Lewiston's Department of Utilities Wastewater Treatment Plant under a Pretreatment Permit.

Product testing is also conducted at this site which consists of test firing finished ammunition. Once fired, bullets are collected and recycled for their lead content. All spent materials from product testing are recycled.

Facility Name: Southport Operations

180 Southport Avenue, P.O. Box 856, Lewiston, Idaho 83501

The Southport Operations' North American Industry Classification System (NAICS) Code is 32992 (Small Arms Ammunition Manufacturing). The Southport Operation serves as the CCI-Speer operations manufacturing for priming mixture, which is placed in rimfire casings and also placed in primer cups to produce primers for use in the CCI-Speer Operation's finished ammunition and sold as a reloading component. There is also one rimfire assembly load line located in the Rimfire Priming department. In addition, brass forming of rimfire cases along with heat treating and washing is conducted, on-site.

The facility consists of the manufacturing plant located on 26 acres in Nez Perce County. The facility is within the city limits. The operation is not located on property that is within an Indian Reservation. The latitude and longitude for the facility are 046 deg. 21'047" and 117 deg. 01'035" respectfully. The facility is owned and operated by Federal Cartridge Company.

The Southport facility has been in operation since May, 1990. The facility generates and accumulates materials that are regulated as hazardous wastes. Hazardous wastes are accumulated for no longer than 90 days and then are sent off-site to an EPA approved TSD facility for treatment and/or disposal or recycling. The EPA identification number for Southport Operation is IDD984669424. Wastewater is treated at the Southport Operations wastewater treatment plant on-site and discharged to the City of Lewiston's Department of Utilities Wastewater Treatment Plant under a Pretreatment Permit. Wastewater generated for categorical operations (case forming) is collected and conveyed (via tanker truck) to the CCI WWTP, where it is treated.

10.0 PREPAREDNESS AND PREVENTION

1. Equipment Requirements

Firefighting equipment includes sprinklers and hydrants, which are located strategically throughout the three plants. In addition, fire extinguishers are located in various locations in each manufacturing building. All extinguishers are under a service contract with an outside firm, which conducts monthly inspections and maintains them.

- 10.1** Hazardous wastes, accumulated on-site, such as waste paint related material, waste combustible liquids, waste powder, waste cartridge power device, waste cartridges, waste primers, spent aerosol residue, and waste acetone present possible fire hazards.
- 10.2** Spill containment materials are kept on-site for the clean up of waste spills or releases. Spill response kits are strategically located in or next to buildings; minor spills will be contained with commercial materials such as

pigs, pads, ultra sorb using hand tools, and brooms and disposed of as required by regulations. The facilities have one concrete wash down pad for decontamination purposes and a fenced backup secondary containment and wash down pad area.

11.0 Emergency Staging Area

In the event of an emergency, CCI/Speer has designated the Engineering Conference room as a stage area. There are two phones with direct dial numbers installed to centralize communication needs during the event. The stage area and a fax machine are just down the hall from the Environmental offices.

11.1 Emergency Action Plan Evacuation

- 11.2** The Emergency Action Plan Evacuation is designed to minimize the danger to employees, equipment, or property in the event of an Emergency. Gathering areas have been assigned to ensure that evacuated employees are at a safe location that will not place them in harm's way because of an incident or emergency vehicles that may enter the facility. Signs are posted at each gathering area and are also marked on the evacuation route maps provided to the departments. Gathering areas also assist in accounting for employees during evacuations. Evacuation maps are posted for each building where employees are working. These maps indicate the primary and secondary route, and corresponding gathering areas. The Safety Department will review the evacuation routes annually to ensure that the department layout changes do not adversely affect evacuation routes.
- 11.3** Evacuation alarm pull stations are located near exits and in other strategic locations. The person who discovers the emergency and activates the alarm pull must be accounted for at their gathering area and then report immediately to the Emergency Command Station (Engineering Conference Room.) and inform the off site response teams as to what the incident is, and what is involved.
- 11.4** Employee training on this plan will be conducted upon initial hire, annually, if substantial changes are made to this plan and if the need for additional training is identified. Evacuation drills are conducted annually.

12.0 Notification Authorities

Authorities will be notified according to the following Off-Site Emergency Agency Contact List.

OFF-SITE EMERGENCY AGENCY CONTACT LIST		
EMERGENCY	AGENCY	PHONE
INJURY OR FIRE/EXPLOSION	Lewiston Fire Department	911
FATALITY/HOSPITALIZATION OF 4 OR MORE EMPLOYEES	OSHA	
HAZARDOUS MATERIALS INCIDENT AND/OR RELEASE	Lewiston Fire Department/Region II HazMat Team	911
	National Response Center (must be called within 15 minutes of release over the reportable quantity (RQ) of a hazardous substance)	1-800-424-8802
	Nez Perce County Emergency Planning Commission	208/799-3084
	Idaho State Police	208/799-5020
	Idaho Department of Environmental Quality	208/799-4370
	Idaho Emergency Response Center	1-800-632-8000
NATURAL DISASTER	Nez Perce County Sheriff	208/799-3131
OTHER EMERGENCY NUMBERS	American Red Cross	208/798-4613

13.0 Required notification reports

- 13.1** An official of CCI/Speer will be designated following an incident, and will notify OSHA, the National Response Center, EPA Regional Administrator of Region 10 and the appropriate State and Local authorities that the follow-up action has been implemented. (See EF-006-01 Accidental Substance Release Notification Form). This report must be filled out no later than fifteen days following any reportable incident.

14.0 Control Procedures

- 14.1** Instructions that outline the emergency reporting and response protocol for medical emergencies, fires, explosions, and hazardous chemical spills or releases are found in EF-006-02 Emergency Action Plan – Call out List, located by each phone at all three facilities. As part of CCI-Speer's contractual agreement with the City of Lewiston to provide fire and emergency medical services, Emergency Vehicle Access Maps have been provided to the Lewiston Fire Department. The maps indicate the vehicle access routes to the CCI, Speer, and Southport Facilities.

15.0 CONTINGENCY PLAN

The information contained herein is submitted in accordance with the requirements for a Contingency Plan, as contained in 40 CFR 262.34/265 Subpart C and Subpart D.

The intent of Paragraph 265, Subpart C (Preparedness and Prevention) and Subpart D (Contingency Plan and emergency procedures) of RCRA is to ensure facilities that treat, store, and dispose of hazardous wastes have established the necessary planned procedures to follow in the event if an emergency situation should arise. The intent of these requirements is to ensure that the facility is properly designed and equipped to minimize the possibility of accidents and prevent the occurrence of emergency situations. The requirements under 40 CFR 265, Subpart D address the actions that are to be taken if an accident should occur.

15.1 General Information

The VP, Ammunition Products is the top official at this location. The Environmental, Health, Safety and Security (EHSS) Manager is the primary safety emergency coordinator and the primary environmental emergency coordinator.

15.2 Emergency coordinators

If an emergency situation develops at the facility, the discoverer should follow the procedures outlined in EF-006-02 – Emergency Action Plan – Call Out List located by each phone. The designated emergency coordinator has full authority to implement the Contingency Plan, however, if a regulated substance is involved the EHSS Manager will manage the incident. If the EHSS Manager is not available then the Team Leader for the Region II Emergency Response Team will take charge of the incident. They will assess the situation and coordinate actions and decisions with appropriate plant management and safety personnel. The designated emergency coordinator is authorized to contact any of the emergency agencies listed in Section 15.0.

On-Site Emergency Contacts

Primary Emergency Coordinator:

Bob Berthiaume

Office -

208 750-3161 or 208 792-1314 (cell)
2299 Snake River Avenue, Lewiston ID 83501

Home -

1760 Lambert Drive, Clarkston WA 99403
360-720-6295

Alternates:

Rachel Imthurn

Office –

208-750-3221 or 208 553-6198 (cell)
2299 Snake River Avenue, Lewiston ID 83501

Home –

1639 42nd St. N., Lewiston ID 83501

Paul Fuson

Office –

208-750-3243 or 208 553-3748 (cell)
2299 Snake River Avenue, Lewiston ID 83501

Home –

412 Sycamore, Clarkston WA 99403

Wastewater Treatment Plant Operators

Phone -

(208) 746-2351 ext. 2428 or (208) 305-9942

During the periods when there is no manufacturing activity, the plant security guards will contact an emergency coordinator at their residence.

The security guards may also contact the Lewiston Fire Department or ambulance service after assessing the situation, if he/she has determined such assistance is needed.

15.3 Implementation of the Contingency Plan

The Contingency Plan will be implemented if an incident occurs which might threaten human health or the environment. The emergency coordinator or emergency environmental coordinator has the full authority to make this decision.

Depending on the degree of seriousness, the Contingency Plan may be implemented in the following situations:

Fire and/or Explosion:

A fire releasing toxic fumes.

A fire that spreads towards materials that may explode when heated.

A fire that resists control attempts and threatens to spread off-site.

An imminent danger exists that an explosion could occur causing a safety hazard.

An explosion occurs

Spills or Material Release:

The spill could result in the release of flammable vapors, causing an explosion hazard.

Overturning or spill from a sludge transfer truck.

Releases of sludge from storage tank or containment measures seem insufficient.

Any release of hazardous material or waste occurs on site.

Natural Disaster:

Usually heavy rainfall and/or flash flooding or mud sliding may affect an unplanned release of hazardous material.

15.4 Response personnel responsibilities

On-Site contacts are identified in Section 15.2 are responsible for implementing the plan and serving as the primary responders to an on-site incident.

Off-site contacts, identified in Section 15.5, are responsible for support of CCI/Speer's on-site responders and implementing all off-site response actions such as evacuation, etc. CCI/Speer on-site responders and the team leader of the Emergency Response Team for the Lewiston Fire Department have authorization to serve on CCI/Speer's behalf as the primary on-site responders.

15.5 Coordination Agreements

Lewiston Fire Department
1245 Idaho Street
Lewiston, Idaho 83501

City of Lewiston Wastewater Treatment Plant
900 7th Avenue North
Lewiston, Idaho 83501

Nez Perce County Sheriff Office
1150 Wall Street
Lewiston, Idaho 83501

Idaho Department of Environmental Quality
1118 F Street
Lewiston, Idaho 83501

Nez Perce County Emergency Planning Commission
P.O. Box 896
Lewiston, Idaho 83501

St. Joseph's Regional Medical Center
P.O. Box 816
Lewiston, Idaho 83501



EMERGENCY ACTION PLAN – CALL OUT LIST

MEDICAL EMERGENCY

1. IF INJURY REQUIRES MORE THAN FIRST AID TREATMENT, THE MERT MEMBER WILL CALL LEWISTON EMERGENCY SERVICES BY DIALING 9-911 FROM ANY SITE PHONE.
CCI FACILITY ADDRESS – 2299 SNAKE RIVER AVENUE
SOUTHPORT FACILITY ADDRESS – 180 SOUTHPORT AVENUE
SPEER FACILITY ADDRESS – 1023 SNAKE RIVER AVENUE
2. **CALL SECURITY GUARDS - CCI/SPEER – 3450 (OR) 208-305-9358 SOUTHPORT-3270 (OR) 208-305-9814**
INFORM GUARD THAT AMBULANCE IS ON THE WAY AND THE LOCATION OF THE VICTIM. IF GUARD IS NOT AVAILABLE, SEND A PERSON TO THE FRONT GATE TO GUIDE AMBULANCE OR EMS CREW.
3. **ONCE THE MEDICAL EMERGENCY HAS BEEN ADDRESSED THE MERT MEMBER (OR DESIGNEE) WILL CALL:**
 - AMY HENDERSON, RN – 208-553-0957
 - LISA PARRISH, RN – 208-816-6378
 - BOB BERTHIAUME – 208-792-1314

FIRE AND/OR INITIATIONS

1. **ACTIVATE FIRE ALARM BY PULLING FIRE ALARM HANDLE (ALARM CENTRAL WILL DISPATCH LEWISTON EMERGENCY SERVICES)**
2. **ALARM CENTRAL WILL ACTIVATE CALL-OUT LIST.**

HAZARDOUS WASTE AND/OR MATERIALS SPILLS OR RELEASES

1. **TAKE ACTION TO PREVENT FURTHER SPILLAGE (IF IT CAN BE TAKEN WITHOUT EXPOSURE TO EMPLOYEE)**
2. **REPORT RELEASE BY PICKING UP ANY SITE PHONE AND REPORT (YOU MUST ACTUALLY SPEAK TO A PERSON-NO VOICE MAIL) SPILL/RELEASE TO ONE OR MORE OF THE FOLLOWING:**
 - YOUR SUPERVISOR (OR) PLANT AUTHORITY–CCI/SPEER-208-305-9200
SOUTHPORT–208-305-6819
 - CCI/SPEER WASTE TREATMENT OPERATOR – 208-305-9942 OR 3406
 - SOUTHPORT WASTE TREATMENT OPERATOR -208-305-9943 OR 3407
 - NATE TANK – 208-553-5618 (OR) 3232
 - ANDREW CHANDLER – 208-553-7600 (OR) 3232
 - **BOB BERTHIAUME – 208-792-1314 (OR) 3161 OR (b) (6) HOME**
 - **RACHEL IMTHURN – 208-553-6198 (OR) 3221 OR (b) (6) HOME**
 - **PAUL FUSON – 208-553-3748 (OR) 3243**
 - BILL MACKLEIT – 208-305-9562
 - MIKE OVERBERG – 208-305-3509
 - BRIT BISBEE – 208-816-1903 (OR) 3505
 - DOUG LENZ-208 - 553-8598 (OR)(b) (6) HOME
 - KELLY KOLB – 208-750-4959 (OR) 3149
 - LYNNETTE BREEDEN – 208-553-7171 (OR) 3113
 - JENNIFER BOGAR-208-816-6981 (OR)(b) (6) HOME

NOTE: IF A RELEASE TO THE ENVIRONMENT (SOIL, WATER, AIR) HAS OCCURRED, CONTACT BOB, TIM OR RACHEL, ASAP, SO WE CAN DETERMINE IF A REPORTABLE QUANTITY LIMIT HAS

BEEN REACHED. (EPA REQUIREMENT)

CLEAN-UP ACTION:

- Only HazMat trained personnel will determine if cleanup of regulated hazardous wastes or unknown substances should be accomplished by on-site or off-site personnel.
- Only trained personnel may clean-up a spill if:
 1. It is within a building (and)
 2. The Manager/Supervisor has approved the cleanup (and)
 3. Spill can be managed according to clean up instructions in Safety Data Sheets (SDS).

16.0 Emergency Plan Procedures

Notification:

In the event of an emergency, the incident coordinator, designated emergency coordinator, or designated emergency environmental coordinator will be notified and in succession, all appropriate on-site contact, federal, state, local agencies and/or fire/police will be notified.

Identification of hazardous waste:

The incident coordinator will immediately identify the character, source, amount, and area extent of the release. When appropriate the emergency environmental coordinator may take samples for chemical analysis, for further verification.

Assessment:

The incident coordinator will assess possible hazard both direct and indirect to human health or the environment. If the incident coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

If his assessment indicates that evacuation of the local area is appropriate, he must immediately notify; according to the type of emergency; the appropriate agencies from the Off-Site Emergency Agency Contact List.

Control procedures:

Potential accidents fall under two primary classifications: (1) fire/explosion and (2) spills or material release. Natural disasters such as floods, wind, or earthquakes are considered too remote in the area in which the facility is located to warrant planning. Consequently, any such natural disaster which might create a hazard situation will be considered and handled as a spill or material release situation.

Fire and/or Explosion

Fire and/or explosion are inherent hazards present in the manufacturing of small arms ammunition. Fire drills are periodically conducted by the facility and the fire department.

Response Procedures:

Any employee discovering a fire and/or explosion must activate the plant-wide emergency alarm and report to the emergency plan gathering area.

Any employee discovering the release of hazardous or toxic materials that cannot be controlled with the equipment and materials on hand without personal risk must activate the emergency alarm and report to the gathering area. The information is also located within each spill response kit and SDS database available in each department.

All employees upon hearing the alarm will evacuate according to standard alarm procedures using the established and posted evacuation routes.

The designated emergency coordinator will assess the situation and notify the appropriate parties identified in the Coordination Agreement and Off-Site Emergency Agency Contact List.

In the event of a release more than the reportable quantity notification requirement or catastrophic disaster, the emergency environmental coordinator will call the National Response Center at 1-800-424-8802 and report the incident.

The report should include the following:

- Name and telephone number of the caller
- Name and address of the facility
- Time and type of incident (i.e., spill or explosion occurred at 3:15 p.m.)
- Identification and quantity of materials involved
- Extent of injuries if applicable
- The possible hazards to the environment or human health outside the facility if any.

The designated emergency coordinator or designee(s) will conduct a roll call to determine that all employees are accounted for.

Prevention of recurrence or spread of fire, explosions, or releases:

The emergency coordinator will investigate the circumstances leading up to the emergency with the assistance of appropriate personnel from CCI/Speer's Chemistry Lab, Safety office, as well as off-site agencies, such as the local fire department, department of health and welfare, and others that may provide such assistance. In some cases, an investigation team may be formed to study the incident and recommend steps to be taken to prevent recurrences.

Disposition and Disposal of released material

Immediately after an emergency, the EHSS Manager, or his designee, will make arrangements for disposal of the recovered waste. The waste is accumulated no more than 90 days from the accumulation start date. If a tank has a serious rupture or an uncontrolled leak, the waste will be sent immediately to an EPA approved TSD facility, as required.

Incompatible Wastes

All wastes are controlled and managed at individual locations on site. Therefore, there is little possibility of mixing incompatible wastes.

Post Emergency Equipment Maintenance

After an emergency, all equipment used will be either discarded or cleaned so that it is fit for use, if a contractor has brought equipment on-site to clean up a spill, that equipment will be cleaned up at the site, on the secondary containment pads that drain to the wastewater treatment plant, prior to removal of the equipment by the contractor.

Tank Spills and Leakage

Spills or leaks from tanks, including Plating, Anodizing, Oil, Lube, and Tanks/Ancillary Equipment that are associated with the wastewater treatment plant will be responded to accordingly per the determination of the Response Coordinator.

Waste Piles

No hazardous waste piles are located at these sites.

Container spills and leakage

The following containers are used at the facilities for collection of hazardous and non-hazardous wastes:

CCI and Southport Waste Powder, Powder Contaminated Debris and Oil (Hazardous Waste)

Powder from disassembling off-specification product and production processes is accumulated in double lined anti-static bags inside of fiber drums. The accumulated powder is located near the Ammo Reclamation building under a covered, three-sided enclosure. In the event of spillage, the powder is swept up with a broom and dustpan and put into the fiber drum. The nature of the characteristic of reactivity would present a hazard if it were subjected to a strong initiating source or if heated under confinement and would be considered an immediate threat to human health. The nature of listed contaminate, lead, in a powder spill or material release would present a hazard only in the excess of the acceptable limits. The hazard presented with a spill or release of listed powder, therefore, might be considered as a possible long-term environmental risk rather than an immediate threat to human health.

CCI Waste Cartridge Power Devices and Waste Cartridges (Hazardous Waste)

Off-Specification product is accumulated in drums. The accumulated material is located near the Ammo Reclamation building under a covered, three-sided enclosure. In the event of spillage, the material is swept up with a broom and dustpan and put into the drums. The nature of characteristics of reactivity would present a hazard if it were subjected to a strong initiating source or if heated under confinement and would be considered an immediate threat to human health. The nature of the listed contaminate, lead, in a spill or material release would present a hazard only in the excess of the acceptable limits. The hazard presented with a spill or release of listed material, therefore, may be considered as a possible long-term environmental risk rather than an immediate threat to human health.

CCI and Southport Waste Primers (Hazardous Waste)

Off-specification product is collected from the department in plastic buckets, before being repackaged into trays, sleeves, cartons, and boxes then accumulated at the Southport Wastewater Treatment Plant in an enclosed storage building. At CCI the Waste Primers are accumulated near the Ammo Reclamation building under a covered, three-sided enclosure. In the event of spillage, the material is swept up with a broom and dustpan and repackaged as described above. The nature of the characteristic of reactivity would present a hazard if it is subjected to a strong initiating source or if heated under confinement and would be considered an immediate threat to human health. The nature of the listed contaminate, lead, in a primer spill or material release would present a hazard only in the excess of the acceptable limits. The hazard presented with a spill or release of listed material, therefore, may be considered as a possible long-term environmental risk rather than an immediate threat to human health.

CCI, Southport and Speer Lead Contaminated Debris (Hazardous Waste)

The debris is solid and placed inside a plastic lined palletized cardboard box (approx. 1 CY). Spillage or leakage could occur if the box becomes wet and saturated but, the chances are unlikely because the boxes are located under roofs. In this event the leakage would be collected with absorbent material and repackaged in a new plastic lined cardboard box. Contaminated debris presents a hazard only in hazardous constituents as lead.

CCI, Southport Barium Nitrate and Heat Treat Waste (Hazardous Waste)

The waste material is collected in 55-gallon drums. In the event of spillage, the material is swept up with a broom and dustpan and

repackaged as described above. Contaminated debris presents a hazard only in hazardous constituents as barium.

CCI Used Coolant/Mop Water (Hazardous Waste)

These wastes are liquid, and such could leak or spill. These containers are located inside a building or within secondary containment and away from drains to reduce the potential problems. In the event of spillage into the secondary containment the waste would be pumped into containers that are in acceptable condition. If the material escapes the secondary containment, then a spill response kit is located at the site to collect the spill with absorbent material. The contaminated material would be disposed of in the Lead Contaminated Debris box. In the event of a release an employee discovering a leak or release of these materials must report to his or her supervisor the pertinent information, (i.e., location and amount of spill). The Supervisor will notify the emergency environmental coordinator for cleanup and notification.

CCI and Southport Dewatered Heavy Metal Sludge and Debris (Hazardous Waste)

Sludge from the wastewater treatment plant is accumulated in a 30 CY metal roll-off box. The roll-off box is located at the wastewater treatment plant and is inside secondary containment. In the event of spillage, the sludge is shoveled into the roll-off box and the liquid portion of the sludge is covered with absorbent and shoveled into the roll-off box. The ground and shovels are washed down. At CCI the wash down water drains into the wastewater treatment plant and is processed. At Southport, sludge that is not captured on secondary containment is cleaned-up in a dry manner (absorbed and/or swept-up). The nature of listed sludge and wastewater spills or material release would present a hazard only in hazardous constituents such as copper, lead, nickel, zinc, and cyanide, in the excess of the acceptable limits. The hazard presented with a spill or release of listed sludge or wastewater, therefore, may be considered as a possible long-term environmental risk rather than an immediate threat to human health.

CCI Spent Waste Paint Related Material, CCI Spent Aerosol Residue, CCI, Speer and Southport Waste Combustible Liquids, Waste Flammable Liquids and Southport Waste Acetone (Hazardous Waste)

These wastes are liquids and as such could leak or spill. The containers are located within secondary containment and away from drains to reduce potential problems. In the event of spillage into the secondary containment the waste would be pumped with an explosion/fireproof pump (air pump) into containers that are in acceptable condition. If the material escapes the secondary containment, then a spill response kit is located at the site to collect the spill with absorbent material. The contaminated material would be disposed of after an appropriate waste determination is

made. Spent waste paint related materials and solvents may be flammable and as such, the collection site is located outside away from sources of ignition. In the event of a release an employee discovering a leak or release of these materials must report to his or her supervisor the pertinent information, (i.e., location and amount of spill). The supervisor will notify the emergency environmental coordinator for cleanup and notification.

CCI and Speer Spent Corn Cob (Hazardous Waste)

The spent cob is a solid and is placed inside a plastic lined palletized cardboard box (approx. 1 CY). Spillage or leakage could occur if the box becomes wet and saturated, but the chances are unlikely because the boxes are located under roofs. In this event the leakage would be collected with absorbent material and repackaged in a new plastic lined cardboard box. Contaminated spent cob presents a hazard only in hazardous constituents as lead.

CCI and Speer Lead/Solvent and Powder/Solvent Contaminated Debris (Hazardous Waste)

These wastes are solid and are placed in metal step can accumulation containers and shipped off plant in a 55 gal. drum. In case of a spill the loose debris is swept up with a broom and placed in the drums; any solvents are wiped up with absorbents then placed into the drum.

The nature of the characteristic of reactivity would present a hazard if it is subjected to a strong initiating source or if heated under confinement and would be considered an immediate threat to human health. The nature of listed contaminate, lead, in a powder spill or material release would present a hazard only in the excess of the acceptable limits. The hazard presented with a spill or release of listed powder, therefore, might be considered as a possible long-term environmental risk rather than an immediate threat to human health.

Southport Absorbent Pads with Oil (Hazardous Waste)

The absorbent pads are solid and placed inside a plastic lined palletized cardboard box (approx. 1 CY). Spillage or leakage could occur if the box becomes wet and saturated but, the chances are unlikely because the boxes are located under roofs. In this event the leakage would be collected with absorbent material and repackaged in a new plastic lined cardboard box. Contaminated absorbent pads present a hazard only in hazardous constituents as lead at Speer and barium at Southport.

Speer Used Oil (Hazardous Waste)

These wastes are liquid, and such could leak or spill. These containers are located within secondary containment, or inside enclosed buildings and away from drains to reduce the potential problems. In the event of spillage into the secondary containment the waste would be pumped into containers that are in acceptable condition. If the material escapes the secondary containment, then a spill response kit is located at the site to collect the spill with absorbent material. The contaminated material would be disposed of in the Lead Contaminated Debris box. In the event of a release an employee discovering a leak or release of these materials must report to his or her supervisor the pertinent information, (i.e., location and amount of spill). The Supervisor will notify the emergency environmental coordinator for cleanup and notification.

Southport Waste Acid (Hazardous Waste)

Excess spent acid not needed for sump neutralization at Southport or pH control at a CCI/Southport industrial wastewater pretreatment plant is accumulated in 275-gallon totes, and then sent to a permitted TSD facility for disposal. In the event of a spill or leak, the Emergency Coordinator will make an appropriate determination for cleanup and disposal of the material.

Southport Lead Contaminated Wastech Lube (Hazardous Waste)

The waste is collected in 275-gallon totes from the Wastech water treatment distillation units. In the event of spillage, the material is absorbed with absorbent pads, pigs, or granular absorbent material, and then is swept up with a broom and dustpan and repackaged appropriately.

CCI Chromic Acid Contaminated Debris (Hazardous Waste)

The waste material is collected in 15-gal drum. In the event of spillage, the material is swept up with a broom and dustpan and repackaged as described above. Contaminated debris presents a hazard only in hazardous constituents as Chromium.

Speer Diatomaceous Earth Waste (Hazardous Waste)

The waste material is collected in a 55-gallon drum. In the event of spillage, the material is swept up with a broom and dustpan and repackaged as described above. Contaminated debris presents a hazard only in hazardous constituents as Diatomaceous Earth and Lead.

CCI, Speer, Southport Mercury Contaminated Debris (Hazardous Waste)

The waste material is collected in 15-gal drum. In the event of spillage, the material is swept up with a broom and dustpan and placed in the drum (all mercury contaminated debris is individually contained in plastic bags). Contaminated debris presents a hazard only in hazardous constituents as Mercury.

Southport Mercury Contaminated Cartridges (Hazardous Waste)

Off-Specification product is accumulated in buckets. The accumulated material is located in the Analytical Lab building. In the event of spillage, the material is swept up with a broom and dustpan and put into the drums. The nature of characteristics of reactivity would present a hazard if it were subjected to a strong initiating source or if heated under confinement and would be considered an immediate threat to human health. The nature of the listed contaminate, lead, in a spill or material release would present a hazard only in the excess of the acceptable limits. The hazard presented with a spill or release of listed material, therefore, may be considered as a possible long-term environmental risk rather than an immediate threat to human health.

Copies of contingency plan

A copy of the contingency plan and all revisions to the plan will be maintained at the facility.

Amendments

The program will be reviewed, and amended as necessary, whenever:

The plan fails in an emergency

The list of designated emergency coordinators change

Internal changes in plant operations which may necessitate changes in emergency response procedures on an annual basis

17. Record of Revisions

Revision Date	Description
7/11/06	Deleted Nick Broemeling, added Mike Shuey
9/22/08	Deleted all references to a fire team
5/25/09	Reviewed entire procedure and updated as necessary
8/9/10	Reviewed entire procedure - Changed phone number for Carrie Bieren
6/8/11	Corrected Mark Von Lindern's cell phone number and changed office phone numbers to new Cisco numbers for Mark, Tim Switzer, Carrie Bieren, and Mike Shuey. Deleted Larry Dale.
4/1/12	Name Change and review
12/12/12	Removed reference to Section 112 (r) Risk Management Program (RMP)
5/15/13	Revised Container spills and leakage for CCI and Southport Dewatered Heavy Metal Sludge and Debris
5/15/13	Added Southport Waste Acid to Container spills and leakage section
7/16/14	Changed cell phone number for Carrie Bieren
7/1/15	Name Change and review
3/3/16	Removed Mark Von Lindern's information and added Bob Berthiaume
11/21/16	Annual Review. Updated Emergency Action Plan – Call Out List. Removed Carrie Bieren and added Rachel Imthurn
11/29/2016	15.2 & 16.0 update information – R.I.
12/01/2016	16.0 Addition of HW information – R.I.
04/11/2017	Additions to 9.0 & 11.0, Changes to Emergency Call Out HW list – T.S. & R.I.
2018	Changes to EAP call out list

2019	Changes to EAP call out list
2020	Changes to EAP call out list
2021	Changes to EAP call out list
08/24/2022	Additions and edits to 15.2, 15.5, 16.0 - PF

Attachment 8:
Jacobs Technical Memorandum



TECHNICAL MEMORANDUM

Storm Water Calculations for Vista Outdoor, Inc. CCI/SPEER Operations
Lewiston, Idaho

TO: Vista Outdoor, Inc. Speer & CCI

FROM: Mike Wirtz/Jacobs
Rick McCormick/Jacobs

DATE: April 24, 2023

SUBJECT: Speer and CCI Facilities Stormwater Calculations

Vista Outdoor, Inc. (Vista) operates two industrial facilities in Lewiston, Idaho as listed below:

- Speer Facility located at 1023 Snake River Avenue
- CCI Facility located at 2299 Snake River Avenue

Both the Speer and CCI facilities maintain Stormwater Pollution Prevention Plans (SWPPPs).

Stormwater calculations for both Speer and CCI facilities were performed based of the respective SWPPP for each property. The NRCS Curve Number (CN) Method was utilized to calculate an overall volume of runoff. A 25-year 24-hour design storm was used as the design storm. Precipitation (in inches) was pulled from a Hyetograph from the 2021 Stormwater Master Plan for the City of Lewiston. Curve numbers were interpreted from the SCS Curve Number Table from TR-55 NRCS, 1986.

- Subbasin areas for the Speer facility were referenced from Table 1 of the Speer SWPPP. Based on the above assumptions, the design storm produces a total of 9,645 cubic feet (ft³) of runoff at the Speer facility. Refer to Attachment A1.
- Subbasin areas for the CCI facility were referenced from Table 1 of the CCI SWPPP. For the CCI facility, the SWPPP does not include 9.48 acres of property as drainage area. To represent stormwater runoff, runoff volumes for the drainage areas reported in the SWPPP, and the remainder of property, were reported separately. When considering just the drainage areas outlined in the SWPPP, the CCI facility has 60,246 cubic feet (ft³) of stormwater runoff during the design storm. The remainder of the property not outlined in the SWPPP produces an

additional 15,250 cubic feet (ft³) of stormwater runoff during the design storm.
Refer to Attachment B1.

Available Stormwater Storage was calculated with measurements received from Vista and an assumed infiltration rate for the soil present within the retention basins. Vista provided the Top Width, Top Length, and Depth of each retention basin.

- For the Speer facility, the retention basin on site is best represented by a trapezoidal cross section. Because of its sand soil material, a conservative infiltration rate of 4.00 inches per hour was used in the storage calculations. From this, it was determined that for the design storm, the retention basin can store 2,850 cubic feet (ft³) of stormwater runoff. Refer to Attachment A2.
- There are three (3) retention basins present on the CCI facility: the parking lot street swale, the parking lot upper pacific swale, and the parking lot lower pacific swale. The upper pacific swale is designed to overflow into the lower pacific swale. For these retention basins, an infiltration rate of 0.5 inches per hour was used. For the design storm, the parking lot street swale can retain 2,625 cubic feet (ft³), the upper pacific swale can retain 900 cubic feet (ft³), and the lower pacific swale can retain 2,188 cubic feet (ft³). From this, the CCI facility can retain a total of 5713 cubic feet (ft³) of runoff from the design storm event. Refer to Attachment B2.

There are no available drawings or plans available on how the historic stormwater swales or retention basins were constructed at the Speer and CCI facilities. However, it appears that the stormwater management feature that most closely reflects the historic storm water swales are bioretention basins. A bioretention basin consists of a shallow depression of porous soil covered with grasses and shrubs. It promotes evapotranspiration, soil porosity, and uptake of some pollutants.

The design criteria for a bioretention basin is referenced in the *Idaho Catalog of Storm Water Best Management Practices (BMPs)*, April 2020, BMP 18. Below is a list of design criteria for a bioretention basin:

- 5 ft minimum top width.
- 2.5 ft minimum bottom width.
- 3H:1V max side slope.
- Maximum of 2% grade along length of swale.
- A 2–3-inch drop is required from the edge of impervious area to the surface of the basin.
- Minimum depth of 3ft from the bottom of the retention facility to the ground water table.
- Swales should be designed to the 25yr 24hr design storm.
- Design storm volume depth of the swale is to be 1 ft maximum.
- Minimum infiltration rate of 0.5 in/hr.
- Based on site conditions under drain filled with drain rock is an optional addition to the swale design to provide additional storage volume

Attachment A1

Stormwater Calculations for Speer Facility

[illegible]

Attachment A2

Stormwater Storage Calculations for Speer Facility

Project Name				Vista Outdoors - Speer			
Swale 1	Infiltration Rate		4.00 in/hr	USER INPUT			
	Length of Swale		30 ft	Solver used to maximize side slope by setting swale bottom width to 0			
	Swale Top Width		10 ft				
	Swale Depth		3 ft				
	Side Slopes (H:1)		1.666667 ft/ft				
	Swale Bottom Width		0 ft				
	Infiltration Area		300 ft ²				
	Infiltration Flow Rate		100 cf/hr				
	Volume Infiltrated over 24hrs		2400 ft ³				
	Cross-sectional Area		15 ft ²				
	Swale Volume		450 ft ³				
	Total Swale Storage		2850 ft ³				

Attachment B1

Stormwater Calculations for CCI Facility

Project Name						Vista Outdoors - CCI		
Swale 1	Infiltration Rate			0.50	in/hr	USER INPUT		
	Length of Swale			50	ft	Solver used to maximize side slope by setting swale bottom width to 0		
	Swale Top Width			15	ft			
	Swale Depth			5	ft			
	Side Slopes (H:1)			1.5	ft/ft			
	Swale Bottom Width			0	ft			
	Infiltration Area			750	ft ²			
	Infiltration Flow Rate			31.25	cf/hr			
	Volume Infiltrated over 24hrs			750	ft ³			
	Cross-sectional Area			37.5	ft ²			
	Swale Volume			1875	ft ³			
	Total Swale Storage			2625	ft ³			
Swale 2	Infiltration Rate			0.50	in/hr			
	Length of Swale			30	ft			
	Swale Top Width			12	ft			
	Swale Depth			3	ft			
	Side Slopes (H:1)			2	ft/ft			
	Swale Bottom Width			0	ft			
	Infiltration Area			360	ft ²			
	Infiltration Flow Rate			15.00	cf/hr			
	Volume Infiltrated over 24hrs			360	ft ³			
	Cross-sectional Area			18	ft ²			
	Swale Volume			540	ft ³			
	Total Swale Storage			900	ft ³			
Swale 3	Infiltration Rate			0.50	in/hr			
	Length of Swale			25	ft			
	Swale Top Width			25	ft			
	Swale Depth			5	ft			
	Side Slopes (H:1)			2.5	ft/ft			
	Swale Bottom Width			0	ft			
	Infiltration Area			625	ft ²			
	Infiltration Flow Rate			26.04	cf/hr			
	Volume Infiltrated over 24hrs			625	ft ³			
	Cross-sectional Area			62.5	ft ²			
	Swale Volume			1563	ft ³			
	Total Swale Storage			2188	ft ³			
TOTAL	Available Storage			5713	ft ³			