



NPDES Compliance Inspection Report

Federal Cartridge Company (Speer/CCI) Lewiston, Idaho

NPDES Permit Tracking Number
IDR053179

Inspection Date: March 29, 2023

Prepared by:

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JEFFERY KENKNIGHT



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Date: 2023.05.25 11:27:31 -07'00'

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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. Ward Parker, and Mr. Paul Fuson or from observations made during the inspection.]

I. Facility Information

Facility Name:	Federal Cartridge Company (legal entity) DBA – Speer/CCI
Facility Address:	1023 Snake River Avenue Lewiston, Idaho 83501
Facility Operator:	Federal Cartridge Company (legal entity) DBA – Speer/CCI (to be referred as “CCI” for this report)
Facility Owner:	Vista Outdoors is owner/primary holding company; Federal Cartridge Company (legal entity) has 2 facilities with MSGP permit coverage DBA – Speer/CCI 1 Vista Way Anoka, Minnesota 55303
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:	N 46.410423 W - 117.032893
NPDES Tracking Number:	IDR053179
NAICS Code(s):	332992 (Small Arms Ammunition Manufacturing)
SIC Code(s):	3482 (Metal Fabrication – Small Arms Ammunition)
Facility Size:	3.25 acres

II. Inspection Information

Inspection Date:	March 29, 2023
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Inspector(s): Vanessa Oquendo
EPA Region 10, ECAD / SWES
Charissa Bujak, Inspector
EPA Region 10, IOO, ECAD / SWES

Arrival Time: 08:02 AM
Departure Time: 11:19 AM

Weather: Overcast, light rain

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 – Speer/CCI (hereinafter referred to as the “Facility”) is the legal entity doing business as “Speer/CCI” permitted under EPA’s Industrial Stormwater General Permit (MSGP). The permit tracking number assigned to the Facility is IDR053179. Vista Outdoors owns the Facility.

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 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 AA 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). PAH indicator monitoring is a report only requirement whereas any benchmark exceedances would require additional implementation measures.

IV. Facility Background

Speer/CCI is a manufacturing facility of small arms ammunition for the shooting sports market, law enforcement agencies, and military departments located in Lewiston, ID. The Facility is a small arms ammunition manufacturing plant operated by Federal Cartridge Company and owned by Vista Outdoors. The Facility operates 24 hours a day, 7 days a week except major holidays and has been in operation since 1943 with no changes to overall site layout since then. The Facility has 53 employees on site, some of

whom are different people conducting various permit requirements than those who conduct permit requirements for the IDR053178 CCI facility located at 2299 Snake River Avenue.

The Facility encompasses approximately 3.25 acres. See **Attachment A**, Aerial Photo (Google Earth). Asphalt paving covers the majority of the Facility's impervious surfaces. According to the Facility's NOI, some of these paved surfaces will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under the MSGP. Primary structures include a main manufacturing plant, loading/unloading areas, a quality assurance test-fire (shooting) range, and multiple storage areas. Primary Facility activity is ammunition manufactured on-site for sale/distribution through processes such as lead forming, lead melting, lead extrusion, brass or copper forming, and quality assurance testing. Lead wire is cut into slugs which form bullet cores. The facility processes approximately 100 to 110 thousand pounds of lead per day with amount of raw material being the same as amount of final product. No vehicle or equipment maintenance including cleaning and wash downs are conducted at the Facility.

According to the Facility's Stormwater Pollution Prevention Plan (SWPPP) and NOI, the Facility can be divided into four drainage basins where primary stormwater on-site collects and originates from rooftops, catch basins, and sheet flow from parking lots, access roads, and other impervious areas and discharges to the City of Lewiston's stormwater system, a permitted MS4 under the MSGP, which then discharges to the Clearwater River. Approximately 50% of the facility is exposed to stormwater. See **Attachment B**, Site Layout and Drainage Maps, red-filled circle highlighting the drain serving as the Facility's discharge to the City of Lewiston's stormwater system.

According to facility representatives, the facility was previously inspected by IDEQ for MSGP compliance shortly after the state of Idaho took primacy over the program in 2021. EPA has not inspected the facility previously for MSGP compliance according to EPA's Enforcement and Compliance History Online (ECHO). The Facility bares the required public sign illustrating permit coverage at its main entrance.

V. Inspection Chronology

This was an announced inspection. On Friday March 24, 2023, I called and spoke with Mr. Robert Berthiaume at 10:24am, Facility Corporate Director of Compliance and Legal / EHSS Supervisor. Mr. Berthiaume is listed as the point of contact on the NOI. During the call, I discussed that I wanted to conduct a routine on-site inspection at the Speer and CCI facilities (IDR053178 and IDR053179) to assess compliance with the MSGP, I explained that I was hoping to conduct the inspection for the IDR053179 facility on the morning of March 29, 2023.

Mr. Berthiaume welcomed the inspections although he stated he would need to double check with his environmental supervisor's schedule, Rachel Imthurn on the date and start time to inspect the IDR053179 facility. Mr. Berthiaume called me back at 10:38am to confirm Ms. Imthurn was free on March 29, 2023.

We agreed to begin the inspection of the Facility with Mr. Berthiaume and Ms. Imthurn at 8:00AM on Wednesday, March 29, 2023. I informed Mr. Berthiaume that I would be joined on the inspection by fellow EPA inspector Ms. Charissa Bujak.

Upon arriving on-site, Ms. Bujak and I made our way to the facility's main office through the parking lot where we met with Mr. Berthiaume, Ms. Imthurn, and Mr. Fuson and began the inspection.

The inspection consisted of an opening conference, a walk-through of the Facility's general operations and stormwater areas, a records review, and ended with a closing conference. We were accompanied throughout the inspection by Mr. Berthiaume, Ms. Imthurn, and Mr. Fuson.

VI. Opening Conference

Opening conference began at 0802.

The opening conference was held with Mr. Robert Berthiaume, Ms. Rachel Imthurn, Mr. Ward Parker, and Mr. Paul Fuson shortly after our arrival. We had our initial introductions; Ms. Bujak and I presented our inspector credentials as needed to any new facility representatives in attendance who weren't in attendance during the previous day's inspection at the CCI facility located at 2299 Snake River Ave (IDR053178) and discussed the purpose and scope of the inspection. During the opening conference facility representatives provided a general background of the Facility operations, current staffing, and general stormwater management responsibilities.

VII. Site Review

The Facility's primary industrial activity is the manufacturing of small arms ammunition through processes and activities described above. Generally manufacturing and associated industrial activities occur indoors with no exposure to stormwater. Industrial activities exposed to stormwater include the loading and unloading of raw materials, material handling areas, waste and raw material storage areas, and vehicle traffic. The primary potential pollutant sources to stormwater are the loading, unloading, and general handling and of materials and chemicals, debris/trash associated with the dumpsters, vehicle traffic, and/or onsite contractor work. According to the Facility's SWPPP, associated pollutants associated with the Facility's activities include oil and grease, sulfuric acid, lead, antimony, iron, and copper. Raw materials delivered to the site are handled in loading/unloading areas located on the west and north sides of the Facility.

There is one general area where materials appeared to be stored or otherwise staged outdoors, located along the eastern perimeter of the site. According to the Facility's SWPPP, raw materials and most work-in-progress are stored under cover in dedicated structures and do not impact stormwater.

As mentioned earlier in this report, the Facility identified one discharge point, a stormwater drain located near the main loading/unloading area next to Snake River Avenue, which then discharges to the City of Lewiston's stormwater (MS4) system. This

drain is not considered to be an outfall according to the Facility's SWPPP.

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 were toured as part of the inspection walk-through. See **Attachment C**, for a photograph log of pictures taken during the site walk-through. The Facility has identified two sampling locations – one for drainage area 4 located at the storm drain on the south side of the Facility where stormwater may come from a storage area or the parking lot; and one for drainage area 2 located in the alley way south of the Facility's cafeteria.

We began the facility walkthrough with Mr. Berthiaume, Ms. Imthurn, and Mr. Fuson starting at the Facility's main parking lot. Stormwater from parking lot enters a French drain aided by additional berming located at the western entrance/exit (**Photo 1 & Photo 2**). Most of the parking lot generally slopes to this French drain. We walked toward the southern entrance/exit along the western part of the parking lot and observed a change in slope aspect and an opening where stormwater may drain to the street (**Photo 3**). We also observed lack of stormwater controls (such as berming) at the parking lot's southern entrance/exit to block stormwater flow coming from the higher-sloped eastern part of the Facility consisting of pervious surfaces (**Photo 4, Photo 5, & Photo 6**).

We continued walking to observe the eastern part of the parking lot where we observed empty ammunition boxes and active onsite contracting work being performed at the Facility (**Photo 7 & Photo 8**). We observed trash behind an equipment storage connex box next to the contractor work area (**Photo 9**). As part of the Facility's best management and housekeeping practices described in the Facility's SWPPP, trash is picked up at least twice per week by Environmental Services personnel using company owned equipment and disposed of at least once per week at the local landfill. Non-regulated recyclable materials are regularly picked up by Lewis-Clark Recyclers. Facility grounds are inspected weekly for stormwater issues by Environmental Services personnel. Bins for scrap metal are used throughout the Facility and are picked up daily. The Facility utilizes an environmental observation tool in which facility employees are instructed to address pollutants seen and properly dispose of them in marked bins. The Facility's observation tools offer metrics and employee concern tracking.

We then proceeded up the hill via a gravel road to walk the eastern perimeter of the Facility (**Photo 6**). We observed what appeared to be a large outdoor storage and staging area of uncovered materials, such as metal racks, shelving, and bins, (**Photo 10**), many of which were worn and showed signs of being exposed outside for a long time (**Photo 11**). Stormwater in this area could encounter pollutants and drain down-slope and out the southern parking lot entrance/exit. The Facility representatives were going to research more into the intended use of the materials and take measures to store the materials indoors or cover them. Additionally, we observed insufficient gravel in this storage and staging area as exposed dirt could lead to track out of soil and water onto the paved surfaces. The Facility now conducts daily checks for track out and facility personnel sweep weekly. The Facility utilizes a contracted sweeper truck quarterly from Valley Sweeping located at 1615 G Street in Lewiston, ID 83501.

We then proceeded along a natural vegetation area on the northern side of the parking lot

where we observed the Facility's ground infiltration basin in which overflow would drain out a pipe (**Photo 13**) that would then drain to the storm drain (**Photo 12**) connecting to the City of Lewiston's stormwater system. When asked if the Facility considered enhanced or additional stormwater controls and mitigation measures to minimize impacts from stormwater discharges from major storm events. The Facility indicated that it did not have such considerations documented yet. As we walked to the storm drain, we observed a loading and unloading area that did not have stormwater controls to ensure stormwater diverted into the drain (**Photo 12 & Photo 14**) given it is not listed as an outfall in the Facility's SWPPP.

We continued our walkthrough to the northern part of the facility along the western perimeter. We observed the facility's permit sign and a downspout conveyance outflow pipe (**Photo 13**) that collects roof runoff from the southern roofs of the facility and is included in composite sampling procedures as location "B" to represent collected stormwater discharging to the main storm drain. The Facility takes a composite sample as well as equal individual samples from two separate locations "A" and "B" using plastic sample bottles. "A" locations are collected from two downspouts located on both sides of the covered area on the northern part of the Facility, and the "B" locations are sampled from two downspout conveyance pipes on the north and south sides of the passageway across from the main office. The Facility initiates sampling within 20 minutes of a measurable storm event.

As we walked north along the western perimeter of the Facility, we observed two treatment and filtration systems that direct stormwater from a downspout into a filtration box base containing MetalZorb media before it flows out of the top of the filter and conveyed to the main storm drain (**Photo 16**). We also observed an indoor storage and loading/unloading area of building 1023 that has an oily water separator. As we arrived at the northern side of the Facility, we observed the quality assurance and test firing building located on an elevated hillside with a paved road that leads downhill and out to the street passing the neighboring property without any stormwater controls (**Photo 17**). Additionally, a hydraulic cooler is scheduled to be installed on the north side of the Facility's building 1023 (**Photo 18 & Photo 21**). The Facility will ensure condensate for this unit is captured at the source and infiltrated prior to exposure to stormwater.

We continued up the hill to the western perimeter and walked to the northwestern-most part of the Facility above the quality assurance building where we observed worn plastic tarps and an unlabeled barrel of unknown contents (**Photo 19 & Photo 20**).

We then walked south behind the main building 1023 and entered the main chemical storage area where we observed RCRA accumulation bins and other chemical drums. Although in a covered area, some chemical drums stored high on a shelf lacked secondary containment (**Photo 22**). As we exited the main chemical storage area, we concluded the site walkthrough after we walked past a small loading/unloading area, a trash dumpster (**Photo 23**), and observed the Facility's main spill kit (**Photo 24**). We proceeded back to the office building where I completed a records review and held the closing conference.

VIII. File Review

The following documents were reviewed as part of this inspection:

- Notice of Intent (NOI) – The Facility’s most recent NOI was reviewed prior to the inspection. It was certified by Mr. Berthiaume on 05/27/2021.
- Annual Reports – Prior to the inspection, permit required annual reports were reviewed via EPA’s online Permit Lookup Tool. Years reviewed included 2018, 2019, and 2020. The reports were submitted timely and contained summarized observations as well as inspection and sampling dates/times for the reporting years.
- Stormwater Pollution Prevention Plan (SWPPP) – A copy of the SWPPP was available for review at the time of inspection. An electronic copy of the SWPPP was also submitted to EPA and reviewed post-inspection. The SWPPP was initially prepared on March 27, 2012. The SWPPP documented yearly updates up until most recently in March 2023. The SWPPP was generally current with the requirements of the 2021 MSGP. The SWPPP was missing some requirements such as additional building labeling for site map elements, description of mitigation measures in the event of a major storm event, and general updating to include additional storm control measures that Facility intends to implement. See **Photo 25** for a picture of the Facility’s SWPPP aerial site map. As part of the Facility’s efforts to improve its processes, the Facility was planning to utilize consulting services to review the SWPPP to assess current and planned BMPs and control measures.
- Site Inspection Reports – The Facility documents completed quarterly site inspections. I reviewed quarterly site inspection reports completed in 2022 and found the Facility’s form to document these inspections to be effective.
- Quarterly Visual Assessment Documentation – I reviewed the Facility’s records of completed visual observations on sampling and observations worksheets (**Photo 26**) for 2022 and 2023 and found the documentation to be adequate.
- Quarterly Stormwater Monitoring Results – I reviewed the Facility’s discharge monitoring reports (DMRs) that had been submitted quarterly per the MSGP, years reviewed included 2018-present post-inspection. I reviewed analytical lab reports and compared the analytical report values to the reported DMR values. I also reviewed the Facility generated stormwater sampling forms which included quarterly visual assessments for the discharge of stormwater into the stormwater drain connecting to the City of Lewiston’s stormwater system. EPA’s online database 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 Facility indicated it took two PAH indicator monitoring samples and planned to report results to IDEQ’s NetDMR website. The Facility also failed to submit DMRs for benchmark monitoring for monitoring periods ending on 9/30/2019, 9/30/2020, 12/31/2020, 3/31/2021, and 6/30/2022. The review of the DMRs identified sector specific benchmark

exceedances during the following quarters (Q):

- 2018
 - 1 exceedance of Iron, total (as Fe) (Q2)
 - 1 exceedance of Aluminum, total (as Al) (Q1)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)
 - 3 exceedances of Nitrite Plus Nitrate (Q1, Q2, Q4)
- 2019
 - 1 exceedance of Iron, total (as Fe) (Q1)
 - 1 exceedance of Aluminum, total (as Al) (Q1, Q2, Q4)
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q2, Q4)
- 2020
 - 1 exceedance of Aluminum, total (as Al) (Q3)
 - 3 exceedances of Zinc, total (as Zn) (Q2, Q3, Q4)
 - 1 exceedance of Nitrite Plus Nitrate (Q3)
- 2021
 - 3 exceedances of Zinc, total (as Zn) (Q1, Q3, Q4)
 - 1 exceedance of Nitrite Plus Nitrate (Q3)
- 2022
 - 3 exceedances of Zinc, total (as Zn) (Q2, Q3, Q4)

IX. Areas of Concern

Observations during the inspection and post inspection communication and additional records review identified the following areas of concern (see **Attachment D** for post inspection correspondence detailing corrective actions the Facility has taken):

A. Representative Sampling and Sampling Type

Section 4.1 of the 2021 MSGP describes the monitoring procedures that are required of each discharge point. Section 4.1.1 of the permit states that “applicable monitoring requirements apply to each discharge point...”

Additionally, Section 4.1.4 states that composite sampling can be used for indicator and benchmark monitoring and that the “composite method may be either flow-weighted or time-weighted and performed manually or with the use of automated sampling equipment.”

The Facility does not have a sampling point on the street for drainage basin 1, but the Facility is currently evaluating this area for sampling. This was not specifically discussed as an area of concern during the inspection, but the Facility was encouraged to re-examine the area to minimize stormwater pollution.

As described earlier in this report, the Facility takes a composite sample from two stormwater collection locations “A” and “B” where “A” locations are two downspouts located on both sides of the covered area on the northern part of the Facility, and the “B” locations are two downspout conveyance pipes on the north and

south sides of the passageway across from the main office. The concern is that the Facility did not specify whether its composite sampling methods are flow-weighted or time-weighted. The Facility may benefit from assessing its sampling procedures to ensure sampling is representative of combined discharge to the main storm drain.

B. Good Housekeeping

Section 2.1.2.2 of the 2021 MSGP states that you must “keep clean all exposed areas that are potential sources of pollutants. You must perform good housekeeping measures in order to minimize pollutant discharges...”

During the inspection I observed plastic, general trash, and other debris scattered throughout the Facility’s grounds. During the inspection, when possible, Facility representatives picked up debris. Post-inspection, the Facility provided written documentation indicating the Facility cleaned up and discarded the debris and that the importance of good housekeeping was discussed during leadership meetings. The Facility also plans to increase the frequency of the sweeper truck schedule.

C. Offsite Tracking

Section 2.1.2.2 of the 2021 MSGP states that you must “minimize generation of dust and off-site tracking of raw, final, or waste materials in order to minimize pollutants discharged via stormwater.” Additionally, Section 3.1.3.3 states that you must look out for “offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.”

During the inspection, there were concerns of insufficient gravel on the pervious road and surfaces leading up to and down from the outdoor storage and staging area that can create track out of sediment from vehicle and foot traffic and discharged with stormwater out the southern entrance/exit of the Facility’s parking lot. Post-inspection, the Facility provided written documentation indicating the Facility removed materials in the staging area to an off-site storage facility. The Facility is currently working on adding more gravel to the area and designating the area as a non-storage and non-staging area.

D. Insufficient Stormwater Control Measures

Section 2.1. of the 2021 MSGP states that you must “select, design, install, and implement stormwater control measures to minimize pollutant discharges that address the selection and design considerations in Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, meet limits contained in applicable effluent limitations guidelines in Part 2.1.3, and meet the water quality-based effluent limitations in Part 2.2.” Parts 2.1.1 – 2.1.8 further describe considerations that must be addressed when selecting and designing control measures.

During the inspection of the Facility’s parking lot, the southwestern corner had a change in slope aspect and opening in the fencing where stormwater could discharge directly into the street without any control measures in place. The southern

entrance/exit of the parking lot did not have any control measures to minimize pollutant discharges in stormwater coming downslope from the outdoor storage and staging area. Post-inspection, the Facility provided written documentation indicating the Facility added an asphalt berm to this part of the parking lot to direct stormwater to the west and was evaluating additional infiltration and conveyance options.

The main loading/unloading area next to the main storm drain that discharges to the City of Lewiston's stormwater system requires additional stormwater control measures to ensure stormwater contacting potential pollutants in the loading/unloading area is diverted into the drain.

Additionally, the quality assurance and test firing building were located uphill at the Facility and stormwater falling downslope could flow down the paved area potentially causing it to collect on the edge of the neighboring property and contribute to drainage area 1 without any stormwater controls. Post-inspection, the Facility provided written documentation indicating the Facility was going to add a berm and conveyance control measures to direct water away from this area.

E. Preventing Leaks or Spills from Drums and other Containers

Section 2.1.2.4.d of the 2021 MSGP states that you must "minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur in order to minimize pollutant discharges. You must conduct spill prevention and response measures, including but not limited to...plainly label containers that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur." Additionally, Section 3.1.3.2 states that "Leaks or spills from industrial equipment, drums, tanks and other containers" should be examined by personnel conducting site inspections.

During the inspection, there was an unmarked and unlabeled rusted drum of unknown contents with a pipe connection on the northwestern corner of the Facility along the western perimeter fencing and above the quality assurance and test firing building. Post-inspection, the Facility provided written documentation indicating the Facility removed and properly disposed of the drum.

F. Chemical Storage

Section 2.1.2.4.e of the 2021 MSGP states that you must "minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur in order to minimize pollutant discharges. You must conduct spill prevention and response measures, including but not limited to...implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas."

During the inspection, I observed inadequate secondary containment of chemical

drums in a covered area stored high on a shelf. Post-inspection, the Facility provided written documentation indicating the Facility planned to put the chemical drums into secondary containment.

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

Section 4.2. of the 2021 MSGP describes the monitoring requirements that may be applicable 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 PAHs for the monitoring period ending on 6/30/2022. The online database also indicates 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, 3/31/2021, and 6/30/2022. The concern is the failure to monitor and/or submit the discharge monitoring data for these time periods. Post-inspection, the Facility provided written documentation indicating the Facility took two indicator monitoring samples and reported those sampling results to IDEQ’s NetDMR website.

H. Sector Specific 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.

The concern is that AIM Levels 1-3 had been triggered due to benchmark exceedances

for total recoverable iron, total recoverable aluminum, total recoverable zinc, and nitrate plus nitrite nitrogen. The Facility did not conduct appropriate responses and did not document actions required by associated deadlines at the time of inspection. Additionally, it was explained to the Facility that all newly planned and implemented stormwater control measures, including those specifically addressed previously in this report and those that meet AIM requirements are to be documented in the Facility's SWPPP. Post-inspection, the Facility drafted a benchmark exceedance report on 4/6/23 detailing the nature of the exceedances and corrective actions.

I. Outdoor Storage and Staging

Section 2.1.2.1 of the 2021 MSGP states that you must “minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and stormwater in order to minimize pollutant discharges by either locating these industrial materials and activities inside or protecting them with storm resistant coverings.”

During the inspection, I observed what appeared to be a large outdoor storage and staging area of uncovered worn materials, such as metal racks, shelving, and bins in which stormwater could encounter pollutants from this area and drain down-slope and out the southern parking lot entrance/exit. Post-inspection, the Facility provided written documentation indicating the Facility removed materials in the staging area to an off-site storage facility, and the area was designated as a non-storage and non-staging area by Facility leadership.

J. Stormwater Pollution Prevention Plan

Section 6.2. of the 2021 MSGP outlines required contents of the SWPPP.

During the records review of the inspection, I had a concern that insufficient building labeling on the site map was not adequate to fully describe and summarize drainage flows and potential pollutant sources. I also had concerns with the SWPPP not fully incorporating all necessary stormwater control measures to address AIM triggering events, enhanced or additional stormwater controls and mitigation measures to minimize stormwater discharge impacts from major storm events, and not identifying the outdoor staging and storage area. Post-inspection the Facility submitted written documentation stating that they are planning to update the SWPPP to include all planned and implemented stormwater control measures including considerations for major storm events. The Facility indicated that building labels have been updated in the SWPPP, the storage/staging area was formally designated as a non-storage and non-staging area by Facility leadership, and an Emergency Action Plan was included with the SWPPP to address major storm event mitigation measures.

X. Closing Conference

Following the walk-through and file review, a closing conference was held with Mr. Robert Berthiaume, Ms. Rachel Imthurn, Mr. Ward Parker, and Mr. Paul Fuson where

we discussed our observations, the areas of concern, and next steps regarding inspection report transmittal. I thanked them for their time and cooperation with the inspection. Closing conference concluded at 11:19AM.

ATTACHMENT A

Aerial Image (Google Earth)



ATTACHMENT B

SWPPP Site Layout and Drainage Maps





ATTACHMENT C

Photograph Log

All photographs taken by Vanessa Oquendo on March 29, 2023

Olympus Tough TG-6/F2.0 Camera

Photo Log- Federal Cartridge Company



Photo #:01 (P3290004)

Description: Facing south, photo of French drain and berm on western entrance/exit of facility parking lot.



Photo #:02 (P3290006)

Description: Facing southwest, close-up photo of the berm on western entrance/exit of facility parking lot.



Photo #:03 (P3290009)

Description: Facing west, photo of opening where drainage leads to street in southwestern part of the facility parking lot due to slope aspect change.



Photo #:04 (P3290011)

Description: Facing southwest, photo of the right side of the entrance/exit of facility parking lot.

Photo Log- Federal Cartridge Company



Photo #:05 (P3290014)

Description: Facing southeast, photo of the left side of the entrance/exit of facility parking lot.



Photo #:06 (P3290017)

Description: Facing east, photo of pervious (gravel) road leading up to material storage area from the southeastern part of the facility parking lot.



Photo #:07 (P3290019)

Description: Facing south, photo of ammunition boxes outside east of the facility's parking lot.



Photo #:08 (P3290024)

Description: Facing north, photo of the onsite contractor work being performed at the facility east of the parking lot.

Photo Log- Federal Cartridge Company



Photo #:09 (P3290026)

Description: Facing southeast, photo of trash on the facility's grounds east of the parking lot.



Photo #:10 (P3290038)

Description: Facing north, photo of the facility's eastern perimeter and area that generally appears to be used for outdoor material storage and staging.



Photo #:11 (P3290057)

Description: Facing south, photo of worn straw waddle on facility's northeastern perimeter.



Photo #:12 (P3290072)

Description: Facing south, photo of the facility's only storm drain located west of the western parking lot entrance/exit that discharges to the City of Lewiston stormwater system.

Photo Log- Federal Cartridge Company



Photo #:13 (P3290074)

Description: Facing east, photo of underground infiltration basin overflow pipe that discharges to facility's storm drain.



Photo #:14 (P3290075)

Description: Facing southwest, photo of the impervious surface and street (Snake River Avenue) where loading and unloading activity occurs; located to the left of the main storm drain by the western entrance/exit of the facility's parking lot.



Photo #:15 (P3290077)

Description: Facing east, photo of downspout conveyance outflow pipe next to loading/unloading area on western side of facility that collects roof runoff and discharges to facility's storm drain.



Photo #:16 (P3290078)

Description: Facing northeast, photo of treatment control and filtration system on facility's western perimeter used to remove metals from stormwater.

Photo Log- Federal Cartridge Company



Photo #:17 (P3290090)

Description: Facing northeast, photo of the impervious area in front of the firing range building contributing to drainage area 1 as labeled on facility's SWPPP.



Photo #:18 (P3290091)

Description: Facing south, photo looking at building 1023 and where new cooling unit installation is planned in drainage basin 1.



Photo #:19 (P3290097)

Description: Facing northeast, photo of the northeastern perimeter for the facility above the test firing range building with worn tarps on the ground.



Photo #:20 (P3290099)

Description: Facing northwest, photo of an unlabeled barrel with unknown contents on the northeastern part of the facility above the test firing range building.

Photo Log- Federal Cartridge Company



Photo #:21 (P3290102)

Description: Facing southwest, photo of where a new cooling unit is to be installed on building 1023 in northern part of the facility.



Photo #:22 (P3290116)

Description: Facing southwest, photo of the chemical storage area in building 1023.



Photo #:23 (P3290124)

Description: Facing east, photo of a facility trash dumpster next to building 1023.



Photo #:24 (P3290130)

Description: Facing south, photo of the facility's spill kit.

Photo Log- Federal Cartridge Company



Photo #:25 (P3290136)

Description: Photo of the facility's aerial site map from its SWPPP.

STORM WATER SAMPLING WORKSHEET

Sample's Initials: ACL/SL

Date: 7-10-23

LOCATION	COI	COLOR	ODOR	CLARITY	FOAM	FOUR	CL. 1-4-5-6-7-8	CL. 9-10	TEMP	COMMENTS
8:00	A	Dark	none	Dark	Some	none	none	-	41°c	
8:10	B	Dark	none	Dark	Some	none	none	-	41°c	
	C	Clear								
9:20	D	Clear	none	Dark	Some	none	none		43°	
SPEED										
8:30	A	Clear	none	Clear	none	none	none		41°c	
8:40	B	Clear	none	Clear	none	none	none		41°c	

H: Shared FORMS STORMWATER SAM

Photo #:26 (P3290143)

Description: Photo of March 2023 sampling worksheet with visual observations recorded for the facility.

ATTACHMENT D

Post Inspection Correspondence