ADEQ

A R K A N S A S
Department of Environmental Quality

June 14,2011

Mr. Sammy Bates, Environmental Coordinator, R.E.M.
Rernington Arms Company, Inc
PO Box 400
Lonoke, AR 72086

AFIN: 43-00024, NPDES Permits No: AROOOI163, ARG250014, and ARR00A251,
Routine Compliance Inspection

Dear Mr. Bates:

On June 11, 2009, Steve Johnson, Inspector Supervisor, Water Division and I performed a routine compliance inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspection revealed the following:

NPDES Permit AROOOI163 – The following items were noted:

1. The activated sludge (domestic wastewater) treatment plant appeared to be overloaded with solids. The mixed liquor suspended solids concentration was around 4,000 mg/l according to your operator and the sludge blanket in the clarifier was less than 2 feet from the bottom of the weirs. At the time of the inspection, solids were bulking over the weir in one location. This is a violation of Part III,B.1.a. of the permit which requires the facility to be properly operated and maintained at all times. Consideration should be given to more frequent wasting from this facility to keep the sludge age and food to microorganism ratio at optimum levels. Solids management is one of the primary causes of problem at activated sludge plants.
2. The recent floods have resulted in the death of the cattails in your constructed wetlands. The required vegetation in the constructed wet lands must be replanted. Additionally, there were a few willow trees in the wetland cells that will need to be removed. This is a violation of Part III,B.1.a. of the permit which requires the facility to be properly operated and maintained at all times.
3. I am also somewhat concerned about excessive chlorination at this facility. It was noted that chlorine tablets were being used in the tablet chlorinator and in the effluent weir trough. While excess chlorination should be removed in the constructed wetlands, please be aware the chlorine can affect the vegetation in the wetland cells.

4. A review of DMR calculations reveals that fecal coliform is being reported to the tenth of a colony per 100 ml. In March 2011, you reported a monthly average of 5.5 colonies per 100 ml. The calculated geometric mean for the month of March

NPDES Permit ARG250014 – **No** violations were noted.

NPDES Permit ARR00A251 – The pH sample collected during the first half of this year exceeded the holding time of 15 minutes. The sample was collected on April 4, 2011 and analyzed by American Interplex on April 5, 2011. As we discussed, you will probably have to run pH samples in house because of the nature of these stormwater samples. If you initiate in house monitoring for stormwater pH values, please be sure to implement a full QA/QC program for the test. This includes doing duplicate analysis.

Construction Permit AR0001163C – A review of the file reveals the Department has not received a construction complete report. Paragraph 2 of this permit requires a construction complete report signed by an engineer licensed in the state of Arkansas be submitted within 30 days of the completion of construction.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch Manager. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. picture) is due by June 24, 2011.

If I can be any assistance, please contact me at benson@adeq.state.ar.us or 501-683-0827.

Sincerely,

Dennis Benson
District 9 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

1	2	3	11	12	17	18	19	20
Transaction Code	NPDES			Yr/Mo/Day		Inspec. Type	Inspector	Fac. Type
N	5	ARG250014		110609		C	S	2

Remarks

67	69	70	71	72	73	74	75	80
Inspection Work Days		Facility Evaluation Rating	BI	QA	----------Reserved----------			
		3	N	N				

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Remington Arms Company, Inc – From North Little Rock go east on I-40 towards Lonoke. Take the Remington Road exit off of I-40 (~18 miles east of NLR). Plant is at southwest corner of I-40 and Remington Road.(Highway 15)	**09:15 AM ON 6/9/11**	**12/1/07**
	Exit Time/Date **11:37 AM ON 6/9/11**	Permit Expiration Date **11/30/12**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. Sammy Bates, Environmental Coordinator, R.E.M.	

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Charles P. Rink, Jr. **Plant Manager** **PO Box 400** **Lonoke, AR 72086** **501-676-3161**	Yes ☐ No ☑

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

No violations were noted at the time of the inspection

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Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Dennis Benson	**AR Dept. of Environmental Quality-** **(501) 683-0827/(501) 682-0910 (Fax)**	**06/09/11**
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐Y ☐N ☑NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑S ☐M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y ☐N ☐NA ☐NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y ☐N ☐NA ☐NE
e. RESULTS OF CALIBRATIONS:	☑Y ☐N ☐NA ☐NE
f. RESULTS OF ANALYSES:	☑Y ☐N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y ☐N ☐NA ☐NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y ☐N ☐NA ☐NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☑S ☐M ☐U ☐NA ☐NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☑S ☐M ☐U ☐NA ☐NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y ☐N ☐NA ☐NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	☐S ☐M ☐U ☑NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☐S ☐M ☐U ☑NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☐S ☐M ☐U ☑NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☐S ☐M ☐U ☑NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☐S ☐M ☐U ☑NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☐Y ☐N ☐NA ☑NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☐Y ☐N ☐NA ☑NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☐Y ☐N ☐NA ☑NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☐Y ☑N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☐Y ☐N ☑NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☐Y ☐N ☑NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☐Y ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐N ☑NA ☐NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☐Y ☐N ☑NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☐Y ☐N ☑NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Noncontact cooling water with consistent flow**	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE:	☐Y ☐N ☑NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☐Y ☐N ☑NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☐Y ☐N ☑NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☐Y ☐N ☑NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☐Y ☐N ☑NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☐Y ☐N ☑NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☐Y ☐N ☑NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☐Y ☐N ☑NA ☐NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐N ☑NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: **American Interplex**	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED: **COD, TSS, O&G, pH**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☐Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☐Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☐Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☐Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☐NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	none	none	none	none	none	none

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☐S ☐M ☐U ☑NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☑NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☐NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☐NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☐NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☐NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☐NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☐NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☐NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☐NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☐NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☐NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☐NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☐NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☐NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☐NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☐NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☐NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☐NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☐NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☐NA ☐NE

FLOW CALCULATION SHEET
NCCW has a consistent flow from unit operation.

Date: _____ Time: _____

Head in Inches: _____ Feet: _____

Type & Size of Primary Flow Measurement Device:

Name & Model of Secondary Flow Measurement Device:

Recorded Flow at Date & Time Listed Above: _____ (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: _____
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{\quad -}{\quad} \times 100$$

$$\% \text{ Error} = \frac{\quad}{\quad} \times 100$$

$$\% \text{ Error} = \frac{\quad}{\quad} \times 100$$

% Error = _____ %

Comments:

DMR Calculation Check

Reporting Period: From 11 (Year) 04 (Month) 01 (Day) **To** 11 (Year) 04 (Month) 30 (Day)

Parameter Checked: COD

	Loading Mass		Concentration Monthly	
	Mo. Avg. - lbs/day	Daily Max- lbs/day	Mo. Avg. - mg/l	Daily Max. - mg/l
Reported Value:	N/A	N/A	<10	<10
Calculated Value:	N/A	N/A	<10	<10
Permit Value:	N/A	N/A	50	75

If calculated value does not equal reported value, explain:

Remington®

Water Division Enforcement Branch Manager
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

AFIN: 43-00024, NPDES Permits No: AR0001163, ARG250014, and ARR00A251

To Whom It May Concern:

On June 11, 2011 Mr. Dennis Benson, Inspector and Steve Johnson, Inspector Supervisor conducted a routine compliance evaluation inspection of the Remington Arms ammunition plant. The following items were noted during the inspection and these have been addressed by Remington as follows:

AR0001163

1. The activated sludge (domestic wastewater) treatment plant appeared to be overloaded with solids. The mixed liquor suspended solids concentration was around 4,000 mg/l according to your operator and the sludge blanket in the clarifier was less than 2 feet from the bottom of the weirs. At the time of the inspection, solids were bulking over the weir in one location. This is a violation of Part III,B.1.a. of the permit which requires the facility to be properly operated and maintained at all times. Consideration should be given to more frequent wasting from this facility to keep the sludge age and food to microorganism ratio at optimum levels. Solids management is one of the primary causes of problem at activated sludge plants.

   Approximately 20,000 gallons of solids were disposed of off site on Monday, June 20. The operator has been instructed to reinstate weekly 30 minute settleability tests (see log sheet) and to waste sludge as required to prevent excess solids in the clarifier.

2. The recent floods have resulted in the death of the cattails in your constructed wetlands. The required vegetation in the constructed wet lands must be replanted. Additionally, there were a few willow trees in the wetland cells that will need to be removed. This is a violation of Part III,B.1.a. of the permit which requires the facility to be properly operated and maintained at all times.

   Remington is in the process of identifying and contracting with a landscape contractor to replant the cattails and remove the willows. This will be accomplished ASAP.

3. I am also somewhat concerned about excessive chlorination at this facility. It was noted that chlorine tablets were being used in the tablet chlorinator and in the effluent weir trough. While excess chlorination should be removed in the constructed wetlands, please be aware the chlorine can affect the vegetation in the wetland cells.

   The wastewater treatment operator was instructed to discontinue the use of chlorine tablets in the weir trough.

4. A review of DMR calculations reveals that fecal coliform is being reported to the tenth of a colony per 100 ml. In March 2011, you reported a monthly average of 5.5 colonies per 100 ml. The calculated geometric mean for the month of March

   Fecal Coliform will be reported in whole numbers only in the future.

5. **NPDES Permit ARG250014** – No violations were noted.

6. **NPDES Permit ARR00A251** – The pH sample collected during the first half of this year exceeded the holding time of 15 minutes. The sample was collected on April 4, 2011 and analyzed by American Interplex on April 5, 2011. As we discussed, you will probably have to run pH samples in house because of the nature of these stormwater samples. If you initiate in house monitoring for stormwater pH values, please be sure to implement a full QA/QC program for the test. This includes doing duplicate analysis.

   Stormwater pH will be done at the time the sample is collected and QA/QC data will be logged on the chain of custody used for the sample (see attached blank chain-of-custody form)

7. **Construction Permit AR0001163C** – A review of the file reveals the Department has not received a construction complete report. Paragraph 2 of this permit requires a construction complete report signed by an engineer licensed in the state of Arkansas be submitted within 30 days of the completion of construction.

   See attached letter submitted to ADEQ January 6, 2011 from Rex Robbins, FTN stating the construction activities have been completed. Please note that the letter is dated January 6, 2010, which is a common dating error at the beginning of a new year, but the file extension at the bottom of the letter correctly denotes it is 1-6-2011.

I trust the responses outlined above in bold italics to the items noted during the inspection are satisfactory. If you have any questions or require more information please do not hesitate to contact me.

Sincerely,

Sammy R. Bates, R.E.M.
Environmental Coordinator, Remington Arms

ftn Associates Ltd.
water resources / environmental consultants
3 Innwood Circle, Suite 220 • Little Rock, AR 72211-2449 • (501) 225-7779 • Fax (501) 225-6738

January 6, 2010

Ms. Cindy Garner
Water Division - Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: Remington Arms Company - Construction Permit
NPDES Permit No. AR0001163C
FTN No. 6425-045

Dear Ms. Garner:

On behalf of the Remington Arms Company (Remington), we are submitting this certification regarding the completion of construction activities at the Remington facility located near Lonoke, as covered by the referenced construction permit. The permit was primarily concerned with the conversion of an existing diversion (equalization) tank into an activated sludge treatment unit.

FTN has made an inspection visit to the site and reviewed the installation. The installation of the system is complete and was constructed in compliance with the plans and specifications prepared by FTN Associates, Ltd. and submitted to the Arkansas Department of Environmental Quality (ADEQ) with the construction permit application.

If you have any questions or comments relating to this certification, please do not hesitate to contact me or Nick Siria at (501) 225-7779.

Kindest regards,
FTN Associates Ltd.

Rex Robbins

Rex M. Robbins, PE
Senior Project Manager

RMR/rml

CC: Sammy Bates (Remington)

R:\WP_FILES\6425-045\CORRESPONDENCE\L-C GARNER 01-06-11\L-C GARNER 01-06-11.DOC MCS

SETTLEABILITY TEST

DATE	5 MINUTE	10 MINUTE	15 MINUTE	30 MINUTE	PH	%	TIME

AMERICAN INTERPLEX CORPORATION
LABORATORIES

8600 Kanis Road
Little Rock, AR 72204-2322
(501) 224-5060
FAX (501) 224-5072

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE OF

Client:
Project Reference:
Project Manager:
Sampled By:

PO No.

SAMPLE MATRIX: GRAB | COMP | WATER | SOIL

NO OF BOTTLES

ANALYSES REQUESTED

AIC CONTROL NO:
AIC PROPOSAL NO:
Carrier:
Received on Ice (4°C)? YES NO

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL		NO OF BOTTLES	Remarks
		Container Type							
		Preservative							

Field pH calibration
on _____ @ _____
Buffer:

G = Glass P = Plastic V = VOA vials H = HCl to pH2 T = Sodium Thiosulfate
NO = none S = Sulfuric acid pH2 N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: _____ Fax: _____
Report Attention to: _____
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
Relinquished By:	Date/Time	Received in Lab By:	Date/Time

Comments:

Remington®

Remington Arms Company, Inc.
2592 Arkansas Hwy. 15N
P.O. Box 400
Lonoke, AR 72086-0400

RETURN SERVICE REQUESTED

7006 2150 0000 9069 5910

CERTIFIED MAIL™

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

7006 2150 0000 9069 5910

UNITED STATES POSTAGE
PITNEY BOWES
02 1A
0004314742
$ 05.79⁰
JUN 23 2011
MAILED FROM ZIP CODE 72086

ADEQ, NPDES Enforcement
5301 Northshore Drive
North Little Rock, AR 72118

7211885317 R015

www.remington.com