Progress Report

Remington Arms Co.
Monthly Progress Report No. 12

Date: 6/13/2016
LIS No. 15-051
Permit No. AR0001163
AFIN 43-00024

The referenced Consent Administrative Order (CAO) from the Arkansas Department of Environmental Quality (ADEQ) requires the submittal of monthly progress report beginning July 15, 2015 and continuing through the term of the CAO (June 15, 2017).

The stated purpose of the Progress Reports is to detail “the progress that has been made toward compliance with the final effluent limits.” Items 2a, 2b and 5 of the Order and Agreement Section of the CAO are specifically directed at efforts to be completed within the term of the CAO. These tasks, if successfully implemented and completed, should provide the framework for achieving compliance. Therefore, this Progress Report and subsequent reports will provide details of progress relative to these specific tasks. The items noted below in italics represent progress included on a previous report. These items are still ongoing. Items marked in bold type are new with this month’s submittal.

Item 2a – Develop and conduct a feasibility study
Milestone Date: ten (10) months from effective date of Order
Recent progress and status:

1. The Permittee has contracted with FTN to provide professional engineering services related to the development of the feasibility study.
2. A feasibility study has been initiated regarding the feasibility of a Hydrograph Controlled Release for the discharge. This option is being studied as an alternate disposal method relative to Item 2.b. (ii) in the Order.
3. An agreement has been reached with ADEQ for quantifying lead and antimony contributions from Building 738. This sampling program was initiated in early September 2015. This information will be used to modify the permit conditions derived from the national effluent guidelines.
4. Sampling and analysis were completed for quantifying lead and antimony contributions from Building 738. A full report was prepared for use in the permit appeal settlement agreement.
5. ADEQ is working on a revision of the operating permit based on the results of the antimony sampling as a condition of the permit appeal resolution.
6. Following the issue of the permit modification for antimony, Remington will submit another permit modification application to revise the mass limits associated with lead
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based on the new sampling results.

7. Final design of the DAF modifications and Peen Plating Filtration project have been completed.

8. The final construction permit for the DAF project has been received.

9. Bids have been received, and a contractor selected, for the installation of the DAF unit. Bids have been received and a contractor selected for the installation of the PEEN plating system. Purchase orders have been written for fabrication work and the installation of the DAF system and the Peen Plating modifications.

10. Remington and FTN have developed and conducted a feasibility study to address the issue of noncompliance with effluent standards. The feasibility study has focused on the use of three major modifications to the facility. These modifications, in tandem with the changes to the NPDES permit that have been worked out with ADEQ staff, support the best opportunity to correct compliance issues. The modifications include: 1) preliminary treatment in the area of the PEEN Plating operation to reduce influent loads of heavy metals and 2) the staged treatment of solids using a Dissolved Air Flotation Unit ahead of the existing clarifier. Both of these projects have been released for construction and are on track to be installed in the calendar year 2016. As a third modification, FTN has also prepared a report including modeling runs based on historical data that show the ability of an Hydrograph Controlled Release system to achieve compliance with effluent limitations. This report has been reviewed with Remington management including the plant manager. The HCR may, or may not, be part of the solution that must be completed within the 15 month period described in Item 2b (see below).

Complete compliance with permit limits is dependent on agreements with ADEQ regarding changes to the NPDES permit. These changes are focused on the changes afforded by a modified Combined Wastestream Formula which takes into consideration the non-regulated status of operations at Buildings 736 and 738. Additional changes to the permit will be required if an HCR is to be implemented. Besides the hydrograph controlled release, an internal outfall may be required to comply with national standards for daily mass discharges.

11. Construction of the Dissolved Air Flotation (DAF) projects has started. CDI Contractors in Little Rock is the general contractor for the installation of the new DAF. Progress is on track for completion in 2016.

12. Construction of the filtration system in the PEEN Plating department has started. This project includes removal of heavy solids from the water prior to discharge to the plant sewer system. It is expected that this new system will significantly reduce the load on the wastewater treatment system. River City Mechanical is serving as general contractor for this project. This work is on track for completion in 2016.

13. A meeting has been scheduled with ADEQ on June 16 to discuss permit modifications and the proposed addition of a Hydrograph Controlled Release at Outfall 004. The HCR will require the installation of a storage basin, controlled pumping and stream flow measurement. It now appears that the construction permit application for this system will be submitted in 2017.
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Item 2b – Submit a detailed report of the feasibility study
Milestone Date: fifteen (15) months from effective date of Order

Recent progress and status:
1. The permittee is maintaining records and data regarding the operation of the DAF unit. This information will become part of the feasibility study.
2. Information regarding flow metering equipment for the stream flow study has been assembled. A preliminary cost estimate for the capital costs was prepared and presented to corporate management. A determination of the critical stream flow is a necessary component of the overall feasibility plan.
3. A Study Plan for the Stream Flow study required by the renewed NPDES permit was submitted to ADEQ on September 1, 2015.
4. FTN has met with ADEQ personnel to discuss the stream flow study plan. FTN provided responses to ADEQ’s comments on October 6, 2015.
5. Remington received comments from ADEQ regarding the flow study plan on 11/30/2015.
6. FTN has been enlisted to prepare engineering documents to allow monitoring of stream flow in accordance with the study plan.
7. Both the DAF and peen plating filtration projects have been released for construction. Both projects are on track to be completed in 2016.
8. FTN has been contracted to complete the detailed feasibility report for submittal on the schedule outlined in the CAO. This report will provide detail of the system modifications and permit changes outlined in the feasibility study (See Item 2a.10 above) that will allow the facility to come into compliance.
9. Work is ongoing with the preparation of the feasibility report. The report is on schedule to be completed by the deadline (August 7, 2016).

Item 5 – Efficiently operate and maintain the existing treatment system
Milestone Date: ongoing
Recent progress and status:
1. The Permittee continues to work with GE Water to optimize the selection of coagulants and flocculants used in the chemical precipitation process.
2. Additional full-time operators have been assigned to the sludge dewatering operation to manage the additional solids generated by the DAF unit and maintain control of solids levels in the clarifier.
3. Specifications have been developed to allow restoration of both basins of the Constructed Wetland. A bid form has been prepared to allow the receipt of bids from contractors for this work.
4. The east basin of the constructed wetland has been completely refurbished.
Approximately 450 tons of solids were removed for disposal off site. The basin was returned to service in November 2015.

5. Remington has contracted the services of FTN to provide detailed engineering for the installation of a new filter press operation. This filter press will greatly expand the capacity of the system to dewater sludge.

6. The cleanout of the west wetland basin is scheduled for the summer of 2016.

7. FTN is working on the design of the filter press building. Remington has placed an order for the filter press.