UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 11 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bobbie T. Schweikart
Environmental Health and Safety Manager
Remington Outdoor Company
1816 Remington Circle SW
Huntsville, Alabama 35824

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Remington Outdoor Company
EPA ID # ALD981932882

Dear Mr. Schweikart:

On April 16, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at Remington Outdoor Company located at 1816 Remington Circle SW, Huntsville, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that potential deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the Alabama Department of Environmental Management for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

, for

Alan A. Annicella
Chief
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Enclosure

cc: Corey Holmes, Industrial Hazardous Waste Program, ADEM Land Division

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JUN 11 2019

Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Remington Outdoor Company
EPA ID Number: ALD981932882

Dear Mr. Crockett:

On April 16, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at the Remington Outdoor Company facility, located at 1816 Remington Circle SW in Huntsville, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that deficiencies of RCRA were discovered during the CEI. Please follow-up with Remington Outdoor Company to ensure the deficiencies have been addressed.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

, FOR

Alan A. Annicella
Chief
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Enclosure

RCRA Inspection Report

1) Inspectors and Authors of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Remington Outdoor Company
1816 Remington Circle SW
Huntsville, Alabama 35824
Madison County
EPA ID: ALD981932882

3) Responsible Official

Bobbie T. Schweikart, Environmental Health and Safety Manager

4) Inspection Participants

Bobbie T. Schweikart	Remington Outdoor Company
Warner Brines	Remington Outdoor Company
Martin Nelson	Remington Outdoor Company
Corey Holmes	ADEM Land Division
Craig Schimmer	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

April 16, 2019 at 11:40 a.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq.*; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

ED_005268_00003272-00003

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) **Purpose of Inspection**

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Remington Outdoor Company, EPA ID# ALD981932882, with the applicable regulations.

8) **Facility Description**

Remington Outdoor Company (Remington) in Huntsville, Alabama is a firearms manufacturer. Remington begin operations at this location in 2014. In 1988 Chrysler opened the plant to produce automotive electronics. The facility was then sold to Siemens VDO Automotive in 2004, who in turn sold to Continental Automotive Systems US, Inc. in 2007. Continental was producing automotive electronics until 2010, when it shut down the facility and moved production to Texas and Mexico.

The Remington facility produces Modern Sporting Rifles (MSRs), hand guns and long guns. The facility provides metal machining, assembly, coating, firing and proofing range testing, as well as research and development.

Remington is located on 137 acres with 699,000 square feet of production area. Remington employs approximately 400 employees. The facility operates 5 days per week, and two 8-hour per day shifts.

Remington's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated January 23, 2018, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, Remington generates used oil, universal wastes, and other wastes which include EPA waste codes D001, D002, D007, D008, and D009 wastes.

9) Previous Inspection History

This facility as Remington Outdoor Company has never been inspected by the EPA or ADEM. It was previously inspected as Continental Automotive Systems US, Inc on April 8, 2008 by the EPA and ADEM. Nine violations were found during the inspection and returned to compliance on June 26, 2008.

10) Findings

At approximately 11:40 a.m. CDT, the EPA and ADEM inspectors arrived at the Remington facility, presented their credentials to the security station. Mr. Warner Brines, Director of Environmental Health and Safety, and Mr. Andy Logan, Counsel, greeted the inspectors and explained to them clearance from the Chief Executive Officer was required before entering the property. After clearance was granted, Mr. Brines escorted the inspectors into a conference room for an opening conference with Mr. Bobbie Schweikart, Environmental Health and Safety Manager, and Mr. Martin Nelson, Maintenance/Facilities Manager, before escorting them around the facility. The inspectors presented their credentials to Mr. Brines at 12:15 p.m. CDT.

At the opening conference, a brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 North Dock

The North Dock is used for raw material and coolant storage. No hazardous waste was observed in this area.

10.2 Less Than 90-Day Hazardous Waste Storage Area

The less than 90-day hazardous waste storage area (HWSA) was enclosed with a gate (Picture 1). The inspectors observed the following enclosed in the area (Pictures 2-10):

- A Gaylord box and two 55-gallon drums of hazardous waste Goff blast media pending analysis and profile;
- A 4-foot and 8-foot universal waste lamp boxes;
- Eight 30-gallon drums of hazardous waste black oxide;
- Three Gaylord boxes of hazardous waste lead contaminated filters;
- Three Gaylord boxes of non-regulated oil and absorbent pads; and
- A new 30-gallon drum of lead contaminated personal protective equipment (PPE) hazardous waste being labeled during the inspection.

All containers were observed closed, labeled and dated.

10.3 Turning Chamber

The Turning Chamber blasting machine cleans and deburrs the steel and aluminum components. The inspectors observed in the Turning Chamber a 250-gallon tote of oily water (Picture 11). The

Remington staff explained that the oily water was generated from washing the steel stock in soapy water, and then skimming off the oil. The inspectors also observed a 55-gallon drum of non-hazardous high-pressure sludge tumbler wet blast (Picture 12), metal chips (turnings) removed from the barrel machining, spent coolant that goes out as oily water and two Gaylord boxes of oily absorbent and debris (Picture 13). No hazardous waste was observed in this area.

10.4 Pucker Machine

The Pucker Machine mashes and compresses aluminum and steel turnings from the Turning Chamber (Picture 14). The oil from the machine is recycled back into the process. No hazardous waste was observed in this area.

10.5 Black Oxide Area

Black oxide is a conversion coating for ferrous materials, stainless steel, copper and copper-based alloys, zinc, powdered metals, and silver solder. It is used to add mild corrosion resistance, for appearance and to minimize light reflection. Remington applies black oxide as a corrosion-resistant, decorative finish. The inspectors observed a 30-gallon satellite accumulation area drum of spent black oxide shavings that was closed and labeled (Picture 15), and the floor grate below the black oxide process is pumped out once a week (Picture 16). The waste water is sent to the tank that discharges to the onsite wastewater treatment plant.

10.6 Wastewater Treatment Plant

The wastewater treatment plant treats the black oxide waste water. The wastewater is treated for low pH. The sludge generated from the treatment process is treated for pH and neutralized. The sludge is also tested for metals. The treated sludge is shipped out as non-hazardous waste (Picture 17).

10.7 Firing and Proofing Ranges

The firing and proofing ranges are used to test the finished firearms. Each range has a dust collector and a heating, ventilation and air conditioning unit. The air handling units are located over the ranges. The air filters from the dust collector are disposed of as hazardous waste. The facility has a 25-yard range, 200-meter range, two proofing ranges, and a 100-meter range. The 25-yard, 200-meter and 100-meter ranges are used to determine the accuracy of the firearms.

The 25-yard range contained two 55-gallon SAA drums. One drum held brass casings for recycling and the second drum contained hazardous waste lead contaminated PPE (Pictures 18-19).

The inspectors observed in the 200-meter firing range two 55-gallon SAA drums. One drum contained hazardous waste lead contaminated PPE and the second drum contained brass casings to be recycled (Pictures 20-21). The Remington staff explained all ammunition was purchased commercial ammunition.

The two proofing ranges use proofing round for double the power, and the employees shoot into a wet trap to test the firearms. The inspectors observed one drum containing hazardous waste lead contaminated PPE and the second drum containing brass casings to be recycled (Pictures 22).

At the time of the inspection, the 100-meter range was in not operation. Outside of the range was a conveyor box with a 16-gallon drum to capture lead debris (Picture 23).

10.8 Salt Bath Furnace

The salt bath furnace quickly hardens the steel by heat treating the metal with a salt quench. The inspectors observed Gaylord boxes of oily pig mats and coat filters and a 55-gallon SAA drum sitting under a chute (Picture 24). The SAA drum was labeled and open and contained hazardous waste salt bath residue. The waste residue was spraying on the floor and into the grate under the drum. The inspectors explained that drums of hazardous waste are required to be closed and that hazardous waste should be stored in appropriate containers, and not on the ground.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4. [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

10.9 Research and Development HWSA

At the time of the inspection, sections of the research and development (R&D) wing in the administration building was closed for renovation. The R&D wing has its own firing ranges to test the firearms. During the inspection, most of the R&D firing ranges were not in operation. The inspectors observed the R&D HWSA contained gun parts for recycling, a 55-gallon SAA drum with hazardous waste lead contaminated PPE, two empty red step cans, and 55-gallon drums of non-hazardous metal chips for recycling (Picture 25).

Records Review

The inspectors requested the training records, the contingency plan, the daily and weekly inspection records, the waste minimization plan, transfer yard tracking log, the 2016-2019 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated January 23, 2018.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Josh Crowell, Maintenance Technician, were provided. Mr. Crowell received Terrell Technical Services Hazardous Waste Management Rules course training on January 8, 2019. The inspectors requested the job descriptions for Mr. Crowell, however it was not available at the time of the inspection.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7. [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

The inspectors requested the contingency plan dated August 25, 2017 for review. The plan included an emergency contact list, a current evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, and documentation (i.e., green return receipt cards, emails) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire,

police, hospital) were available.

In addition, the updated regulation under the Generator Improvement Rule, requires that the generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders to have the following information:

(1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
(2) The estimated maximum amount of each hazardous waste that may be present at any one time;
(3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
(6) The locations of water supply (e.g., fire hydrant and its flow rate);
(7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
(8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

At the time, of the inspection, the current contingency plan had not been updated after May 2017, and the Quick Reference Guide was not available at this time.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6.]40 C.F.R. § 262.17(a)(6)[, which incorporates ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)[, and is a condition of the LQG Permit Exemption, a generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders to have the required information.

The inspectors reviewed the weekly inspection records for 2018-2019 for the HWSA. No issues were noted during the review.

The waste minimization plan was requested. The inspectors reviewed the waste minimization certification dated November 1, 2017.

Hazardous and non-hazardous manifests were reviewed for 2016-2019.
Non-hazardous wastes were shipped to Republic Services Sand Valley Landfill in Collinsville, AL.

Hazardous, non-hazardous and universal wastes were shipped to the following facilities:
Clean Harbors Deer Park (EPA TXD055414137 5) in LaPorte, TX;
Spring Grove Resource Recovery, Inc. (EPA ID OHD000816629) in Cincinnati, OH;
Clean Harbors El Dorado LLC (EPA ID ARD06748192) in El Dorado, AR;
Clean Harbors Chattanooga LLC (EPA ID TND982141392) in Chattanooga, TN; and
Safety Kleen Systems (EPA ID SCD077995488) in Lexington, SC.

The land disposal restriction forms were reviewed.

Used oil and oily water was shipped to Safety Kleen Systems (EPA ID ALD981028798) in Huntsville, AL.

Waste profiles for AMCO Slide Sludge and Filter Press Residual from the WWT were requested and reviewed. Both materials were provided by Safety Kleen Systems and profiled as non-regulated.

11) **Summary**

The inspectors conducted the exit meeting with Mr. Schweikart, Mr. Brines and Mr. Nelson. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Remington Outdoor Company was inspected as a large quantity generator of hazardous waste, the facility was not in compliance with some requirements of RCRA.

12) **Signed**

Paula A. Whiting
Environmental Engineer

Date 6/11/19

Concurrence

Alan A. Annicella, FOR
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Date 6/11/19

ATTACHMENT A

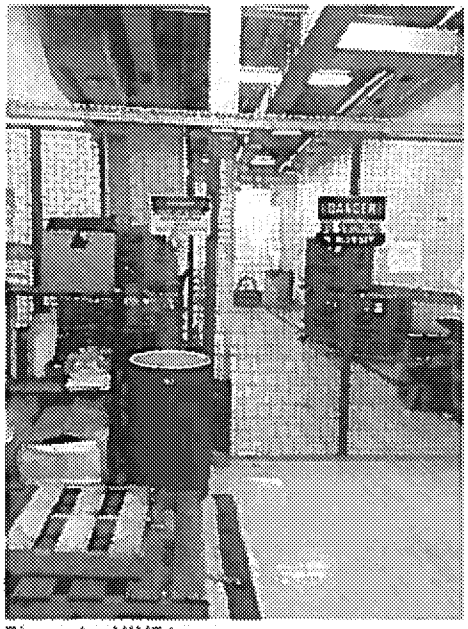
REMINGTON OUTDOOR COMPANY

HUNTSVILLE, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

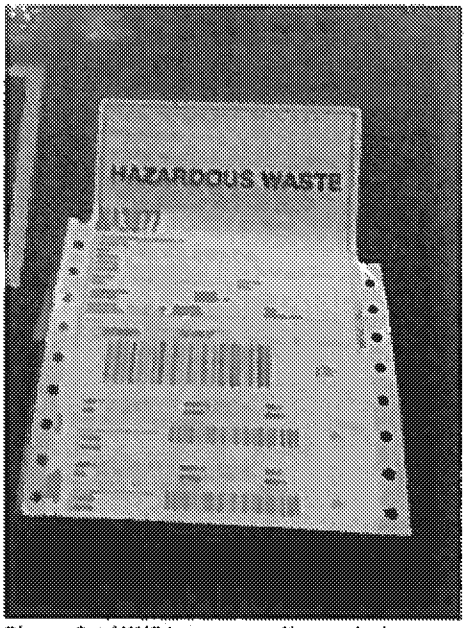
April 16, 2019

Photos taken by Paula A. Whiting
Camera Type: Samsung J7 SkyPro

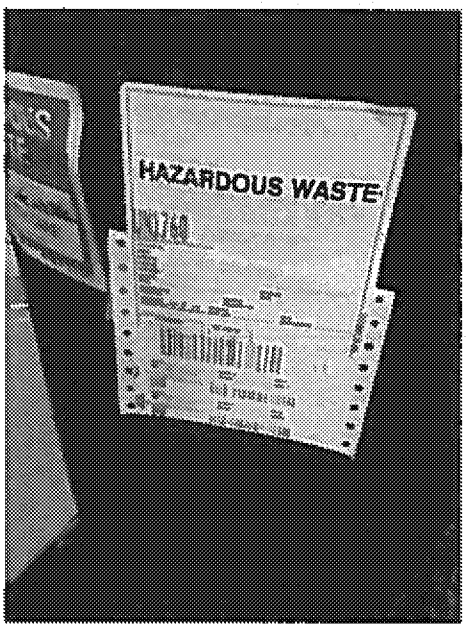


Picture 1 – HWSA gate

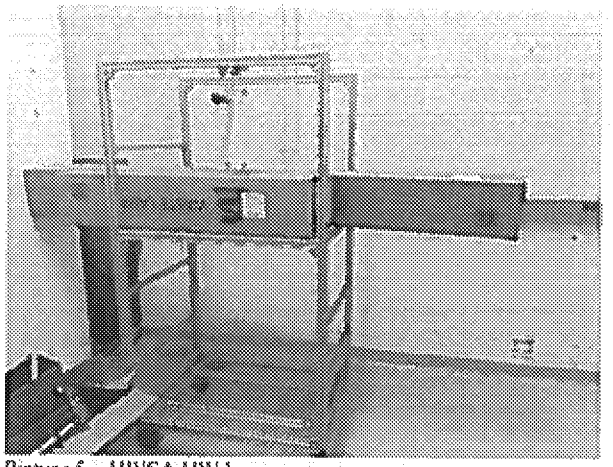
Picture 2 – HWSA waste pending analysis



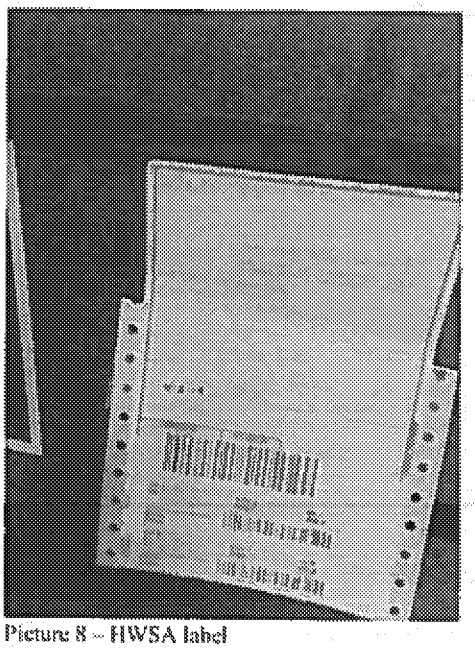
Picture 3 – HWSA waste pending analysis



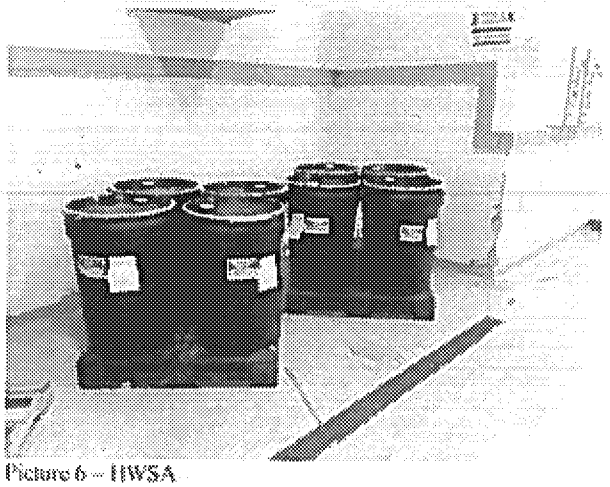
Picture 4 – HWSA waste pending analysis label



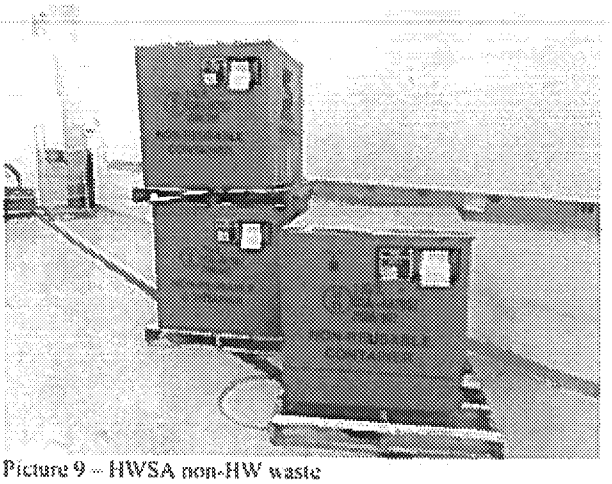
Picture 5 – HWSA UW lamps



Picture 8 – HWSA label

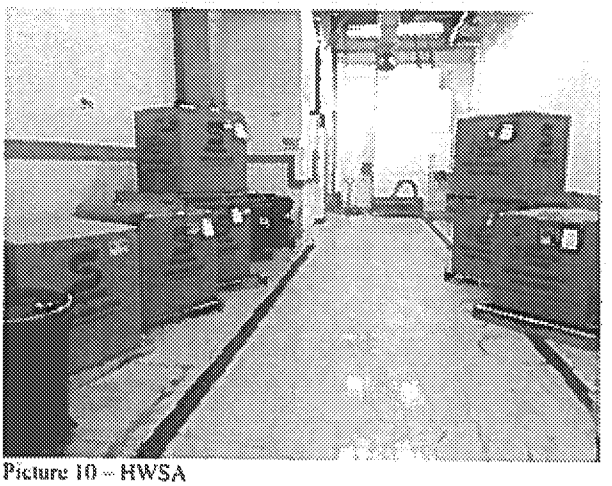


Picture 6 – HWSA



Picture 9 – HWSA non-HW waste

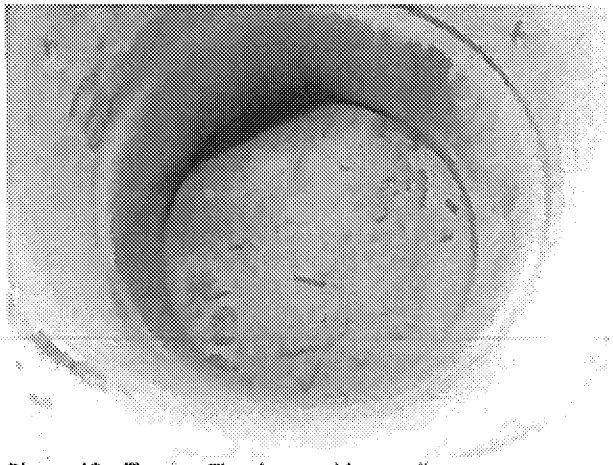
Picture 7 – HWSA



Picture 10 – HWSA

Picture 11 – Turning Chamber oily water tote

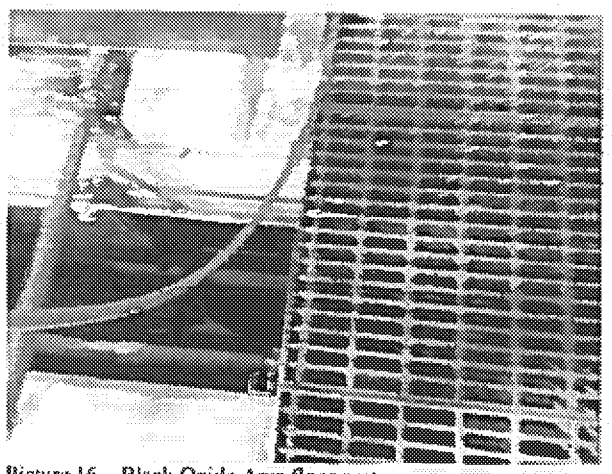
Picture 14 – Pucker Machine



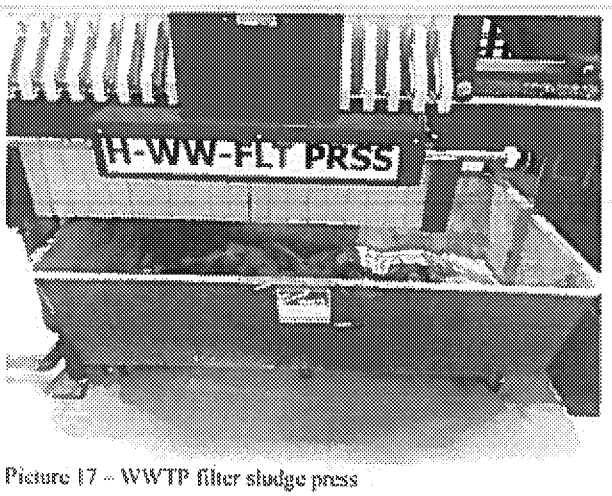
Picture 12 – Turning Chamber wet blast media

Picture 15 – Black Oxide Area SAA drum

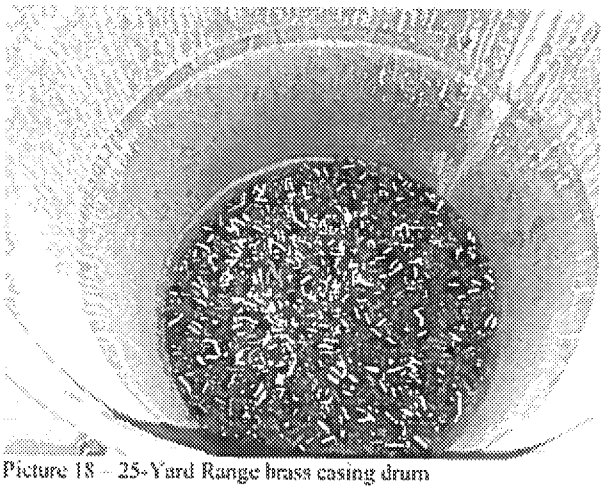
Picture 13 – Turning Chamber oily debris boxes



Picture 16 – Black Oxide Area floor grate



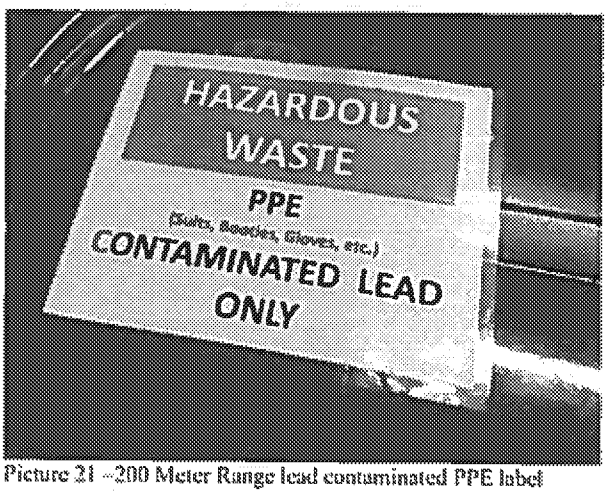
Picture 17 – WWTP filter sludge press



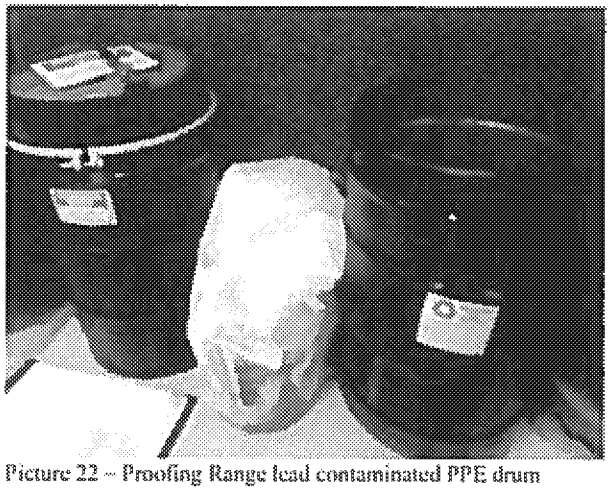
Picture 18 – 25-Yard Range brass casing drum

Picture 19 –25-Yard Range lead contaminated PPE drum

Picture 20 – 200 Meter Range lead contaminated PPE drum



Picture 21 –200 Meter Range lead contaminated PPE label



Picture 22 – Proofing Range lead contaminated PPE drum

Picture 24 – Salt Bath Furnace SAA releasing residue on floor

Picture 23 – 100 Meter Range conveyor box debris drum

Picture 25 – R&D HWSA