



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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DENVER, CO 80202

Phone 800-227-8917

<http://www.epa.gov/region08>

Enclosure 2

The Last Best Armory LLC Fact Sheet

Pretreatment ICIS Number: MT-PF00102

Facility Name and Address: The Last Best Armory LLC (Formerly C. Sharps Arms)
100 Centennial Drive
Big Timber, MT 59011

Authorized Representative Contact: Yancy Terland and Thor Terland
Co-owners
23 Brakke Lane
Big Timber, MT 59011
yperland@gmail.com

Applicable Pretreatment Regulations: Metal Finishing Point Source Category, Categorical Industrial User, Zero-Discharge

Categorical Reference: 40 CFR Part 433 (Pretreatment Standards for New Sources at 40 CFR § 433.17)

Receiving POTW/Collection System: Big Timber POTW
NPDES Permit No. MT-0020796
1605 E 3rd Ave.
Big Timber, MT 59011

POTW Contact: Kris Novotny, Public Works Director
City of Big Timber
1605 E 3rd Ave.
Big Timber, MT 59011
406-932-5646, pwbtmt@itstriangle.com

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Section 1 The Last Best Armory LLC Process Description Operation

1.1 Facility Description

NOTE: During the preparation for the public notice of the C. Sharps Arms notice of discharge requirement (NDR), the EPA was notified on September 17, 2026 of the sale of the facility operations, not including the building from Zach Schoffstall (C. Sharps Arms) to Yancy Terland and Thor Terland. The sale of the facility operations that was completed on September 10, 2026 resulted in the a name change for the NDR from C. Sharps Arms to The Last Best Armory LLC. As a result, the NDR for the public notice is listed under The Last Best Armory LLC, the fact sheet and NDR are changed to reflect the sale of the facility operations.

The Last Best Armory LLC facility (facility) located at 100 Centennial Drive, Big Timber MT began operation in 1983 manufacturing replicas of the 1874 Sharps rifles, as well as other rifles. The facility has nine manufacturing staff and operates four days a week.

The facility was first issued a control mechanism by the EPA through an Administrative Order on Consent on September 26, 2019, with the authorization to discharge to the City of Big Timber, Montana. The facility notified the EPA on October 8, 2024, of a change in wastewater processing to become a zero-discharge facility. The facility's last discharge was September 2024.

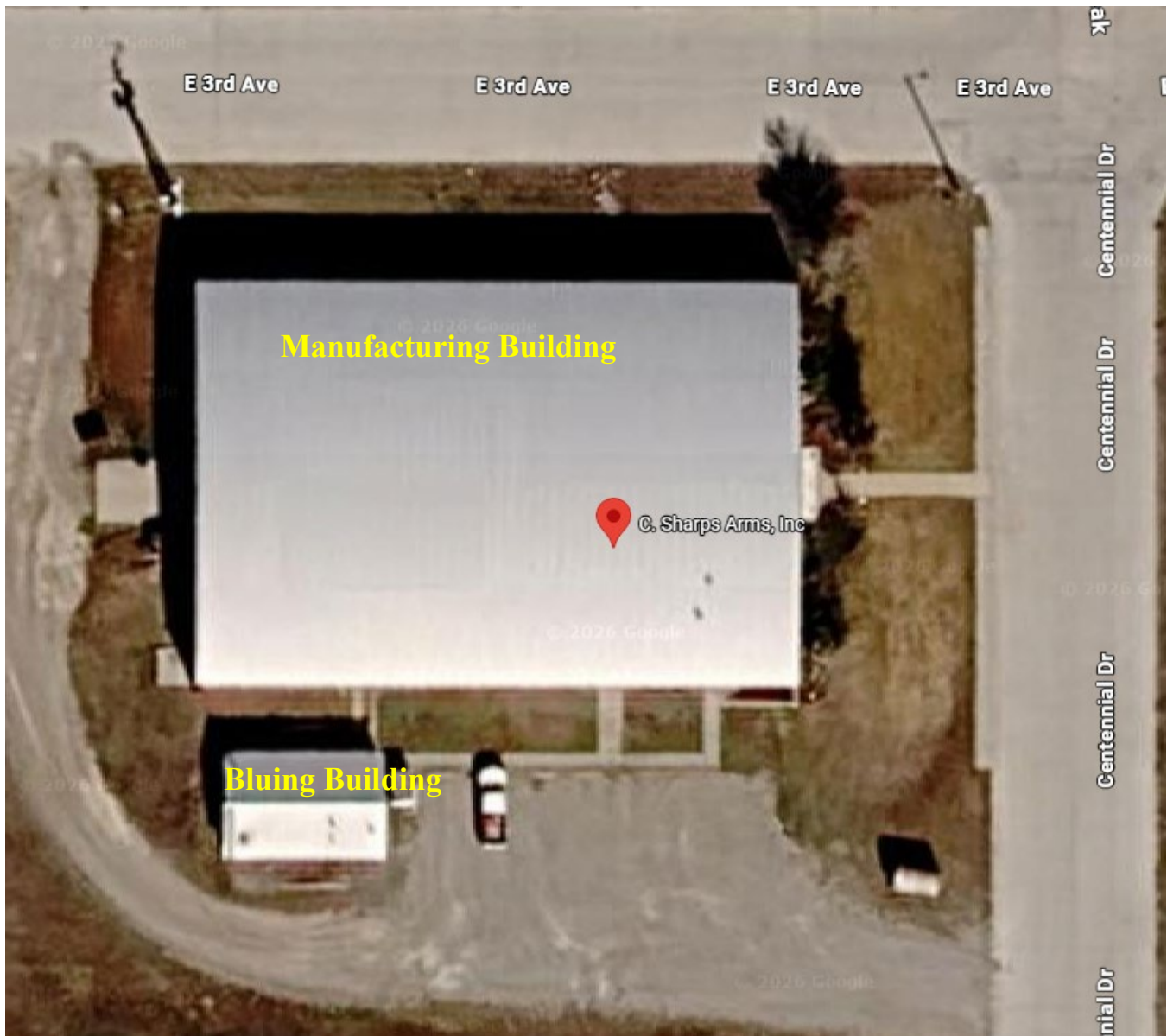


Figure 1 – The Last Best Armory LLC - Google Earth View

1.2 Machining and Bluing Operations

The manufacturing process starts in the manufacturing building, where there were multiple worktables, tools, CNC machines, barrel drilling machines, and other large pieces of equipment used to manufacture the various steel components used in the Sharps rifle.

The facility operates the bluing process approximately once each month. The bluing building is a separate building located southwest of the manufacturing building and a portion of the metal components of the rifles (barrels and screws) are colored through the application of a metal salt coating during the bluing process. For the bluing process (Figures 2 and 3), steel components are placed into an 8-gallon tank with a soap/degreaser solution bath (tank 6) then are rinsed with hot water in an 8-gallon tank (tank 5). Steel components are placed in one of the two 8-gallon bluing tanks (tanks 1 or 2) for varying lengths of time.

The metal components are then placed in an 8-gallon cold rinse tank (tank 3) for cooling. Next, metal components are placed into the final 8-gallon boil-out hot water rinse tank (tank 4). The final step is immersion into an 8-gallon water displacement oil bath (tank 7). During production, tank 3 has a continuous flow of tap water for temperature control, and therefore a continuous overflow into a 160-gallon open holding tank located directly south of tank 3 (Figure 4). During production the facility estimates approximately 80-85 gallons of overflow enter the tank. The tank has a heater to evaporate the water in the tank. The facility recently removed a different holding tank that included a discharge into Big Timber's POTW; with the addition of the open tank and heater for evaporation, the facility no longer discharges. The previous discharge pipe and drain to the POTW have been removed, plugged, and sealed to remove the potential to discharge (Figure 5).

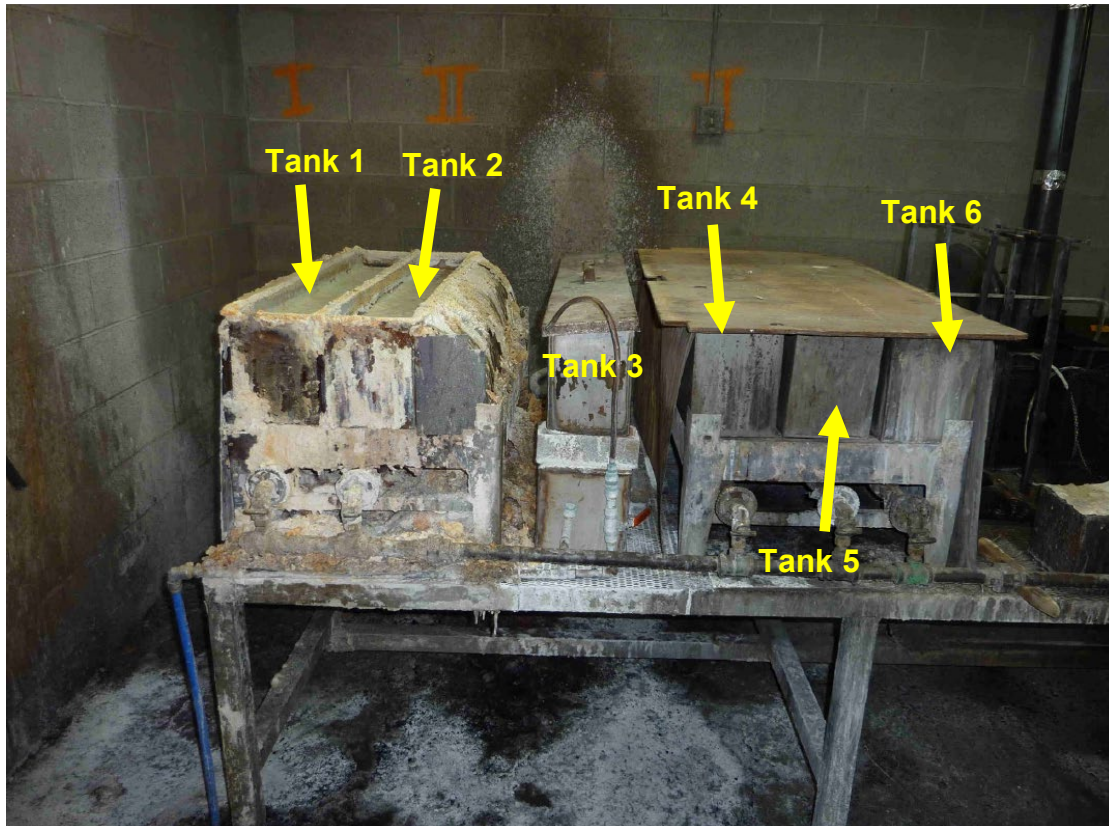


Figure 2 - Bluing Process Tanks



Figure 3 – Bluing Process - Displacing Oil Tank #7 and Oil Collection Bucket



Figure 4 – Evaporative Holding Tank



Figure 5 – Permanently Capped Floor Drain

The metal components that undergo the case hardening process are heat treated in an oven containing sodium cyanide (Figure 6). For the case hardening process, the metal components are first cleaned with acetone and are then heat treated in an oven containing sodium cyanide. Sodium cyanide is heated in an oven until it turns to liquid, metal components are heated enough that they begin to absorb carbon from the sodium cyanide. The additional carbon enters the crystalline structure of the surface of the metal, and hardens when cooled, or quenched. This leaves the surface of the metal component hard, while the interior characteristics of the metal do not change. Depending on the length of time the metal component is exposed to the sodium cyanide, the process will prevent corrosion and provide a decorative finish. Once the oven cools, the sodium cyanide returns to solid form and is reused. Spent sodium cyanide, in ash form, is placed in a drum and is disposed of when the drum is full.

Once metal components are removed from the oven, they are submerged in a 103-gallon quench tank containing water (Figure 7) and then rinsed in a 5-gallon water tank (tank 10); neither tank is emptied, only tap water is added. Components are then placed in the final 8-gallon boil-out tap water tank (tank 8). Tank 8 is the only tank in the case hardening process which is emptied after each use into a 5-gallon bucket. Prior to the case hardening operation beginning, tank 8 is filled with water from the last operation (stored in the 5-gallon bucket) and additional tap water if required. At the end of the process, water from tank 8 is then transferred back into the 5-gallon bucket until the next production use. Once metal parts are processed, they are polished and assembled in the main building to a final product. The entire area encompassing the bluing and case hardening process is sunken approximately 4 inches as secondary containment to contain any minor tank top-over spills and/or drips during process flow.



Figure 6 – Case Hardening Oven



Figure 7 – Case Hardening Process Line

1.3 Wastewater Management

The wastewater generated from the bluing and case hardening unit operations are either evaporated in process, in a 160-gallon heated evaporation tank or collected for reuse. The floor drains to the City are permanently sealed.

Section 2 Applicable Pretreatment Regulations

The facility is subject to the Metal Finishing Point Source Category found in 40 C.F.R. Part 433. These regulations are applicable to discharges from facilities which perform any of the following six metal finishing operations: Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture. If any of those six operations are present, then this part applies to discharges from those operations and also to discharges from any of the following 40 process operations: Cleaning, Machining, Grinding, Polishing, Tumbling, Burnishing, Impact Deformation, Pressure Deformation, Shearing, Heat Treating, Thermal Cutting, Welding, Brazing, Soldering, Flame Spraying, Sand Blasting, Other Abrasive Jet Machining, Electric Discharge Machining, Electrochemical Machining, Electron Beam Machining, Laser Beam Machining, Plasma Arc Machining, Ultrasonic Machining, Sintering, Laminating, Hot Dip Coating, Sputtering, Vapor Plating, Thermal Infusion, Salt Bath Descaling, Solvent Degreasing, Paint Stripping, Painting, Electrostatic Painting, Electropainting, Vacuum Metalizing, Assembly, Calibration, Testing, and Mechanical Plating.

The facility currently conducts coating operations such as cleaning, machining, and assembly defined by the Metal Finishing Regulations; however, the facility does not discharge wastewater from any of the core or ancillary operations. The Notice of Discharge Requirements (NDR) issued to the facility prohibits discharge of wastewater generated from the Metal Finishing core and ancillary operations.

Section 3 Pretreatment Requirements

3.1 Reporting, Monitoring, Notification and Record-Keeping Requirements

The reporting, monitoring, notification, and record keeping requirements are found in 40 C.F.R. Part 403 of the General Pretreatment Regulations and include the following:

- **Baseline Report and 90-Day Compliance Report Monitoring Requirements** (40 C.F.R. § 403.12(b) and (d); 40 C.F.R. § 403.12(g));
- **Periodic Compliance Report Monitoring Requirements** (40 CFR§ 403.12(e); 40 C.F.R. § 403.12(g))
- **Potential Problem and Slug Reporting** (40 C.F.R. § 403.12(f))
- **Effluent Violation Reporting and Resampling** (40 C.F.R. § 403.12(g)(2))
- **Notification of Changed Discharge** (40 C.F.R. § 403.12(j))
- **Hazardous Waste Discharge Notification** (40 C.F.R. § 403.12(p))
- **Upset Effect, Notification, and Reporting** (40 C.F.R. § 403.16)
- **Bypass Requirements Notification** (40 C.F.R. § 403.17)
- **Report Signatory Requirements** (40 C.F.R. § 403.12(l))
- **Retention of Records** (40 C.F.R. § 403.12(o))

These Pretreatment Requirements include monitoring, recordkeeping, reporting, and notification requirements found in 40 C.F.R. Sections 403.12, 403.16, and 403.17 and specialized definitions and monitoring requirements specific to the Metal Finishing Point Source Category found in 40 C.F.R. §433. The applicable effluent limits are listed in the pretreatment standards for new sources at 40 C.F.R. 433.17.

The facility does not discharge wastewater defined by the Metal Finishing Regulations, and as a result, the Baseline report, 90-day compliance report and periodic compliance report monitoring requirements do not apply. The facility is required to submit a zero-discharge report on a 6-month frequency. In addition, the Notification of Changed Discharge required in 40 C.F.R. § 403.12(j) that may affect the facility's zero discharge status is required. The facility is required to maintain adequate records required in 40 C.F.R. § 403.12(o) to document its zero-discharge status and demonstrate compliance with this zero-discharge NDR.

3.2 Zero-Discharge Reporting Requirement

40 C.F.R. § 403.12(e) requires industrial users “subject to a categorical Pretreatment Standard” to monitor and report twice per year “unless required more frequently...by the Control Authority,” which is the EPA in this case. Because the facility maintains a zero-discharge status of its unit operations, there are no monitoring requirements, however, the facility is required to submit a zero-discharge compliance report and certification every 6 months.

Table 1 – The Last Best Armory LLC Reporting Deadline

Compliance Monitoring Period	Due Date
January through June	July 31
July through December	January 31

Zero-Discharge Compliance Report Requirements:

- Permit number.
- Facility name and address.
- If applicable, any significant changes in operations.
- Manifests for all off-site disposal of wastes and operational logs maintained for the evaporation unit.
- The certification statement required in section 3.5 of this NDR and signed by the authorized representative.
- The following zero-discharge certification statement, signed by the Facility's authorized representative:

“I certify that **no discharge** of any industrial wastewater or wastes prohibited by this permit has occurred in this reporting period. I have reported all required information and I understand that there are significant penalties for making false statements, including criminal penalties.”

3.3 Notification of Changed Discharges

The Pretreatment Regulations at 40 C.F.R. 403.12(j) states the following: “All Industrial Users shall promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under paragraph (p) of this section.”

This regulation requires the Facility to promptly notify EPA, as the Control Authority, and the Town of Big Timber in advance of any substantial change in its unit operations that may affect its zero-discharge status, such as changes to the unit operations, wastestream generation, and/or wastewater management.

3.4 Record-keeping Requirements

40 C.F.R. § 403.12(o) establishes record-keeping requirements for any Industrial User subject to reporting requirements resulting from any monitoring (including flow monitoring), including documentation with Best Management Practices.

The facility shall be required to retain for a minimum of three years any records documenting its zero-discharge status, including operational logs for the evaporation unit and manifests for process wastewater hauled off-site and shall make such records available for inspection and copying by EPA and the POTW. This period of retention shall be extended during any unresolved litigation regarding the facility or when requested by EPA.

3.5 Signatory Requirement

Pursuant to 40 C.F.R. §403.12(l), the Zero-Discharge Compliance Reports shall include the following signed certification statement:

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

The certification statement shall be signed as follows:

1. By a responsible corporate officer, if the Industrial User is a corporation. For the purpose of this paragraph, a responsible corporate officer means:
 - a. A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or
 - b. The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term

environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

2. By a general partner or proprietor if the Industrial User is a partnership, or sole proprietorship respectively.
3. By a duly authorized representative of the individual designated in (1) or (2) of this section if:
 - a. The authorization is made in writing by the individual described in paragraph (1) or (2);
 - b. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - c. The written authorization is submitted to the EPA.
4. If an authorization under (3) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of (3) of this section must be submitted to EPA prior to or together with any reports to be signed by an authorized representative.

3.6 Reporting and Notification Contacts

On October 22, 2015, the Environmental Protection Agency (EPA) published in the federal register the NPDES Electronic Reporting rule for all NPDES permit reporting and notification requirements (40 C.F.R. Part 127). The deadline for the electronic reporting of Periodic Compliance Reports for CIUs/SIUs in municipalities without an approved Pretreatment program was December 21, 2020 (40 C.F.R. § 127.16). A final rule to extend this deadline to December 21, 2025 was signed by the EPA On September 23, 2020. Upon this revised deadline of the NPDES Electronic Reporting Rule, the facility was required to:

- a. Establish a NetDMR account to electronically submit DMRs and notifications and must sign and certify all electronic submissions in accordance with the signatory requirements of the control mechanism. NetDMR is accessed from the internet at <https://netdmr.zendesk.com/home>. Additionally, the facility can contact the EPA via our R8NetDMR@epa.gov mailbox for any individual assistance or one-on-one training and support.
- b. A zero-discharge DMR will be submitted via NetDMR to the EPA on a semi-annual basis, per the frequency and deadlines described in section 3.2.

Other written reports and notifications to the EPA shall be submitted at the following address:

NPDES and Wetlands Enforcement Section (8ENF-W-NW)
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202
Attention: Pretreatment

All written reports and verbal notifications must also be submitted to the POTW at the following address:

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Kris Novotny, Public Works Director
City of Big Timber Public Works
1600 East 3rd Street
Big Timber, MT 59011
pwbtmt@itstriangle.com
406-932-5646

Verbal notifications required to be submitted to the EPA shall be made by calling either number below and asking to speak with NPDES Enforcement, Pretreatment.

303-312-6312 or 800-227-8917

Section 4 Public Notice Period and Response to Comments

Pending:

Comments received during Public Notice:

Pending: