



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Lucas County
Kennametal Inc.
Industrial
Storm Water

October 3, 2011

Mr. Larry Tussing, IT Manager
Kennametal Inc.
6325 Industrial Parkway
Whitehouse, Ohio 43571

Dear Mr. Tussing:

On September 21, 2011, I inspected Kennametal Inc., located at 6325 and 6315 Industrial Parkway, Whitehouse (photos taken). The purpose of my visit was to evaluate compliance of the sites with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity, Facility ID Nos. 2GR01548 and 2GR01664, respectively. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures industrial cutting tools. It has a primary SIC code of 3541, Machine Tools, Metal Cutting Types. NPDES permit coverage was granted May 2008 for 6325 Industrial Parkway and in March 2011 for 6315 Industrial Parkway. Industrial activities with potential exposure of pollutants to storm water include: material transfer and outside storage of the garbage dumpsters (had lids); air pollution control equipment (Exhaust from manufacturing machines is collected and condenses. The material removed is collected in drums outside, below the units. The process vents back to building). Propane tanks and empty barrels are stored outside of the building at 6315 Industrial Parkway.
2. While the current version of the permit has expired, your coverage remains in effect until Ohio EPA issues a new general permit. Ohio EPA is currently in the process of renewing the general permit, called the Multi-Sector General Permit (MSGP). The draft permit may be viewed at:
http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater_draft_GP_oct10.aspx
Once the general permit is renewed, Ohio EPA will send an application packet to all permittees instructing them on how to renew coverage. You will have 90 days from receipt of these instructions to renew permit coverage.

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At this time, I recommend reviewing the MSGP. Sections 1 through 8 pertain to all facilities. Subpart AB outlines some of the Best Management Practices (BMPs) required for your industry. Please be aware that the draft Multi-Sector General Permit will require at least quarterly routine documented inspections of all areas of the facility where industrial activities or materials are exposed to storm water and of all storm water control measures used to comply with this permit.

3. I did observe a discharge into the catch basin along Industrial Parkway. It was from a pipe entering the catch basin from the east, the direction of the building at 6325 Industrial Parkway. The discharge appeared clear. Facility sampling is not required under the current permit and has not been performed. However, routine visual monitoring will be required under the MSGP. At this time, the Agency is currently revising the frequency of monitoring in the draft permit. Once the permit is issued final, guidance on MSGP monitoring can be found at: http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf.

A Storm Water Pollution Prevention Plan (SWP3) was available onsite. While a note on the pages indicated it was last revised March 2011, the signature and certification statement did not include a date. The SWP3 did include a Pollution Prevention Team and their responsibilities; a site map; a Spill Prevention and Response Plan; Employee Training; and Sediment and Erosion Controls. The SWP3 lacked descriptions of specific timeframes for Good Housekeeping and Preventative Maintenance. The location of outfalls, loading and unloading areas, waste storage and transfer areas; and spill response equipment must be noted on the site map. *The missing details are a violation of Part IV.D. of the permit.* Please make sure the Spill Response Plan includes contact information for individuals or agencies that must be notified in the event of a spill.

Please remember when revising the SWP3 that any report or document created for the permit must include the certification statement and be signed in accordance with Part VII.G. of the permit. This includes the quarterly inspection reports and annual Comprehensive Site Compliance Evaluation.

The NPDES permit requires that the SWP3 describe and insure implementation of storm water controls. These controls must address several different components of facility operations that are listed in the permit. Storm water control implementation issues were noted for the following facility operations:

Mr. Larry Tussing, IT Manager

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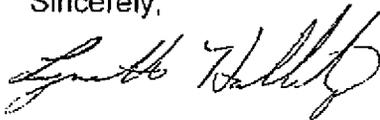
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4. Inspections – The SWP3 shall identify qualified personnel to inspect designated equipment and areas and specify inspection frequency. Tracking or follow-up procedures shall be used. Inspections shall be documented and records shall be maintained. While it was reported that safety inspections are done monthly, the SWP3 did not include the frequency. *Failure to identify inspection schedules is a violation of Part IV.D.3.d. of the permit.* It appears that the inspections double as the annual Comprehensive Site Compliance Evaluation. *Please be sure to review Parts IV.D.3.d. and IV.D.4. to ensure that all required areas are reviewed during inspections and that observations are recorded.* The reports need to include observations of the outfall structure, when the last measurable precipitation event occurred, and the size of the event.

5. Non-Storm Water Discharge Certification –The permit requires the SWP3 to contain a certification that the discharge has been tested or evaluated for the presence for non-storm water discharges. The SWP3 must include a description of the results of any test or evaluation, the evaluation criteria or testing method used, the date of the assessment and the onsite drainage points that were observed. *The lack of information is a violation of Part IV.D.3. g. of the permit.*

Within 30 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to address the compliance issues. Your response should include the dates, either actual or proposed, for the completion of the actions. It must also include a written certification that the requested changes to the SWP3 have been made. If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Section

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pc: DSW:NWDO:File