



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

Re: Kennametal, Inc.  
OHD047308069  
Lucas County  
Hazardous Waste  
**Return to Compliance**

March 18, 2013

Mr. Bradford Morgan, Plant Manager  
Kennametal, Inc.  
6325 Industrial Parkway  
Whitehouse, Ohio 43571

Dear Mr. Morgan:

Thank you for your March 12, 2013, response to Ohio EPA's February 20, 2013, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. Kennametal, Inc. (Kennametal) submitted waste evaluation documentation. My review of the documentation submitted reveals that Kennametal has adequately demonstrated abatement of all of the violations cited in the February 20, 2013, NOV/PRTC.

The following is a summary of the violations cited in the February 20, 2013, NOV/PRTC as a result of Ohio EPA's February 5, 2013, inspection and your compliance with respect to each:

**1. Waste Evaluation: OAC Rule 3745-52-11:**

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a) At the time of the inspection, Kennametal did not have waste evaluation documentation for the spent grinder sludge. Coolants/cutting fluids used with the grinders, along with the spent ultrasonic cleaning water, are placed in an evaporator. Sludge accumulates in the bottom of the evaporator and the facility cleans it out and stores it in 55-gallon drums. Kennametal has historically shipped the spent grinder sludge off-site as a non-hazardous waste.

**On March 12, 2013, Kennametal submitted a copy of the analytical results, along with a copy of the chain of custody, for the spent grinder sludge. The submitted analytical results indicate that the spent grinder sludge is a non-hazardous waste. Kennametal can continue to ship this waste stream to AES Environmental in Calvert City, Kentucky as a non-hazardous waste.**

***With this information, this portion of the violation has been abated.***

- b) At the time of the inspection, Kennametal did not have waste evaluation documentation for the spent filter wash water. The re-usable filters located on the brass wire EDM machines are cleaned in a water/acid solution and the resulting spent filter wash water has historically been managed as a non-hazardous waste.

**On March 12, 2013, Kennametal submitted a copy of the analytical results, along with a copy of the chain of custody, for the spent filter wash water. The submitted analytical results indicate that the spent filter wash water is hazardous due to a pH of 1.18. A waste exhibits the characteristic of corrosivity (D002) if it is aqueous and has a pH less than or equal to two or greater than or equal to 12.5. Kennametal can continue to ship this waste stream to AES Environmental in Calvert City, Kentucky, since they are a permitted treatment, storage, and disposal facility. Kennametal must manage and ship the spent filter wash water as a characteristic hazardous waste.**

***With this information, this portion of the violation has been abated.***

- c) At the time of the inspection, Kennametal did not have waste evaluation documentation for the spent filters and filter paper that are not re-usable and managed as a solid waste.

**On March 12, 2013, Kennametal submitted a copy of the analytical results, along with a copy of the chain of custody, for the spent filters/filter paper. The submitted analytical results indicate that the spent filters/filter paper is a non-hazardous waste. Kennametal can continue to manage this waste stream as a solid waste.**

***With this information, this portion of the violation has been abated.***

***These violations have been completely abated.***

**2. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Kennametal did not store the spent fluorescent lamps in containers that were closed. Specifically, Kennametal had three containers of spent fluorescent lamps in the mezzanine area that were open.

***This violation was previously abated on February 5, 2013.***

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**3. OAC Rule 3745-273-15(C): Accumulation Time for Universal Waste Batteries and Lamps:**

A small quantity handler of universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Kennametal was unable to demonstrate the length of time one box of spent fluorescent lamps have been on-site. Kennametal was able to demonstrate when the universal waste lamps were last shipped off-site, but was not tracking the date when the accumulation began.

***This violation was previously abated on February 5, 2013.***

**4. OAC Rule 3745-273-16: Universal Waste Employee Training:**

A small quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

Kennametal has not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures.

***This violation was previously abated on February 11, 2013.***

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers  
Division of Materials and Waste Management

/cg

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO  
ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO

**Notice:**

Ohio's EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.