



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act
Kennametal, Inc.

From: John (Jack) Melcher, Environmental Engineer

JOHN MELCHER Digitally signed by JOHN MELCHER
Date: 2022.12.15 11:05:30 -05'00'

To: File

I. Facility Information

A. Facility Name: Kennametal, Inc.

B. Facility Location: 34 Sanderson Street
Greenfield, MA 01301

C. Facility Contacts: Joe Sulda, Plant Manager

Wade Ryan, Local EHS Manager
413-325-7402, wade.ryan@kennametal.com

Meagan Huff, Corporate EHS Manager
440-219-9078, Meagan.Huff@Kennametal.com

D. NPDES ID No(s): ICIS ID: 3601486899

II. Type and Purpose of Desk Audit

EPA conducted a Desk Audit to evaluate applicability of the Metal Finishing Point Source Category at 40 C.F.R. Part 433.

III. Facility Description

The Facility was identified by the City of Greenfield as discharging to the Publicly Owned Treatment Works and potentially subject to the Metal Finishing Point Source Category. The Facility has a neutralization system and sends monthly discharge reports to the City.

IV. Desk Audit

On November 30, 2022, at approximately 10:00, Damian Bednarz and I participated in a conference call with Mr. Sulda, Mr. Ryan, and Ms. Huff.

The Facility representatives described operations performed at the Facility. The Facility fabricates cylindrical parts out of steel, including taps used to make threaded holes. Cutting, grinding, cleaning, and marking is performed on parts. The Facility discharges wastewater to the sewer from machine tools, washing (using Simple Green), and floor mopping.

A “pickling tank” is used to provide a uniform finish to some parts, generating occasional wastewaters to the sewer. A detergent (“Oakite LRS,” manufactured by BASF / Chemetall) and an electric current is used in the process. Facility representatives provided the Safety Data Sheet for Oakite LRS, provided in Appendix A of this report.

Oakite LRS contains the following:

- Tetrasodium ethylenediaminetetraacetate (Content (W/W): $\geq 5\%$ - $< 7\%$);
- 2,2'-Iminodiethanol (Content (W/W): $\geq 0,2\%$ - $< 0,3\%$); and
- Sodium hydroxide (Content (W/W): $\geq 20\%$ - $< 25\%$).

I told the Facility representatives that it did not appear that the Facility was subject to the Metal Finishing Point Source Category.

The call ended at approximately 10:45.