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1/29/09



State of Ohio Environmental Protection Agency

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STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

Certified Mail #91 7108 2133 3932 4450 1017

January 27, 2009

Lou Burcsak, Environmental Engineer
Rolls-Royce Energy Systems
105 North Sandusky Street
Mount Vernon, OH 43050

**Re: Rolls Royce Energy Systems
NPDES permit: 4IN00101**

Dear Mr. Burcsak:

Attached is the Reconnaissance Inspection Report conducted by Ohio EPA at the Mount Vernon facility at 105 North Sandusky Street and operating under NPDES permit 4IN00101.

As discussed during the inspection, two new outfalls will be added in the shortly upcoming permit renewal since new buildings are being constructed to enable testing of bigger compressor/turbine units.

The one item that needs to be addressed and responded to in writing is the fact that maximum flows are reported every month when testing and sampling are done during a turbine or compressor test. It would be more precise if either water meter readings could be used, or if the formula for water flow rates for hydraulic dynamometers was used with precise measurements. If this can not be done, then using your current method is acceptable provided conditions have not changed.

Should you have any questions, please call me at 614-728-3846.

Sincerely,

Larry Korecko
Environmental Specialist
Compliance and Enforcement
Division of Surface water
Central District Office

LK/nsm RolsRoyce 12-2008 RI inspect cover letter

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. 4IN00101	NPDES No. OH0005738	Date 12/11/2008	Inspection Type R	Inspector S	Facility Type 2
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B. FACILITY DATA

Name and Location of Facility Inspected Rolls- Royce Energy Systems 105 North Sandusky Street Mount Vernon, OH 43050	Entry Time	Permit Effective Date 06/01/2003
	Exit Time	Permit Expiration Date 05/31/2008

Name(s) and Title(s) of On-Site Representative(s) Lou Burcsak, Environmental Engineer	Phone Number(s) 740-393-8603
Name, Address and Title of Responsible Official Lou Burcsak, Environmental Engineer	Phone Number 740-393-8603

C. AREAS EVALUATED DURING INSPECTION

<u>S*</u> Permit	<u>S*</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>N/A</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N/A</u> Sludge Storage/Disposal	<u> </u> Other
<u>N</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

--- For flow measurement, the day the sample is taken for oil-grease and pH is the day that flow should be measured. So the engineers running the test should take actual water meter readings if possible. If the engineers are able to collect all the data needed for the formula using absorbed horsepower percentage, inlet / outlet temperatures, and time run, then use this flow. As a back-up the flow calculations you provided in your March 21, 2006 letter would suffice as long as those conditions still exist.

Larry Korecko
Larry Korecko, Inspector, Ohio EPA, Central District Office

1-26-09
Date

Erin Sherer
Erin Sherer, Reviewer, Ohio EPA, Central District Office

1-26-09
Date

ATTACHMENT

General

The Rolls-Royce Energy Systems facility in Mount Vernon, Ohio assembles turbines for compressors and electrical generation for the oil and gas industry.

The only discharge is non-contact cooling water associated with testing turbines and compressors. The oil-grease monitoring is to ensure there are no leaks of oils from the turbines/compressors.

The facility is in the midst of constructing two new buildings which will allow it to test larger compressor/turbine engines. However, the company does not expect any increase in the amount of cooling water discharged as it will just use its existing cooling tower more often.

Review of monthly self-monitoring discharge reports in SWIMS for the period January 2006 through November 2008 revealed that there were no NPDES permit violations for those parameters that had permit limitations.

The NPDES renewal for this facility will include two new outfalls which will have the same parameters as other outfalls.

The draft renewal was sent out with a public notice date of January 20, 2009.

The facility SPCC plan was last updated January 2008.

Spot checking of monthly self-monitoring discharge reports with the commercial laboratory data sheet showed the data was correctly transposed.

The flow for the day that oil-grease and pH samples are taken should be reported. If the water meter readings can be taken that day then report that. If the test engineers can record all the information needed for the water flow rate for hydraulic dynamometers, then use that. Otherwise use the formula you provided back in your letter of March 21, 2006 provided that the same conditions exist.