



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

October 12, 2012

Glenn Richardson, Vice President
Rolls-Royce Energy Systems Inc.
105 North Sandusky Street
Mount Vernon, OH 43050

**Re: Rolls-Royce Energy Systems Inc.
NPDES Permit 4IN00101/ OH0005738
Reconnaissance Inspection
Knox County
Notice of Violation**

Dear Mr. Richardson:

This correspondence serves as **Notice of Violation** for Non-Compliance with the terms and conditions of the NPDES permit issued to Rolls Royce Energy Systems facility in Mount Vernon, Ohio.

On September 27, 2012, a Reconnaissance Inspection was conducted at the Rolls-Royce Energy Systems facility. Present for the inspection were Rob Flowers, representing Rolls Royce Energy Systems and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the reasons for non-submittal of effluent monitoring report data.

The Reconnaissance Inspection raised several concerns which must be addressed in the following areas:

eDMR Data – Electronic Discharge Monitoring Reports (eDMR) containing effluent monitoring data for the months of May, June and July 2012 were not submitted until September 5, 2012. At the time of the inspection, eDMR reports for April and August had still not been submitted. Please be advised that eDMR data must be submitted every month on or before the 20th day of the month following the month of interest. **Failure to submit all monitoring data in a timely manner at any point in the future, and for all months dating back to April 2012 shall result in the initiation of formal enforcement action.**

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Rolls-Royce Energy Systems Inc.
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Non-compliance Notification - Please be advised that Part III-12 of your effective NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. Please provide an explanation for the violations noted in this report and a description of the corrective actions taken or proposed to resolve future violations. Please also provide the required explanations for all future permit violations from this point forward.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink that reads "Michael Sapp". The signature is written in a cursive style with a large, sweeping "M" and "S".

Michael Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Mike Sapp

MS/nsm Rolls Royce 12

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00101	OH0005738	RI	S	Industrial
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
9/27/2012	9:30 AM	11:15 AM	Yes	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Rolls-Royce Energy Systems Inc. 105 North Sandusky Street Mount Vernon, Ohio 43050	4/1/2009
	Permit Expiration Date
	3/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Rob Flowers HS&E Specialist	(740) 393-8597
Name and Title of Responsible Official	Phone Number
Glenn Richardson, Vice President	

SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

U	NPDES Compliance	Non-submittal of required eDMR data.
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
M	Receiving Waters	Oils and grease violations in May 2012
S	Laboratory	

Comments:

Signatures

 10/9/12	 10/10/12
Mike Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

ADDITIONAL INFORMATION
Rolls-Royce Energy Systems, Inc.
4IN00101 - OH0005738

The Rolls-Royce Energy Systems facility in Mount Vernon, Ohio manufactures compressors and turbines for utilization in the fields of power production and oil and gas distribution. The Mount Vernon facility utilizes non-contact cooling water when the turbines and compressors are tested. The facility is equipped with a cooling tower and water from the tower is utilized whenever possible. Occasionally, once through city water must be utilized for cooling purposes when demands on the cooling system are high or the temperature of the cooling tower is not low enough to sufficiently cool the lubricating oil. Water for both the closed loop system and the once through cooling water is supplied by the City of Mount Vernon.

Cooling water is discharged through five outfalls which are authorized in the effective NPDES permit. All five outfalls enter the City of Mount Vernon storm sewer system before being discharged to the Kokosing River. Outfall 007 has not been used for several years and it is unlikely that it will be used in the future due to the age and condition of the test bays tributary to that outfall.

Outfall 008 contains blowdowns from the cooling tower system and once through non-contact cooling water from a nearby test bay. Blowdown events occur, on average, three times per year and are done to preclude the growth of Legionella bacteria in the cooling tower and to maintain acceptable levels of pH and hardness. Hydrogen peroxide and temperature are now utilized to control growth of nuisance algae and Legionella bacteria. Blowdown events average 10,000-12,000 gallons/day and the flows are measured by meter readings taken before and after each event.

At the time of the inspection, the following general observations were made regarding the operational practices at the facility:

1. Coshocton Environmental performs contract laboratory analysis for oil and grease. Rolls-Royce monitors for pH and maximum temperature. The pH meter is calibrated prior to use with 4, 7 and 10 buffer solutions.
2. Non-contact cooling water flows are estimated based on the flow volume generated by the individual test equipment and the average length of time testing is performed at each outfall.
3. The oil coolers are equipped with pressure and temperature sensors which will alert the test operators to the possibility of a leak in the oil coolers.
4. At several outfalls, grab samples for oil and grease were still being collected using a plastic container attached to a pole to facilitate sample collection in manholes and catch basins. Please be advised that grab samples for oil and grease must be collected directly into the glass sample containers provided by

provided by your contract laboratory. Rob Flowers indicated the he would explore the possibility of installing sample ports off of the oil chillers to address the sample collection constraints posed by sampling in locations below grade.

5. Temperature monitoring was mistakenly omitted from four of the five outfalls in the current permit. I would anticipate that temperature monitoring will be required at all of the outfalls when the permit is renewed in 2014.
6. NPDES permit violations, since the previous inspection was conducted in July 2011, are illustrated in the attached table. Please be advised that Part III-12 of your effective NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. Please provide an explanation for the violations noted in this report and a description of the corrective actions taken or proposed to resolve future violations. Please also provide the required explanations for all future permit violations from this point forward.
7. Please be advised that effluent monitoring data, using eDMR, is required to be submitted by the 20th day of every month following the month of interest. eDMR data for May, June and July 2012 was not submitted until September 5, 2012 and no data has been submitted for April and August 2012. **Failure to submit monitoring data, in a timely manner, at any point in the future, and for all months dating back to April 2012 shall result in the initiation of formal enforcement action.**

Rob Flowers explained that the eDMR data was not submitted because the oil and grease results were often unavailable before the 20th of the following month when the data was due. Mr. Flowers has proposed to collect oil and grease samples earlier in the month to better account for the laboratory delays. In the future, if the oil and grease results are not available from your contract laboratory, I would encourage you to submit the data you do have and resubmit the oil and grease data as soon as it is available.

In general, I am willing to work with you to voluntarily resolve issues of non-compliance; however, non-submittal of eDMR data is completely unacceptable. Timely submittal of monitoring data is critical information that our Agency needs to ensure that discharges from your facility are protective of human health and the environment.

**Compliance Data for Rolls-Royce Energy Systems Inc * between
7/1/2011 to 9/1/2012**

Summary

Permit Effluent Limit Violations: 2
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: * 0
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit	Actual	Exceedance	Date
May 2012	00	Oil and Grease, Hexane	30D Conc	7	19.	5/1/2012
May 2012	008	Oil and Grease, Hexane	1D Conc	10	19.	5/31/2012

*The facility has 10 missing data reports.

Station	Required Report Period	DMR Received
003	April 2012	No
007	April 2012	No
008	April 2012	No
009	April 2012	No
010	April 2012	No
003	August 2012	No
007	August 2012	No
008	August 2012	No
009	August 2012	No
010	August 2012	No