



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502-5794

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-arranged

**FACILITY NAME:** Ring Power Corporation

**DEP/EPA ID #:** FLR000136598

**STREET ADDRESS:** 32000 Blue Star Highway, Midway, Florida 32343

**COUNTY:** Gadsden

**PHONE:** (850)562-2121

**DATE:** 04/18/2007 **TIME:** 9:30 A.M.

### HW facility status

- ☐ non-handler
- ☒ CESQG
- ☐ SQG
- ☐ LQG
  
- ☐ transporter
- ☐ transfer facility
  
- ☐ TSD
  
- ☐ SQH
- ☐ LQH

### used oil facility status

- ☒ generator
- ☒ transporter
- ☐ transfer facility
- ☐ marketer
- ☐ processor
- ☐ on-spec. burner
- ☐ off-spec. burner
  
- ☒ filter generator
- ☐ filter transporter
- ☐ filter transfer facility
- ☐ filter processor

### Hg facility status

- ☐ exempt
- ☐ generator
  
- ☐ transporter
  
- ☐ Hg recovery facility
- ☐ Hg reclamation facility

### PCW facility status

- ☐ producer
- ☐ transporter
- ☐ recovery facility

## 2. APPLICABLE REGULATIONS:

- |  |  |   |   |
|--|--|---|---|
| <input checked="" type="checkbox"/> 40 CFR 261 | <input type="checkbox"/> 40 CFR 262            | <input type="checkbox"/> 40 CFR 263             | <input type="checkbox"/> 40 CFR 264             |
| <input type="checkbox"/> 40 CFR 265            | <input type="checkbox"/> 40 CFR 266            | <input type="checkbox"/> 40 CFR 268             | <input type="checkbox"/> 40 CFR 270             |
| <input type="checkbox"/> 40 CFR 273            | <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

3. **RESPONSIBLE OFFICIAL:** Ted Gerald, Regional Manager

4. **INSPECTION PARTICIPANTS:** Rudy Carlson, Facility Maintenance Supervisor & John Johnson and Nicole McDonald (FDEP)

5. **LATITUDE/LONGITUDE:** Lat 30° 29' 42"/Long 084° 26' 18"

6. **TYPE OF OWNERSHIP:** private

7. **PERMIT No.:** N/A **DATE ISSUED:** **EXP. DATE:**

8. Site History and Description:

Ring Power Corporation (RP) is located at 32000 Blue Star Highway in Midway Florida. RP moved operations from the 4760 Capitol Circle NW location to this new facility in January of 2007. The new facility covers approximately 140,000 square feet. RP last notified as a Small Quantity Generator for this location in January 2007. RP corporate office is located in Tampa, Florida and the regional Environmental Manager is Dave Brimblecombe. RP services heavy equipment, tractor trailers and RV's. RP currently has 80 employees at this facility.

9. Site Inspections:

On April 18, 2007, Department staff Nicole McDonald and John Johnson conducted a routine compliance inspection to ensure RP's compliance with State and Federal hazardous waste, and Used Oil Program. Mr. Carlson answered questions and facilitated the inspection.

We first reviewed the waste disposal records with Mr. Carlson. At the time of this inspection, no hazardous waste has been generated at this facility. Mr. Carlson stated that RP does not plan on installing a paint booth and the waste streams identified on the notification form will not be generated at this facility. Used oil is picked up by Siemens. All parts washers are serviced by Safety Kleen every 8-16 weeks. The facility is divided up into four areas: Truck Shop, Heavy Equipment, Wash Rack, and Utility Building.

The Truck Shop services large trucks, tractor trailers and RV's. This area uses portable used oil collection pans labeled "waste oil". Used oil is drained into the pans and then taken to one of two pump stations to be pumped directly into the used oil tank located outside the facility. Unlabeled buckets are stored under the nozzles to prevent spillage of oil. Used Oil filters are drained over the portable pans or taken to a pan underneath one of the pump stations and allowed to drain for several days then placed into a labeled 55-gallon drum. The used oil in this drain pan is only pumped out when needed and does not have secondary containment. We recommended that RP drain filters over the portable containers that are pumped out daily. Two labeled 55-gallon drums of oil filters are located inside this shop area. RP utilizes the green parts washers from Safety Kleen that are part of the Continued Use Program which use Premium Gold Solvent. There are a total of 8 parts washers in the truck shop. RP uses non chlorinated brake/carb cleaner. This product is sprayed on and wiped off with rags. The rags are sent to Cintas for cleaning. The floors are cleaned daily with a floor cleaner and the dirty water is taken to the wash rack. One ¼ full aerosol can of "Fabulous Blaster" was found in the trash. We inquired about disposal of aerosol cans and Mr. Carlson explained that they should only be thrown away if empty. We discussed a couple different disposal methods for aerosol cans.



Portable used oil collection



Pump station for used oil



Used oil filter storage

Used oil and used antifreeze are stored in one of two 15,000 gallon double walled labeled tanks. Hoses and pump stations are located within secondary containment.



Used Oil Storage Tanks



Pump Station

Used fluorescent lamps are stored in a separate room above the truck shop. Lamps were stored in boxes or wrapped in paper, none were labeled. We discussed the appropriate storage, labeling and recycling requirements for this waste stream.



Waste fluorescent lamp storage



The Heavy Equipment Shop services large equipment and contains the Cat Rental Store repair shop and hydraulic shop as well. This area has 19 bays. Used oil is collected in the same manner as the Truck shop. Most used oil containers were labeled "waste oil" some newer collection containers were not labeled. The hydraulic shop contains a sealed grated, sunken concrete floor approximately 20 x 30 where hydraulic components are pulled apart and the used oil is allowed to drain into the floor. A sump

pump is located to one side but the floor does not flow to the sump. When enough oil has collected on the floor, it is then pumped out with a portable pump every couple of weeks or as needed. One parts washer was located in this area that is not part of the CUP program. This parts washer contains a recycler unit, and Mr. Carlson was not sure what happens to the sludge or if they have yet to remove any. In a phone conversation with Mr. Brimblecombe, he stated that this System 1 unit contains a distillation unit for solvent. Make-up solvent is added to the system when needed and there should be a weekly draw off of 1 pint of oily residue. This oily residue is a hazardous waste and should be collected as such. This waste stream contains silver, naphthalene and 1,2,4 Trimethylbenzene. In a follow up phone conversation, Mr. Carlson confirmed that this facility has not drained off any residue from this parts washer. He stated the machine has an automatic shut-off that shows when it is ready to be drained. Mr. Brimblecombe has ordered a drum for storage of this hazardous waste.



Hydraulic shop used oil collections system



Parts washer with distillation unit

The Wash Rack is located in a separate building at the facility. This area is used to wash off all vehicles and equipment before entering the repair facility and after repair. Wash water goes into a large settling tank and then the water is run through a filter system. The sludge from the settling tank is scooped out when needed and stored in a bin located next to the settling tank. This sludge is collected by Ray City Remediation and burned. In a phone conversation with Mr. Brimblecombe he stated samples are taken when requested by Ray City; to date he is not aware of any hazardous constituents within this dirt.



Wash rack



Sludge



The Utility Building contains truck rebuild, fabrication and welding shop. This area collects used oil in the same manner as the rest of the facility. One unlabeled used oil collection drum was located inside the shop. This area has its own used oil and used antifreeze collection tanks. A 500 gallon, double walled, labeled used oil and used antifreeze tank is located behind the facility. Used batteries are stored under cover in an unlabeled box.



Unlabeled used oil drum



Used oil storage

#### 10. Summary of Alleged Violations:

##### **A. 62-710.401(6) & 40 CFR 279.22(c)(1) Secondary Containment for Used Oil & Used Oil Container Management.**

No person may store used oil in tanks or containers unless they are clearly labeled, in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container.


##### **B. 40 CFR 273.13(d)(1) & 40 CFR 273.14(e) Universal Waste Container 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 contents of lamps. Containers must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage. Each lamp or container must be labeled with one of the following: "Universal Waste Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)".

#### 11. Recommendations:

- a) RP needs to label all used oil containers with the words "Used Oil".
- b) RP needs to ensure that the hydraulic shop used oil collection system has secondary containment or is emptied daily.
- c) RP needs to ensure that waste fluorescent lamps are stored and labeled properly.

- d) RP needs to ensure waste aerosol cans are empty before placing into trash or managed appropriately per State and Federal regulations.
- e) RP needs to ensure that the System 1 parts washer/distillation units' oily waste is being managed as a hazardous waste.

Report prepared by:    
Nicole McDonald & John Johnson

Date: May 22, 2007