

**Perry, Jenna D.**

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**From:** Dave.Strickland@RingPower.com  
**Sent:** Thursday, December 23, 2010 12:06 PM  
**To:** Perry, Jenna D.  
**Subject:** RE: Used Oil Registration  
**Attachments:** pic17713.gif; Aerosol Can Management.pdf; 000\_0331.jpg; 000\_0330.jpg; IMG00453-20101222-0842.jpg; IMG00456-20101222-0902.jpg; IMG00461-20101222-0908.jpg

Jenna Perry  
Environmental Specialist III - Hazardous Waste  
Florida Department of Environmental Protection  
Ref :FDEP environmental inspection visit at  
Ring Power Gainesville Fl  
December 16 2010

As introduction I am the Environmental Manager for Ring Power and I am located in St Augustine.

I meet with Robert and the other managers at the Gainesville store on Wednesday to observe the progress of the corrective action required as a result of the inspection.

A lot of the cut off drain containers have been cleaned and discarded. The ones left that were not properly labeled have been and as soon as all are completed pictures will be provided.

The general house keeping around the track press, the truck work areas and in the drum storage area has been completed.

Signs have been installed at the battery storage and battery charging stations and all used batteries have been placed in the storage area. More permanet signs are on order for some of the locations.

The area around the used oil pump has been cleaned up and the pump checked for leaks.

All drums stored at the wash rack with residual residue have been emptied and lids with rings have been installed.

With reference to the secondary containment for the drum storage area at the wash rack please consider that the concrete slab where these drums are stored is a part of the equipment wash area. It is designed to capture all liquid and by gravity allow it flows into the wash pit. The wash pit water is contained and is processed through a water cleaning system for reuse. This is a closed loop system recycling the wash water. No liquid on the wash pad should ever escape to the surrounding soil.

With respect to the replacement of the blast media in the bead blaster we have never replaced this material in this unit as it does not get much use. Standard procedure if the need arises for replacement of the blast media is to test the material prior to removal and from the resulted determine how to dispose of it properly.

Concerning empty aerosol can management, we made a decision not to throw un-punctured cans in the metal recycle bin but to puncture each can to insure only empties are disposed of. Because of low usage in some branches it seemed safer to send the empties to a branch with a puncture device than to have the a partially full residue drum, which would never be filled ,sitting around for a long time in the shop. I will be interested in your response as according to the doc ref below we could put empties in the trash with out puncturing.

(See attached file: Aerosol Can Management.pdf)

(See attached file: 000\_0331.jpg)(See attached file: 000\_0330.jpg)

(See attached file: IMG00461-20101222-0908.jpg)(See attached file: IMG00456-20101222-0902.jpg)

(See attached file: IMG00453-20101222-0842.jpg)

▼ "Perry, Jenna D." <[Jenna.D.Perry@dep.state.fl.us](mailto:Jenna.D.Perry@dep.state.fl.us)>

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"Perry, Jenna D."  
<[Jenna.D.Perry@dep.state.fl.us](mailto:Jenna.D.Perry@dep.state.fl.us)>

12/20/2010 03:29 PM

To "Robert.Jones@RingPower.com"  
<[Robert.Jones@RingPower.com](mailto:Robert.Jones@RingPower.com)>

cc "Dave.Strickland@RingPower.com"  
<[Dave.Strickland@RingPower.com](mailto:Dave.Strickland@RingPower.com)>,  
"Darryl.Brinkley@RingPower.com"  
<[Darryl.Brinkley@RingPower.com](mailto:Darryl.Brinkley@RingPower.com)>

SubjectRE: Used Oil Registration

Great. Thank you. Please be sure to post the registration somewhere within the facility. As promised, here is the list of items to be corrected at your shop (in addition to the registration):

1. A few used oil containers were either not labeled, or improperly labeled. Please label them "Used Oil."
2. The used oil drums in the wash rack need secondary containment.

I haven't had a chance yet to discuss the transportation of the waste aerosols with my supervisor, I'll let you know what we decide. Also, be sure to watch/cleanup the spills in the shop and secondary containment.

Please let me know, in writing, how and when these items were corrected. Any photos you can take to document the corrections would be appreciated. If you have any questions, please let me know.

Thanks!

Jenna Perry

Environmental Specialist III - Hazardous Waste

Florida Department of Environmental Protection

office: 904-256-1674| fax: 904-448-4362

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

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**From:** [Robert.Jones@RingPower.com](mailto:Robert.Jones@RingPower.com) [mailto:[Robert.Jones@RingPower.com](mailto:Robert.Jones@RingPower.com)]

**Sent:** Friday, December 17, 2010 8:26 AM

**To:** Perry, Jenna D.

**Cc:** [Dave.Strickland@RingPower.com](mailto:Dave.Strickland@RingPower.com); [Darryl.Brinkley@RingPower.com](mailto:Darryl.Brinkley@RingPower.com)

**Subject:** Used Oil Registration

Hello Jenna,

After yesterdays inspection we found the new registration

I have enclosed it for your review

Thank You!

Robert Jones

Truck Service Operation Manager

352-872-6909

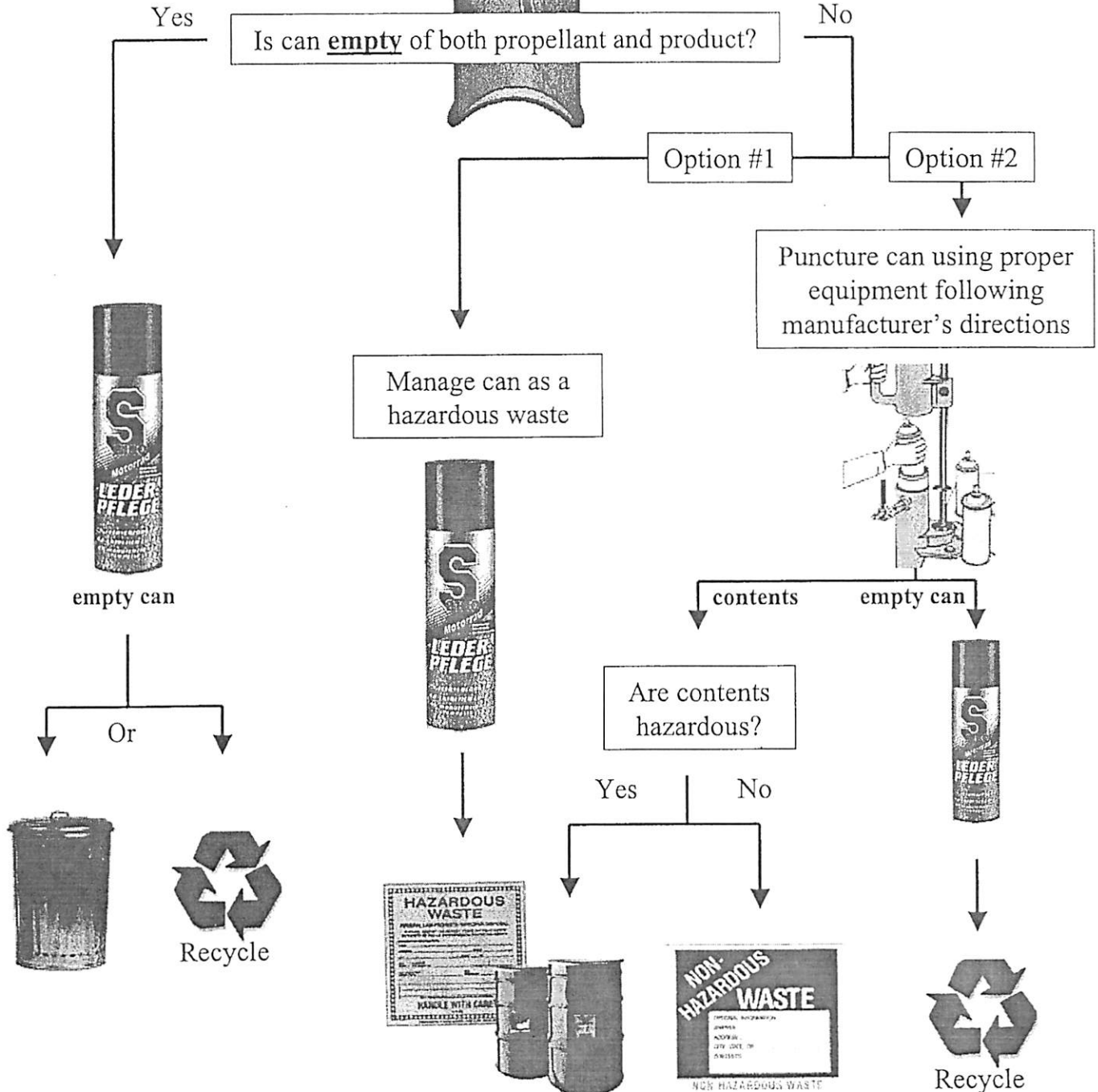
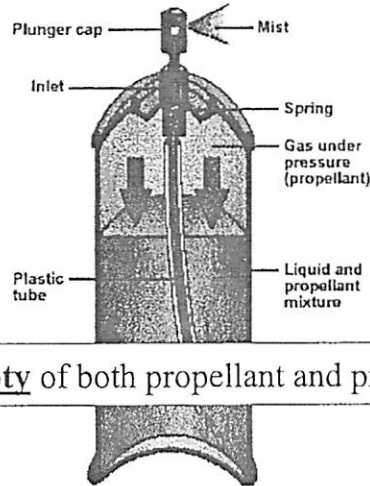
[robert.jones@ringpower.com](mailto:robert.jones@ringpower.com) (See attached file: *Used Oil Registration 6 30 11.pdf*)



# Aerosol Can Management:

Aerosol cans can be hazardous due to:

- 1) Propellant's reactivity
- 2) Hazardous contents



This information is offered as guidance on regulatory compliance. Specific requirements may vary with individual processes and/or businesses. For further reference see 40 CFR Parts 260 to 268 and Chapter 62-730 FAC.







