



Florida Department of Environmental Protection

Northeast District
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Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

February 4, 2011

SENT VIA EMAIL

Dave.Strickland@RingPower.com

Mr. Dave Strickland, Environmental Manager
Ring Power Corp
500 World Commerce Pkwy
St Augustine, Florida 32092

Re: Ring Power Corp
4900 N Main St, Gainesville, Florida 32609
EPA/DEP ID: FLD 982 150 237
Alachua County - Hazardous Waste

Dear Mr. Strickland:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection at your facility on December 16, 2010. Enclosed is the report that documents this inspection.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning used oil management. Subsequent to the inspection, your facility submitted information stating that the violations have been corrected. Since your facility has returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.256.1674.

Sincerely,

Jenna Perry
Environmental Specialist III
Hazardous Waste Section

Enclosure(s)



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Ring Power Corp.

On-Site Inspection Start Date: 12/16/2010

On-Site Inspection End Date: 12/16/2010

ME ID#: 15436

EPA ID#: FLD982150237

Facility Street Address: 4900 N Main St, Gainesville, Florida 32609-1407

Contact Mailing Address: 500 World Commerce Pkwy, St Augustine, Florida 32092

County Name: Alachua

Contact Phone: (904) 494-1417

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jenna Perry, Inspector

Other Participants: Robert Jones, Truck Service Operations Manager

LATITUDE / LONGITUDE: Lat 29° 41' 57.8963" / Long 82° 19' 4.6522"

SIC CODE: 7538 - Services - general automotive repair shops

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corp was inspected on December 16, 2010, as a hazardous waste compliance evaluation inspection. The facility was last inspected by the DEP on 1/25/1995, when it was operating as a Conditionally Exempt Small Quantity Generator (CESQG). The facility last notified the DEP in March of 2010 as a CESQG and a used oil transporter, and is currently operating as such.

Ring Power is a dealer and service agent for Caterpillar equipment, as well as a service agent for a variety of generators and trucks. The facility has been in operation since 1987 and has 15 employees. The facility consists of offices, a service shop, wash rack, and used oil storage area. Mr. Robert Jones, Truck Service Operations Manager, was present throughout the inspection. The facility is on city sewer.

Process Description:

Used Oil Transportation

Ring Power services generators and heavy equipment in the field. Used oil generated from these operations is brought back to the facility for disposal with the used oil generated on-site. Used oil from generators is placed in 55-gallon drums in the wash rack area, while used oil generated from heavy equipment servicing is added to the facility's used oil tank.

Since the facility transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter, Ring Power must only comply with the following used oil transportation requirements: the facility must

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annually register its used oil transportation activities with the DEP, it must display the used oil transporter registration in a prominent place at the facility, and it must maintain proof of financial responsibility according to Rule 62-710.600(2)(e), FAC. At the time of the inspection, the used oil transportation registration on display at the facility had expired on 6/30/2010 [[Rule 62-710.500\(4\), FAC](#)].

Service Shop

General maintenance on a variety of vehicles is performed in this area. Several used oil containers were not properly labeled with the words "Used Oil" (Photos 1 - 3) [[40 CFR 279.22\(c\)\(1\)](#)]. A 55-gallon drum of used oil within the shop was placed in a small metal containment. There was a small amount of used oil within the metal containment (Photo 4). [This is an area of concern.](#)

The facility operates two Safety Kleen System One parts washers. The sludge is collected in a 30-gallon drum and will be disposed of when needed. The facility has had these parts washers for approximately two years and has not yet had to dispose of any sludge waste since installing them.

There was one 55-gallon drum in the area for the collection of waste aerosols. Mr. Jones stated that aerosol cans are collected in this drum once the shop has used them. Mr. Jones also stated that the waste aerosol cans are taken as needed by the facility to another Ring Power located in Tampa, where they are punctured and disposed of. None of the waste aerosol cans within the drum appeared to contain any residual liquids. The drum was dated 11/17/10. [This is an area of concern.](#)

The facility operates one glove box bead blasting machine, which is used to blast only bare metal parts.

Wash Rack

Equipment is washed down in this area with a closed-loop wash system. The facility also uses this area for storage of used oil drums that have been transported back to the facility after field technicians have serviced generators. At the time of the inspection, there were four 55-gallon drums of used oil in this area (Photos 5 - 7). All of the drums were labeled and closed; however, they were not within adequate secondary containment because they were stored at the edge of the concrete pad [[Rule 62-710.401\(6\), FAC](#)].

Used Oil Storage Area

The facility has a 1,000-gallon used oil tank for storage of used oil generated on-site and for used oil that is generated off-site from servicing heavy equipment. The tank was properly labeled and within secondary containment.

Record Review

Synergy Recycling collects the facility's used oil, used oil filters, and used antifreeze. No discrepancies were noted in the facility's disposal records.

Ring Power Corp is currently operating as a CESQG and a used oil transporter. The facility has been assigned the EPA ID number FLD 982 150 237. Please use this number on all hazardous waste manifests and on all correspondence with the DEP.

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Areas of Concern:

1. A 55-gallon drum of used oil within the shop was placed in a small metal containment. There was a small amount of used oil within the metal containment. The facility should clean up this release and remove any contaminated materials for proper disposal.
2. Mr. Jones stated that aerosol cans are collected in a 55-gallon drum once the shop has used them. Mr. Jones also stated that the waste aerosol cans are taken as needed by the facility to another Ring Power located in Tampa, where they are punctured and disposed of. The facility is reminded that non-empty aerosol cans are, at a minimum, a D001 hazardous waste. Although CESQGs are allowed to transport hazardous waste in Florida without registering as a hazardous waste transporter, the receiving facility must have permission from the FDEP to receive hazardous waste from CESQGs. The DEP recommends one of the following disposal options for waste aerosol cans: the facility may throw away or recycle these cans as scrap metal if they are empty; the facility may collect the waste aerosols and have them disposed of with a treatment, storage, or disposal facility; or Ring Power may puncture the cans with a drum-top aerosol can puncturer on-site.

New Potential Violations:*CFR = Code of Federal Regulation; FAC = Florida Administrative Code*

Type: Violation 1
Rule: 40 CFR 279.22(c)(1)
Explanation: Several used oil containers within the Service Shop were not properly labeled.
Corrective Action: No further action is required. The facility returned to compliance on 1/10/11.

Type: Violation 2
Rule: Rule 62-710.500(4), FAC
Explanation: The facility failed to display a valid used oil transporter registration within the facility.
Corrective Action: No further action is required. The facility returned to compliance on 12/17/10.

Type: Violation 3
Rule: Rule 62-710.401(6), FAC
Explanation: The facility failed to provide adequate secondary containment for four 55-gallon drums of used oil in the Wash Rack area.
Corrective Action: No further action is required. The facility returned to compliance on 1/24/2011.

Summary of Potential Violations:Potential Violations

Rule Number	Area	Date Cited	Explanation
279.22(c)(1)		12/16/2010	Several used oil containers within the Service Shop were not properly labeled.
62-710.500(4)		12/16/2010	The facility failed to display a valid used oil transporter registration within the facility.

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Rule Number	Area	Date Cited	Explanation
62-710.401(6)		12/16/2010	The facility failed to provide adequate secondary containment for four 55-gallon drums of used oil in the Wash Rack area.

PHOTOS:

Photo 1



Photo 2



Photo 3



Photo 4



Inspection Date: 12/16/2010

Photo 5



Photo 6



Photo 7 (provided by facility)



Inspection Date: 12/16/2010

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Jenna Perry

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

2/3/2011

DATE

Robert Jones

REPRESENTATIVE NAME

Truck Service Operations Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Ring Power

ORGANIZATION**Report Approvers:**

Vicky Valade

SUPERVISOR NAME

Environmental Manager

SUPERVISOR TITLE**SUPERVISOR SIGNATURE**

FDEP

ORGANIZATION

2/3/2011

DATE

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.