

**Perry, Jenna D.**

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**From:** Perry, Jenna D.  
**Sent:** Thursday, February 03, 2011 3:38 PM  
**To:** 'Dave.Strickland@RingPower.com'  
**Subject:** RE: Used Oil Registration - Ring Power Gainesville

Dave,  
Here are the answers to your questions:

*Q: If the cans are "empty" when they go into our collection drum why can't we dispose of the "empty" cans in the scrap metal dumpster and not have to be concerned with the puncturing of the cans?*

*A: If the cans are empty, recycling the empty cans as a scrap metal is acceptable and encouraged. Puncturing is not required.*

*Q: Can we just punch a hole in an "empty" can without having to use the puncture device with the content capturing capability? If the puncture device is used there is a Haz drum on site which requires special handling and weekly inspections with paper work. All of these are a problem that goes away if we can dispose of "empty" cans in the scrap bin.*

*A: There is not a regulatory requirement to use a drum-top aerosol can puncturing system; however, if you are going to puncture the cans, I do recommend using such a system for safety purposes. If the cans have liquids in them, the liquids must be disposed of properly regardless of how the can was punctured. I do want to point out that an in-process hazardous waste aerosol drum with a puncturer attached would be considered a satellite accumulation container and would not require weekly inspections of the container (assuming you have only one in the area).*

If you have any other further questions, please let me know. I anticipate getting you the Ring Power Gainesville inspection report within a few days. It will arrive via email.

Regards,  
Jenna Perry  
Environmental Specialist III - Hazardous Waste  
Florida Department of Environmental Protection  
office: 904-256-1674 | fax: 904-448-4362

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**From:** Dave.Strickland@RingPower.com [mailto:Dave.Strickland@RingPower.com]  
**Sent:** Wednesday, February 02, 2011 1:56 PM  
**To:** Perry, Jenna D.  
**Subject:** RE: Used Oil Registration - Ring Power Gainesville

Jenna I have a question concerning the aerosol can disposal issue.

If the cans are "empty" when they go into our collection drum why can't we dispose of the "empty" cans in the scrap metal dumpster and not have to be concerned with the puncturing of the cans?

Can we just punch a hole in an "empty" can without having to use the puncture device with the content capturing capability? If the puncture device is used there is a Haz drum on site which requires special handling and weekly inspections with paper work. All of these are a problem that goes away if we can dispose of "empty" cans in the scrap bin.

"Perry, Jenna D." <Jenna.D.Perry@dep.state.fl.us>

"Perry, Jenna D."  
<Jenna.D.Perry@dep.state.fl.us>

01/06/2011 02:39 PM

To "Dave.Strickland@RingPower.com"  
<Dave.Strickland@RingPower.com>

cc

Subject: RE: Used Oil Registration - Ring Power Gainesville

Dave,

Thank you for the information and quick action at your Gainesville facility. Regarding the used oil drums on the wash pad, I do understand that they are placed on a wash pad, which you stated was designed to allow for gravity flow of liquids; however, given the placement of the used oil drums on the edge of the wash pad and less than two feet from a grassy area, it is our position that the wash pad does not provide adequate secondary containment. If you wanted to move the used oil farther into the wash rack or place an oil impervious berm on that edge of the wash pad, either of those choices would work.

In regards to the aerosol can management, I see no issues with your plan for empty aerosols. The concern I have is when they are not empty. It is very common for us to find "empty" aerosol cans in the trash at other facilities that are not empty and still contain liquid, but that were thrown away because the tech considered them empty. I just wanted to make sure that the aerosols managed according to your policy are, in fact, actually empty. If they are not, they are a hazardous waste. As a CESQG the Gainesville facility can transport hazardous waste, but your Tampa area facility which receives them for puncturing is not, as far as I'm aware, authorized to accept hazardous waste from CESQG facilities. All of the aerosols I looked at in the waste drum at the facility were actually empty, I just brought it up with Robert as a concern.

Please let me know what you plan to do about the used oil on the wash pad and also update me when you get those pictures of the labeled used oil containers. As always, feel free to give me a call or shoot me an email with any questions.

Thanks again,  
Jenna Perry  
Environmental Specialist III - Hazardous Waste  
Florida Department of Environmental Protection  
office: 904-256-1674 | fax: 904-448-4362

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**From:** Dave.Strickland@RingPower.com [<mailto:Dave.Strickland@RingPower.com>]  
**Sent:** Thursday, December 23, 2010 12:06 PM  
**To:** Perry, Jenna D.  
**Subject:** RE: Used Oil Registration

Jenna Perry  
Environmental Specialist III - Hazardous Waste  
Florida Department of Environmental Protection  
Ref :FDEP environmental inspection visit at  
Ring Power Gainsville 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 Gainsville 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

[IMAGE][IMAGE]

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

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

[IMAGE][IMAGE]

"[Dave.Strickland@RingPower.com](mailto:Dave.Strickland@RingPower.com)"

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

"[Darryl.Brinkley@RingPower.com](mailto:Darryl.Brinkley@RingPower.com)"

<[Darryl.Brinkley@RingPower.com](mailto:Darryl.Brinkley@RingPower.com)>

[IMAGE][IMAGE]

RE: Used Oil Registration  
Subject

[IMAGE]

[IMAGE]

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)  
**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*)(See attached file: *image005.png*)(See attached file: *image006.png*)