



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 14, 2012

SENT VIA EMAIL

marcel.meyer@ringpower.com

Mr. Marcel Meyer, Service Manager
Ring Power Corp
8040 Philips Highway
Jacksonville, Florida 32256

Re: Ring Power Corp
EPA/DEP ID: FLD 984 209 346
Duval County - Hazardous Waste

Dear Mr. Meyer:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection at your facility on February 21, 2012. Enclosed is the report that documents this inspection.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.256.1671.

Sincerely,

Jabe Breland III
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: 02/21/2012

On-Site Inspection End Date: 02/21/2012

ME ID#: 34171

EPA ID#: FLD984209346

Facility Street Address: 8040 Philips Hwy, Jacksonville, Florida 32256-7406

Contact Mailing Address: 500 World Commerce Pkwy, St Augustine, Florida 32092-3788

County Name: Duval

Contact Phone: (904) 494-1417

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

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

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Marcel Meyer, Service Manager

LATITUDE / LONGITUDE: Lat 30° 13' 30.8539" / Long 81° 35' 21.8391"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corp was inspected on February 21, 2011, as an unannounced hazardous waste compliance inspection. The facility notified the DEP in 2011 that they were operating as a Small Quantity Generator (SQG) of hazardous waste and a Used Oil Transporter. The facility was last inspected on December 30, 2010.

At the time of the inspection, the facility was operating as a Conditionally Exempt Small Quantity Generator of hazardous waste and is a registered used oil transporter. The facility has been assigned the EPA ID number FLD984209346. Please use this number on all hazardous waste manifests and on future correspondence with the DEP.

Process Description:

Service Center:

Ring Power services forklifts and other various heavy equipment in a 15 bay garage, generating used oil and used oil filters. Used oil is drained into several small containers around the shop before being pumped into its used oil tank. All of these used oil containers that were inspected were properly labeled. The used oil tank was properly labeled and in secondary containment (Photo 1). The facility operates two parts washers that are serviced by Safety Kleen under its continued use program.

Aramark launders the facility's rags.

Paint Shop:

Two or three forklifts are painted per week in the facility's paint shop. Ring Power uses mostly

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black and CAT yellow paints. Spray guns are cleaned by DT-5 Virgin lacquer thinner (35-45% methanol, 25-35 toluene, 15-20% acetone, 2 degrees Fahrenheit flashpoint), and the D001/F003/F005 hazardous waste is accumulated in a 55-gallon drum. This drum was properly labeled and closed (Photo 2). Its rags used for cleanup are laundered by Aramark.

On the outside of the paint shop, and underneath cover, is where the facility stores its used oil filters (Photo 3). The facility drains its used oil filters into a 55-gallon drum labeled "used oil." The filters are then accumulated in two used oil filter drums, which were properly labeled. The facility operates an aerosol puncture system in this area. According to Mr. Meyer, the facility has not had to dispose of this aerosol waste to date. All of these drums were on secondary containment pallets.

On the other side of the paint shop the facility operates a wash basin for its forklifts. The 100% recycle system generates oily sludge/dirt. Occasionally, the facility will remove this dirt and store it in a 55-gallon drum. One drum was accumulating this contaminated dirt near the used oil filters.

Used Oil Transportation:

The facility services lift trucks in the field and then transports the used oil generated from that operation back to its facility at 8040 Philips Highway. Mr. Meyer stated that the facility transports no more than 10 gallons of used oil per day and less than 500 gallons per year. These totals fall below the definition of a used oil transporter, as defined in Section 62-710.201, FAC. Since the facility does not currently meet the definition of a used oil transporter, the facility is not required to comply with the used oil transportation rules. Should the facility begin transporting more than 55 gallons of used oil at one time, the facility will be required to comply with the following: the facility must 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. Though it was not required at the time of the inspection, the facility was in compliance with these used oil transportation requirements. The used oil generated in the field is added to the facility's used oil tank.

Records:

Safety Kleen services the facility's two parts washers (30-gallons total) under its continued use program. Synergy Recycling recycles the facility's used oil and used oil filters. Approximately 15-gallons of hazardous waste paint has been generated in the past three years. The facility has not had to dispose of its hazardous waste paint/solvent to date. The facility should keep records of disposal on-site for a minimum of three years.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

ATTACHMENTS:

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Photo 1



Photo 2



Photo 3



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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.

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

3/14/2012

DATE

Marcel Meyer

REPRESENTATIVE NAME

Service Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Ring Power

ORGANIZATION

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.