



Ring Power Corporation
500 World Commerce Parkway
St. Augustine, Florida 32092
(904) 494-7464

Dept. Of Environmental Protection

NOV 08 2010

Southwest District

November 4, 2010

Ms. Deborah A. Getzoff
District Director/Southwest District
Florida Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

RE: Ring Power Corporation
FLD 984 170 415
Warning Letter #WL10-0064HW292WD
Hillsborough County

Dear Ms. Getzoff,

In response to the inspection and warning letter referenced above, I would like to offer the following information referencing the violations cited. This response includes some new information which was not readily retrievable at the time of the inspection.

1. Failure to post a modified contingency plan or to have a contingency plan available on site.

Within the last year Ring Power has had a large reduction in staff and three environmental managers. The last environmental manager was in our Riverview office but the new environmental manager is located in St. Augustine. When the change in personnel took place, all the environmental records from the previous manager were removed to St Augustine. There has also been a relocation of a large number of personnel in the Riverview branch to new work areas. In this confusion, the contingency plan was relocated to St Augustine. Although the contingency plan was not onsite there was a list of emergency phone numbers posted at each reception desk.

Corrective Action: The contingency plan has been up dated and a copy is on site. The phone list at each reception desk is up to date.

2. Failure to make arrangements with the local authorities.

After the inspection we contacted the local fire engine company and they did have a copy of the contingency plan on file.

Corrective Action: A copy of the new plan has been sent to the local emergency agencies.

3. Failure to label all containers storing used oil with the words "Used Oil".

The Ring Lift and Tow Motor shop areas of the old building have just been repainted. The personnel were moved from one location to another location. Prior to the inspection we were in the process of getting all the details from the move in place and had not relabeled the tank and drain table after painting.

Corrective Action: All areas noted were labeled prior to the completion of the inspection.

9/14

4. Failure to provide secondary containment for the used oil storage.

The plastic containment container which was in use to collect used oil drained from used oil filters holds about 30 gallons of liquid and was located on a sturdy steel stand on a concrete floor inside the building. It was also discovered, after the inspection, that the used oil tank located in the vicinity of the filter draining device is a double walled steel tank.

Corrective action: A new device for draining the oil filters with secondary containment has been constructed.

5. No contest

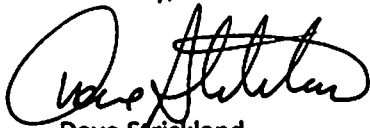
6. No contest

Based on the above explanations Ring Power feels that the fines are extremely heavy for the violations. In some cases the assessment was the maximum fine for a violation which would indicate a willful intent to violate the requirement.

- Paragraph one: We did have a contingency plan but it had been removed from the site in the reorganization of the department.
- Paragraph two: The contingency plan had been distributed.
- Paragraph Three: Of all containers onsite, only a small number were found to be without labels. This does not show a willful intent to disregard the requirement, but an oversight. All the containers that were not labeled were labeled prior to the end of the inspection.
- Paragraph four: The containment device was on concrete inside a building and was less than 55 gallons.

Ring Power takes pride in our presentation to the community and this includes the cleanliness of our shops. We endeavor to comply with all DEP requirements, performing self inspections at all locations and training for all personnel. It our request that the fines levied be reconsidered with the provision of this explanation.

Sincerely,



Dave Strickland
Environmental Manager

cc: Rebecca Foster, Southwest District, DEP
Kevin Wurtenberg, Ring Power, Environmental Mgr.