



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

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**FACILITY INFORMATION:**

**Facility Name:** Ring Power Corp

**On-Site Inspection Start Date:** 08/30/2012

**On-Site Inspection End Date:** 08/30/2012

**ME ID#:** 60688

**EPA ID#:** FLD984170415

**Facility Street Address:** 10421 Fern Hill Dr, Riverview, Florida 33569

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

**County Name:** Hillsborough

**Contact Phone:** (904) 494-1417

**NOTIFIED AS:**

SQG (100-1000 kg/month)

Used Oil

**INSPECTION TYPE:**

Routine Inspection for SQG (100-1000 kg/month) facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Robert Soich, Inspector

Other Participants: Kevin Wurtenberg, Facilities Manager; Sammy Simmons, Tampa Operations MCRC

**LATITUDE / LONGITUDE:** Lat 27° 50' 50.8989" / Long 82° 20' 40.2859"

**SIC CODE:** 3531 - Manufacturing - construction machinery

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Ring Power Corp was inspected on August 30, 2012, to verify the facility's compliance with state and federal hazardous waste regulations. The inspection verified that Ring Power Corp is a small quantity generator of hazardous waste. This facility was last inspected by the Department's Hazardous Waste Program on September 8, 2010. Mr. Kevin Wurtenberg, the Facility Manager, and Mr. Sammy Simmons, the Assistant Service Manager, went with the inspector during the inspection.

**Process Description:**

Ring Power's operation is the same as it was during the September 8, 2010, hazardous waste inspection except for the following. Two additional Safety Kleen Model 121 parts washers were added in the disassembly area of the engine rebuild facility. There are now a total of 51 parts washers, 24 of which are System One recycling parts washers. The remaining parts washers, including the two new Model 121 parts washers, use Safety Kleen Premium Gold Solvent and are in Safety Kleen's Continued Use Program. Safety Kleen services all of the parts washers and the still bottoms from the System One parts washers are taken as hazardous waste. The Mart Tornado parts washer was replaced with a new Typhoon Proceco Parts washer using hot water and detergent (CAT CTP Powdered Cleaner) performing the same function as the Mart Tornado washer. Safety Kleen takes this waste water as hazardous waste. The Clam parts washer is no longer on site. There is now one grit blasting booth located at the paint shop and the two blasting booths at the old heavy equipment service building are gone. The old heavy equipment service building is now the ring lift truck shop. There is a new hydraulic shop with a hone and a D&A bench located in the old CAT Rental Building. An 1-AQ-1 Aqueous Multi Purpose parts washer is located there. Safety Kleen takes waste generated from this washer as oily water.

The oil lab analyzes engine oil, hydraulic oil, transmission oil, and final drive oil for wear (metals), silicone entry, and coolant entry on the vehicles. Used oils are tested for chrome and lead content before disposal. Waste samples are combined and placed in a satellite container and disposed of in

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with the used oil stored in their used oil above ground storage tank. Ligroine (heptane) is used to flush oil samples at the viscosity meters. The used oil is drained from the meters to a five gallon container labeled "Used Oil" under the machines. The Ligroine flush is drained to a five gallon container under the machines that was mislabeled "Used Oil." The inspector explained that this container contained hazardous waste and as a satellite container should be labeled "Hazardous Waste" or for its contents name. The container was correctly labeled at the end of the inspection. The Ligroine waste is recovered by recycling the waste in a Safety Kleen recovery still. The recovery still is located in the lab store room. Five gallons of waste solvent are placed in the still every two weeks and four gallons of recycled solvent are recovered. Still bottoms are placed in a 55-gallon drum located next to the machine. Safety Kleen handles this waste as hazardous waste. A second drum was located here for acid waste created from glycol testing. Both of these drums had "Hazardous Waste" labels on them. The still bottom drum had an August 13, 2012, accumulation start date and the acid drum had an August 6, 2012, start date. The drums are picked up by Safety Kleen every eight to twelve months when they are full. It was noted that a drain in the storage room drains to a self contained oil/ water separator on the property. Blue prints of the facility indicated that the oil/ water separator is not connected to the sewer system. The floor of the storage room and the drain were clean and free of spilled material.

The engine rebuild facility is where engines are disassembled and rebuilt. There are 12 System One model 250 parts washers located here and four Safety Kleen Model 121 parts washers located in the disassembly area. At the rear of the disassembly area were the two Safety Kleen steel tub type parts washers. Also located at the rear of the disassembly area were the Typhoon Proceco parts washer and a Magnus AJA-LIF parts washer, both using water and detergent. The washers are serviced by Safety Kleen.

In front of the main shop is an open area called the Ready Line Area. Rental vehicles and vehicles that are for sale are parked for display. A used oil stain was on the stone covering the ground in the center of this area. The used oil contaminated stone and soil was cleaned up at the end of the inspection. The used oil contaminated stone and soil are placed in with the waste dirt at the wash rack. The waste dirt is sent to Clark Environmental, Inc., located in Mulberry, for processing. The areas under the heavy equipment located here appeared free of stains.

The paint shop uses LIC Industrial Finishes paint and gray primer that do not contain heavy metals. Records of paint inventory were reviewed for metal content and were found in order. Used paint booth filters are bagged and placed in with the solid waste. TCI Product DT-5 Virgin Lacquer Thinner is used for thinning and cleaning. Two 55-gallon drums were stored in the paint mixing room. One drum was for storing spent solvent and waste thinner, and the other was for storing waste paint. The drums were labeled for content. The waste paint drum had an accumulation start date of August 2, 2012, placed on the label. Both drums had closed funnels in their bung holes, but had the second smaller bung holes open on the top of the drums. The inspector explained that the hazardous waste storage drums had to remain closed when waste was not being added or removed from the drums. Mr. Simmons placed the bungs in the bung holes during the inspection. A solvent recovery still is used to recycle waste thinner. Ten gallons of waste thinner is placed in the still and eight gallons of clean solvent are recovered every workday. The new blasting booth, located here, has two bag houses to control dust emissions. The blasting media is recycled and used until it cannot be used anymore. The activity here is the same as it was during the use of the two old blasting booths. Analysis of the spent blasting media in 2003 determined that the waste media was non hazardous. The spent blasting media is disposed of as a solid waste.

The Ring Lift Division consists of four buildings. The PSD truck shop and the lift truck, the CAT rental store, the machine shop undercarriage, and the new hydraulic shop. Used lead acid batteries are sent to the parts department and are recycled by Caterpillar. Used rags are placed in labeled 5-gallon step cans and are laundered by Cintas. Non-chlorinated brake cleaners are used in the shop. An aerosol can puncturer is located in the lift truck shop. It had a carbon filter, but a log was not kept of the filter changes. The inspector recommended that a filter log is kept recording the filter change dates and that the filters are changed according to the manufacturer's recommendation. Mr. Wurtenberg stated that they will start a filter log to keep track of the filter changes and they will change filters according to the manufacturer's recommendation. Punctured aerosol cans were stored in a labeled 55-gallon drum for metal recycling. A second 55-gallon

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drum labeled "Used Aerosol Cans" was used to store waste aerosol cans to be disposed of as hazardous waste. Approximately, one 55-gallon drum is generated from the aerosol can crusher every three months. At the welding shop, all waste aerosol cans are placed in a container and taken to the paint shop where they are disposed of as hazardous waste. In the grinder shop the Barnes Drill Co. magnetic fabric filter is disposed of as hazardous waste when it is changed out approximately once per year. In the new hydraulic shop the filter on the D&A bench used to filter the machine oil is also disposed of as hazardous waste when it is changed out. The used machine oils are placed in the used oil above ground storage tank at the main shop. Waste sludge from the small wash rack at the truck shop is taken to the main wash rack and placed in with the contaminated soil and sludge that is stored there.

Used Oil drain tables, drums, containers, and pans in the various shops along with the used oil above ground storage tanks were all correctly labeled "Used Oil." Used oil filter 55-gallon storage drums in the various shops were labeled "Used Oil Filters." The used oil above ground storage tanks were all either double walled or stored in secondary containment. The large 6000 gallon used oil above ground storage tank at the main shop was double walled and stored in secondary containment.

Hazardous waste manifests and used oil bill of lading were reviewed. Safety Kleen takes their hazardous waste for disposal or recycling. FCC Environmental, Inc. handles the used oil, used oil filters, and used antifreeze for recycling. Clark Environmental, Inc. processes their used oil contaminated soil and sludge from the wash racks. Hazardous waste is picked up monthly. On August 6, 2012, four 55-gallon drums or 1,600 pounds of waste paint were picked up as hazardous waste. 2,000 pounds of used hazardous parts washer solvent can be picked up in a month, but this used solvent is recycled for use as part of the continued use program. The facility generates hazardous waste at small quantity generator levels. The repair of heavy equipment generates approximately, 1,700 to 2,000 gallons of used oil and 500 to 1,000 pounds of used oil filters per month from the main shop. At the truck shop, approximately, 2,000 gallons of used oil, 2,750 pounds of used oil filters and 335 gallons of used antifreeze are generated per month.

Weekly container inspections were performed at the oil lab and paint shop and were in order except for one missed inspection between in May 11th and May 25th of 2012. A complete contingency plan was available and kept in a binder at the front reception desk in the main office building. This was a problem during the last inspection when the contingency plan was not available during the September 8, 2010 inspection. The contingency plan was reviewed and was current. Emergency Arrangement Letters, including the contingency plan were sent on November 1, 2010, as a result of the September 8, 2010, inspection. Kevin Wurtenberg, the emergency coordinator had hazardous waste training in February 2011. All employees also had HAZMAT training during February 2011. According to Mr. Wurtenberg, hazardous waste training for 2012 will be scheduled within the next two months.

At the Security and Facilities Office across the street, universal waste lamps were correctly stored in closed boxes labeled "Universal Waste", "Used Mercury Lamps." Four Waste Management boxes of universal waste lamps were stored there. The boxes are mailed to Waste Management for the lamps to be recycled.

## New Potential Violations and Areas of Concern:

### Violations

Type:	Violation
Rule:	262.34(c)(1)(ii)
Question Number:	4.280
Question:	Are satellite containers closed? Are satellite containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?
Explanation:	The satellite accumulation container under the viscosity meters that was used to collect the Ligroine (Hexane) flush waste was incorrectly labeled "Used Oil" and

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was not correctly labeled "Hazardous Waste" or for its contents. (Corrected)

Corrective Action: The satellite container was correctly labeled "Waste Hexane" at the end of the inspection.

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Type: Violation

Rule: 262.34(c)(1)(ii)

Question Number: 4.280

Question: Are satellite containers closed? Are satellite containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?

Explanation: Two 55-gallon hazardous waste paint and solvent drums stored in the paint mixing room had closed funnels in their bung holes but had second small bung holes open on the top of the drums. (Corrected)

Corrective Action: The bungs were placed in the bung holes during the inspection.

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Type: Violation

Rule: 265.174

Question Number: 2.60

Question: Are each of the containers inspected at least weekly?

Explanation: Weekly container inspections were reviewed for 2011 and 2012. One weekly container inspection was missed between May 11th and May 25th 2012. (Corrected)

Corrective Action: A program will be initiated to review and ensure that weekly container inspections are performed and that personnel are available to perform weekly container inspections in case an inspector is absent.

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Type: Violation

Rule: 279.22(d)

Question Number: 5.170

Question: If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service?

Explanation: A used oil stain was on the ground at the Ready Line Area in Front of the main shop. (Corrected)

Corrective Action: The used oil stained stone cover and soil were cleaned up at the end of the inspection and placed in with used oil contaminated soil at the wash rack for processing at Clark Environmental, Inc.

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## Conclusion:

Ring Power Corp was found in violation of the regulations that govern small quantity generators of hazardous waste and the handlers of used oil. Having corrected the violations, no further action is required.

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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.

Robert Soich

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE***Robert Soich***PRINCIPAL INSPECTOR SIGNATURE**

DEP

**ORGANIZATION**

9/19/2012

**DATE****Supervisor:** James Dregne

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.