Blandin, Norva

From: Blandin, Norva
Sent: Monday, July 13, 2015 11:10 AM
To: 'Bridget.Lindsey@ringpower.com'
Cc: 'dave.strickland@ringpower.com'
Subject: Project Closed Letter- Returned to Compliance Ring Power Corp. EPA ID EPA ID FLR000199034
Attachments: Ring Power Corp. inspection_report.pdf

Importance: High

RE: Hazardous Waste Compliance Evaluation Inspection – Ring Power Corp.

EPA ID # FLR000199034

3400 NW 77th Ct, Doral Florida 33122

Dear Mrs. Lindsey/Mr. Strickland :

On May 13, 2015, the Department conducted a hazardous waste compliance evaluation inspection (CEI) at your facility. A copy of the inspection report is attached for your records. The documentation requested at the conclusion of the inspection was provided to the Department, and it appears that your facility **has returned to compliance**. However, the Department will continue to performing inspections without notices. Please maintain your facility in compliance with all the requirements for proper management of used oil and hazardous wastes; If the facility failed, the Department might be consider the non-compliances issues as repeated violations and possible enforcement will be occur.

If you have any questions about the inspection or any other compliance related issues, please contact me. Thank you for your cooperation.

Cordially,

Biol. Norva H. Blandin, MSEM
Environmental Specialist II
Compliance Assurance Program- Hazardous Wastes
Florida Department of Environmental Protection
3301 Gun Club Road
MSC 7210-1
West Palm Beach, FL 33406
561-681-6728 phone
561-681-6755 fax

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 05/13/2015 **On-Site Inspection End Date:** 05/13/2015

ME ID#: 108496 **EPA ID#:** FLR000199034

Facility Street Address: 3400 NW 77th Ct, Doral, Florida 33122-1118

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

County Name: Miami-Dade **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 CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Norva Blandin, Inspector

Other Participants: Kathy Winston, Environmental Consultant; Jairo Sevilla, Branch Store Parts Manager

LATITUDE / LONGITUDE: Lat 25° 48' 24.732" / Long 80° 19' 18.0048"

SIC CODE: 7623 - Services - refrigeration service and repair

TYPE OF OWNERSHIP: Private

Introduction:

On May 13, 2015 a representative of the Florida Department of Environmental Protection (FDEP) conducted a hazardous waste and used oil compliance inspection at Ring Power Corp (RP). This company primarily operates as used oil transporter/transfer facility for their own clients since 2013. Ring Power services engines, generators, and transmissions for CAT industrial equipment and vehicles. Work is done both in the field and on-site. The facility has been in operation at this location for approximately 2 years. This facility occupies approximately 250,000 square feet, is connected to city sewer and to water. This facility has 46 employees.

Notification history:
4/16/2013 - Notified as SQG and Used Oil Transporter/Transfer facility. Their current registration is active for Transfer facility for used oil and used oil filters. Expiration date: 06/30/2016

Inspection history:
Never inspected by FDEP

Process Description:

Technicians perform work, including oil and oil filter changes, both on-site and in the field. Field technicians will change the oil in the engine and then transport the used oil and used oil filters back to the facility. Used oil and used oil filters generated in the field are added to the used oil and used oil filters generated on-site.

The facility consists of one- building with different stages areas, administration office and pick-up and service areas. At the time of inspection, the Branch Store Parts Manager, Mr. Jairo Sevilla toured

us thru the facility. Below the description of the process:

A. Offices and Reception Area - No hazardous waste at this area.

B. Used Oil and Hazardous wastes storage Area -

The inspectors observed:
1-200 gallons tank of used oil; properly closed, labeled and secondary containment
5-55 gallon drums of used antifreeze; properly closed, labeled.
4-55 gallons drum of used oil; properly closed, labeled and secondary containment
2-55 gallons drum of used oil filters; properly closed, labeled.
6-55 gallons drum of oily water; properly closed, labeled.
1-55 gallons drum of spent aerosol cans- properly closed.
3-red cans for oily rags

C. Maintenance Area/Service Parts storage

Vehicle batteries are exchanged through East Penn Batteries. Spent oily absorbent rags are accumulated in labeled 5-gallon containers located throughout the facility.

The facility uses the cloth rags with CRC Brake Cleaner (containing 45-55% acetone, 25-35% toluene, and 10 -20% methanol with a flashpoint of <0 degrees Fahrenheit) and they are accumulated in one- 55 gallons drum located at the facility. According to the information provided by RP, they are managing the solvent reusable rags under the 40 CFR 261.4(a)(26) conditional exclusion (rags are commercially laundered). However, when the inspectors were there, the requirements to meet the conditional exclusion were not fully implemented on site. After inspection, the facility provided photos of the container labeled with the words "Excluded Solvent-Contaminated Wipes" and the laundry service company is Cintas.

One 1- solvent part washer (petroleum naphtha wastes) serviced by Safety Kleen and dispose as hazardous wastes (<10gallons every 16 wks.)

The facility reported that when the aerosol cans are empty, they puncture them without controls or capture of propellant, volatile organics or residue, if any. Aerosol cans that are “RCRA empty” (pursuant to 40 CFR part 261.7) and nonreactive (either as-is or if punctured and drained) at the point of generation may meet the definition of “scrap metal” in 40 CFR 261.1(c)(6), and if recycled as scrap metal would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(ii). Any liquids and propellants drained from punctured cans are subject to regulation as hazardous wastes if they are listed or exhibit a hazardous characteristic. Based on the observations of the inspection,the facility was collecting the empty cans in a container and reported that an unidentified local scrap metal guy takes them for recycling, but did not have any documentation. No full or punctured cans were observed in the trash, and the facility reported that there were no residues generated from their manner of puncturing empty cans. The facility was advised to obtain a proper puncturing system or manage aerosol cans that are reactive and contain hazardous residues as hazardous waste.

The facility decide to contracted the services of Aersolv for the puncturing system and Safety Kleen will take the empty aerosol cans as scrap metal and dispose properly any hazardous waste residues.

Record Review:

Because the facility transports only its used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its own used oil and used oil filters picked up by a certified used oil/used oil filter transporter, Ring Power must only comply with the following used oil transportation requirements:
-Annually register its used oil/used oil filter transportation activities the Department,
-Display the facility's used oil transporter registration in a prominent place at the facility,

-Maintain proof of financial responsibility according to Rule 62-710.600(2)(e), FAC.

Used oil and hazardous wastes disposal records were partially available for review at the time of inspection.

For hazardous waste activities, the facility has Safety Kleen; for used oil activities has FCC Environmental (now is Crystal Clean/Sinergy). The inspectors requested a copy of the manifests at least three (3) years for hazardous wastes and used oil activities.
SPCC Plan rule (40 CFR 279.45/40 CFR Part 112) is not applicable to this facility because doesn't meet the criteria of storage quantity (>1,320 gallons). However, the facility has a Contingency Plan in case of emergency.
Insurance Liability Documentation- the facility was unable to locate a copy of their proof of Pollution Liability Insurance at the time of inspection. After inspection, the facility provided a copy of their current insurance liability; Policy #HC2ECAP475MS399TCT15 exp. date 4/1/16.
FDEP Registration as UOT/UO-Transfer facility was displayed on site.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-730.030(3)
Explanation:	Based on the inspectors observations, RP operates as CESQG level according to the last pickup. However, disposal records from the last 3yrs were not available for review at the time of inspection.
Corrective Action:	Please provide to the Department a copy of disposal records, at least 3yrs. *** this item was corrected by submittal of documentation on 6/4/2015 ****

Type:	Violation
Rule:	62-710.600(2)(e)
Explanation:	According to Department records, the facility's last proof of adequate pollution liability insurance on file expired on 4/1/2015.
Corrective Action:	Please, provide to the Department a copy of your current and adequate pollution liability insurance. ***The facility demonstrated there is not lapse in liability insurance coverage and RP was covered during the time of notification-permit renewal. This item was corrected by submittal of documentation on 5/21/2015 ****

Conclusion:

The observations of the inspection indicates the facility operates as Used oil/used oil filters transporter /transfer facility and CESQG level. The facility was not in compliance at the time of

inspection. A copy of the draft inspection (exit interview) and Florida's Handbook for Small Quantity Generators of Hazardous Waste were provided to the facility the day of the inspection and the above listed violation was discussed. The owner or operator has fifteen days (15) days to comply and submit a description of all corrective actions taken.

According to the disposal records provided after inspection performed, this facility operates as a CESQG. The facility submitted a copy of the form 8700-12FL to update notification status to FDEP Tallahassee.

The facility is back to compliance.

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.

Norva Blandin	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	FDEP	7/9/2015
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Supervisor: **Karen Kantor**

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.