

## Blandin, Norva

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**From:** Perrigan, Glen  
**Sent:** Monday, July 13, 2015 9:41 AM  
**To:** Kantor, Karen E.  
**Cc:** Smith, Jennifer K.; Blandin, Norva; Bahr, Tim; Scarborough, Jill R.  
**Subject:** FW: Request for Case Classification Review Ring Power Corp EPA ID FLR000199034  
**Attachments:** Facility EPAID FLR000199034 Ring Power Corp 05-13-15.xlsx; Ring Power Corp. HazardousWasteInspectionReport 7-8-15.pdf; CaseSpecificClassificationReviewRingPowerCorpFLR000199034.pdf

Karen,

The Division has conducted a case specific classification review for Ring Power Corp EPA ID FLR000199034 and concludes that an enforcement response is not appropriate at this time.

Glen Perrigan  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS4560  
Tallahassee, FL 32399-2400  
850-245-8749  
[glen.perrigan@dep.state.fl.us](mailto:glen.perrigan@dep.state.fl.us)  
[www.dep.state.fl.us](http://www.dep.state.fl.us)

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**From:** Kantor, Karen E.  
**Sent:** Wednesday, July 08, 2015 4:07 PM  
**To:** Perrigan, Glen  
**Cc:** Smith, Jennifer K.; Blandin, Norva  
**Subject:** Request for Case Classification Review Ring Power Corp EPA ID FLR000199034

Glen: please find attached the documents for a case classification review for a secondary violator.

Karen Kantor, PG  
Environmental Manager, Compliance Assurance Program (Hazardous Waste)  
Florida Department of Environmental Protection - Southeast District  
3301 Gun Club Road  
MSC 7210-1  
West Palm Beach, FL 33406  
561-681-6670 direct  
561-681-6600 main  
561-681-6755 fax  
[karen.e.kantor@dep.state.fl.us](mailto:karen.e.kantor@dep.state.fl.us)

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**From:** Blandin, Norva  
**Sent:** Wednesday, July 8, 2015 1:45 PM  
**To:** Kantor, Karen E.  
**Subject:** RE: Case Classification Review Ring Power Corp EPA ID FLR000199034

Edits and comments incorporated.

Biol. Norva H. Blandin, MSEM  
Environmental Specialist II  
Compliance Assurance Program- Hazardous Wastes  
Florida Department of Environmental Protection  
3301 Gun Club Road  
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**From:** Kantor, Karen E.  
**Sent:** Wednesday, July 8, 2015 12:56 PM  
**To:** Blandin, Norva  
**Subject:** FW: Ring Power

Karen Kantor, PG  
Environmental Manager, Compliance Assurance Program (Hazardous Waste)  
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[karen.e.kantor@dep.state.fl.us](mailto:karen.e.kantor@dep.state.fl.us)

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**From:** Blandin, Norva  
**Sent:** Tuesday, July 7, 2015 9:43 AM  
**To:** Kantor, Karen E.  
**Subject:** RE: Ring Power

Sorry... see attachments.

Biol. Norva H. Blandin, MSEM  
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**From:** Kantor, Karen E.  
**Sent:** Tuesday, July 7, 2015 9:37 AM  
**To:** Blandin, Norva  
**Subject:** RE: Ring Power

Send me all updated documents in the same email please.

Karen Kantor, PG  
Environmental Manager, Compliance Assurance Program (Hazardous Waste)  
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**From:** Blandin, Norva  
**Sent:** Tuesday, July 7, 2015 8:19 AM  
**To:** Kantor, Karen E.  
**Subject:** RE: Ring Power

Good morning Karen:

Comments and edits incorporate. For your final review and approval.

Regards,  
Biol. Norva H. Blandin, MSEM  
Environmental Specialist II  
Compliance Assurance Program- Hazardous Wastes  
Florida Department of Environmental Protection  
3301 Gun Club Road  
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**From:** Kantor, Karen E.  
**Sent:** Monday, July 6, 2015 1:59 PM  
**To:** Blandin, Norva  
**Subject:** FW: Ring Power

After my meetings, I will come see you to make the final revisions on this case so it can go up. See what is in the attached so far, and have the case review and spreadsheet ready for me to review with you.

Karen Kantor, PG  
Environmental Manager, Compliance Assurance Program (Hazardous Waste)  
Florida Department of Environmental Protection - Southeast District

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**From:** Blandin, Norva  
**Sent:** Wednesday, June 24, 2015 2:37 PM  
**To:** Kantor, Karen E.  
**Subject:** Ring Power

Karen:

I incorporate the comments related to the empty aerosol cans. Let me know if sounds good.. ☺

Biol. Norva H. Blandin, MSEM  
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Compliance Assurance Program- Hazardous Wastes  
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HW

Generator Status	Focus Area	Rule Cite	Harm & Potential for Harm	Extent of Deviation	Classification*	Regulation Description
CESQG	CESQG failure to maintain records of disposal of HW for 3 years	62-730.030(3)	Minor	Minor	SV (Compliance Assistance)	
Transporter	Have, verify, and maintain vehicle insurance with a combined single limit of no less than \$1,000,000. Such insurance, or additional policy, must in no way exclude pollution coverage for sudden and accidental alleged or threatened discharge, dispersal, seepage, migration, release or escape of used oil, and must include any cost or expense relating to pollution damage for which the transporter is legally liable. Such insurance must be maintained at all times and be exclusive of legal defense costs. (Having insurance but not submitting proof in a timely fashion)	62-710.600(2)(e)	Minor (facility provided copy of proof of insurance-after inspection)	Minor	Case Specific (potential SNC)	

**HARM RANKING SYSTEM WORKSHEET  
FOR UO VIOLATIONS**

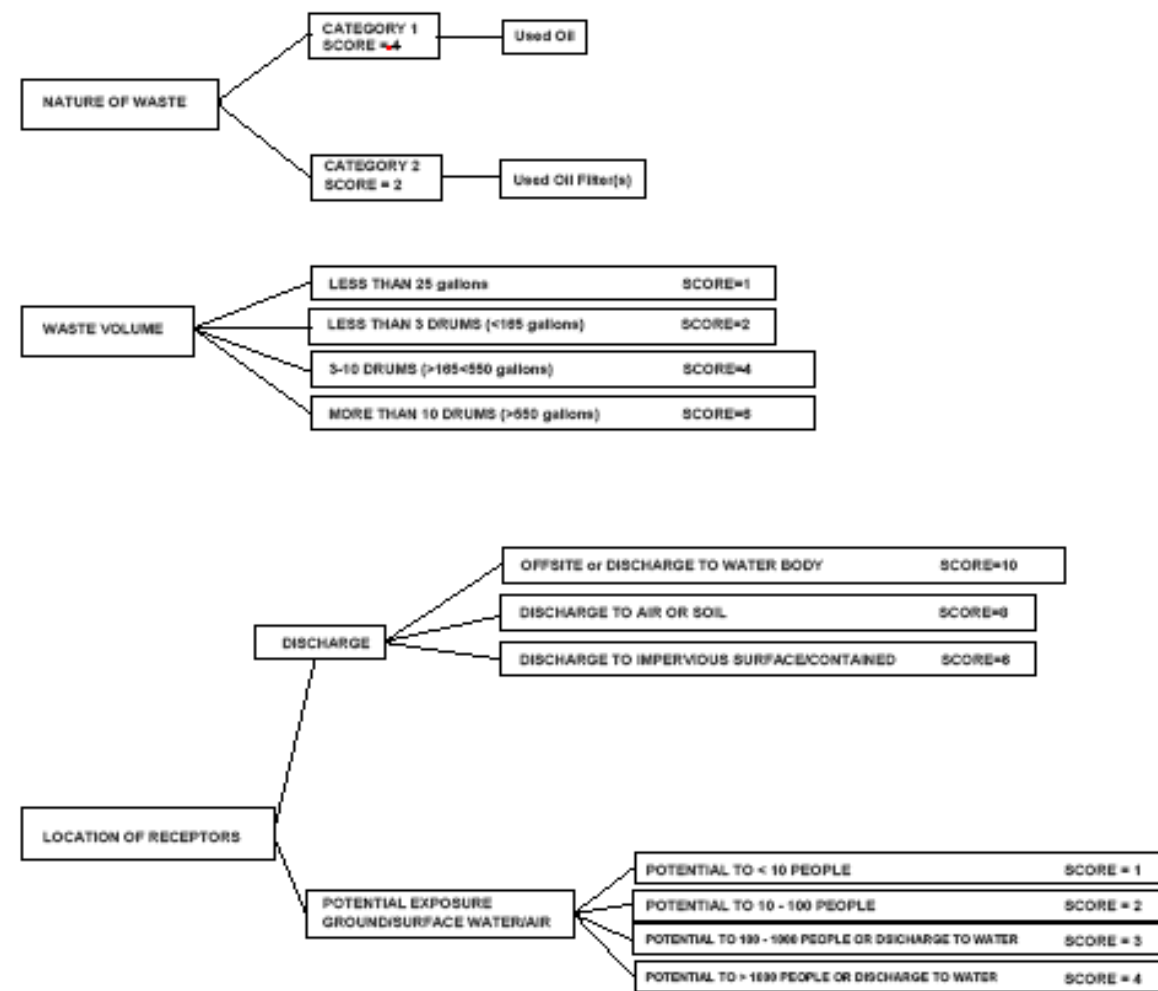
**FACILITY NAME:** Ring Power Corp.

Violation No.	Alleged Violation Type	Nature of Waste	Waste Volume	RECEPTORS		Total Score	Harm Ranking
				Discharge/Risk Potential	Potential Exposure		
#2	F.A.C 62-710.600(2)e Financial Insurance	4	5	0	0	9	Minor

**Assigned by:** Norva Blandin

HAZARDOUS WASTE SCORING SYSTEM	
<b>If the Total Score is</b>	<b>Then the Harm Ranking is</b>
21 -- 36	MAJOR
13-- 20	MODERATE
7--12	MINOR

### USED OIL/USED FILTER HARM RANKING SYSTEM



**TOTAL POTENTIAL FOR HARM:**

19 - 24	MAJOR
13 - 18	MODERATE
4 - 12	MINOR

# Hazardous Waste Program

## CASE REVIEW FORM

Check Case Review Type: <input type="checkbox"/> Case Specific Classification Review  <input type="checkbox"/> Enforcement Case Review					
Current Date:		Inspection Date:		Inspector:	
EPA ID: _____  Facility Name: _____  Facility Address: _____  Reference Links: _____					
Alleged Violation Citation/Regulator Reference		Manual Guide	Potential for Harm	Extent of Deviation	Check All That Apply
1.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
2.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
3.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
4.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
5.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
6.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents



## Hazardous Waste Program CASE REVIEW FORM

Comments: (Optional)					
7.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
8.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
9.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
10.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					

DWM Notes:

Note: This staff assessment is preliminary and is designed to assist in the compliance review process, prior to final agency direction. Comments provided herein are not the final position of the Department and may be subject to revision, pursuant to additional information and/or further review.