



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 11/06/2014

On-Site Inspection End Date: 11/06/2014

ME ID#: 15436

EPA ID#: FLD982150237

Facility Street Address: 4900 N Main St, Gainesville, Florida 32609-1407

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

County Name: Alachua

Contact Phone: (904) 494-1417

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Heather Hahn, Inspector; Richard Morris, Heavy Equipment Service

LATITUDE / LONGITUDE: Lat 29° 41' 57.8963" / Long 82° 19' 4.6522"

SIC CODE: 7538 - Services - general automotive repair shops

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corp was inspected on November 6, 2014, as a hazardous waste compliance evaluation inspection. The facility was last inspected by the DEP's Hazardous Waste Section on December 16, 2010. The facility last notified the DEP in March of 2014, as a CESQG and a used oil transporter.

Ring Power is a dealer and service agent for Caterpillar equipment, as well as a service agent for a variety of generators and trucks. The facility has been in operation since 1987 and has 20 employees. The facility consists of offices, a service shop, wash rack, and used oil storage area. Mr. Richard Morris, Heavy Equipment Service Manager, was present throughout the inspection. The facility is on city water and sewer. Ring Power Corp is currently operating as a CESQG and a used oil transporter. The facility has been assigned the EPA ID number FLD 982 150 237. Please use this number on all hazardous waste manifests and on all correspondence with the DEP.

Process Description:

Used Oil Transportation

Ring Power services generators and heavy equipment in the field. Used oil generated from these operations is brought back to the facility and managed with the used oil generated on-site. Used oil from generators is placed in 55-gallon drums in the wash rack area, while used oil generated from heavy equipment servicing is added to the facility's used oil tank described below.

Since the facility transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter, Ring Power must only comply with the following used oil transportation

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requirements: the facility must annually register its used oil transportation activities with the DEP, it must display its 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. At the time of the inspection, the used oil transportation registration on display at the facility was expired [Rule 62-710.500(4), FAC]. During the inspection, the facility replaced the expired registration with its current registration.

Service Shop

General maintenance on a variety of vehicles is performed in this area. Used oil, used oil filters, and spent antifreeze are generated from the facility's operations. Used oil is drained into portable dollies and then pumped into a 1,000 gallon double-walled tank located outside (Photo 1). All of these used oil dollies and the used oil tank were properly labeled. The facility has one 55-gallon drum to collect used oil filters. This drum was properly labeled. When used oil filter drums are full they are taken to the drum storage area located on the wash rack.

The facility operates two Safety Kleen System One parts washers. The sludge is collected in a 30-gallon drum and is disposed of as a D006/D007/D008 hazardous waste as needed. The last disposal of this parts washer sludge was on 6.12.12 with a weight of 175 pounds.

There was one 55-gallon drum for the collection of waste aerosols (Photo 2). Mr. Morris stated that aerosol cans are collected in this drum once they are empty. Mr. Morris also stated that the waste aerosol cans are punctured in the old used oil filter crusher because some of the cans are not completely empty. The residue is collected in the used oil filter drum. Since the waste aerosol can liquid is a D001 hazardous waste, this is not ensuring proper disposal of hazardous waste [40 CFR 261.5(g)(3)] (Photo 3).

Oily rags are laundered by Cintas. Since the facility has the potential to contaminate these rags with brake cleaner and other hazardous constituents, the DEP recommends that it label its rag container with the words "Excluded Solvent Contaminated Rags." The facility operates one glove box bead blasting machine, which is used to blast only bare metal parts.

Wash Rack

Equipment is washed down in this area with a closed-loop wash system. Sludge and dirt generated from this wash rack is disposed of as a non-hazardous waste. The facility also uses this area for storage of used oil drums that have been transported back to the facility after field technicians have serviced generators. At the time of the inspection, there were three 55-gallon drums of used oil and some empty drums (Photos 4). These used oil drums were not labeled [40 CFR 279.22(c)(1)] and were not within adequate secondary containment because they were stored at the edge of the concrete berm [Rule 62-710.401(6), FAC].

Also located on the wash rack was a 55-gallon drum that was labeled "Paint Waste." Mr. Morris stated that this drum is used to collect paint chips, debris, and PPE used when the facility removes the paint from part of a new piece of equipment's tracks. The facility rolls on Klean Strip Aircraft Remover (60-100% methylene chloride, 5-10% methanol). The paint chips that fall off, and anything else that contacts the stripper, is put into this drum. The DEP has determined that waste from this process is a F003/F002 hazardous waste. The facility started this practice earlier this summer, and it has not disposed of a drum to date. At the time of the inspection, the drum was approximately 1/10 full. The facility does not wash or rinse the tracks off during this process.

Record Review

FCC Environmental recycles the facility's used oil, used oil filters, and used antifreeze. Safety Kleen disposes of the facility's hazardous parts washer waste. No discrepancies were noted in the facility's disposal records.

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New Potential Violations and Areas of Concern:**Violations**

Type: Violation
Rule: 261.5(g)(3)
Explanation: The facility was puncturing aerosol cans and capturing the waste in its used oil drum. The D001 hazardous aerosol waste was not being properly disposed of.
Corrective Action: The facility sent documentation to the DEP on 11.11.14, returning to compliance. No further action is necessary.

Type: Violation
Rule: 279.22(c)(1)
Explanation: The facility did not have three used oil drums labeled with the words "Used Oil."
Corrective Action: The facility sent documentation to the DEP on 11.11.14, returning to compliance. No further action is necessary.

Type: Violation
Rule: 62-710.401(6)
Explanation: The facility was storing three 55-gallon drums on the edge of its containment berm.
Corrective Action: The facility sent documentation to the DEP on 11.11.14, returning to compliance. No further action is required.

Please note repeat violations, if cited in future inspections, may trigger formal enforcement.

Type: Violation
Rule: 62-710.500(4)
Explanation: The facility's posted used oil registration was expired.
Corrective Action: The facility posted its current registration during the inspection. No further action is necessary.

PHOTO ATTACHMENTS:

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Photo 1 - used oil tank



Photo 2



Photo 3 - used oil filter puncture system used for aerosols



Photo 4 - used oil drums on the edge of berm



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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

11/18/2014

DATE**Supervisor:** Jabe Breland III**Inspection Approval Date:** 08/28/2015

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.