Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

August 22, 2016

Mark Carter, Facility Supervisor
Ring Power Corporation
10421 Fern Hill Drive
Riverview, Florida 33578
Mark.carter@ringpower.com

Re: Compliance Assistance Offer
Ring Power Corporation
HW Facility ID #FLD984170415
Hillsborough County

Dear Mr. Carter:

A Hazardous Waste compliance inspection was conducted at your facility on June 14, 2016. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of Chapter 376 and 403, F.S., Chapter 62-730, Florida Administrative Code (F.A.C.), and Title 40, Code of Federal Regulation (CFR) Parts 262, 265, 279 were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

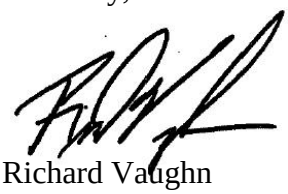
We request you review the item(s) of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issues or provide a schedule describing how/when the issue will be addressed.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the items of concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Leslie Pedigo of the Southwest District Office at (813)470-5870 or via e-mail at Leslie.Pedigo@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,



Richard Vaughn
Environmental Manager
Compliance Assurance Program
Southwest District

Enclosures: Inspection Report

RV/lelp

ec: Jerry Javier, SQG Program, Hillsborough EPC, javier@epchc.org
Richard Vaughn, FDEP; Richard.Vaughn@dep.state.fl.us
Leslie Pedigo, FDEP; Leslie.Pedigo@dep.state.fl.us
SWD_clerical@dep.state.fl.us

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 06/14/2016 **On-Site Inspection End Date:** 06/14/2016

ME ID#: 60688 **EPA ID#:** FLD984170415

Facility Street Address: 10421 Fern Hill Dr, Riverview, FL 33569

Contact Mailing Address: 500 World Commerce Pkwy, Saint Augustine, FL 32092-3788

County Name: HILLSBOROUGH **Contact Phone:** (904) 737-7730

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil Transporter

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

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

INSPECTION PARTICIPANTS:

Principal Inspector:	Leslie Pedigo, Inspector
Other Participants:	Roger Evans, Engineer III; Mark Carter, Facility Supervisor; Andy Marsh, Facilities Maintenance Leadman

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

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation (Ring Power) was inspected on June 14, 2016, to verify the facility's compliance with state and federal hazardous waste regulations. Ring Power initially notified the Department of its status as a generator of hazardous waste on August 21, 1989. On February 24, 1998, Ring Power notified as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter, and Used Oil Filter Transfer Facility. On December 29, 2003, Ring Power re-notified as a Small Quantity Generator (SQG) of Hazardous Waste. A number of Hazardous Waste inspections have previously been conducted by the Department at this facility, most recently on August 30, 2012. Mr. Andy Marsh, Facility Maintenance Leadman, accompanied the inspectors during the inspection. Mr. Mark Carter, Facility Supervisor, provided the records reviewed.

Process Description:

Ring Power is an authorized dealer for Caterpillar Equipment that sells and services heavy earth moving equipment, engines and generators. The facility, comprised of seven building built between 1989 and 2010, is located on 71.38 acres owned by Ring Power. Currently the facility employs 407 people working two shifts, 24 hours per day, Monday through Friday; additional shifts are scheduled on weekend as needed. Water and wastewater utilities are provided by Hillsborough County. Wastes generated by Ring Power includes used oil, used oil filters, used antifreeze, used fuel, used absorbents, soiled reusable rags, used absorbents, spent parts washer fluid, used batteries, empty aerosol cans, paint/solvent waste, oil laboratory waste (waste flammable liquids and waste heptane), spent grit, solids from equipment washing, scrap metal and slag, and universal waste lamps.

Used oil, used oil filters, used antifreeze, used absorbents and oily water are collected by Synergy Recycling of Central Florida, LLC. Step cans for the collection of soiled reusable rags are located throughout the shop areas; the rags are collected in the Tool Room and are picked up and laundered by Cintas. Scrap metal from around the facility is collected and recycled through Kimmins Contracting Corporation. Scrap Wood and cardboard are also collected for recycling. The wash bays located adjacent to the various shops are plumbed

to oil water separators; the wastewater is then sent to the Hillsborough County sewage system. Solids from the wash bays are collected daily and stored, along with the spent grit from the various sandblasting units, in the wash rack area; this material (wash solids and spent blast) is sent to Clark Environmental, Inc., for thermal treatment. Solvent parts washer are located throughout the facility and are either enrolled Safety-Kleen's Continued Use Program or the spent fluid is managed by Safety-Kleen as a hazardous waste. A number of the parts washers were found to be open during the inspection and did not appear to be in use. Personnel were directed to keep the solvent parts washers closed when not in use to reduce solvent evaporation. Forklifts are powered by propane and batteries.

Building 7, built in 2010, houses the Heavy Equipment Rental Shop in the south wing, the MCRC Assembly Shop, the MCRC Disassembly Shop, the Oil Laboratory, and the Tool Room in the main building; the Heavy Equipment Specification/Main Shop and the Preventative Maintenance Bay in the East Wing; and the Service Mine Division in the North Wing. The building is equipped with a “reclaimed system” for the used oil and used antifreeze. Each shop has a pump station were used oil and used antifreeze is pumped into aboveground piping which is discharge directly to the used oil and used antifreeze storage tanks located outside the East Wing of the building. Drums for the collection of used oil filters, used absorbents, and other wastes are located adjacent to the pump stations.

The Heavy Equipment Rental Shop, located in the south wing, consists of ten work bays plus one wash bay. At the time of the inspection, one 55-gallon drum of used absorbent and five 55-gallon drums of used oil filters were located next to the used oil/used antifreeze pump station. The drums were properly labeled. Four Model 30 Solvent Parts Washers were located in this shop. One small mobile used oil tank (a.k.a., used oil sucker or used oil pig) and an oil drain cart were both properly labeled.

The Oil Laboratory analyzes engine oil, hydraulic oil, transmission oil, and final drive oil for wear (metals), silicone entry, and coolant entry. Additionally, used oil is tested for chrome and lead content prior to disposal. Unused oil samples are collected in labeled 5-gallon containers under each piece of analytical equipment and are emptied into a labeled used oil container located in a storage room/hazardous waste storage area located next to the laboratory; this container is emptied into the used oil aboveground storage tank as needed. Heptane is used to flush oil samples at the viscosity meters. The Heptane flush is drained into properly labeled 5-gallon containers under each piece of equipment; these containers are taken to the hazardous waste storage area for processing. At the time of the inspection, three 5-gallon containers of Heptane/used oil waste were located in this area and were waiting processing in the still. The Heptane/used oil waste is then placed into a Safety-Kleen recovery still to recover usable Heptane; the still bottoms are collected in a 55-gallon metal drum labeled “Waste Heptane” located next to the still. A 50-gallon polypropylene drum, labeled “Waste Flammable Liquids", is also located in this area for collection of acid waste from the glycol testing procedure. According to laboratory personnel, the larger 5-gallon waste containers under the equipment are taken to the hazardous waste storage area on a weekly basis, while smaller waste containers are emptied nightly. The hazardous waste drums are picked up by Safety-Kleen Systems every three to eight months as needed; the last shipment was on March 11, 2016, when 200 pounds of Waste Flammable Liquids (waste acid) and 250 pounds of Waste Heptane were shipped off. According to a previous inspection, the drain in the storage room drains to a self-contained oil/ water separator on the property which is not connected to the sewer system. The floor of the storage room/ hazardous waste storage area and laboratory were clean and free of spilled material.

The Tool Room is located next to the Oil Laboratory. Soiled reusable rags from the step cans around the facility are brought to the tool room and collected in drums pending pick up from Cintas. At the time of the inspection, two drums of soiled used rags were located in this area. Spent alkaline batteries were also collected in a container in this area.

Major Component Reconstruction (MCRC) Shop is located next to the Oil Laboratory. The MCRC Disassembly Shop disassembles, cleans and evaluates engines and drive trains for missing/broken parts and MCRC Assembly Shop where engines and drive trains are rebuilt and tested. The MCRC Assembly Shop contained eleven System One model 250 parts washers. The MCRC Disassembly Shop contained five System One model 250 parts washers and one large Typhoon Proceco parts washer which uses water and detergent. Additionally, the MCRC Disassembly Shop had one 55-gallon drum of used absorbent, one 55-gallon drum of used oil filters and one 55-gallon drum of empty aerosol cans located next to the used oil/used antifreeze pump station; the drums were properly labeled. A sand blasting unit and small paint booth (using aerosol paint) used for small parts; containers for the collection of scrap metal; and a wash bay are also located in this shop.

The Heavy Equipment Main Shop is located in the East Wing of Building Seven. This shop has sixteen bays and eight System One model 250 parts washers. One 55-gallon metal drum of used absorbent, three 55-gallon metal drums of used oil filters, and two 55-gallon polypropylene drums used fuel were located next to the west side used oil/used antifreeze pump station. One of the drums of used oil filters was labeled with both used oil filter label and a hazardous waste label. If clean, the used fuel is returned to the vehicles once repairs are made; if the fuel is unsuitable for reuse, it is transferred into the used oil tank for disposal. One 55-gallon metal drum of used absorbent, three 55-gallon metal drums of used oil filters, were located next to the east side used oil/used antifreeze pump station. The absorbent drum and one of the used oil filter drums was not labeled. Facility personnel were directed to verify that all waste containers are properly labeled.

The Preventative Maintenance (PM) Bay is located at the east end of the East Wing of Building Seven. Ring Power operates six vehicles which conduct mobile/field repairs for their customers. Used motor fluids and used oil filters are containerized within the services vehicles and returned to the PM Bay for proper disposal. Fluids are pumped into the appropriate tank at a trough located on the exterior wall of the bay. A 220-gallon polypropylene filter drain tank, not secondarily contained, was filled to the rim at the time of the inspection. Facility personnel were directed to empty this tank nightly or provide secondary containment. Four aboveground storage tanks (ASTs) are located south of the PM Bay, at the east end of the East Wing. Three of the ASTs contain vehicular fuel while the fourth has two compartments, one for used oil and the other for used antifreeze.

The Service Mine Division, located in the North Wing, consists of nine work bays. This shop conducts repairs on mining equipment, mostly in the field. Two System One model 250 parts washers are located in the area along with one 55-gallon metal drum of used oil filters and one 55-gallon metal drum of used absorbents; the drums were properly labeled.

Building 6, built in 2009, houses the Paint Shop. Two large paints booths are located in the south end of the building with the Mixing Room/Mixing “Kitchen” in between. The paint shop uses LIC Industrial Finishes paint and gray primer that do not contain heavy metals. The paint booth filters are changed twice per year; used paint booth filters are bagged and placed in with the solid waste. The paint booth filter were last collected for testing on September 24, 2012; the analytical results document that the paint booth filters were not hazardous. One active labeled 55-gallon drum of waste paint, with a start date of June 1, 2016, was stored in the paint mixing room. One active labeled 55-gallon drum of waste paint, with a start date of June 2, 2016, was stored in 180-day Hazardous Waste Storage area located behind the mixing room. Also located in this area is a solvent recovery still which is used to recycle the thinner that is used to clean the paint guns. The still is able to recover eight gallons of clean solvent for each 10 gallons of waste solvent run through the still. The still bottoms are stored in the waste paint drum in the 180-day Hazardous Waste Storage area. A blasting booth, fitted with two bag houses to control dust emissions, is located on the north side of the building. The booth uses Red Garnet blast media and is equipped with a reuse system which is able to reuse the media approximately five times until it is too fine for use. The unusable spent blast media is emptied from the hopper approximately every eight hours into a bin which is emptied into the spent grit areas in the wash rack.

The Wash Rack is located in Building 5, built in 2007. Three wash bays are housed here: one bay contains the cannon washer, one bay contains a pressure washer and the third bay contains a truck wash. The wash bays are covered under an Industrial Wastewater permit issued by the Hillsborough County Environmental Protection Commission. Two areas in the building are used for the collection of the wash bay solids, the solids from the various wash bays from the other buildings and the spent blast media. This material is sent to Clark Environmental, Inc., for soil treatment.

Building 4, built in 1998, houses the Hydraulic Shop. Four parts washer are located in this area along with used oil pans under the work benches. The pans are all properly labeled and are pumped out by the Preventative Maintenance trucks daily or every other day.

Building 3, built in 1989, is called the Fabrication and Undercarriage Building. The Welding and Fabrication Shop is housed in two bays. A small amount of dross/slag is generated in this shop and is collected in a cardboard drum and recycled through Ring Power’s World Commerce Center (WCC). The Advanced Chroming Technologies (ACT) Shop, which occupies west side of the building, is where thermal spray is applied to fabricated rods. This area contains a large hot tank parts washer for cleaning engine blocks and cylinder heads (managed by Safety-Kleen). A wash rack and grit blaster is located in this area. The solids

from the wash rack and spent grit is collected and sent to the Wash Rack building for storage. The overspray powder is collected in drums and sent to Alpha Omega Recycling of Longview, Texas for recycling. The Machine Shop, which occupies two bays, contains three parts washers (two of which are enrolled Safety-Kleen's Continued Use Program). The Undercarriage Shop, made up of six bays, contains a sub-arch welder; the dross/slag generated is collected in a cardboard drum and recycled through WCC; scrap metal is collected for recycling. This shop also contains three parts washers, a used oil “pig” which is emptied nightly and a blast cabinet used for small parts. The Facilities Shop is housed in a single bay. The facility is in the process of switching from fluorescent lighting to LED lighting. At the time of the inspection, three properly labeled and closed boxes of spent fluorescent lights were stored in this area. The full spent fluorescent light boxes are sent to the Parts Department where they are sent via UPS to Grainger for recycling.

Building 1 and 2, built in 1989, house the One Building/Old Main Shop, the Truck Shop and Parts Department. The One Building/Old Main Shop is divided into three areas: the Industrial Shop on the north side which occupies six bays, the CAT Rental Shop on the south side which occupies seven bays, and the Forklift Shop on the west side which occupies three bays. The Old Main Shop contains eight parts washers and two elevated 1,000-gallon aboveground storage tanks (the “Elephant”), one for the storage of used oil and one for the storage of used antifreeze collected in the One Building/Old Main Shop. Under these tanks were stored four drums containing used oil filters, two drums containing used absorbents, and rolling used oil collection pans. The drums were properly labeled, however the oil pans were not.

The Truck Shop five parts washers, four Safety-Kleen's Continued Use Program parts washers and one cabinet style parts washer which is managed by Safety-Kleen, were located throughout the shop. Two approximately 500-gallon double-walled aboveground storage tanks, one for the storage of used oil and one for the storage of used antifreeze used, were located along one of the interior walls; both tanks were properly labeled. Also in this area were six 55-gallon metal drums, two containing used oil filters, one containing used absorbents, and three were empty. Two of the drums were not properly labeled, and at least one of the used oil pans in this area was not properly labeled.

Spent vehicular batteries from throughout the facility are collected by the Parts Department. Spent batteries are recycled by East Penn/Deka Batteries in Pennsylvania. At the time of the inspection five pallets of spent batteries were prepared for shipment and were stored on the covered breezeway adjacent to the Parts Department.

A review of the hazardous waste manifests documents that Safety-Kleen Systems, Inc. (TXR000081205) is the transporter and the designated disposal facility is either Safety-Kleen, Inc. (KYD053348108), Safety-Kleen Systems, Inc. (SCD077995488), Clean Harbors Environmental Services (MAD039322250), or Clean Harbors El Dorado (ARD065748192). Between 40 and 1,200 pounds of hazardous waste was disposed of eight to ten times per year and included waste paint related materials from the Paint Shop, waste parts washer fluids from the parts washers not included in Safety-Kleen Continued Use Program, and waste from the Oil Laboratory. The facility generates hazardous waste at small quantity generator levels. The used oil “bills of lading” document that Synergy Recycling Central Florida, picks up the used oil, used oil filters, used antifreeze, oily water, used fuel and used absorbents on a regular basis. Clark Environmental, Inc., processes the used oil contaminated soil, sludge from the wash racks, and spent sandblasting grit.

Weekly container inspections were typically performed for the 180-day hazardous waste storage areas in the Oil Laboratory and the Paint Shop; however, some gaps were noted. For the Oil Laboratory, weekly inspections were missed between October 7, 2013 and October 21, 2013; March 31, 2014 and May 12, 2014; July 7, 2014 and November 7, 2014; May 2, 2016 and May 17, 2016 and May 23, 2016 and June 6, 2016. For the Paint Shop weekly inspection were missed between December 13, 2013 and January 10, 2014; May 30, 2014 and June 13, 2014; July 25, 204 and August 8, 2014; November 21, 2014 and December 12, 2014, December 19, 2014 and January 9, 2015; November 13, 2015 and December 11, 2015; December 18, 2015 and January 8, 2016; January 15, 2016 and January 29, 2016; and February 5 and February 26, 2016. Modified contingency plans were maintained for each area and include a map of the work area, egress routes, designated meeting areas, and the location of safety equipment (fire extinguishers, trauma kits, and first aid kits), flammable materials and hazardous areas. Emergency Arrangement Letters were sent on November 1, 2010, as a result of the September 8, 2010, inspection. As a new hospital, St. Joseph’s Hospital-South, opened nearby in 2015, an Emergency Arrangement Letter should be sent to this hospital. Hazardous waste training records were not provided.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.401(6)
Explanation:	Several used oil drums, used oil containers, and used oil filter drums were not properly labeled. Additionally one drum was labeled both “Used Oil Filters” and “Hazardous Waste.” All used oil and used oil filter containers need to be labeled “Used Oil” or “Used Oil Filters” as appropriate. “Used Oil” and “Used Oil Filters” stencils were provided during the inspection.
Corrective Action:	An inventory of all used oil and used oil filter containers located in the various shops should be conducted to ensure they are all properly labeled.

Type:	Violation
Rule:	265.174
Explanation:	The 180-days hazardous waste storage areas in the Oil Laboratory and Paint Shop were not always inspected weekly as noted in the inspection narrative.
Corrective Action:	The 180-day hazardous waste storage areas must be inspected at least weekly.

Type:	Violation
Rule:	262.34(d)(5)(iii)
Explanation:	The facility was not able to provide records to document that all employees were thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operation and emergencies.
Corrective Action:	Immediately provide is required training and provide documentation of this training to the Department.

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 at the time of this inspection.

1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	Unk	N/A
1.1	Has the facility notified with correct status? 262.12	✔			
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✔			
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✔			

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.

Leslie Pedigo	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
Leslie Pedigo	FDEP/SWD	08/12/2016
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Roger Evans	Engineer III
Inspector NAME	**Inspector TITLE**
	FDEP/SWD
	ORGANIZATION

Andy Marsh	Facilities Maintenance Leadman
Representative NAME	**Representative TITLE**
	Ring Power Corporation
	ORGANIZATION

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.

Mark Carter	Facility Supervisor
Representative NAME	**Representative TITLE**
	Ring Power Corporation
	ORGANIZATION

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.

Report Approvers:

Approver: Richard M Vaughn **Inspection Approval Date:** 08/12/2016