



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

January 23, 2019

Mr. Brian Brown, Environmental and Property Manager  
Ring Power Corporation  
500 World Commerce Parkway  
St. Augustine, FL 32092  
[Brian.Brown@RingPower.com](mailto:Brian.Brown@RingPower.com)

Re: Ring Power Corporation – 4900 North Main St., Gainesville  
EPA/DEP ID: FLD 982 150 237  
**Alachua County – Hazardous Waste**

Dear Mr. Brown:

Department personnel conducted a compliance inspection of the above-referenced facility on November 1, 2018. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Bonnie Bradshaw at 904-256-1638 or via e-mail at [bonnie.bradshaw@FloridaDEP.gov](mailto:bonnie.bradshaw@FloridaDEP.gov).

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner".

Matthew Kershner  
Environmental Manager

Enclosure: Inspection Report

cc: [pamela.fellabaum@floridadep.gov](mailto:pamela.fellabaum@floridadep.gov),  
[cheryl.l.mitchell@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov);  
[bonnie.bradshaw@floridadep.gov](mailto:bonnie.bradshaw@floridadep.gov)  
DEP\_NED



**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:** 11/01/2018

**On-Site Inspection End Date:** 11/01/2018

**ME ID#:** 15436

**EPA ID#:** FLD982150237

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

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

**County Name:** Alachua

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

**NOTIFIED AS:**

Used Oil

VSQG

**INSPECTION TYPE:**

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

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transfer Facility facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Bonnie M Bradshaw, Inspector

**Other Participants:** Richard Morris, Heavy Equipment Lead Man

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

**SIC CODE:** 7699 - Services - repair services, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Ring Power Corporation (Ring Power) was inspected on November 1, 2018, as an unannounced hazardous waste compliance inspection. Pam Fellabaum (DEP) and Richard Morris (Ring Power) were present throughout the inspection. Ring Power was last inspected by the Department's Hazardous Waste Program on November 6, 2014. The facility is registered and operating as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter and Used Oil Filter Transfer Facility. The facility is also operating as a used oil generator and Very Small Quantity Generator (VSQG) of hazardous waste. The facility has been issued the EPA/DEP identification number FLD 982 150 237. Please use this EPA/DEP identification number on all hazardous waste correspondence with the Department.

Ring Power is a dealer and service agent for trucks, heavy equipment, generators, parts and other equipment. The facility has been in operation since 1987 and has 20 employees. Ring Power owns the property and the building which is connected to city water and sewer. Hours of operation are Monday – Friday from 7:30 am – 5:00 pm and on call as needed. The facility consists of offices, a Service Shop, a Parts Warehouse and a Wash Rack. The facility operates 5 repair trucks and 1 lube truck.

**Process Description:**

Used Oil Transportation

Ring Power services generators, heavy equipment and trucks in the field. Used oil, used oil filters and used antifreeze generated during field servicing activities are transported back to the facility and accumulated with the waste streams generated at the facility. The lube truck, which is equipped with a 200-gallon used oil tank and an oil filter tray with collection pan, is typically used for jobs requiring used oil removal. Used antifreeze is collected in a 55-gallon drum. The facility transports only its own used oil generated at its own non-

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contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter. Mr. Morris stated that whenever spent fuel is generated, it is managed by the fuel division out of the St. Augustine Ring Power facility. He stated that there have been no discharges since the previous inspection.

### Service Shop

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General maintenance is performed on a variety of vehicles in the 7-bay Service Shop (Photo 1). Used oil, used oil filters and used antifreeze are generated by the facility's operations. Used oil is drained into portable drain containers (Photo 2) and then pumped into a 1,000-gallon double-walled tank located outside (Photo 3). All of the used oil drain containers and the used oil tank were properly labeled. It is recommended that the label on the tank be re-stenciled, as it is beginning to fade. Used oil filters are drained into a portable drain container before being accumulated in a 330-gallon steel container (Photo 4). The container was in good condition, properly labeled and stored on an oil-impermeable surface. Used antifreeze is drained into portable drain containers and then transferred into a 250-gallon double-walled tank located outside (Photo 5). The tank was properly labeled.

Oil absorbent pads are also generated by maintenance activities. Spent pads are stored in a plastic bag-lined can adjacent to the used oil filter collection bin. Once full, the bag is closed and placed into the used oil filter collection container for disposal by Safety-Kleen (FLD980847214).

The facility operates two Safety-Kleen System One parts washers that use Safety-Kleen Premium Solvent (hydrotreated light petroleum distillates 100%; flash point 148°F) (Photo 6). The units distill spent solvent within the unit and pump clean solvent into the basin. The units are on a 16-week service with Safety-Kleen to add clean solvent as needed. The sludge is collected and disposed of as D006/D007/D008 hazardous waste as needed. The last shipment was in 2012 by Safety-Kleen (FLD980847214).

Rags are generated by maintenance activities and may be contaminated with oil, grease, Brakleen Brake Parts Cleaner - Non-Chlorinated (methanol 40-50%, toluene 10-20%, acetone 5-15%, 3-methylhexane 5-10%, carbon dioxide 5-10%, n-heptane 5-10%, methylcyclohexane 3-5%, hydrotreated light naphtha (petroleum) 3-5%, cyclohexane 1-3%, ethylbenzene <0.2%), Lectra-Motive Electric Parts Cleaner (tetrachloroethylene 90-100%, carbon dioxide 1-5%) or PB Penetrating Catalyst (hydrotreated light petroleum distillates 50-60%, heavy aromatic petroleum solvent naphtha 20-30%, hydrotreated heavy naphthenic petroleum distillates 20-30%, carbon dioxide 1-4%). Most rags are accumulated in closed containers labeled as "Excluded Solvent Contaminated Wipes" (Photo 8). Some smaller rag accumulation containers were labeled "E.S.C.W." The facility was reminded that in order to maintain the exclusion, it should label all rag accumulation containers as "Excluded Solvent Contaminated Wipes." Rags are laundered by Cintas weekly.

Aerosol cans of Lectra-Motive Electric Parts Cleaner (tetrachloroethylene 90-100%, carbon dioxide 1-5%; no flashpoint) are used in the Service Shop. This generates a D039/U210 hazardous waste liquid from the non-empty aerosol cans. Aerosol cans of Brakleen Brake Parts Cleaner - Non-Chlorinated (methanol 40-50%, toluene 10-20%, acetone 5-15%, 3-methylhexane 5-10%, carbon dioxide 5-10%, n-heptane 5-10%, methylcyclohexane 3-5%, hydrotreated light naphtha (petroleum) 3-5%, cyclohexane 1-3%, ethylbenzene <0.2%; flashpoint 0° F), WD-40 (aliphatic hydrocarbon 45-50%, petroleum base oil <25%, LVP aliphatic hydrocarbon 12-18%, carbon dioxide 2-3%; flash point 122°F) and Caterpillar Yellow, White or Black Standard Performance Top Coat (flash points -20.2°F - 52° F) are also used. These products generate a D001 hazardous waste liquid from the non-empty aerosol cans. Aerosol cans of PB Penetrating Catalyst (hydrotreated light petroleum distillates 50-60%, heavy aromatic petroleum solvent naphtha 20-30%, hydrotreated heavy naphthenic petroleum distillates 20-30%, carbon dioxide 1-4%; flash point >141°F) used in the Service Shop generate non-hazardous waste. Aerosol cans are punctured and drained into a 55-gallon drum with a drum-top aerosol can puncturing device (Photo 7). The drum was placed into service February 9, 2015, and it is labeled "Hazardous Waste." The drum has not been shipped off-site yet. Punctured and drained cans are recycled as scrap metal.

The facility operates one glove box bead blasting machine which is used to blast bare engine parts (Photo 9). Painted parts are sent to another Ring Power facility for blasting. Caterpillar Glass Beads 9U-5271 are used as the media. Mr. Morris stated that spent blasting media has not been disposed of in at least 10 years, as the machine is rarely used. Following the inspection, the facility provided Toxicity Characteristic Leaching Procedure (TCLP) analysis results for metals and volatiles which indicated the material is non-hazardous. The facility is reminded that if the process or materials used in the process change, additional analysis may

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be required.

Floors are cleaned with Mean Green 9 (2-butoxyethanol 2.5-10%). Mop water is disposed of as used oil or in the Wash Rack depending on the quantity of oil in the bucket.

At the time of inspection, the facility does not generate used antifreeze filters, perform tire service or generate air bag waste.

#### Parts Warehouse

There is a Parts Warehouse (Photo 10) located adjacent to the Service Shop. Parts Warehouse operations generate Excluded Solvent Contaminated Wipes. There was one closed, properly labeled container for the accumulation of wipes observed. Spent lead acid batteries generated by maintenance operations are stored on a secondary containment pallet outside the parts warehouse (Photo 11). Batteries are sent back to Caterpillar for recycling by East Penn Manufacturing. Fluorescent bulbs are changed out and disposed of by the St. Augustine Ring Power facility. Electronic waste is also disposed of by the St. Augustine Ring Power facility.

#### Wash Rack

The Wash Rack is a covered, closed-loop system used to wash equipment potentially contaminated with oil prior to service with Mean Green 9 and/or heated water (Photo 12). Wash water drains to a collection pit where water is skimmed and filtered for oil. The used oil is accumulated in a 5-gallon bucket which is added to used oil generated by other facility operations. Water is recycled back to the Wash Rack pressure washer. Water is treated with chlorine one time per month. Sludge and dirt is cleaned out of the pit as needed. The water is temporarily pumped out of the pit so that the sludge can be removed. The water is pumped back into the pit and the sludge and dirt are accumulated on the concrete pad of the Wash Rack area enclosed by an "L" shaped concrete wall. Loose dirt swept off the vehicles is also added to the accumulation area. The sludge and dirt is disposed of as non-hazardous waste as needed. TCLP metal and volatile constituent analysis has indicated the waste is non-hazardous. The facility is reminded to ensure that when sampling is conducted that a representative sample is collected and analyzed in accordance with EPA publication SW# 846 "Test Methods for Evaluating Solid Waste" 3rd Edition and with Rule 62-160, Florida Administrative Code (FAC). The facility does not recall replacing the skimmer filters. The facility is reminded to conduct a hazardous waste determination on the filters, including TCLP analysis, prior to disposal.

There is an area within the Wash Rack used to store drums. Empty drums and drums of used and new antifreeze were stored in the area. A partially full drum of used antifreeze was observed in the area labeled "used coolant." A second drum with what appeared to be used antifreeze was also observed. It was labeled "used oil/used oil filters/used absorbent." Other drums were not labeled. The facility is reminded that best management practices for management of used antifreeze destined for recycling should be in place. These include labeling drums as "used antifreeze," avoiding cross contamination with oil, ensuring containers are in good condition, keeping storage containers closed and inspecting storage containers weekly. Mr. Morris stated that the used antifreeze was stored in this area because the used antifreeze tank was full.

There were two dumpsters observed adjacent to the Wash Rack area. One dumpster contained several empty aerosol cans of Lectra-Motive Electric Parts Cleaner (Photo 13). The cans were punctured, but did not appear to have been punctured with the drum-top puncturing device. The cans were removed from the dumpster at the time of inspection. The facility is reminded that aerosol cans should be punctured with the designated puncturing device to ensure proper collection of the remaining product in the can in order for it to be managed as hazardous waste.

The process of stripping paint from new equipment tracks that has previously been conducted at the facility has been discontinued approximately 3-4 years ago.

#### Records Review

Used oil, used oil filters, used oil absorbents and used antifreeze are transported by Safety-Kleen (FLD980847214). Records indicate used oil is scheduled for pick-up by Safety-Kleen for recycling every 2 weeks and was last transported on October 30, 2018. The facility is reminded that transfer facilities that store used oil for more than 35 days are subject to regulation as a used oil processor.

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Records indicate used oil filters and absorbents are scheduled for pick-up every 2 weeks by Safety-Kleen and were last transported October 11, 2018. Records indicate used antifreeze is picked-up by Safety-Kleen for recycling every 4 weeks and was last transported August 22, 2018. Following the inspection, the facility provided a letter from Safety-Kleen dated December 7, 2018, certifying that the used antifreeze is recycled. Records indicate that parts washers are serviced by Safety-Kleen every 16 weeks and were last serviced on July 24, 2018. It was noted that in some cases Safety-Kleen pick-ups were not conducted as scheduled due to this location's low generation volume.

The used oil registration which expires on June 30, 2019 was posted.

\*\*\*\*\*NOTE: As of June 18, 2018, the State of Florida has adopted the recently-updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule. As a generator of hazardous waste, your facility is impacted by the rule change.

Please see the eCFR site for a copy of the Federal rule at - [https://www.ecfr.gov/cgi-bin/text-idx?SID=ab7ac7e8d2fb42037c72a0de5162bcfe&mc=true&tpl=/ecfrbrowse/Title40/40cfrv28\\_02.tpl#0](https://www.ecfr.gov/cgi-bin/text-idx?SID=ab7ac7e8d2fb42037c72a0de5162bcfe&mc=true&tpl=/ecfrbrowse/Title40/40cfrv28_02.tpl#0)

The November 28, 2016, Federal Register also has a good discussion about the new requirements - <https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-27429.pdf>

Copies of PowerPoints that discuss the new requirements may also be found here - <https://floridadep.gov/northeast/ne-compliance-assurance/content/compliance-assurance-resources>

Please note that the new rule in 40 CFR 262.18 requires re-notification for LQGs every other year effective immediately and every four years for SQGs starting in 2021.

## PHOTO ATTACHMENTS:

Photo 1



Photo 2





Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8





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Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



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**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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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	✓		



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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.

Bonnie M Bradshaw

Inspector

**Principal Inspector Name****Principal Inspector Title***B. Bradshaw*

DEP

01/09/2019

**Principal Inspector Signature****Organization****Date**

Richard Morris

Heavy Equipment Lead Man

**Representative Name****Representative Title**

Ring Power Corp

**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:**

Pam Fellabaum

**Inspection Approval Date:**

01/09/2019