Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 01/06/2020 **On-Site Inspection End Date:** 01/06/2020

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

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

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

County Name: Hillsborough **Contact Phone:** (904) 494-1417

NOTIFIED AS:

SQG (100-1000 kg/month), Used Oil

WASTE ACTIVITIES:

Generator: SQG **Used Oil:** Used Oil, Oil Filters **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Mercury Contaning Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for SQG (100-1000 kg/month) Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility
Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kiana Sladicki, Inspector

Other Participants: Ileana Hernandez, Environmental Specialist II; Andy Marsh, Facilities Leadperson; Scott Skinner, Environmental Manager; Sheri Delgado, Fluid Analysis Lab Staff

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

NAIC: 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation (“Ring Power”) was inspected on January 6, 2020, by the Florida Department of Environmental Protection (“Department”) to determine the facility’s compliance with state and federal hazardous waste and used oil regulations. The inspectors were accompanied throughout the facility by Andy Marsh, Facilities Maintenance Leadman. Sheri Delgado provided additional assistance in the Oil Lab and Scott Skinner, Environmental Manager, joined the inspectors for the second half of the inspection. The last inspection of Ring Power was on June 14, 2016. Ring Power last notified as a Small Quantity Generator (“SQG”) of hazardous waste on February 14, 2013.

Process Description:

Ring Power is an authorized dealer for Caterpillar (“CAT”) Equipment that sells and services heavy earth-moving equipment, engines, and generators. In addition, Ring Power provides field service for their rented equipment. The facility is comprised of seven buildings located on 71.38 acres owned by Ring Power. Currently the facility employs 481 people working two shifts, 24 hours per day, Monday through Friday; additional shifts are scheduled on the weekend as needed. Ring Power has 23 service trucks that can complete in-field oil changes and 70 service trucks. Water and wastewater utilities are provided by Hillsborough County. A majority of the

process was the same as noted in the June 14, 2016, inspection report. The walkthrough inspection was as followed:

BUILDING 7 / SOUTH WING
The South Wing housed the following: Heavy Equipment Rental Shop, Major Component Reconstruction (“MCRC”) Assembly Shop, MCRC Disassembly Shop, Heavy Equipment Tool Room, Oil Laboratory, Equipment Specification (“Spec”)/Main Shop, Preventative Maintenance Bay (“PM Bay”), and Dragline Mining Specialist (f.k.a. the Service Mine Division). The Crane Room was added since the last inspection.

The Crane Room is a new addition to the South Wing. The area had two Model 30 solvent parts washers and three 55-gallon drums for used oil and used antifreeze.

The Heavy Equipment Rental has 10 work bays and one wash bay that drains to the wash rack. Four Model 30 solvent parts washers were located here. In addition, there was one used oil 5-gallon bucket and a 330-gallon container of used oil filters, both properly labeled.

The MCRC Assembly Shop tests engine equipment before installation and had 12 drum top parts washers.

The Heavy Equipment Tool room is accessed through the MCRA Assembly Shop. Used oily rags from step cans around the facility are brought to the tool room and collected in properly managed 55-gallon drums, which are now picked up by Aramark. A 50-gallon container storing universal waste batteries was observed onsite and was being properly managed.

The MCRC Disassembly Shop disassembles, cleans and evaluates engines and drive trains for missing/broken parts. There were six System One Model 250 parts washers, one 250-gallon solvent parts washer dip tank, one Typhoon Proceco parts washer (using water and detergent), and two large solvent parts washers in this area. A sand blasting unit, a small paint booth, containers for the collection of scrap metal, a 55-gallon drum of used absorbents, and a wash bay are also located in this shop. In addition, there was one properly managed 55-gallon drum of used aerosol cans which are punctured prior to being sent to a scrap metal recycler.

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. 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 then taken to the hazardous waste satellite accumulation area ("SAA"). This SAA consisted of a 10-gallon container of hazardous waste flammable liquid, a 5-gallon container of hazardous waste corrosive liquid, and a 30-gallon container of hazardous waste flammable liquid and were being properly managed at the time of the inspection. Safety-Kleen (TXR000081205) picks up the hazardous waste and transports it to Safety-Kleen Systems (KYD053348106). There were four shipments in 2019 and the most recent was on January 3, 2020, for 200 pounds of waste flammable liquid. All shipments were for waste flammable liquid except for the August 12, 2019, shipment of 200 pounds of waste flammable liquid and waste corrosive liquid to Safety-Kleen Systems (TXD055141378).

The Spec Shop / Main Shop located in the East Wing has 16 bays and pressure washer bay. There were 9 System One model 250 solvent parts washers present at the time of the inspection.

The PM Bay is located in the East Wing. Used motor fluids and used oil filters are containerized within the service 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. Three used oil filter and one used absorbent 330-gallon containers were located inside this building. Outside the PM Bay were four above-ground storage tanks, one with two compartments for used oil/used antifreeze and three for new product.

The Dragline Mining Specialist conducts repairs on mining equipment, mostly in the field. This building housed eight work bays, one 55-gallon used absorbent drum, one 55-gallon used oil filter drum, and two System One model 250 solvent parts washers.

BUILDING 6 / PAINT SHOP
Two large paints booths are located in the south end of the building with the Mixing Room in between. One properly managed 55-gallon satellite drum of waste paint was observed in the paint mixing room. At the time of the inspection, one properly managed 55-gallon drum of waste paint with a start date of December 6, 2019, was stored in the 180-day hazardous waste central accumulation area (“CAA”) located behind the mixing room.

Ensure that emergency contact information is posted in a conspicuous area at all hazardous waste accumulation areas. 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. 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. Blast media is sent to the wash rack every eight hours.

BUILDING 5 / WASH RACK
Three wash bays are housed in the wash rack: the cannon washer, pressure washer, and the truck wash bay. 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 located in the other buildings, and the spent blast media. This material is sent to Clark Environmental, Inc., for soil treatment.

BUILDING 4 / HYDRAULIC SHOP
The Hydraulic Shop consisted of seven work bays and one bay with a Dyno Machine. Throughout this shop there were four solvent parts washers, properly labeled used oil pans and containers, and a climate-controlled room which consisted of: one 55-gallon drum of used oil absorbents (Pig Mats), one 55-gallon drum of oily waste/rags, and one 5-gallon bucket of used oil all properly labeled.

BUILDING 3
Building 3 housed the following areas: Fabrication Shop with two fabrication bays; the Machine Shop with three solvent parts washers; the Advanced Chroming Technologies ("ACT") Shop that housed a hot water parts washer, a grit blaster, and an ACT machine; the Undercarriage Shop with six bays, a tool room, five solvent parts washers, and a properly managed 300-gallon used oil recovery tank; and the Facilities Shop which contained product storage and universal waste lamp storage. At the time of the inspection, there were two properly labeled boxes of universal waste lamps with an accumulation start date of October 30, 2019, which are sent to Grainger for recycling.

BUILDINGS 1 AND 2 / OLD MAIN SHOP
This area consisted of the CAT Rental Shop, Forklift Maintenance/Industrial Shop, Tool Room, and the Truck Shop. The CAT Rental Shop had seven bays, two elevated 1,000-gallon above-ground storage tanks (one for used oil and one for used antifreeze), two 330-gallon used oil filter containers, eight solvent parts washers, and a 300-gallon used oil tank. The Forklift Maintenance/Industrial Shop had three bays, eight solvent parts washers, one 55-gallon used antifreeze drum, and multiple 5-gallon used oil buckets, all of which were properly managed. The Truck Shop had two above-ground used oil / used antifreeze tanks, used oil dollies, a 330-gallon used oil filter container, two 55-gallon drums of empty aerosol cans, one 55-gallon drum of oily rags, three solvent parts washers, and one aqueous parts washer.

Please continue to ensure that solvent parts washers remain closed when not in use to prevent solvent evaporation.

RECORDS REVIEW
Weekly inspections are conducted at the CAA in the paint shop. Waste paint is picked up by Safety-Kleen Systems (TXR000081205) and disposed of at Safety-Kleen Systems (SCD077995488), with the last pickup on October 24, 2019, for 900 pounds. Spent parts washer solvent is shipped off roughly monthly through Safety-Kleen Systems, with the most recent on January 3, 2020, for 40 pounds. Used oil is shipped off roughly weekly by Safety-Kleen, who also picks up used oil filters, used antifreeze, oily water, and used absorbents. Clark Environmental, Inc., processes the used oil contaminated soil and sludge from the wash racks, and spent sandblasting media. Insurance and registration documents were current and displayed at the facility. The contingency plan was currently being revised at the time of the inspection.

PHOTO ATTACHMENTS:

Hazardous Waste Satellite Accumulation Area

Hazardous Waste Central Accumulation Area

Conclusion:

At the time of the inspection, Ring Power was operating in-compliance with state and federal regulations of hazardous waste and used oil.

*Please note that Florida adopted the Generator Improvements Rule on June 18, 2018. Beginning in 2021 and every four years thereafter, a small quantity generator of hazardous waste must re-notify the Department using the EPA 8700-12 notification form by September 1st of each year in which re-notification is required.

3.0: Small Quantity Generator 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.	40 CFR 262 Subpart A -- General Standards	Yes	No	N/A
3.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
3.2	Has the facility obtained an EPA ID number? 262.18(a)	✓		
3.3	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? 262.18(c)	✓		
3.4	Are any hazardous wastes treated or disposed of on site?			
3.5	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)			✓
Item No.	Land Disposal Restrictions	Yes	No	N/A
3.6	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
3.7	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)	✓		
3.8	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
3.9	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
3.10	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
3.11	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
3.12	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
3.13	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
3.14	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)	✓		
3.15	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
3.16	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
3.17	If the generator choses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
3.18	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
3.19	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped?	✓		

	268.7(a)(8)			
3.20	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
3.21	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
3.22	Is the generator a small quantity generator (SQG) using a tolling agreement pursuant to 40 CFR 262.20(e)?			
3.23	Did the SQG comply with the applicable notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(10)			✓
3.24	Has the SQG retained on-site a copy of the notification and certification, along with the tolling agreement, for at least 3 years after termination or expiration of the agreement? 268.7(a)(10)	✓		
Item No.	The Manifest	Yes	No	N/A
3.25	Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are NOT in compliance) 262.20(a)(1) ☐ Item 1. Generator's U.S. EPA Identification Number ☐ Item 2. Page 1 of "X" (total number of pages used to complete the manifest) ☐ Item 3. Emergency Response Phone Number (must meet requirements below) ☐ Item 4. Manifest Tracking Number ☐ Item 5. Generator's Mailing Address, Phone Number and Site Address ☐ Item 6. Transporter 1 Company Name & U.S. EPA ID Number ☐ Item 7. Transporter 2 Company Name & U.S. EPA ID Number ☐ Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number ☐ Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group. ☐ Item 10. Containers (Number and Type) ☐ Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) ☐ Item 12. Units of Measure (Weight/Volume) ☐ Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. ☐ Item 14. Special Handling Instructions and Additional Information ☐ Item 15. Generator's / Offeror's Certifications ☐ Item 16. International Shipments (Import or Export must be noted) ☐ Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) ☐ Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) ☐ Item 19. Hazardous Waste Report Management Codes ☐ Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)	✓		
3.26	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
3.27	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
3.28	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
3.29	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		

3.30	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓
3.31	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) ☐ The next non-rail transporter? ☐ The Designated Facility if transported solely by rail? ☐ The last rail transporter to handle the waste in the U.S. if exported by rail?			✓
3.32	If the generator did not receive a signed return copy of the manifest from the designated facility within 60 days of shipment, did the generator file an exception report? 262.42(b)			✓
3.33	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
3.34	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
3.35	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	Pre Transport Requirements	Yes	No	N/A
3.36	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
3.37	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
3.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
3.39	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are NOT in compliance) 262.32(b) ☐ Generator's Name and Address? ☐ Generator's EPA ID Number? ☐ Manifest Tracking Number?			✓
3.40	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	Accumulation Requirements	Yes	No	N/A
3.41	Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.16	✓		
3.42	Check the applicable accumulation unit if the facility accumulates hazardous waste on-site prior to treatment or disposal ☑ Containers - Complete Container Checklist below ☐ Tanks - Complete Tanks Checklist below			
3.43	Does the facility comply with the 180-day accumulation time limit? 262.16(d)	✓		
3.44	If NO, has the facility been issued an extension by the Department? 262.16(d)			✓
3.45	Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? 262.16(b)(1)	✓		
3.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.16(b)(6)(i)(B)	✓		
3.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.16(b)(6)(i)(A)	✓		
3.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
3.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)	✓		

3.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)	✓		
3.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)	✓		
3.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.15(a)(1)	✓		
3.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)	✓		
3.54	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)	✓		
3.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point?			
3.56	If YES, after 3 days did the generator mark an accumulation start date on the excess waste container? 262.15(a)(6)			✓
3.57	If YES, after 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.15(a)(6)			✓
Item No.	Emergency Information/Personnel Training	Yes	No	N/A
3.58	Has the facility identified at least one employee to act as the Emergency Coordinator? 262.16(b)(9)(i)	✓		
3.59	Has the facility posted required emergency information next to a telephones or in areas directly involved in the generation and accumulation of hazardous waste? (Check items below that are NOT in compliance) 262.16(b)(9)(ii) ☐ Name and telephone number of the Emergency Coordinator ☐ Location of fire extinguishers and spill control material, and, if present, fire alarm ☐ Telephone number of the fire department, unless the facility has a direct alarm (911 is acceptable)	✓		
3.60	Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii)	✓		
3.61	Has the facility had to respond to any emergencies in the past 3 years?			
3.62	If YES, did the facility respond in a manner described below, or other appropriate manner? (Check items below that are NOT in compliance) 262.16(b)(9)(iv) ☐ FIRE - Call fire department or attempt to extinguish with a fire extinguisher ☐ SPILL - Contain the waste and clean up any hazardous waste and contaminated materials and soil ☐ FIRE, EXPLOSION, or RELEASE that posed threat - Notify the State Watch Office and National Response Center and report			✓
Item No.	Use and Management of Containers	Yes	No	N/A
3.63	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.16(b)(2)(i)	✓		
3.64	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.16(b)(2)(ii)	✓		
3.65	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.16(b)(2)(iii)(A)	✓		
3.66	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.16(b)(2)(iii)(B)	✓		
3.67	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.16(b)(2)(iv)	✓		
3.68	Does the generator properly document the weekly inspections? This should include at a	✓		

	minimum:(Check items below that are NOT in compliance) 62-730.160(3) ☐ Date and Time of inspection ☐ Legibly printed name of inspector ☐ Number of hazardous waste containers ☐ Condition of containers ☐ Notation of observations made ☐ Date and nature of any repairs or remedial actions			
3.69	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 262.16(b)(2)(v)(A)? 262.16(b)(2)(v)(A)			✓
3.70	If the facility places hazardous waste in an unwashed container that previously held incomplatible wastes or materials, is it done in compliance with 40 CFR 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B)			✓
3.71	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C)			✓
Item No.	Tanks Requirements for SQGs	Yes	No	N/A
3.72	Does the facility treat or store hazardous waste in tanks?			
3.73	If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A)			✓
3.74	Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B)			✓
3.75	Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C)			✓
3.76	If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii)(D)			✓
3.77	Does the facility inspect, where present, the following at least once each operating day:			
3.78	Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A)			✓
3.79	Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 262.16(b)(3)(iii)(B)			✓
3.80	The level of waste in the tank? 262.16(b)(3)(iii)(C)			✓
3.81	Does the facility inspect the following at least weekly:			
3.82	The construction materials of the tank to detect corrosion or leaking of fixtures or seams? 262.16(b)(3)(iii)(D)			✓
3.83	The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) to detect erosion or obvious signs or leakage? 262.16(b)(3)(iii)(E)			✓
3.84	Does the facility accumulate waste in tanks or tank systems that have full secondary containment and either leak detection equipment to alert facility personnel to leaks or established workplace practices to ensure leaks are promptly identified?			
3.85	If YES, does the facility inspect Discharge Control Equipment, Data, and Level of waste in tanks at least weekly? 262.16(b)(3)(iv)			✓
3.86	Is the use of the alternate inspection schedule (weekly versus daily) documented in the facility's operating record? 262.16(b)(3)(iv)			✓
3.87	Does the documentation include a description of the established workplace practices at the facility? 262.16(b)(3)(iv)			✓
3.88	Upon closure of the facility, was all hazardous waste removed from tanks, discharge control equipment, and confinement structures? 262.16(b)(3)(vi)			✓
3.89	Does the facility manage ignitable or reactive waste in tanks?			

3.90	If YES, does the facility meet one of the following 3 conditions? (Check the condition that applies below) 262.16(b)(3)(vii)(A) ☐ If ignitable or reactive waste is placed in a tank is the waste treated, rendered, or mixed before or immediately after placement in the tank so that (A) the resulting mixture no longer meets the definition of ignitable or reactive waste and (B) the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? ☐ If ignitable or reactive waste is placed in a tank is the waste treated or stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? ☐ If ignitable or reactive waste is placed in a tank is the tank used solely for emergencies?			✓
3.91	If the facility treats or stores ignitable or reactive waste in a covered tank does the facility comply with the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? 262.16(b)(3)(vii)(B)			✓
3.92	If incompatible wastes or incompatible waste and materials are placed in the same tank does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(1)			✓
3.93	If hazardous waste is placed in an unwashed tank which previously held an incompatible waste or material does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(2)			✓
Item No.	Preparedness and Prevention	Yes	No	N/A
3.94	Is there no evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? 262.16(b)(8)(i)	✓		
3.95	Does the facility have an internal communication or alarm system? 262.16(b)(8)(ii)(A)	✓		
3.96	Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.16(b)(8)(ii)(B)	✓		
3.97	Is the fire control equipment adequate? 262.16(b)(8)(ii)(C)	✓		
3.98	Is spill control and decontamination equipment present? 262.16(b)(8)(ii)(C)	✓		
3.99	If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? 262.16(b)(8)(ii)(D)	✓		
3.100	Is the emergency equipment inspected and tested periodically? 262.16(b)(8)(iii) If yes, how many times per year?262.16(b)(8)(v)	✓		
3.101	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? 262.16(b)(8)(v)	✓		
3.102	Has the facility made emergency response arrangements with the following: 262.16(b)(8)(vi)(A) ☐ Fire Department ☐ Police ☐ Hospital ☐ Emergency Response Contractor	✓		
3.103	If NO has the facility attempted to do so and is the refusal documented? 262.16(b)(8)(vi)(B)			✓
Item No.	Record keeping and Reporting	Yes	No	N/A
3.104	Is the generator keeping records of exception reports? 262.42(b)			✓
3.105	Is the generator keeping records of test results, waste analysis or other determinations made in accordance with 262.11? 262.11(f)	✓		
3.106	Are the records kept on-site? 262.40	✓		
3.107	Are records kept for a minimum of 3 years? 262.40	✓		

3.108	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
3.109	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was inteneded to be shipped off-site? 262.83(b)			✓
3.110	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
3.111	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)	✓		
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			✓
5.16	contain the released oil? 279.22(d)(2)			✓
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A

5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oi62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
	☐ Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	☐ Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	☐ Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards?			✓

	[Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓
Item No.	Marketing and Processing	Yes	No	N/A
	☐ Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40			

	CFR 279 Subpart H.]			
	☐ Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

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

Kiana Sladicki	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
	DEP	01/27/2020
Principal Investigator Signature	**Organization**	**Date**

Ileana Hernandez	Environmental Specialist II
Inspector Name	**Inspector Title**
	DEP
	Organization

Andy Marsh	Facilities Leadperson
Representative Name	**Representative Title**
	Ring Power
	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.

Scott Skinner	Environmental Manager
Representative Name	**Representative Title**
	Ring Power
	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.

Sheri Delgado	Fluid Analysis Lab Staff
Representative Name	**Representative Title**
	Ring Power
	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:	Shannon Kennedy	**Inspection Approval Date:**	01/27/2020