Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corporation

On-Site Inspection Start Date: 01/22/2021 **On-Site Inspection End Date:** 01/22/2021

ME ID#: 38304 **EPA ID#:** FLR000097444

Facility Street Address: 2700 Gandy Blvd N, St Petersburg, Florida 33702-2022

Contact Mailing Address: 500 World Commerce Parkway, St Augustine, Florida 32092

County Name: Pinellas **Contact Phone:** (904) 494-7445

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: SQG **Used Oil:** Used Oil, Oil Filters

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Principal Inspector: Kiana Sladicki, Inspector
Don Stillwaugh, Environmental Specialist II; Landon Barnett, Field Service Supervisor;
Other Participants: Phillip Lacey, Service Lead Man

LATITUDE / LONGITUDE: Lat 27° 50' 55.1078" / Long 82° 40' 13.7981"

NAIC: 811121 - Automotive Body, Paint, and Interior Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation St. Petersburg (“Ring Power”) was inspected on January 22, 2021, by the Florida Department of Environmental Protection (“Department”) and the Pinellas County Solid Waste Program to determine the facility’s compliance with state and federal hazardous waste and used oil regulations. The inspectors were accompanied throughout the facility by Landon Barnett, Field Service Supervisor, and Philip Lacey, Service Lead Man. This was the first inspection of Ring Power by the Department. Ring Power opened business at this location in 2020 and notified as a Small Quantity Generator (“SQG”) of hazardous waste on August 26, 2020. Ring Power is also a registered used oil transporter, used oil transfer, used oil filter transporter, and used oil filter transfer facility.

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 one building. Currently the facility employs approximately 25 people working 7:30 AM - 5 PM, Monday through Friday. Ring Power has 10 technicians that can complete 3-4 off-site maintenance visits a day, occasionally completing oil changes. Used oil and used oil filters are transferred in properly managed 5-gallon buckets back to the facility. All the lights in the facility are LED and the batteries from the forklifts are taken for core credit. Water and wastewater utilities are provided by the City of St. Petersburg. The walkthrough inspection was as followed:

SERVICE SHOP
The Service Shop housed six work bays for onsite maintenance. There were two Model 30 Safety Kleen solvent

parts washers that were properly closed and managed by Safety Kleen every eight weeks. Adjacent to one of the parts washers was a used oil filter collection container that was being properly managed. South of the used oil filter container and parts washer was a 55-gallon aerosol can puncturing drum. At the time of the inspection, the facility was managing waste liquid from punctured aerosol cans as hazardous waste; however, the drum used for the collection of the waste liquid was not properly labeled with the words "hazardous waste". Mr. Lacey properly labeled the drum during the inspection and the Department verbally discussed the recently adopted rule from October 30, 2020, that aerosol cans can now be managed as universal waste. More information can be found here: https://floridadep.gov/waste/permitting-compliance-assistance/content/hazardous-waste-rulemaking.

Adjacent to the aerosol can puncturing drum were two 5-gallon step cans for shop rags, which are laundered by Aramark. Ring Power typically utilizes about 200 rags per week. On the south wall of the Service Shop were five double-walled 300 gallon tanks, three of which were product. There was one for used coolant and another properly managed tank was for used oil. All used oil from both on-site and off-site service jobs are collected in this tank. Ring Power is a notified used oil transporter and transfer facility and therefore cannot hold used oil from offsite for longer than 35 days. This used oil tank is not shipped off every 35 days and therefore the facility would be operating as a used oil processor. The Department discussed options on how to abide by the used oil transfer and transporter requirements; on February 1, 2021, Ring Power confirmed via email that moving forward, used oil will be picked up on a four week interval instead of every eight weeks.

WASH BAY
Outside of the Service Shop to the west was an open wash bay that is on a closed loop system. Non-hazardous solids from this are held in a covered dumpster and hauled by Clark Environmental. The waste water is treated in an onsite treatment unit. Also outside was a scrap metal dumpster that is serviced by Trademark Metal.

RECORDS
Since the facility's only hazardous waste streams are the two solvent parts washers and a 55-gallon aerosol can puncturing drum, the facility does not have a central accumulation area and therefore no weekly inspection logs. Training records included a course taken the morning of January 22, 2021, called Contamination Control for Techs. There is also an annual course.

The last used oil shipment was on January 11, 2021, for 240 gallons that was picked up by Safety Kleen. Used oil filters were last picked up on November 11, 2020, by Safety Kleen. Safety Kleen services the parts washers every eight weeks and last picked up 30 gallons of flammable aerosol waste on November 6, 2020. The Certificate of Liability Insurance was posted and expires on July 1, 2021. The used oil registration was posted and expires on June 30, 2021.

Ring Power had a modified contingency plan posted that included the emergency coordinator, Ruben Obijo. The plan included information on the local authorities, however, Ring Power did not maintain an attempt to make arrangements with the listed authorities. Ring Power submitted documentation of the corrective action on February 1, 2021, via email.

The Department noted that Ring Power was generating at a Very Small Quantity Generator rate. However, Ring Power will maintain the SQG status.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.15(a)(5)
Question Number:	3.54
Question:	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)
Explanation:	All containers storing hazardous waste must be marked with the words "Hazardous Waste". At the time of the inspection, Ring Power did not label the aerosol can puncturing drum with the words "Hazardous Waste".

Corrective Action:	CORRECTED: Ring Power labeled the aerosol puncturing can drum with the words "Hazardous Waste".

Photo Attachments:

Aerosol puncturing can drum not properly labeled.



CORRECTED: Properly labeled with the words "Hazardous Waste"



Type:	Violation
Rule:	262.16(b)(8)(vi)(A)
Question Number:	3.102
Question:	Has the facility made emergency response arrangements with the following: 262.16(b)(8)(vi)(A)
Explanation:	All small quantity generators of hazardous waste must attempt to make arrangements with local authorities. Documentation of acceptance or rejection must be kept onsite. Ring Power did not maintain an attempt to make arrangements with the listed authorities
Corrective Action:	CORRECTED: Ring Power submitted the documentation of an attempt to make arrangements with the appropriate local authorities via email on February 1, 2021.

Type:	Violation
Rule:	279.45(a)
Explanation:	Used oil transfer facilities are transportation related facilities including loading docks, parking areas, storage areas, and other areas where shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days. Transfer facilities that store used oil for more than 35 days are subject to regulation under subpart F of this part. Ring Power was storing used oil from offsite at the facility for longer than 35 days and was not a registered used oil processor.
Corrective Action:	CORRECTED: Ring Power changed their used oil pickup for offsite disposal from every eight weeks to every four weeks to ensure compliance with the 35 day requirement. This was confirmed via email on February 1, 2021.

PHOTO ATTACHMENTS:

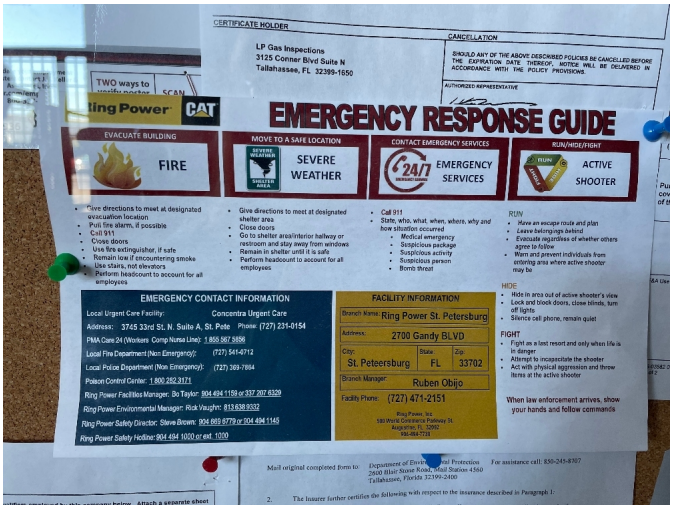
Used oil filter container and one parts washer



Used oil tank



Modified contingency plan



The second parts washer



Conclusion:

At the time of the inspection, Ring Power was not operating in compliance with state and federal regulations applicable to small quantity generators of hazardous waste and used oil transport and transfer facilities. With information received after the inspection, Ring Power was determined to be back in compliance.

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(b)	✓		
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)(C)			✓
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)(2)	✓		
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 or label an accumulation start date on the excess waste containers ? 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			✓

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	02/01/2021
Principal Investigator Signature	**Organization**	**Date**

Don Stillwaugh	Environmental Specialist II
Representative Name	**Representative Title**
	Pinellas County
	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.

Landon Barnett	Field Service Supervisor
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.

Phillip Lacey	Service Lead Man
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:	Michael C Lynch	**Inspection Approval Date:**	02/01/2021