



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

December 5, 2012

SENT VIA EMAIL

Tim.morgan@ringpower.com

Mr. Tim Morgan, Branch Foreman
Ring Power Corp
330 Pecan Park Road
Jacksonville, Florida 32218

**Re: Ring Power Corp
EPA/DEP ID: FLR 000 127 274
Duval County – Hazardous Waste**

Dear Mr. Forman:

Thank you for your assistance during the hazardous waste inspection conducted by the Florida Department of Environmental Protection (Department) at your facility on November 20, 2012. Enclosed are the report and photos that document the inspection.

The EPA ID No. FLR 000 127 274 has been assigned to your facility. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.256.1671.

Sincerely,

Jabe Breland III
Environmental Specialist III
Hazardous Waste Section

Enclosure(s)



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 11/20/2012

On-Site Inspection End Date: 11/20/2012

ME ID#: 27798

EPA ID#: FLR000127274

Facility Street Address: 330 Pecan Park Rd, Jacksonville, Florida 32218-1308

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

County Name: Duval

Contact Phone: (904) 494-1417

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

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

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Tim Morgan, Branch Foreman

LATITUDE / LONGITUDE: Lat 30° 30' 51.0755" / Long 81° 37' 57.7476"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power was inspected on November 20, 2012, as an unannounced hazardous waste compliance evaluation inspection. This Ring Power facility is a Ring Power Service and Repair Center. The facility last notified the Department that it was operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste, a used oil transporter/transfer facility, a used oil filter transporter/transfer facility, and a small quantity handler (SQH) of universal waste in February of 2012.

Ring Power services engines, generators, and transmissions for CAT industrial equipment and vehicles. Work is done both in the field and on-site. The facility has been in operation for approximately seven years and was last inspected by the Department's Hazardous Waste Section in February of 2006. Mr. Tim Morgan, Branch Foreman, was present throughout the inspection.

Process Description:

Used Oil Transportation

Technicians perform work, including oil and oil filter changes, both on-site and in the field. Field technicians will change the oil in an engine and then transport the used oil and used oil filters back to the facility, where it is placed in with the used oil generated on-site. According to Mr. Tim Morgan, Ring Power may transport over 55 gallons of used oil at one time.

Since the facility transports only its own used oil generated at its own non-contiguous operations

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to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter, Ring Power must only comply with the following used oil transportation requirements: the facility must annually register its used oil transportation activities with the DEP, it must display the used oil transporter registration in a prominent place at the facility, and it must maintain proof of financial responsibility according to Rule 62-710.600(2)(e), FAC. At the time of the inspection, the facility was in compliance with these requirements.

Service Center

Ring Power services forklifts, vehicles, and other various heavy equipment in a large garage, generating used oil and used oil filters. Used oil is drained into several small containers around the shop before being pumped into its used oil tank. All of these used oil containers that were inspected were properly labeled. The used oil tank was properly labeled and was double-walled (Photo 1). Used oil filters are stored inside the shop in 55-gallon drums (Photo 2). All of these used oil filter drums were properly labeled. The facility operates four Recycle Kleen parts washers that are serviced by Safety Kleen under its continued use program. Cintas launders the facility's rags.

In the rear of the facility there is a wash basin for heavy equipment (Photo 3). The 100% recycle system generates oily sludge/dirt which is disposed of as a non-hazardous waste through Safety Kleen. All painting is performed at Ring Power's St. Augustine location.

Records

A review of the facility's disposal records revealed that there was a shipment of D006/D007/D008 hazardous waste distillation bottoms on 2/19/10 and again on 9/1/10. Both of these disposals had a weight of 200 pounds. According to Mr. Morgan, he was unaware where this waste was generated. Mr. Morgan said Safety Kleen told him that this was from "sludge from bottom of machine at the outside tanks." The Department recommends the facility identify where hazardous waste is generated in its facility to ensure compliance with applicable regulations. No subsequent hazardous waste disposals have been made to date.

Safety Kleen services the facility's four parts washers approximately every two months under its continued use program. FCC Environmental recycles the facility's used oil and used oil filters. All records reviewed were found to be in order.

PHOTO ATTACHMENTS:

Photo 1 - used oil tank



Photo 2 - used oil filter drums



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Photo 3



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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Jabe Breland III**PRINCIPAL INSPECTOR NAME**Inspector**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**DEP**ORGANIZATION**12/5/2012**DATE****Supervisor:** Jabe Breland III**Inspection Approval Date:** 12/05/2012

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.