



# Florida Department of Environmental Protection

Northeast District Office  
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Jacksonville, Florida 32256-7590

file 3/11

Charles W.  
Governor

Jeff Labadie  
Lt. Governor

Michael W. Sole  
Secretary

MAR 11 2009

Mr. David Brimblecombe, Environmental Manager  
Ring Power Corporation  
6200 North US Highway 441  
Ocala, Florida 34475

Re: **Ring Power Corporation**  
**EPA/DEP ID: FLD 984 206 854**  
**Columbia County - Hazardous Waste**

Dear Mr. Brimblecombe:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Department at your facility on February 2, 2009. Enclosed is the report that documents this inspection.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning hazardous waste and used oil management. Subsequent to the inspection, your facility submitted information stating that the violations have been corrected. Since your facility has returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.807.3369.

Sincerely,

*Tami Applebee*

Tami Applebee  
Environmental Specialist I  
Hazardous Waste Section

*DAE*  
Enclosure



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Ring Power Corporation

**On-Site Inspection Start Date:** 02/03/2009

**On-Site Inspection End Date:** 02/03/2009

**ME ID#:** 40828

**EPA ID#:** FLD984206854

**Facility Street Address:** 390 SW Ring Ct, Lake City, Florida 32025-3148

**Contact Mailing Address:** PO Box 30169, Tampa, Florida 33630-3169

**County Name:** Columbia

**Contact Phone:** (813) 865-2700

**NOTIFIED AS:**

SQG (100-1000 kg/month)

Used Oil

**INSPECTION TYPE:**

Follow-Up Inspection for CESQG (<100 kg/month) facility

Follow-Up Inspection for Used Oil Generator facility

Follow-Up Inspection for Used Oil Transporter facility

Follow-Up Inspection for Used Oil Transfer Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Tami A Applebee, Environmental Specialist I

**Other Participants:** Richard Jernigan, Tool Room Attendant

**LATITUDE / LONGITUDE:** Lat 30° 7' 27.0" / Long 82° 39' 28.1"

**SIC CODE:** 7359 - Services - equipment rental and leasing, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Ring Power Corporation - Lake City (Ring Power) was inspected on February 3, 2009, as an unannounced hazardous waste compliance inspection. The facility notified the Department as a Small Quantity Generator (SQG) on June 24, 2005, and was last inspected on September 11, 2008. This report pertains to both inspections. The facility is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG). The facility also maintains registration as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter, and Used Oil Filter Transfer Facility. The current registration expires on June 30, 2009. The facility has approximately 30 employees and has been in operation since 1991.

**Process Description:**

**Maintenance Areas**

The facility is comprised of three distinct maintenance areas: a Truck Shop, a Heavy Equipment Shop, and a Rental Shop. Although different types of equipment are maintained in these areas, waste streams and waste management are similar. Maintenance operations generate used oil, used oil filters, and waste antifreeze. Used oil is collected in mobile containers and then pumped to a 500-gallon, labeled, used oil tank located within secondary containment. One mobile used oil container in the Truck Shop was not labeled with the words "Used Oil." During a prior inspection, on September 11, 2008, a DEP inspector had similarly identified one used oil collection container not labeled. A facility that generates used oil that does not label or clearly mark the containers or Aboveground Storage Tanks (ASTs) that contain used oil with the words "Used Oil" is in violation of

Inspection Date: 02/03/2009

40 Code of Federal Regulations (CFR) 279.22(c)(1). The violation was corrected during the inspection. Used oil filters and waste antifreeze are accumulated in labeled 55-gallon drums. Used oil, used oil filters, waste antifreeze, and used oil absorbents are recycled through Synergy Recycling, LLC. Oily rags are collected in kick-cans and laundered by Cintas. Three System-One parts cleaners are located in the Truck Shop and three are in the Heavy Equipment Shop. These are maintained by Safety-Kleen. The sludge is collected in a closed 55-gallon drum labeled, "System One Sludge." When disposed of, the sludge is manifested as D006/D007/D008 hazardous waste. If Safety-Kleen changes the solvent within the parts washers, it is recycled through their Continued Use Program. All of the drains in and around the Truck Shop lead to a sump which is ran through the Wash Rack (described below). The facility has developed an aerosol can collection program. This was noted as an area of concern during the previous September 11, 2008 inspection. Used lead acid batteries are transported to the Parts Department where they are collected for transport to the St. Augustine Ring Power facility, and eventually, recycled through East Penn Batteries. Scrap metal is recycled through Tri-County Metals. No painting is performed on-site; all paint work is referred to the St. Augustine Ring Power facility.

#### Wash Rack

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The facility operates a 100% closed loop recycling system for high pressure washing of equipment. [See attached photo]. Approximately two to four vehicles are washed in this area per day. This area is permitted by the State of Florida DEP Industrial Wastewater Facility Permit number FLA017322. The facility occasionally uses an alkaline solvent, Hydrosolve 4165 in this area (pH 13) which is sprayed on undiluted prior to the vehicle being pressure washed. Wastewater flows from a concrete wash pad to a collection area which filters solid materials and directs the wastewater to an oil-water separator. The solid material is removed, as necessary, dried and accumulated for disposal through Veolia Environmental Services as "Contaminated Debris." Analyticals are performed at the time of shipment. The facility provided a total metals analysis for the sludge dated April 3, 2008, indicating the material was not hazardous waste. Wastewater is then diverted to an oil-water separator. The water fraction is pumped to a lined pond which is pumped out on a regular basis and managed as petroleum contact water through Petrotech Southeast, Inc. The oil fraction is recycled through Safety-Kleen.

#### Other Outside Areas

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The facility also includes a sales and display lot and a separate 40 foot by 40 foot aluminum shed used for storage. No hazardous waste is generated in these areas.

#### Used Oil Transporter

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The facility maintains registration as a Used Oil Transporter, Used Oil Filter Transporter, and Transfer Facility for the transport of their own used oil via a preventative maintenance truck which performs off-site service and maintenance. The truck has a 90-gallon capacity. Records supplied by Ring Power indicate that the truck transports from two to 90 gallons of used oil on any given day. A current registration certificate was displayed at the facility, in the break room, as required by Rule 62-710.500(4), FAC. According to Rule 62-710.510(3), FAC, "A generator of used oil that transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter is not subject to the record keeping and reporting requirements of...[Rule 62-710.510, FAC]." The facility does maintain a log recording the location, date, and amount of used oil transported. Rule 62-710.600(1)(b), FAC exempts the facility from many of the certification requirements when self-transporting. The facility had proof of financial responsibility as required by Rule 62-910.600(2)(e), FAC.

#### New Potential Violations and Areas of Concern:

#### Used Oil Generator Checklist

Inspection Date: 02/03/2009

Type: Violation

Rule: 279.22(c)

Question Number: 5.40

Question: Are containers/tanks storing used oil marked with the words "Used Oil"?

Explanation: One mobile used oil container was not labeled with the words "Used Oil."

Corrective Action: The facility returned to compliance during the inspection.

**Attachments:**

Mobile used oil container.



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**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
Used Oil Generator Checklist 279.22(c)		02/03/2009	One mobile used oil container was not labeled with the words "Used Oil."

Areas of Concern

No Areas of Concern

**ATTACHMENTS:**

Inspection Date: 02/03/2009

Wash Rack Area.



**Conclusion:**

Ring Power has been assigned the EPA identification number: FLD 984 206 854. Please use this number on all hazardous waste manifests and on all correspondence with the DEP.

Inspection Date: 02/03/2009

**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.

Tami A Applebee**PRINCIPAL INSPECTOR NAME**Environmental Specialist I**PRINCIPAL INSPECTOR TITLE**Tami Applebee**PRINCIPAL INSPECTOR SIGNATURE**FDEP**ORGANIZATION**3/10/2009**DATE**Richard Jernigan**REPRESENTATIVE NAME**Tool Room Attendant**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**Ring Power Corporation**ORGANIZATION****Report Approvers:**Vicky Valade**SUPERVISOR NAME**Environmental Manager**SUPERVISOR TITLE**Vicky G Valade**SUPERVISOR SIGNATURE**FDEP**ORGANIZATION**3/10/2009**DATE**

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.



Inspection Date: 02/03/2009

**CESQG Checklist - 40 CFR 261.5**

Standards for Conditionally Exempt Small Quantity Generators		Potential Violation or AOC cited
7.1	Did the facility conduct a waste determination on all wastes generated?	
7.10	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes?	
7.20	Has the facility obtained an EPA ID #? (not required for CESQGs)	
7.30	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste?	
7.40	Is the facility disposing of hazardous waste by mixing with used oil?	
7.50	Can the facility document proper disposal through written receipts or records?	
7.51	Does the written documentation include names and addresses of the generator and the TSD, the type and amount of hazardous waste delivered, and the date of shipment?	
7.52	Is written documentation retained for 3 years?	
7.60	Are any hazardous wastes treated or disposed of on site? <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">If yes, describe in Narrative</div>	
7.70	Are there any unpermitted discharges of other wastes to the environment?	

Inspection Date: 02/03/2009

**Used Oil Generator Checklist**

On site storage of unmixed used oil or filter shipped through certified transporters		Potential Violation or AOC cited
5.10	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units?	
5.20	Are containers/tanks in good condition?	
5.30	Are containers/tanks leaking?	
5.40	Are containers/tanks storing used oil marked with the words "Used Oil"?	✓
5.50	Including fill pipes used to fill underground tanks?	
5.60	Are containers/tanks (regardless of size) that are stored outside:	
5.70	Closed or otherwise protected from the environment	
5.80	Either 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	
5.90	Are containers/tanks that are stored inside:	
5.100	Either 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 (regardless of size)? Note: Inside containers that are 55 gallons or less are assumed to meet the secondary containment requirement if they are stored on an oil-impervious surface. Inside containers/tanks that are larger than 55 gallons and are portable/wheeled are assumed to meet the secondary containment if they are stored on an oil-impervious surface and if they are typically emptied every 24 hours.	
5.110	Are used oil filters stored in above ground containers which are:	
5.120	In good condition?	
5.130	Are used oil filter containers closed or otherwise protected from weather?	
5.140	Are used oil filter containers labeled "Used Oil Filters"?	
5.150	Are used oil filter containers stored on an oil impervious surface?	
5.160	Have any releases to the environment occurred, other than a leak from a UST?	
5.170	If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service?	
5.180	Does the generator only use transporters who have received EPA Identification numbers?	
5.190	Is transporter also a Florida certified used oil transporter?	
5.200	Names and numbers of transporters:	
5.210	Does the facility generate other materials contaminated with used oil?	
5.220	If so, are the materials burned for energy recovery as used oil?	
5.230	or, Does the facility have records documenting the residuals are not hazardous waste?	
5.240	Does the generator mix hazardous waste with the used oil?	
5.250	If so, is the facility a CESQG? [CESQGs that mix HW and used oil must maintain disposal documentation per 62-730.030(3), FAC.]	
5.260	If not, Is the oil mixed with a characteristic hazardous waste? [If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.] Describe Waste	
5.270	If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste?	



Inspection Date: 02/03/2009

On site storage of unmixed used oil or filter shipped through certified transporters		Potential Violation or AOC cited
5.280	Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable?	

Generator Self Transport		Potential Violation or AOC cited
5.290	Does facility transport used oil pursuant to the generator self transport exemption?	
5.300	Transports only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Name and location of center: Location of generator aggregation point	
5.310	If so, is this only in vehicles owned by the facility or facility employees?	
5.320	Is no more than 55 gallons transported at one time?	

Processor, Marketer & Burner Applicability		Potential Violation or AOC cited
5.330	Does the generator claim that the used oil meets the specification in 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.]	
5.340	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.]	
5.350	Does the generator burn on site in a 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.]	
5.360	If so, does he burn only DIY oil or oil generated on site?	
5.370	Does the heater have a capacity of no more than 0.5 million BTU/hr?	
5.380	Are combustion gasses vented to the atmosphere?	
5.390	Alternatively, does the generator have a tolling arrangement with a used oil reclaimer?	
5.400	Is a copy of the contract kept on site specifying type and frequency of shipments?	
5.410	That the transport vehicle is owned by the processor?	
5.420	That the reclaimed oil will be returned to the generator?	