



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 13, 2013

Mr. Johnny Batton, Shop Leadman
Ring Power Corporation
2920 S Byron Butler Parkway
Perry, Florida 32348
johnny.batton@ringpower.com

**Re: Ring Power Corporation
EPA/DEP ID: FLD 981 480 205
Taylor County – Hazardous Waste**

Dear Mr. Batton:

The Florida Department of Environmental Protection (Department) personnel conducted a compliance inspection of the above-referenced facility on September 16, 2013. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Stephany Fenn at (904) 256-1694 or via e-mail at Stephany.Fenn@dep.state.fl.us.

Sincerely,

Michael Savage
Environmental Manager
Northeast District

Enclosure(s) – Inspection Report

Ec: Dave Strickland, Environmental Manager, dave.strickland@ringpower.com



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 09/16/2013

On-Site Inspection End Date: 09/16/2013

ME ID#: 39549

EPA ID#: FLD981480205

Facility Street Address: 2920-A S Byron Butler Pkwy, Perry, Florida 32348-6314

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

County Name: Taylor

Contact Phone: (904) 494-1417

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Stephany Fenn, Inspector

Other Participants: Johnny Batton, Shop Leadman; Melissa Padgett, Inspector

LATITUDE / LONGITUDE: Lat 30° 5' 1.579" / Long 83° 34' 1.8334"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power was inspected on September 16, 2013, as an unannounced hazardous waste Compliance Evaluation Inspection (CEI). Ring Power notified the Department's Hazardous Waste Section as a Conditionally Exempt Small Quantity Generator (CESQG) in March 2011, and updated its Used Oil Transporter registration in April 2013. The facility was last inspected by the Department's Hazardous Waste Section on September 15, 2006. At the time of the current inspection, the facility was operating as a CESQG of hazardous waste, a Used Oil Transporter, and a Used Oil Transfer facility.

The facility has been issued the EPA/DEP identification number FLD 981 480 205. Please use this number on all correspondence with the Department's Hazardous Waste Section.

Ring Power is a heavy equipment dealer that performs routine maintenance and repair to heavy equipment. The facility also provides field services including maintenance and repair of equipment, equipment installation, and owner/operator training to industrial and agricultural businesses. The facility has been at this location for approximately 20 years, is on city water, well water, and septic, and has four service technicians.

The facility consists of a Washrack area, a Maintenance Shop, and offices.

Inspection Date: 09/16/2013

Process Description:

Washrack:

When equipment is returned from rental use, it is taken to the Washrack to be cleaned (Photo 1). Dirt is removed from the equipment using a pressure washer with water. The dirt is shoveled into an adjacent shed where it is accumulated and after testing for RCRA heavy metals, the non-hazardous dirt is incinerated or sent to a landfill (Photo 2). The facility test and disposes of this waste stream once every four to five years.

After dirt has been removed, the equipment is washed using a non-hazardous soap to remove grease and oil from the equipment. The oily washwater is directed to an adjacent sump where the water is evaporated (Photo 3). During a heavy rainfall event, overflow water is directed to a nearby detention pond. This is an area of concern because of the potential for a used oil release to the ground. DEP Inspectors, Joseph Emery and Kyle Watson, from the Department's Wastewater section met with Dave Strickland, Environmental Manager, and Johnny Batton, Shop Leadman, on-site to discuss whether the washrack system required a permit or other Best Management Practices (BMPs). The concern was forwarded to the Suwannee Water Management District for their review.

Dirt in the sump is occasionally removed and placed into the shed where it is tested prior to being incinerated or sent to a landfill as described above.

Maintenance Shop

In the Maintenance Shop, routine maintenance and repairs are performed on customer equipment, rental equipment, and facility equipment. Used oil generated from routine maintenance is collected in used oil catch pans and pumped into the facility's 500-gallon double-walled used oil tank. The tank was labeled "Used Oil" (Photo 4).

Used oil filters are drained into a used oil container and then placed into a 55-gallon drum for accumulation. Three 55-gallon drums were accumulating, and all were properly labeled with the words "Used Oil Filters" (Photo 5). Used oil and used oil filters are recycled through FCC Environmental. Spent antifreeze is collected in a 250-gallon tote, and it is recycled through FCC Environmental. The facility has three 30-gallon Safety Kleen petroleum naphtha parts washers (Photo 6). The parts washers are serviced by Safety Kleen every eight weeks under Safety Kleen's continued use program.

The facility has one glove box sand blasting unit that has bag filters (Photo 7). This unit is used approximately once per month to blast rust and staining from small parts and tools. Glassbeads are used as blast grit, and the filter bags have not yet been changed. The facility should perform a Toxicity Characteristic Leaching Procedure (TCLP) for RCRA metals on waste generated from this blasting unit and manage the waste based upon the determination.

The facility collects aerosol cans in 55-gallon drums for recycling as scrap metal (Photo 8). If a can is not empty, but is not usable, the facility sends the can to the Tallahassee facility for puncturing and draining. This is an area of concern, because the Tallahassee facility is not authorized to accept CESQG hazardous waste. Subsequent to the inspection, the facility implemented a plan to collect spent aerosol cans for recycle as scrap metal. Waste aerosol cans that are not spent will be managed as hazardous waste.

Rags are laundered through Cintas. Spent batteries are collected on pallets and transferred to the facility's main office located in Ocala. They are then sent for recycling to East Penn in Pennsylvania.

There were no violations observed in this area.

Inspection Date: 09/16/2013

Used Oil Transportation:

The facility services equipment in the field and transports the used oil back to the Perry location in a truck that has a 90-gallon used oil tank. The facility labeled the tank Used Oil during the inspection (Photo 9). The facility's registration was up to date, it's used oil transporter registration certificate was displayed, and it maintains proof of financial responsibility according to 62-170.600(2)(e), FAC. All used oil transportation is logged and this log is kept up to date. Used oil generated in the field is added to the facility's 500-gallon double-walled used oil tank.

Record Review:

Ring Power is currently operating as a CESQG of hazardous waste. The facility generates non-empty hazardous waste spent aerosol cans. The facility estimated that it may generate one 55-gallon drum of non-empty hazardous waste spent aerosol cans per year. The three Safety Kleen parts washers are serviced every eight weeks under Safety Kleen's continued use program. Used oil and used oil filters are recycled through FCC Environmental. The records reviewed were in order.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Inspection Date: 09/16/2013

Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Inspection Date: 09/16/2013

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.

Stephany Fenn

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

11/7/2013

DATE**Supervisor:** Vicky Valade

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.