



**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 20, 2013

Mr. Dave Strickland, Environmental Manager
Ring Power Corp
500 World commerce Parkway
St. Augustine, Florida 32092
dave.strickland@ringpower.com

**Re: Ring Power Corp
EPA/DEP ID: FLR 000 119 347
St. Johns County – Hazardous Waste**

Dear Mr. Strickland:

The Florida Department of Environmental Protection (Department) personnel conducted a compliance inspection of the above-referenced facility on June 19, 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. Non-compliance identified in the inspection report has been corrected.

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 Jabe Breland at (904) 256-1671 or via e-mail at Jabe.Breland@dep.state.fl.us.

Sincerely,

Vincent Clark
Environmental Manager
Northeast District

Enclosure(s)



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 06/19/2013

On-Site Inspection End Date: 06/19/2013

ME ID#: 36377

EPA ID#: FLR000119347

Facility Street Address: 500 World Commerce Pkwy, St Augustine, Florida 32092-3788

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

County Name: St. Johns

Contact Phone: (904) 494-1417

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for SQG (100-1000 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Stephany Fenn, Inspector; Dave Strickland, Environmental Manager

LATITUDE / LONGITUDE: Lat 29° 58' 32.3117" / Long 81° 27' 30.4177"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corp (Ring Power) was inspected on June 19, 2013, as an unannounced hazardous waste compliance inspection. Ring Power was last inspected by the Department on November 28, 2006, as a Small Quantity Generator (SQG) of hazardous waste and a Used Oil Transporter (UOT). The facility is currently registered and operating as a SQG, UOT and a Used Oil Transfer Facility.

The facility has been issued the EPA/DEP identification number FLR 000 119 347. Please use this number on all correspondence with the Department's Hazardous Waste Section.

Ring Power is a sales and rental facility for heavy equipment, including CAT equipment, generators, cranes, and boom trucks. The facility is also a heavy equipment repair, maintenance, and paint shop. The facility has been in operation at this location since 2004, has 250 employees, and is on city water and sewer. The facility consists of a Washrack, Blasting and Paint Shop, Engine Tear-down Area, Machine Shop, various Maintenance and Repair Shops, and a Tank Farm.

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. After dirt is removed, the equipment is washed using a non-hazardous soap. The washwater is filtered and processed with

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enzymes that dissolve grease and oils. Processed washwater is discharged to city sewer. Dirt and oil/grease sludge is collected and after testing, the non-hazardous dirt and oil/grease is incinerated or landfilled.

There were no violations observed in the Washrack area.

Near the Washrack, the facility has a storage shed. There was one 55-gallon drum of paint waste that was labeled hazardous waste (Photo 2). The label indicated that the drum was generated at the Ring Power in Jacksonville on Philips Hwy and was pending analysis. Subsequent to the inspection, the facility properly disposed of the waste. The facility is reminded that as a Small Quantity Generator, it is not approved to transport hazardous waste.

Blasting and Paint Shop:

The facility repairs and paints CAT equipment in the Blasting and Paint Shop area. The facility blasts equipment inside a blasting room using silica sand. The spent blast grit is collected in two 55-gallon drums via a vacuum system (Photo 3). The facility tests this waste stream regularly and it is non-hazardous.

After blasting, equipment is painted in the facility's on-site paintbooth. The facility uses Valspar Yellow Fast Dry (CAT Yellow), which contains 10-15% acetone, 1-5% titanium dioxide, and has a flashpoint of 22 degrees Fahrenheit, which generates a D001 hazardous waste liquid when spent. The facility also uses Valspar High Gloss Black Fast Dry, which contains 5-10% xylene, 1-5% acetone, 1-5% carbon black, and has a flashpoint of 41 degrees Fahrenheit, which generates a D001 hazardous waste liquid when spent. A D001 low flash reducer is also used with the paint and is added to the paint on an as-needed basis.

The facility uses gravity-fed guns to paint larger equipment. The gun lines and nozzles are cleaned using Grow Automotive HET 1501 thinner, which contains 10-30% methyl alcohol, 10-30% toluene, and has a flashpoint of six degrees Fahrenheit, which generates a D001/F003/F005 hazardous waste liquid when spent. Spent paint and thinner is recovered in the facility's on-site still, located in the paint mixing room (Photo 4). The facility estimated that it recovers approximately four and a half gallons per five gallons of spent paint and solvent placed in the still. The facility distills the solvent two to three times per week and generates a still bottom from each distillation. These F005 hazardous waste still bottoms are placed into a 55-gallon satellite drum that was properly labeled (Photo 5).

Some spent paint is accumulated in two 55-gallon satellite drums in the paint mixing room (Photos 6 and 7). At the time of the inspection, the facility had less than 55-gallons of spent paint in the satellite area, however the facility is reminded that it should not accumulate more than 55-gallons of hazardous waste in one satellite area. Dave Strickland, Environmental Manager, stated the facility would only use one 55-gallon drum in the satellite area moving forward.

The day prior to the inspection, the facility had a paint line burst and paint spilled inside of the paint mixing room. At the time of the inspection, the facility was still cleaning up the spent CAT yellow paint.

For painting smaller equipment, the facility uses pot-guns. These guns are cleaned in the facility's gunwasher using HET 1501 (Photo 8). Spent paint and thinner is collected in a 5-gallon container in the gunwasher. The facility removes the D001/F003/F005 spent paint and solvent from the gunwasher quarterly and places it into a 55-gallon hazardous waste accumulation drum for disposal as hazardous waste. The accumulation drum was properly labeled, dated, and had been accumulating for less than 180 days at the time of the inspection (Photos 9 and 10).

Outside of the paint mixing room, the facility has one hazardous waste accumulation area (Photo 11). In the accumulation area, the facility had two 55-gallon drums of spent paint, one 55-gallon drum of still bottoms, two 55-gallon drums of off-spec paint, one 55-gallon drum of F005 hazardous waste PPE and rags, and one empty drum. The two 55-gallon drums of off-spec paint

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were closed, but they were not labeled or dated [40 CFR 262.34(a)(3), 40 CFR 262.34(a)(2)]. The facility labeled and dated these drums during the inspection. All other drums were closed, properly labeled, dated, and had been accumulating for less than 180 days. The facility also had one 55-gallon satellite drum for aerosol cans in this area. The drum was closed and labeled.

Engine Tear-Down Area:

In this area, engines are dismantled and washed in parts washers for repairs. The used oil drains from engines through grates onto large pig mats. FCC disposes of the pig mats as used oil absorbents every two to four weeks. Shallow pans below the pig mats catch any used oil that is not absorbed in the pig mats. Below the pans is a sealed sump that serves as secondary containment for the pans. The facility empties the pans into the sump when FCC or Safety Kleen is on-site to pump the used oil. The used oil drains by gravity to one corner of the sump where FCC or Safety Kleen is able to pump the used oil out of the sump. The sump is approximately six inches deep, and covers the length of the work area (approximately 20' x 40') (Photo 12). The floor around the sump was labeled "Used Oil." Mr. Strickland estimated that it takes approximately one year to generate enough used oil to pump out of this area.

After engines are drained, they are cleaned in one of three immersion parts washers. The facility has two 600-gallon mineral spirits parts washers that are managed by FCC on its continued use program (Photo 13). The facility also has one 900-gallon aqueous immersion parts washer that is managed by Safety Kleen as non-hazardous waste (Photo 14). The parts washers are serviced bi-annually.

There were no violations observed in this area.

Machine Shop:

The facility tears down hydraulic cylinders in the machine shop. A small amounts of used oil drain from the cylinders through grates onto large pig mats. FCC disposes of the pigs mats as used oil absorbents on an as-needed basis. Shallow pans below the pig mats catch any used oil that is not absorbed in the pig mats. The used oil is pumped out by FCC or Safety Kleen for recycling on an as-needed basis. Below the pans is a sealed sump that serves as secondary containment for the pans. The sump is approximately four inches deep and covers the length of the work area (approximately 6' x 8'). The floor around the sump was labeled "Used Oil."

There were no violations observed in this area.

Maintenance and Repairs Shops:

The facility has these additional maintenance and repair shops on-site: Truck Shop, Generator Building, Crane Shop, Undercarriage Reconditioning Shop, Steel Fab Shop, Clean Room, and a Heavy Equipment Shop. Between these shops, the facility has 24 30-gallon System One Safety Kleen Parts Washers. These parts washers are serviced quarterly and generate a D006/D007/D008 sludge that is accumulated in a 30-gallon satellite drum near each parts washer (Photo 15). All drums were properly labeled.

Used oil and used oil filters generated from these shops are collected in 55-gallons drums or used oil tanks. All drums and tanks were properly labeled and were located within secondary containment.

The facility generates aerosol cans in each shop. The facility's standard operating procedure is to accumulate cans for puncturing and draining into a satellite 55-gallon drum and then dispose of the empty cans as scrap metal. In the Heavy Equipment Shop, the facility was accumulating spent aerosol cans in a hopper (Photo 16).

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There was some liquid from aerosol cans accumulating in the bottom of the hopper, and the hopper was open, allowing the hazardous waste to evaporate [40 CFR 262.20(a)]. The Heavy Equipment Shop is also a major producer of the facility's used oil. Used oil is collected in containers, and it is then pumped through above ground pipes to the tank farm.

Tank Farm:

The Tank Farm is located near the Truck Shop and Heavy Equipment Shop (Photo 17). The facility has four 10,000-gallon double-walled tanks. Tanks one and three contain product oil. Tank two is divided and contains 2,500 gallons of used oil and 7,500 gallons of product hydraulic oil. Tank four is divided and contains 5,000 gallons of product antifreeze and 5,000 gallons spent antifreeze. The tanks were properly labeled.

No violations were observed in this area.

Used Oil Transportation:

The facility services equipment in the field and then transports the used oil generated from that operation back to the St. Augustine location. The facility's registration was up to date, its 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 directly to the facility's 2,500-gallon double-walled used oil tank, located in the Tank Farm.

Record Review:

Ring Power is currently operating as a SQG of hazardous waste. The facility generates approximately one 55-gallon drum of paint waste per month that is manifested by Safety Kleen as D001/F003/F005/D007/D035 hazardous waste, small amounts of D001 spent liquid from aerosol cans, and approximately 800 pounds of D006/D007/D008 sludge from the Safety Kleen System One Parts Washers bi-annually.

A review of the facility's records revealed the following:

Safety Kleen handles the facility's hazardous waste and manages its 24 30-gallon System One parts washers.

FCC Environmental recycles the facility's used oil and used oil filters and manages its two 600-gallon continued use parts washers.

Rags are laundered by Cintas, and batteries are recycled through East Penn Manufacturing Company.

Non-hazardous Washrack dirt is shipped to Veolia Pecan Row Landfill, LLC in Valdosta, GA for disposal.

The facility's contingency plan, weekly inspections, emergency coordinator, and personnel training were complete. The facility did not have arrangements with local authorities [40 CFR 265.37].

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

Type:	Violation
Rule:	262.20(a)
Explanation:	The facility accumulated D001 spent aerosol can liquid in an open hopper, allowing the waste liquid to evaporate.
Corrective Action:	No further action is required. The facility returned to compliance per a June 26, 2013, email.
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Type:	Violation
Rule:	262.34(a)(2)
Explanation:	Two 55-gallon drums of off-spec paint were not marked with the accumulated start date.
Corrective Action:	No further action is required. The facility returned to compliance during the inspection.
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Type:	Violation
Rule:	262.34(a)(3)
Explanation:	Two 55-gallon drums of of-spec paint were not labeled "Hazardous Waste."
Corrective Action:	No further action is required. The facility returned to compliance during the inspection.
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Type:	Violation
Rule:	265.37
Explanation:	The facility did not make arrangements with local authorities.
Corrective Action:	No further action is required. The facility returned to compliance per a June 26, 2013, email.
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PHOTO ATTACHMENTS:

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Photo 1



Photo 2

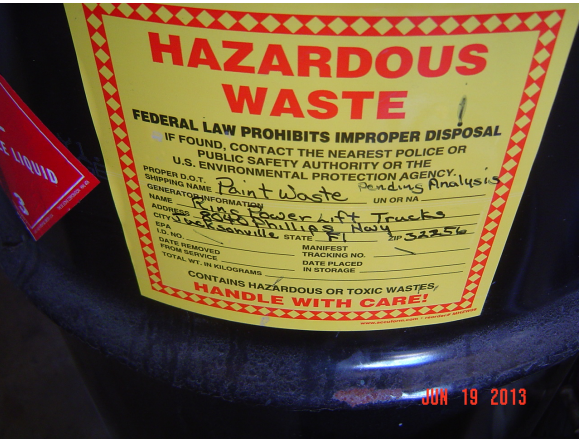


Photo 3



Photo 4



Photo 5



Photo 6



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Photo 7



Photo 8



Photo 9



Photo 10



Photo 11



Photo 12



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Photo 13



Photo 14



Photo 15



Photo 16



Photo 17



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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**

11/14/2013

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.