

FW: Ring Power - Summary of Perry and Lake City inspections

Fenn, Stephany

Thu 10/10/2013 12:04 PM

To: Dave.Strickland@RingPower.com <Dave.Strickland@RingPower.com>;

Cc: Padgett, Melissa A. <Melissa.A.Padgett@dep.state.fl.us>; Breland, Jabe <Jabe.Breland@dep.state.fl.us>;

 1 attachment

Procedure for Aerosol can disposal when no puncture device is used.docx;

Thanks Dave. This policy looks good. I'll be out in Perry with the other DEP inspectors as well, so I'll see you tomorrow.

Thanks,
Stephany

From: Dave.Strickland@RingPower.com [mailto:Dave.Strickland@RingPower.com]**Sent:** Thursday, October 10, 2013 10:49 AM**To:** Fenn, Stephany**Subject:** Re: Ring Power - Summary of Perry and Lake City inspections

Concerning aerosol can disposal

The following policy has been distributed to all branches with out aerosol can puncture devices.

I will be in Perry tomorrow to meet with the DEP staff concerning the wash rack.

(See attached file: Procedure for Aerosol can disposal when no puncture device is used.docx)▼ "Fenn, Stephany" <Stephany.Fenn@dep.state.fl.us>

"Fenn, Stephany"

<Stephany.Fenn@dep.state.fl.us>

09/23/2013 03:01 PM

To

"Dave.Strickland@RingPower.com" <
Dave.Strickland@RingPower.com>

cc

"Padgett, Melissa A." <Melissa.A.Padgett@dep.state.fl.us>

Subject

Ring Power - Summary of Perry and Lake City inspections

We had a couple follow-up questions from the inspections conducted at the ring Power Perry and the Ring Power Lake City. Please get back to Melissa and I when you can.

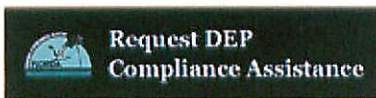
Perry facility:

1. Washrack - I am checking with our Industrial Wastewater section to see if the facility is exempt from a permit. I will have more information as it becomes available. The concern with the pit is that stains along the outside wall make it seem that the pit may occasionally overflow and the stains are indicative of oil. The pit is not covered, so in heavy rainfall events it may overflow. Also, the pit may need to be sealed, as concrete is not impervious to used oil. I'm still doing some research on this, but any info you have on the system would be helpful as well.
2. Where are batteries sent for disposal? Any records?
3. Aerosol cans - My concern is that the facility determines that the aerosol can is waste and places it in the 55-gallon drum (some were empty, some were not). Then the 55-gallon drum is eventually sent to the Tallahassee location for disposal (and it wasn't clear what type of disposal). I don't know if the Tallahassee location is authorized to accept CESQG waste. Can you provide clarification or details on how they might be managed moving forward?

Lake City facility:

1. Aerosol cans – several non-empty aerosol cans were on the floor of the shop and behind drums. It wasn't clear how cans were disposed of if non-empty. Can you provide clarification or details on how they might be managed moving forward?
2. Where are batteries sent for disposal? Any records?
 3. Currently using disposable rags - Brake cleaner containing toluene is used throughout the facility. Rags with this brake cleaner cannot be disposed of in solid waste trash. Mike McCray indicated that he preferred using a linen service, but he was not sure why the Lake City location was not using one.

Thank you,
Stephany Fenn
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Procedure for Disposal of Aerosol Cans When No Puncture Device is Used

All empty cans may be put in the metal dumpster for recycling. The key to this policy is "empty". If a can cannot be emptied or the contents are not useable it must be placed in a 55 gal drum labeled "Aerosol Cans for disposal". When the drum is full Safety Kleen can be contacted to remove it.

If there is a question about whether a can is empty place it in the drum don't put it in the recycle dumpster. DEP inspectors have been known to retrieve cans from the dumpster for the purpose of sampling to determine if they are empty.