#### Re: Ring Power - Summary of Perry and Lake City inspections

Jennifer.Steinberger@RingPower.com on behalf of Dave.Strickland@RingPower.com

Mon 9/30/2013 4:01 PM

To:Fenn, Stephany <Stephany.Fenn@dep.state.fl.us>;

**0** 1 attachment

20130930034657.pdf;

(See attached file: 20130930034657.pdf)

#### Perry Facility DEP visit:

- 1. Due to the age of the facility I am not aware of a permit for the wash rack.
- 2. The Ring Power procedure for the battery recycling is for used batteries to be sent on the company truck to central location for further shipment to a recycling facility. In the case of Perry the central location is Ocala. The Ocala Ring Power store is our hub for the nightly loop parts truck. In Ocala the batteries are off loaded to a storage site where they are consolidated with batteries from the Ocala shops and possibly other Ring Power locations. We have a paper trail that starts at the site of origin which includes a inventory of batteries which are prepared for shipment and a loop shipper showing the originating site and the site of destination. A copy of the shipper and the inventory are keep at the site of origin and a copy is keep at the destination upon arrival. When the amount of old batteries at the collection site reaches a certain amount in this cast at the Ocala store a shipper and inventory are prepared for all the accumulated batteries for the East Penn Manufacturing Company. East Penn will be notified of the pick up request and will send a truck to pick up the batteries for delivery to the recycling facility in Pennsylvania. Copies of the paper work are keep in the Ring Power branch store and a Shipping memo is returned to the branch from East Penn indicating the batteries reached the proper destination. Because there are so few batteries replaced in the Perry store they are not sent to Ocala often. I have arranged for the batteries found on site at the time of the inspection to be shipped to Ocala and will provide copies of the paperwork as soon as it is avaliable.
- 3. I will respond on the aerosol can disposal later. What was the decision on moving cans with some residual left to a location where they can be propertly emptied into a puncture device?

Lake City Facility DEP visit:

1. I will respond to the aresol can discussion later.

- 2. The procedure for handeling Batteries is the same for Lake City as described for Perry except they are sent from Lake City to St Augustine not Ocala. I have attached paperwork for the process of moving batteries from one site to another.
- 3. We are investigating a linen service for the rags but in the mean time all disposal wipes are to go in to the same drums with the soiled Pig mats. The company that removes our used oil and filters also removes our used Pig mats for disposal.

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

"Dave.Strickland@RingPower.com"

<Dave.Strickland@RingPower.com"

<Dave.Strickland@RingPower.com>

"Fenn, Stephany"

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

09/23/2013 03:01 PM

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

**Environmental Specialist II** 

Compliance Assurance Florida Department of Environmental Protection 8800 Baymeadows Way West, Suite 100 Jacksonville, FL 32256 Stephany.Fenn@dep.state.fl.us

O: 904-256-1694 F: 904-256-1590

Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>.

Paperwork for shipping Batteries from one branch to another on the company Loop truck

Ring Power Loop Truck Shipper Filled out by the shipping branch and a copy kept on site

**East Penn Manufacturing Co** 

Battery pick up form this form is used as an inventory for batteries to be shipped. It is filled out by the shipping branch. A copy is kept on site

!	Date: 9-16-1			p Truck Shipper	141258
	Ship to (branch): Ship to (name):	St. Aug Parts		Ship by (branch): Ship by (name):	Ake City Parts
	Destination:  Cat Rental Store H/E Service Machine Shop Parts Dept. Parts Exchange PSD Service Warranty	_	Ship VIA  Container  Loop Tub Pallet Stand  Allet Box		palks of old Bate
	Trip to Branch:  Prooksville  vtona  resville	Lake City Lakeland Coala  Coala		Work Order #  Perry St. Augustine Sarasota Lift Trucks  Manilla - attach to item shipped	☐ Tailahassee ☐ Tampa ☐ Tarpon Springs ☐ Other

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#### CATERPILLAR ® EAST PENN manufacturing co., inc. **BATTERIES BATTERY PICKUP FORM** To Schedule a Junk Pickup by East Penn: East Penn Contact: Lisa Koch Phone #: 610-682-6361, ext. 2488 epmcs8@eastpenn-deka.com E-mail: \* Date: For Office Use Only: Mailing Address: \* BOL#: SM \* Carrier: Dealer Number: \* Caterpillar Dealer Name: \* Dealer Address: \* Dealer City, State, & Zip: **JUNK CATEGORY** \* QUANTITY UTILITY / SMALL ENGINE / LAWN & GARDEN AUTOMOTIVE LIGHT COMMERCIAL (6C, 3, 7D, 4, 29H/30H, 29HM, 31, 33, 4DLT, 16TF, 17TF, 6TN, 3ET, 3EH, 4EH) **HEAVY DUTY COMMERCIAL** (4D, 4DM, 8D, 8V, 3D) PALLET COUNT NOTE: EAST PENN WILL ONLY ACCEPT LEAD ACID BATTERIES. \* DRIVER SIGNATURE \* DEALER SIGNATURE Form must be returned and complete in order to receive a junk check \* Required Fields ATTN: Cindra Heffner **RETURN VIA FAX TO:** 610-682-4781

Date: 9-16-13	Ring Power Lo	op Truck Shipper	141258
Ship to (branch): 8th Aug Ship to (name): Pavts	3	Ship by (branch): Lttkc	City Davis
Destination: ☐ Cat Rental Store ☐ H/E Service	Ship VIA  Container  Loop Tub	Description of Items Shipped	
☐ Machine Shop ☐ Parts Dept. ☐ Parts Exchange ☐ PSD Service	□ Pallet □ Stand □ PAllet Box	1-palk-	of old Batterie
☐ Warranty ☐Sales De	ot.	Work Order #	
Ship to Branch:  ☐ Brooksville ☐ Lake City ☐ Daytona ☐ Lakeland ☐ Cainesville ☐ Ocala		☐ Sarasota ☐ Tam	ahassee pa eon Springs er
White - shipper copy Pink - shipping branch cop	y Yellow - ship to branch copy	Manilla - attach to item shipped	

CATERPILLAR ®	EAST PENN manufacturing co., inc.
BATTERIES	BATTERY PICKUP FORM
To Schedule a Junk Pickup by East Penn:  East Penn Contact: Lisa Koch Phone #: 610-682-6361, ext. 2488 E-mail: epmcs8@eastpenn-deka.com	Pb Pb Ph
For Office Use Only: Mailing Address:	* Date: 9-16-13 * BOL#: SM 1412585 * Carrier: Loap Truck
* Caterpillar Dealer Name: RING Power  * Dealer Address: 3805w Rin  * Dealer City, State, & Zip: LAKE CITY	Dealer Number: N 357  09 (004  Pi. 32025
JUNK CATEGORY	* QUANTITY
UTILITY / SMALL ENGINE / LAWN & GARDEN AUTOMOTIVE LIGHT COMMERCIAL (6C, 3, 7D, 4, 29H/30H, 29HM, 31, 33, 4DLT, 16TF, 17TF, 6TN, 3ET, 3EH, 4EH)	29
HEAVY DUTY COMMERCIAL (4D, 4DM, 8D, 8V, 3D)	4
PALLET COUNT	<u>33</u>
NOTE: EAST PENN WILL ONLY ACCEPT LEAD ACID BA	TTERIES.
* DRIVER SIGNATURE	
* Required Fields Form must be returned and c	omplete in order to receive a junk check
RETURN VIA FAX TO: 610-682-4781 ATTN: Cindra	Heffner

Date: 8-30	)-13	Ring Power Loc	pp Truck Shipper	141186
Ship to (branch Ship to (name)	· _	3	Ship by (branch): Ship by (name):	
Destination:  Cat Rental Si  H/E Service	ore	Ship VIA  Container Loop Tub	Description of Items Sh	ipped
Machine Sho Parts Dept. Parts Exchar	Ige	Pallet Stand  PAllet Box	1- PAlle- BAtt	t Box of used erics
☐ PSD Service ☐ Warranty ☐	_	t.	Work Order #	
Ship to Branch	: Lake City	☐ Orlando	☐ Perry	☐ Tallahassee
☐ Daytona ☐ Gainesville	☐ Lakeland ☐ Ocala	☐ Palm Bay ☐ Pecan Park	St. Augustine Sarasota Lift Trucks	☐ Tampa ☐ Tarpon Springs ☐ Other
White - shipper copy	Pink - shipping branch copy	Yallow - ship to branch copy	Manilia - attach to item shipped	Ci Ottes

CATERPILLAR ®	EASI PENN manutacturing co., inc.
BATTERIES	BATTERY PICKUP FORM
To Schedule a Junk Pickup by East Penn:  East Penn Contact: Lisa Koch Phone #: 610-682-6361, ext. 2488 E-mail: epmcs8@eastpenn-deka.com	Pb Philips
For Office Use Only: Mailing Address:	* Date: 8-20-13  * BOL#: SM 141186  * Carrier: LOOP TRUCK
* Caterpillar Dealer Name: King Power  * Dealer Address: 390 Sw Rin  * Dealer City, State, & Zip: LAke City F	Dealer Number: <u>D357</u> Ug Cuurt  U 32025
JUNK CATEGORY	* QUANTITY
UTILITY / SMALL ENGINE / LAWN & GARDEN	
AUTOMOTIVE  LIGHT COMMERCIAL (6C, 3, 7D, 4, 29H/30H, 29HM, 31, 33, 4DLT, 16TF, 17TF, 6TN, 3ET, 3EH, 4EH)	26
HEAVY DUTY COMMERCIAL (40, 40M, 80, 8V, 3D)	_ <i></i>
PALLET COUNT	36
NOTE: EAST PENN WILL ONLY ACCEPT LEAD ACID BAT	ITERIES.
* DRIVER SIGNATURE	
* DEALER SIGNATURE  * Required Fields  Form must be returned and co	omplete in order to receive a junk check
RETURN VIA FAX TO: 610-682-4781 ATTN: Cindra	Heliner

Date: 5-29-	13 F	Ring Power Loc	op Truck Shipper	134872
Ship to (branch): Ship to (name):	St. Ave	Parts Hutches	omb wy (oranion),	rrevce Gaiver
Destination:  Cat Rental Stor  H/E Service	re	Ship VIA  Container  Loop Tub	Description of Items Si	hipped 
Machine Shop AParts Dept. Parts Exchange PSD Service Warranty		D Pallet Stand  A pallet Box	1- pa	llet Box of Used batteries
	Sales Dept.		Work Order #	
Ship to Branch:	<b></b>		<b>—</b> –	<b>—</b> —
☐ Brooksville	☐ Lake City	☐ Orlando	Perry	☐ Tallahassee
☐ Daytona ☐ Gainesville	☐ Lakeland☐ Ocala	☐ Palm Bay ☐ Pecan Park	St. Augustine Sarasota Lift Trucks	☐ Tampa ☐ Tarpon Springs ☐ Other
White - chinner conv Di	nk - ehlening bronch coeu	Vollage - ohlo to hannob come	Manilla - attach to Bom chiennel	

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CATERPILLAR®	EAST PENN manufacturing co., inc.		
BATTERIES	BATTERY PICKUP FORM		
To Schedule a Junk Pickup by East Penn: East Penn Conlact: Lisa Koch Phone #: 610-682-6361, ext. 2488 E-mail: epmcs8@eastpenn-deka.com	Pb Pb RECYCLE		
For Office Use Only: Mailing Address:	* Date: 5-89-13  * BOL#: SM 134872  * Carrier: LODO Truck		
* Caterpillar Dealer Name: RING Power  * Dealer Address: 370 SW Ring (  * Dealer City, State, & Zip: LAke City FL	Dealer Number:		
JUNK CATEGORY	* QUANTITY		
UTILITY / SMALL ENGINE / LAWN & GARDEN			
AUTOMOTIVE			
LIGHT COMMERCIAL (6C, 3, 7D, 4, 29H/30H, 29HM, 31, 33, 4DLT, 16TF, 17TF, 6TN, 3ET, 3EH, 4EH)	44		
HEAVY DUTY COMMERCIAL (4D, 4DM, 8D, 8V, 3D)	_5_		
PALLET COUNT	55		
NOTE: EAST PENN WILL ONLY ACCEPT LEAD ACID BAT	TERIES.		
* DRIVER SIGNATURE			
* Required Fields Form must be returned and co	mplete in order to receive a junk check		
RETURN VIA FAX TO: 610-682-4781 ATTN: Cindra H	leffner		

Date: 3-90 Ship to (branch Ship to (name):	): St. A	Ring Power Loo Ug Parts totches	p Truck Shipper  ship by (branch):	134827 The City Trence Gainer
Destination: ☐ Cat Rental St ☐ H/E Service	ore	Ship VIA  Container  Loop Tub	Description of Items Sh	ipped 
☐ Machine Shop ☐ Parts Dept. ☐ Parts Exchan ☐ PSD Service ☐ Warranty	•	Pallet Stand  Pallet Box	l- palle Ba-	et Box of used Herics
	Sales Dept	t.	Work Order #	
Ship to Branch Brooksville Daytona Gainesville	: ☐ Lake City ☐ Lakeland ☐ Ocala	☐ Orlando ☐ Palm Bay ☐ Pecan Park	Perry St. Augustine Sarasota Lift Trucks	☐ Tallahassee ☐ Tampa ☐ Tarpon Springs ☐ Other
White - shipper copy	Pink - shipping branch copy	Yeliow - ship to brench copy	Manilla - attach to item shipped	

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CATERPILLAR ®	EAST PENN manufacturing co., inc.
BATTERIES	BATTERY PICKUP FORM
To Schedule a Junk Pickup by East Penn:  East Penn Contact: Lisa Koch  Phone #: 610-682-6361, ext. 2488  E-mail: epmcs8@eastpenn-deka.com	Pb And
For Office Use Only: Mailing Address:	* Date: 3-80-13 * BOL#: SM 134827 * Carrier: Loop truck
* Caterpillar Dealer Name: Ring Power  * Dealer Address: 390 Sw Bin	Dealer Number: D357
* Dealer City, State, & Zip: Lake City FC	32025
JUNK CATEGORY  UTILITY / SMALL ENGINE / LAWN & GARDEN  AUTOMOTIVE  LIGHT COMMERCIAL (6C. 3, 7D. 4, 29H/30H, 28HM, 31, 33, 4DLT, 16TF, 17TF, 6TN, 3ET, 3EH, 4EH)  HEAVY DUTY COMMERCIAL (4D, 4DM, 8D, 8V, 3D)	QUANTITY  26  4
PALLET COUNT	
NOTE: EAST PENN WILL ONLY ACCEPT <u>LEAD ACID BA</u>	ITERIES.
• DRIVER SIGNATURE	
* DEALER SIGNATURE  * Required Fields  Form must be returned and company to the second	omplete in order to receive a junk check
RETURN VIA FAX TO: 610-682-4781 ATTN: Cindra	Helfner

Paperwork for shipping used Batteries from Ring Power St Augustine store to the East Penn manufacturing company in Pennsylvania.

Information Release Memo Filled out by Ring Power prior to shipping

Inventory sheet of batteries to be shipped Filled out by Ring Power prior to shipping

Deka Batteries Return Goods Report Filled out by truck driver receiving the batteries at time of pick up

East Penn Shipping Memo Received back from East Penn upon receiving of the batteries

# Attachment I- Battery Junk pickup Form

CATERPILLAR ®	EAST PENN manufacturing co inc. JUNK PICKUP FORM
DATTERIES	a cross
1) To schedule a junk pickup by East Penn, fax the East Penn Contact: Lisa Koch 610-682-6361, ext. 2488 Penne #: Ikoch@dekabatteries.co	RECYCLE
* Caterpillar® Dealer Name: Ring Powc  * Dealer Address: 500 Worl  * Dealer City, State, & Zip: Ron Hutc	d Commerce PKWY stine, FL 32092 904-493-81
	QUANTITY
JUNK CATEGORY  UTILITY / SMALL ENGINE / LAWN & GARDEN	1/
	27
AUTOMOTIVE	48
LIGHT COMMERCIAL (6C, 3, 7D, 4, 29H/30H, 29HM, 31, 33, 4DLT, 16TF, 17TF 6TN, 3ET, 3EH, 4EH)	57
HEAVY DUTY COMMERCIAL (4D, 4DM, 8D, 8V, 3D) PALLET COUNT NOTE: EAST PENN WILL ONLY ACCEPT <u>LEAD AC</u> I	D BATTERIES.
2) When pick up is complete, this form must be faxed to Lisa Koch at 610-682-4781.	(Check payable to)
St. August	
* Driver Signature:	·
* Dealer Signature:	s complete in order to receive junk credit.
Management of the control of the con	

#### **HEAVY DUTY COM**

size	part #	quan
8D	1535720	4
8D	1014000	
4D	2420825	
4D	1535710	15
4D	1535700	24
4D	9X9730	4
4D	9X9720	
4D	1020400	
4D	8C3622	
4D	NON-CAT	4
8D	NON-CAT	6
	TOTAL	57

## LIGHT COMERCIAL

size	part #	quan
31	1152422	17
31	3T5760	7
31	9X3404	8
	NON-CAT	16
	TOTAL	48

## AUTOMOTIVE

size	part#	quan
24	1535656	3
65	2306368	12
24F	3T5858	
75	7X6100	1
	NON-CAT	11
	TOTAL	27

#### UTILITY /SMALL/ LAWN GD

size	part #	quan
	NON-CAT	17
	8T3636	
	TOTAL	17

	CASE 1	1980
	CASE 2	2044
	CASE 3	2098
	CASE 4	2022
	CASE 5	1996
149	TOTAL	10140



## RETURNED GOODS REPORT DEKA BATTERIES "LAST LONGER"

CUSTOMER'S COPY

	LK OR LER NO	EAST PENN MANUFA DEKA ROAD, LYON S PHONE (610) 682-6361 ORDER	ACTURING C STATION, PA	O., INC. 19536	DATE 8/ 3	2420/3
		PHONE (610) 682-6361 ORDER	DEPT. HOTE	INE: (610)	682-4231	
RECE	IVED F	ROM King Power C	000			
. ADD	RESS_	Soo World Commer	COPKA	vy .	St. Avais	tion Fil
		THIS FORM MUST BE FILLED OUT COMPLETELY. AN WILL BE CREDIT	Y BATTERY WIT	HOUT DATE C	ODE LISTED HERE	ON O
Q	UAN.	ТҮРЕ			UNIT PRICE	TMUOMA
7	7	Andriatio Jul				
1	2	LK 6 Jul				
L	18	60mg 7/ 7ml				
		8-D Jul		-		
	5	fy they				
н.м.	TOTAL QTY.	DESCRIPTION	TOTAL WEIGHT		TOTAL ►	
	144	UN2794, Batteries, Wet, Filled with Acid, 8, PG III Recyclable	10,140	Cúst. No.	00 186	5
		UN2794, Batteries, Wet, Filled with Acid, 8, PG III	<i>'</i>	Del.	1 1 7	<del></del>
~~~~		UN2796, Battery Fluid, Acid, 8, PG II		NO.	·	
		UN2796, Battery Fluid, Acid, 8, PG II Packed with Dry Battery			•	
This is to	certify that th	e above-named materials are properly classified, described, packaged, man n for transportation, according to the applicable, regulations of the Departm	rked, and labeled, and			
		TION SIGNATURE	A STATE OF THE STA		r	
	EIVED	The state of the s	1 2 a 6			
		CONTACT: Chemtrec 1-800-424-9300 (Toll Free in C East Penn Mfg. Co	US, ÚSVI, CÁN)	703-527-388	7 (Elsewhere)	
GEORGE	HILL SYSTE 332271	MS BOYERTOWN PA 19512 00 CE 1/13	n, një. GGN/20	วฮ	CUST	TOMER'S COPY

# EAST PENN manufacturing co., inc.

SHIPPING MEMO CUSTOMER COPY

REPRINT DATE

08-27-13 01:02

-CANARY-

PAGE

1 OF 1

DEKA ROAD, LYON STATION, PENNSYLVANIA 19536 PHONE (610)682-6361 ORDER DEPARTMENT PHONE (610)682-4231

SOLD TO

1805

SHIP TO

ORDER DATE 08-22-13

CUST NO. 15001865

CUSTOMER P.O. NO. JUNK

RING POWER CORPORATION 500 WORLD COMMERCE PKWY

P/U 9/5

**SALESMAN** 0051 REF. NO

MORTON IL

PICK UP

CATERPILLAR SARL

%CATERPILLAR INC-ACCT DP

4700 MORTON AVE -MT174

01

61550

ST AUGUSTINE FL

PHONE: (904)493-8122

32092

A B

DELIVERY NUMBER 1308224036-00 H.M. DESCRIPTION EAST PENN ITEM NUMBER ORDERED SHIPPED B/O **UNIT WEIGHT** LINE NO. MISCELLANEOUS SUPPLIES PICKUP JUNK P/UJUNK 1 0.0000 LB 10 PICKUP JUNK PALT PJNK-PALT 0.0000 LB 20 MUST CALL 24 HOURS BEFORE P/U CONTACT #: RON HUTCHES

PALLETIZE ON CATERPILLAR PALLETS SHIP VIA EAST PENN TRK OR COMMON CARRIER - FRT PREPAID

PHONE#: 904-493-8122

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE CERTIFICATION SIGNATURE DATE SHIPPED RECEIVED BY **DATE RECEIVED TOTAL WEIGHT** PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE BONNY KRESSLEY 8-27-13 DEPARTMENT OF TRANSPORTATION. 0.0000 LB

EMERGENCY CONTACT: Chemtrec 1(800)424-9300 OR (703)527-3887 East Penn Mfg. Co., Inc. CCN7283

Toll-free in US, USVI & Canada



