



**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#: 40828

EPA ID#: FLD984206854

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

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

County Name: Columbia

Contact Phone: (904) 494-1417

NOTIFIED AS:

CESQG (<100 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: Melissa A. Padgett, Inspector

Other Participants: Stephany Fenn, Inspector; Mike McCray, Main Shop Leadman

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 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 April 2011, and updated its Used Oil Transporter registration in March 2013. The facility was last inspected by the Department's Hazardous Waste Section on February 9, 2009. 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 984 206 854. Please use this number on all correspondence with the Department's Hazardous Waste Section.

Ring Power is a heavy equipment dealer that also 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.

Process Description:

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 used oil catch pans and is then pumped into the facility's 500-gallon double-walled used oil tank.

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Used oil generated at the transmission bench is vacuumed into a 200-gallon used oil tank which is transferred into the facility's 500-gallon used oil tank daily (Photo 1). All used oil containers and both used oil tanks were properly labeled with the words "Used Oil." Used oil filters are drained into a used oil container and then placed into a 55-gallon drum for accumulation. Four 55-gallon drums were accumulating, and all drums were properly labeled with the words "Used Oil Filters" (Photo 2). 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 3). The D006/D007/D007 hazardous waste sludge from the parts washers is collected in a 30-gallon drum and is managed by Safety Kleen (Photo 4) once per year. The facility has one glove box sand blasting unit with bag filters. This unit is used approximately four to five times per month to blast rust and staining from small parts and tools. Glass beads are used as blast grit, and the filter bags have not yet needed to be changed.

Several spent aerosol cans were observed throughout the facility laying on the floor and on the ground (Photo 5). 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. The facility uses disposable rags throughout the facility. These rags are disposed of in the solid waste trash. This is an Area of Concern because these rags may contain F001 hazardous waste tetrachloroethylene that is from brake cleaner used as a solvent. Rags used by field employees are laundered through Cintas. Subsequent to the inspection, the facility implemented a facility-wide policy to use only rags laundered through Cintas both in the shop and in the field.

The facility has one 500-gallon double-walled used oil tank that is located within a containment structure (Photo 6). The structure has a drain that can be opened to allow rainwater that has accumulated to be released. The drain was closed at the time of the inspection. No oily sheen was observed on the rainwater in the containment structure. The tank was properly labeled with the words "Used Oil".

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.

Truck Maintenance Shop

Routine maintenance and repair of the facility's fleet of vehicles is performed in the Truck Maintenance Shop. Used oil generated in this area is collected in a used oil containers and then it is pumped into the facility's 500-gallon used oil tank. All containers were properly labeled with the words "Used Oil." Used oil filters are drained and collected in a 55-gallon drum. The 55-gallon drum was properly labeled with the words "Used Oil Filters." This area has three 30-gallon Safety Kleen petroleum naphtha parts washers. The D006/D007/D008 hazardous waste sludge from the parts washers is collected in a 30-gallon drum and is managed by Safety Kleen once per year. The facility has one 30-gallon Safety Kleen solvent parts washer that is serviced every eight weeks on a continued use program.

Track Shop

In the Track Shop, new equipment tracks are placed on equipment. The tracks arrive with a protective paint coating that must be removed prior to installation onto equipment. The paint is stripped with Klean Strip Aircraft Paint Stripper (methylene chloride 60-100%, xylene 1-5%). All F002/F003 hazardous waste paint stripping waste is collected in one 55-gallon drum. At the time of the inspection, one 55-gallon drum was accumulating (Photo 7). The drum was closed and properly labeled. The facility has recently implemented the paint removal program and has not yet had a disposal of this waste stream. The facility anticipates generating one to two 55-gallon drums of this waste stream per year.

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Wash Rack

Equipment is washed in a closed-loop Wash Rack (Photo 8) using non-hazardous detergents. Water from washing is drained through a series of filters and recycled back into the system. Sludge and soils are removed from the system every two months and tested prior to disposal in a solid waste landfill. Testing has revealed this waste stream to be non-hazardous. Disposal occurs approximately every six months. The filters are pressure washed annually to remove build up. Sludge from filters is added to the soils for disposal as non-hazardous waste.

Used Oil Transportation

The facility services equipment in the field and then transports the used oil generated from that operation back to the Lake City location. The facility transports less than 10 gallons of used oil per day and less than 500 gallons per year. These totals fall below the definition of a used oil transporter as defined in Section 62-710.201, FAC. Since the facility does not currently meet the definition of a used oil transporter, the facility is not required to comply with the used oil transportation rules. Should the facility begin transporting greater than 55-gallons of used oil at one time, the facility will be required to comply with the following: the facility must annually register its used oil transportation activities with the Department, it must display the used oil transporter registration in a prominent place at the facility, and it must maintain proof of financial responsibility according to 62-170.600(2)(e), FAC. Though it was not required at the time of the inspection, the facility was in compliance with these used oil transportation requirements. Used oil generated in the field is added to the facility's 500-gallon double-walled used oil tank.

Record Review

At the time of the inspection, the facility was operating as a CESQG of hazardous waste, a Used Oil Transporter, and Used Oil Generator. Used oil, used oil filters, and spent antifreeze are recycled through FCC Environmental every four weeks. The facility generates approximately 30 gallons of D006/D007/D008 hazardous waste parts washer sludge per year that is managed by Safety Kleen. The facility anticipates generating approximately one to two 55-gallon drums of F002/F003 hazardous waste paint stripping waste per year.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



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Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



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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.

Melissa A. Padgett

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

10/31/2013

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.