



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 12/17/2015 **On-Site Inspection End Date:** 12/17/2015

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 Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Generator facility

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

INSPECTION PARTICIPANTS:

Principal Inspector: Heather M. Hahn, Inspector

Other Participants: Dave Strickland, Operations Manager

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

SIC CODE: 7539 - Services - automotive repair shops, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation (Ring Power) was inspected on December 17, 2015, as an unannounced hazardous waste compliance inspection. Ring Power was last inspected by the Department on June 19, 2013, 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 Program.

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. Dirt is removed from the equipment using a high pressure pressure washer with water. After dirt is removed, the equipment is washed using a low pressure pressure washer and non-hazardous soap. The washwater is filtered and processed with enzymes that dissolve grease and oils. Processed

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washwater is discharged to city sewer. Dirt and oil/grease sludge is collected and after testing, the non-hazardous dirt and oil/grease is shipped off-site to be incinerated or landfilled.

There were no violations observed in the Washrack area.

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 four 55-gallon drums via a vacuum system. The facility tests this waste stream regularly, and it is non-hazardous. Spent blast grit is added to the facility's washrack sludge.

After blasting, equipment is painted in the facility's on-site paint booth. 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 it 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. For painting smaller equipment, the facility uses pot-guns. These guns are cleaned in the facility's gunwasher using HET 1501. 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.

Spent paint and thinner is recovered in the facility's on-site still, located in the paint mixing room. 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 once per week and generates a still bottom from each distillation. These F005 hazardous waste still bottoms are placed into a 55-gallon satellite drum located outside the mixing room. The drum was properly labeled and closed.

Outside of the paint mixing room, the facility has one hazardous waste satellite accumulation area. In the accumulation area was the facility's 55-gallon drum for F005 spent still bottoms, one 55-gallon drum for spent solvent rags and wipes, and one 55-gallon drum fitted with a drum-top aerosol puncturing system. The filter for the aerosol puncturing system is changed every three months. Spent filters are placed inside the drum. All the drums were closed and labeled. At the time of the inspection, the facility had less than 55-gallons of spent paint and other wastes 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.

Engine Tear-Down Area:

In this area, engines are dismantled and washed in parts washers for repairs. The used oil drains from engines into shallow pans or onto large absorbent pads. Synergy disposes of the spent adsorbents as used oily absorbents.

After engines are drained, they are cleaned in one of three immersion parts washers. The facility has one 600-gallon mineral spirits parts washer that is managed by Safety Kleen on its continued use program. Three 200-gallon caustic solvent dip tanks are serviced by safety Kleen annually as

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hazardous waste. The facility also has one 900-gallon aqueous immersion parts washer that is managed by Safety Kleen as non-hazardous waste. The parts washers are serviced bi-annually.

One glove box sand blaster was located in this area. Spent grit blast is handed as D006/D007/D008 hazardous waste. One 30-gallon satellite drum of spent blast media was closed and labeled.

There were no violations observed in this area.

Machine Shop:

The facility tears down hydraulic cylinders in the machine shop. A small amount of used oil drains from the cylinders through grates onto large absorbent pads placed over shallow pans. Synergy disposes of the pads as used oil absorbents on an as needed basis.

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 under Safety Kleen's Continued Use Program.

Used oil and used oil filters generated from these shops are collected in 55-gallon 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 hazardous waste drum and then dispose of the empty cans as scrap metal.

The Heavy Equipment Shop is also a major producer of the facility's used oil. Used oil is collected in containers, and 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. 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.

Storage Yard:

The facility stores vehicles and equipment both for facility use and rental in an outside storage yard. Four 55-gallon drums of used oil were observed in the area where air compressors for customer rental are stored. The drums were not labeled [40 CFR 279.22(c)(1)], were not on an oil impervious surface, and did not have adequate secondary containment [62-710.401(6), FAC]. The facility added the drums to the facility's used oil during the inspection.

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Oily dirt generated from leaking or damaged vehicles is cleaned up and added to the facility's washrack dirt for disposal.

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, 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 directly to the facility's 2,500-gallon double-walled used oil tank, located in the Tank Farm.

Universal Waste Storage:

Universal waste is stored in a room near a loading and unloading area. The facility generates spent fluorescent tubes throughout the facility. Spent fluorescents are brought to this area and are placed into boxes prior to being recycled through Sylvania.

Outside the storage area was a spill pallet for batteries. There was a small amount of liquid inside the spill pallet. The facility neutralized the acid and properly disposed of the spill pallet residue as D008 hazardous waste on January 21, 2016.

Record Review:

Ring Power is currently operating as a SQG of hazardous waste. The facility generates approximately one 55-gallon drum of D001/F003/F005/D007/D035 paint waste or one 55-gallon drum of D001/D005/D006/D007/F003/F005 paint waste solids per month which is manifested by Safety Kleen as hazardous waste, small amounts of D001 spent liquid from aerosol cans, and approximately 800 pounds of D006/D007/D008 sludge from the Safety Kleen Caustic Parts Washers 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 under Safety Kleen's Continued Use Program. Synergy Recycling recycles the facility's used oil, used oil filters, spent antifreeze, and manages its oily absorbents. Any petroleum contact water generated by the facility would be handled by Synergy Recycling. 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, Georgia for disposal.

The facility's contingency plan, weekly inspections, emergency coordinator, arrangements with local authorities, and personnel training were complete. Records are kept on-site and available for review.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1)
Explanation:	Four 55-gallon drums of used oil were not labeled with the word "Used Oil."

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Corrective Action: No further action is required. The facility returned to compliance at the time of the inspection.

Type: Violation

Rule: 62-710.401(6)

Explanation: Four 55-gallon drums of used oil were not located in secondary containment.

Corrective Action: No further action is required. The facility returned to compliance during the inspection.

Photo Attachments:

Used Oil Drums



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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.

Heather M. Hahn _____

PRINCIPAL INSPECTOR NAME

Inspector _____

PRINCIPAL INSPECTOR TITLE

Heather Hahn

PRINCIPAL INSPECTOR SIGNATURE

FDEP _____

ORGANIZATION

4/7/2016 _____

DATE

Supervisor: Heather Hahn

Inspection Approval Date: 04/07/2016

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.