



Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

October 21, 2016

Mr. Tim Bloodworth, Field Service Dispatcher
Ring Power Corporation
390 SW Ring Court
Lake City, Florida 32025
Tim.Bloodworth@ringpower.com

Re: Ring Power Corporation
EPA/DEP ID: FLD 984 206 854
Columbia County – Hazardous Waste

Dear Mr. Bloodworth:

Department personnel conducted a compliance inspection of the above-referenced facility on August 2, 2016. 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 Homer Butler at (904) 256-1531 or via e-mail at Homer.Butler@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner".

Matthew Kershner
Environmental Manager
Northeast District

Enclosure(s): Inspection Report

Ec: Mr. Brian Brown, Environmental & Property Manager, Brian.Brown@ringpower.com



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 08/02/2016

On-Site Inspection End Date: 08/02/2016

ME ID#: 40828

EPA ID#: FLD984206854

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

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

County Name: COLUMBIA

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 Transfer Facility facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pam Fellabaum, Inspector

Other Participants: Homer Butler, Inspector; Tim Bloodworth, Heavy Equipment Supervisor

LATITUDE / LONGITUDE: Lat 30° 7' 27.5652" / Long 82° 39' 28.8847"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power at Lake City (RPLC) was inspected August 2, 2016, as an unannounced hazardous waste compliance inspection. RPLC's last hazardous waste inspection by the Department was on September 16, 2013. The facility is operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste and transports its own oil and used oil filters. RPLC has been issued the EPA/DEP identification number FLD 984 206 854. Please use this number on all hazardous waste related correspondence with the Department.

RPLC is a heavy equipment dealer, maintenance, and facility owner/operator training provider. The staff at RPLC provide field and facility services for clients that include equipment maintenance, repair, and parts installation. The facility has been operating as RPLC at this location since 1991, has 40 employees, and has one well in addition to access to city water and sewer. Ring Power corporate owns the property, and the facility at Lake City operates five days a week, Monday through Friday.

The facility is comprised of a main building with an office and maintenance areas. Outside of the main building are the Heavy Equipment Wash Area (HEWA), the 40X40 Building, the Outside Holding Area, and an Equipment Parking Area.

The following areas were evaluated during the inspection: The Maintenance Areas, The Heavy Equipment Wash Area (HEWA), the 40X40 Building, the Outside Holding Area, and a sales and display lot. Mr. Tim Bloodworth, Mr. Greg Hill, and Mr. Brad Clyatt, accompanied the inspectors during the inspection.

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Process Description:**Maintenance Areas**

The facility is comprised of three distinct maintenance areas: The Heavy Equipment Shop, Rental Shop, and Truck Shop. Although different types of equipment are maintained in these areas, waste streams and waste management are similar. Maintenance operations generate used oil, used oil filters, spent antifreeze, used shop towels, and spent aerosol cans. Major equipment painting is performed off-site at the St. Augustine Ring Power facility, and only spot painting is performed here at the RPLC facility.

RPLC has one 500-gallon double-walled used oil tank located within a containment structure (Photo 1). The structure has a drain that can be opened to allow the released of accumulated rainwater (Photo 2). The drain was closed at the time of the inspection, and no oily sheen was observed on the rainwater in the containment structure. The tank was closed and labeled with the words "Used Oil."

The facility has implemented a scrap metal recycling collection plan for spent aerosol cans. Waste aerosol cans containing liquid are accumulated in 55-gallon drums that are closed and labeled "Aerosol cans for recycling" (Photo 3). Cans are then taken to the satellite aerosol can puncturing area that consists of one 55-gallon drum to accumulate the liquid waste. Empty waste aerosol cans are then placed into a scrap metal roll-off container (Photo 4).

Heavy Equipment Shop

The Heavy Equipment Shop performs routine repairs, and parts instillation on heavy equipment. In this shop one bay is dedicated for servicing specific system parts and hydraulic cylinder bench work. The used oil accumulation pan for the hydraulic cylinder bench was not marked clearly with the words "Used Oil" (Photo 5) [40 CFR 279.22(c)(1)]. The facility labeled the accumulation pan during the inspection (Photo 6). Generated used shop towels are accumulated in one 31-gallon container that was closed, and labeled "Excluded Solvent Contaminated Wipes" (Photo 7). Spent rags are collected and laundered by Cintas weekly.

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 8). 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. Two 55-gallon drums were accumulating, and both were properly labeled with the words "Used Oil Filters" (Photos 9 and 10). Used oil and used oil filters are recycled through Synergy.

Spent antifreeze is collected in a 250-gallon tote, and it is recycled through Synergy. The Heavy Equipment Shop has three parts washers: one 30-gallon Safety Kleen solvent parts washer that is serviced every eight weeks on a continued use program, and two 30-gallon Heritage Crystal Clean aqueous combination unit parts washers that are serviced every eight weeks on a continued use program.

The Heavy Equipment Shop has one glove box sand blasting unit with bag filters. This unit is used approximately three to four times per month to blast rust and staining from small parts and tools. The glove box generates glass bead blast grit that is accumulated in filter bags. At the time of the inspection the filter bags had not accumulated enough blast grit to require disposal. No waste has been generated from the glove box.

Rental Shop

In the Rental Shop routine maintenance and repair of the facility's fleet of rental vehicles is performed in two work bays. Used oil generated in this area is accumulated in mobile used oil containers and then 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, and the 55-gallon drum was properly labeled with the words "Used Oil Filters." This area has no parts washers, and staff use the HEWA for cleaning vehicles. One 5-gallon container was accumulating used shop towels was closed, but not labeled "Excluded Solvent Contaminated Wipes." The facility labeled the container during the inspection.

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Truck Shop

In the Truck Shop routine maintenance and repair is performed on facility fleet vehicles and contracted customer vehicles. Used oil generated in this area is collected in used oil containers and then it is pumped into the facility's 500-gallon used oil tank. Two 55-gallon drums were not properly labeled with the words "Used Oil" (Photos 11 and 12) [40 CFR 279.22(c)(1)]. Used oil filters are drained and collected in a 55-gallon drum. Two 55-gallon drums were not properly labeled with the words "Used Oil Filters" (Photo 13) [Rule 62-710.850(5)(a), FAC]. The facility labeled the containers during the inspection. Shop towels are accumulated in 5-gallon closed, and labeled "Excluded Solvent Contaminated Wipes" containers in each maintenance bay.

40X40 Building/Track Shop

In the Track Shop, the facility no longer performs new equipment tracks installation. At the time of the inspection, one 55-gallon drum was accumulating waste paint chips (Photo 14) from this process. The drum was closed and properly labeled "Waste Paint." The drum will be sent off-site for proper disposal as hazardous waste. The facility had a current weekly container log on display. One 5-gallon container of shop towels was closed, but not labeled "Excluded Solvent Contaminated Wipes." The facility labeled the container during the inspection.

Heavy Equipment Wash Area (HEWA)

The HEWA is a 100% closed loop recycling system for high pressure washing of equipment (Photo 15). Approximately two to four vehicles are washed in this area per week. The facility occasionally uses an alkaline soap (Hydrosolve 4165) in this area which is sprayed on prior to vehicle pressure washing. Wastewater flows from a concrete wash pad to a collection area which filters solid materials and directs the wastewater to an oil-water separator. The solid material is removed and dried in accumulation area adjacent to the HEWA. The filters are pressure washed annually to remove build up, and the sludge is added to the accumulation area. Solids from the HEWA are transported approximately every six months to a solid waste landfill. The waste was analyzed July 30, 2015, and has been found to be non-hazardous. Wastewater generated from the HEWA is diverted to an oil-water separator. The oil-water separator is serviced by Safety Kleen.

Outside Holding Area

The Outside Holding Area is a temporary staging area for equipment parts and facility materials. Spent lead-acid batteries are accumulated in a large closed plastic container for pick-up and recycling (Photo 16).

Equipment Parking Area

In the Equipment Parking Area, heavy equipment vehicles are staged for customers to inspect for ownership or rental. No waste is generated in this area.

Used Oil Transporter

The facility maintains registration as a Used Oil Transporter, Used Oil Filter Transporter, and Transfer Facility for the transport of its own used oil via a preventative maintenance truck which performs off-site service and maintenance. The truck has a 200-gallon capacity, and records supplied by RPLC indicate the truck transports from 20 to 30 gallons of used oil and seven to ten used oil filters daily. A current registration certificate was displayed at the facility in the break room. The facility maintains daily logs recording the location, date, and amount of used oil transported. The facility had a current proof of financial responsibility.

Record Review

At the time of the inspection, the facility was operating as a CESQG of hazardous waste, a Used Oil Transporter, a Used Oil Filter Transporter, and a Used Oil Generator. Personnel training for used oil transporters including proper management, spill response, SOP for halogen screening, and unsupervised transporter driving are being provided, and the training is up to date.

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Used oil, used oil filters, used absorbent pads and spent antifreeze are managed by Synergy. Used shop towels are laundered by Cintas. Lead-acid batteries are pick-up for recycling by East Penn Manufacturing Co., Inc.

A review of RPLC's operating records found them to be in order.

New Potential Violations and Areas of Concern:

Violations

Type: Violation
Rule: 279.22(c)(1)
Explanation: 1. In the Heavy Equipment Shop the used oil accumulation pan for the hydraulic cylinder bench was not marked clearly with the words "Used Oil."
2. In the Truck Shop two 55-gallon drums were not properly labeled with the words "Used Oil."
Corrective Action: No further action is required. The facility labeled the containers during the inspection.

Type: Violation
Rule: 62-710.850(5)(a)
Explanation: In the Truck Shop two 55-gallon drums were not properly labeled with the words "Used Oil Filters."
Corrective Action: No further action is required. The facility labeled the containers during the inspection.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



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Photo 3



Photo 4



Photo 5

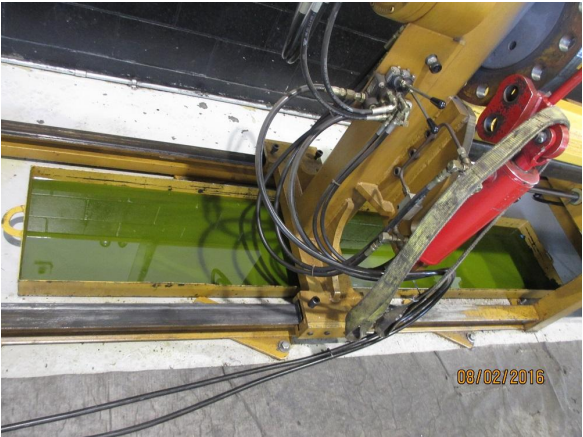


Photo 6



Photo 7



Photo 8



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Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14



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Photo 15



Photo 16



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1.0 - Pre-Inspection Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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.

Pam Fellabaum

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

10/14/2016

DATE

Homer Butler

Inspector NAME

Inspector

Inspector TITLE

FDEP

ORGANIZATION

Tim Bloodworth

Representative NAME

Heavy Equipment Supervisor

Representative TITLE

Ring Power Corp

ORGANIZATION

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.

Report Approvers:**Approver:** Pam Fellabaum**Inspection Approval Date:** 10/14/2016