



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

November 7, 2016

Mr. Johnny Batton, Truck Shop Leadman
Ring Power Corporation
2920 South Byron Butler Parkway
Perry, Florida 32348
Johnny.Batton@ringpower.com

Re: Ring Power Corporation
EPA/DEP ID: FLD 981 480 205
Taylor County – Hazardous Waste

Dear Mr. Batton:

Department personnel conducted a compliance inspection of the above-referenced facility on September 15, 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: 09/15/2016

On-Site Inspection End Date: 09/15/2016

ME ID#: 39549

EPA ID#: FLD981480205

Facility Street Address: 2920 S Byron Butler Pkwy, Perry, FL 32348-6314

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

County Name: TAYLOR

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility facility

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: Homer D Butler, Inspector

Other Participants: Pam Fellabaum, Inspector; Johnny Batton, Truck Shop Leadman

LATITUDE / LONGITUDE: Lat 30° 5' 1.579" / Long 83° 34' 1.8334"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power at Perry (RPP) was inspected September 15, 2016, as an unannounced hazardous waste compliance inspection. RPP'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. RPP has been issued the EPA/DEP identification number FLD 981 480 205. Please use this number on all hazardous waste related correspondence with the Department.

RPP is a heavy equipment dealer, maintenance, and facility owner/operator training provider. The staff at RPP provide field and facility services for clients that include equipment maintenance, repair, and parts installation. The facility has been operating as RPP at this location approximately 23 years, has 12 employees, and has one well in addition to access to city water and sewer. Ring Power corporate owns the property, and the facility at Perry 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 is a Heavy Equipment Wash Area (HEWA) with an adjacent covered solid accumulation area.

The following areas were evaluated during the inspection: The Maintenance Areas and the Heavy Equipment Wash Area (HEWA). Mr. Johnny Batton, Shop Leadman accompanied the inspectors during the inspection.

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Process Description:**Maintenance Areas**

In the three Maintenance areas, routine maintenance and repairs are performed on customer equipment, rental equipment, and facility equipment. Maintenance operations generate used oil, used oil filters, spent antifreeze, used shop towels, and spent aerosol cans. Major equipment rebuilds and painting is performed off-site at the St. Augustine Ring Power facility, and only spot painting is performed at the RPP facility.

Used oil generated from routine maintenance is collected in used oil catch pans and pumped into the facility's 500-gallon double-walled tank. The tank was closed and properly labeled "Used Oil" (Photo 1). Used oil filters are drained into used oil containers and then placed into a 55-gallon drum for accumulation. Two 55-gallon drums were accumulating, and both were closed and properly labeled with the words "Used Oil Filters" (Photo 2). Used oil and used oil filters are recycled through Synergy. Generated spent antifreeze is collected in a 250-gallon tote, and it is also recycled through Synergy.

Located in each maintenance area is one 30-gallon Safety Kleen petroleum naphtha parts washer (Photo 3). The three parts washers are serviced every eight weeks under Safety Kleen's continued use program. Used shop towels generated by maintenance practices are accumulated in one 30-gallon container located in each maintenance area that are closed and labeled "Excluded Solvent Contaminated Wipes" (Photo 4). All three spent towels containers are collected and laundered by Cintas weekly.

All three maintenance areas share one glove box sand blasting unit that has bag filters (Photo 5). This unit is used approximately one to two times per month to blast rust and staining from small parts and tools. At the time of the inspection the bag filters had not accumulated enough blast grit to require disposal. No waste has been generated from the glove box. The glove box generates glass bead blast grit that accumulates inside a sealed filter container. The facility should perform a Toxicity Characteristic Leaching Procedure (TCLP) for RCRA metals on waste generated from this blasting unit and manage the waste based on the TCLP determination.

The RPP facility has implemented a scrap metal recycling collection plan for spent aerosol cans. Waste aerosol cans containing liquid are accumulated in a 55-gallon drum (Photo 6). 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 7).

RPP accumulates its spent lead-acid batteries on pallets inside the main building on the second-floor supply loft (Photo 8). Once two pallets are accumulated, the spent lead-acid batteries are recycled by East Penn Manufacturing Co., Inc.

Heavy Equipment Wash Area (HEWA)

The HEWA is where returning rental equipment is cleaned after use (Photo 9). The dirt is removed from the equipment using a pressure washer with water. 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 with an adjacent oily wastewater evaporation sump. Solid material is removed and dried in the covered accumulation area adjacent to the HEWA (Photo 10).

Solids from the HEWA are transported approximately once every four to five years to an incinerator or to a solid waste landfill in Valdosta Ga. The waste dirt was analyzed on July, 07, 2008 for RCRA heavy metals and was been found to be non-hazardous.

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 preventive maintenance (PM) truck which performs off-site service and maintenance. The truck has a 200-gallon capacity, and records supplied by RPP indicate the truck transports from 10 to 20 gallons of used oil and three to six used oil filters daily. A current registration certificate was displayed at the facility on the wall at the break area. The facility maintains daily logs recording the location, date, and amount of used oil transported. The facility had a current proof of financial responsibility. Used oil generated in the field is added to the facility's 500-gallon used oil tank. At the time of

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the inspection the PM truck was supporting the Ring Power Saint Augustine facility, so it was not on site to inspect.

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, unsupervised transporter driving is being provided, and the training is up to date. 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 RPP's operating records found them to be in order.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



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Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Photo 10



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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.

Homer D Butler

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE*Homer D Butler***PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

11/07/2016

DATE

Pam Fellabaum

Inspector NAME

Inspector

Inspector TITLE

FDEP

ORGANIZATION

Johnny Batton

Representative NAME

Truck Shop Leadman

Representative TITLE

Ring Power Corporation

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:

11/07/2016