



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 06/05/2017

On-Site Inspection End Date: 06/05/2017

ME ID#: 36366

EPA ID#: FLR000119123

Facility Street Address: 7500 26th Court E, Sarasota, FL 34243

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

County Name: MANATEE

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

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

Routine Inspection for Used Oil Transfer Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: Ileana A Hernandez, Environmental Specialist I

Other Participants: Beth Knauss, Environmental Consultant; Shannon Kennedy, Environmental Specialist II; Andy Carothers, Branch Service Manager

LATITUDE / LONGITUDE: Lat 27° 24' 19.2696" / Long 82° 31' 53.7092"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

On February 23, 2003, the Florida Department of Environmental Protection (Department) received notification that Ring Power Corporation in Sarasota (Ring Power) had become a small quantity generator (SQG) of hazardous waste. Ring Power is also a registered used oil handler and used oil transporter. The facility was last inspected on June 25, 2013, by the Department's hazardous waste section. Mr. Andy Carothers, Branch Service Manager, accompanied the Department representatives during the inspection conducted on June 5, 2017.

Process Description:

Ring Power rents and services heavy equipment and is on Manatee County water and sewer. The maintenance shop contains nine service bays and a wash rack and associated wastewater recycling system. The wash rack is maintained by Southern Environmental and all solids accumulated from the wastewater are transported to Clark Environmental. Ring Power also operates two service trucks from this location to provide service to leased equipment in the field. One of the trucks has a 200-gallon capacity used oil compartment, and the other has a 90-gallon used oil compartment. As more than 55 gallons of used oil is transported at a time, the facility is subject to used oil transporter requirements. The facility does not manage oil generated by other facilities or transporters.

There are three System One recycling parts washers serviced every 4 months by Safety-Kleen and three drum top parts washers that are on Safety-Kleen's continued use program and serviced every 2 months. The still bottoms from the parts washers are collected by Safety-Kleen. The spent solvent generated from these parts washers may be subject to hazardous waste storage and disposal regulations if it contains any

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ingredients that make it hazardous. On June 2, 2017, Mr. Travis Anders, Shop Foreman, signed a "Solvent Generator Notification and Certification" stating that the spent solvent was non-hazardous without prior testing of its contents. The Department is requesting the facility to perform a TCLP analysis on one representative recycling parts washer and one representative drum top parts washer to determine whether the spent solvent is hazardous or non-hazardous; please submit the TCLP analysis results to the Department for review.

Used oil is stored in a 5,000-gallon double-walled above ground storage tank. The facility's used oil tank had been re-painted recently and was not yet labeled, even though the fill port was labeled properly. The tank was labeled with the words "Used Oil" during the inspection. All used oil, used antifreeze, used oil filters, and used oil absorbents are collected by Synergy Recycling (FLR000053611).

Aerosol cans are punctured prior to recycling. One unlabeled 55-gallon satellite puncturing drum was observed on-site (CORRECTED during the inspection: the drum was labeled properly with the words "Hazardous Waste"). Universal waste lamps and universal waste batteries are taken to the Ring Power facility in Riverview (FLD984170415) for consolidation prior to disposal. Lead-acid batteries are exchanged back to Caterpillar or recycled with Deka Batteries for core credit out of the Tampa location. Universal waste bulbs are recycled with Veolia Technical Solutions, LLC.

Ring Power's certificate of liability insurance and used oil handler and transporter registration were displayed during the inspection and were current. Hazardous waste shipping manifests were available for review with the most recent shipment occurring on February 1, 2017, where 250 pounds of waste paint were transported to Clean Harbors (FLD980729610). During a review of the used oil manifests from January 2017 to June 2017, it was recorded that approximately 600-900 gallons of used oil are transported to Synergy Recycling once to twice each month.

The facility has a modified contingency plan which was implemented on January 2, 2017, due to a discharge of 400 gallons of hydraulic oil from a faulty pump valve connected to the diesel motor oil tank. The proper authorities were notified, ACT Environmental responded on scene for clean-up, and all contaminated soil was shipped to Clark Environmental. More information on this event can be found in the storage tank facility discharge site inspection report dated January 5, 2017 – Storage Tank Facility ID #9807432.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Question Number:	3.1
Question:	Has the facility properly identified all hazardous waste streams? 262.11
Explanation:	The spent solvent generated from the parts washers may be subject to hazardous waste storage and disposal regulations if it contains any ingredients that make it hazardous. Currently, it is being transported off-site as non-hazardous waste without prior testing of its contents.
Corrective Action:	The Department is requesting the facility to perform a TCLP analysis on one representative recycling parts washer and one representative drum top parts washer to determine whether the spent solvent is hazardous or non-hazardous; please submit the TCLP analysis results to the Department for review.

Type:	Violation
Rule:	262.34(c)(1)(ii)
Question Number:	3.54
Question:	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(ii)
Explanation:	One unlabeled 55-gallon satellite puncturing drum for aerosol cans was observed on-site.

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Corrective Action: CORRECTED during the inspection. The satellite puncturing drum was properly labeled with the words "Hazardous Waste."

Conclusion:

Based on the observations made at the time of the inspection, Ring Power Corporation in Sarasota was not operating in compliance with state and federal hazardous waste rules and regulations applicable to small quantity generators and used oil generators/transporters.

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3.0 - Small Quantity Generator 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.	40 CFR 262 Subpart A -- General Standards	Yes	No	N/A
3.1	Has the facility properly identified all hazardous waste streams? 262.11		✓	
3.2	Has the facility obtained an EPA ID number? 262.12(a)	✓		
3.3	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? 262.12(c)	✓		
3.5	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)			✓
Item No.	40 CFR Part 268 -- Land Disposal Restrictions	Yes	No	N/A
3.6	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)			✓
3.7	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			✓
3.8	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
3.9	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
3.10	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
3.11	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
3.12	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
3.13	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)			✓
3.14	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)			✓
3.15	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
3.16	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
3.17	If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
3.18	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
3.19	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)			✓
3.21	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
3.23	Did the SQG comply with the applicable notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(10)			✓
3.24	Has the SQG retained on-site a copy of the notification and certification, along with the tolling agreement, for at least 3 years after termination or expiration of the agreement? 268.7(a)(10)			✓
Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A

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Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
3.25	<p>Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are NOT in compliance) 262.20(a)(1)</p> <p><input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number</p> <p><input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest)</p> <p><input type="checkbox"/> Item 3. Emergency Response Phone Number (must meet requirements below)</p> <p><input type="checkbox"/> Item 4. Manifest Tracking Number</p> <p><input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address</p> <p><input type="checkbox"/> Item 6. Transporter 1 Company Name & U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 7. Transporter 2 Company Name & U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group.</p> <p><input type="checkbox"/> Item 10. Containers (Number and Type)</p> <p><input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</p> <p><input type="checkbox"/> Item 12. Units of Measure (Weight/Volume)</p> <p><input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.</p> <p><input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information</p> <p><input type="checkbox"/> Item 15. Generator's / Offeror's Certifications</p> <p><input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted)</p> <p><input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt)</p> <p><input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility)</p> <p><input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes</p> <p><input type="checkbox"/> Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)</p>	✓		
3.26	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
3.27	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
3.28	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
3.29	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		
3.30	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓
3.31	<p>For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d)</p> <p><input type="checkbox"/> The next non-rail transporter?</p> <p><input type="checkbox"/> The Designated Facility if transported solely by rail?</p> <p><input type="checkbox"/> The last rail transporter to handle the waste in the U.S. if exported by rail?</p>			✓
3.32	If the generator did not receive a signed return copy of the manifest from the designated facility within 60 days of shipment, did the generator file an exception report? 262.42(b)			✓
3.33	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
3.34	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?		✓	
3.35	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
3.36	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
3.37	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓

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Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
3.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
3.39	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are NOT in compliance) 262.32(b) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number?			✓
3.40	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
3.41	Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.34(d)	✓		
3.43	Does the facility comply with the 180-day accumulation time limit? 262.34(d), 262.34(f)	✓		
3.44	If NO, has the facility been issued an extension by the Department? 262.34(d), 262.34(f)			✓
3.45	Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? 262.34(d)(1)	✓		
3.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.34(a)(2)	✓		
3.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.34(a)(3)	✓		
3.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)	✓		
3.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.34(c)(1)	✓		
3.50	Are satellite containers under the control of the operator of the process generating the waste? 262.34(c)(1)	✓		
3.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.34(c)(1)(i), 265.171	✓		
3.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.34(c)(1)(i), 265.172	✓		
3.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.34(c)(1)(i), 265.173(a)	✓		
3.54	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(ii)		✓	
3.56	If YES, after 3 days did the generator mark an accumulation start date on the excess waste container? 262.34(a)(2)			✓
3.57	If YES, after 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.34(a)(3)			✓
Item No.	40 CFR 262 Subpart C -- Emergency Information/Personnel Training -- (262.34(d)(5))	Yes	No	N/A
3.58	Has the facility identified at least one employee to act as the Emergency Coordinator? 262.34(d)(5)(i)	✓		
3.59	Has the facility posted required emergency information next to a telephone? (Check items below that are NOT in compliance) 262.34(d)(5)(ii) <input type="checkbox"/> Name and telephone number of the Emergency Coordinator <input type="checkbox"/> Location of fire extinguishers and spill control material, and, if present, fire alarm <input type="checkbox"/> Telephone number of the fire department, unless the facility has a direct alarm (911 is acceptable)	✓		
3.60	Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.34(d)(5)(iii)	✓		
3.62	If YES, did the facility respond in a manner described below, or other appropriate manner? (Check items below that are NOT in compliance) 262.34(d)(5)(iv) <input type="checkbox"/> FIRE - Call fire department or attempt to extinguish with a fire extinguisher <input type="checkbox"/> SPILL - Contain the waste and clean up any hazardous waste and contaminated materials and soil <input type="checkbox"/> FIRE, EXPLOSION, or RELEASE that posed threat - Notify the State Watch Office and National Response Center and report	✓		
Item No.	40 CFR 265 Subpart I -- Use and Management of Containers	Yes	No	N/A

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Item No.	40 CFR 265 Subpart I -- Use and Management of Containers	Yes	No	N/A
3.63	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 265.171	✓		
3.64	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 265.172	✓		
3.65	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 265.173(a)	✓		
3.66	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 265.173(b)	✓		
3.67	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 265.174	✓		
3.68	Does the generator properly document the weekly inspections? This should include at a minimum: (Check items below that are NOT in compliance) 62-730.160(5) <input type="checkbox"/> Date and Time of inspection <input type="checkbox"/> Legibly printed name of inspector <input type="checkbox"/> Number of hazardous waste containers <input type="checkbox"/> Condition of containers <input type="checkbox"/> Notation of observations made <input type="checkbox"/> Date and nature of any repairs or remedial actions	✓		
3.69	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 265.177(a), 265.17(b)			✓
3.70	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 265.177(b), 265.17(b)			✓
3.71	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 265.177(c)			✓
Item No.	40 CFR 265.201 - Subpart J Tanks Requirements for SQGs	Yes	No	N/A
3.73	If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 265.201(b)(1), 265.17(b)			✓
3.74	Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 265.201(b)(2)			✓
3.75	Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 265.201(b)(3)			✓
3.76	If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 265.201(b)(4)			✓
3.78	Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 265.201(c)(1)			✓
3.79	Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 265.201(c)(2)			✓
3.80	The level of waste in the tank? 265.201(c)(3)			✓
3.82	The construction materials of the tank to detect corrosion or leaking of fixtures or seams? 265.201(c)(4)			✓
3.83	The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) to detect erosion or obvious signs or leakage? 265.201(c)(5)			✓
3.85	If YES, does the facility inspect Discharge Control Equipment, Data, and Level of waste in tanks at least weekly? 265.201(d)			✓
3.86	Is the use of the alternate inspection schedule (weekly versus daily) documented in the facility's operating record? 265.201(d)			✓
3.87	Does the documentation include a description of the established workplace practices at the facility? 265.201(d)			✓
3.88	Upon closure of the facility, was all hazardous waste removed from tanks, discharge control equipment, and confinement structures? 265.201(f)			✓
3.90	If YES, does the facility meet one of the following 3 conditions? (Check the condition that applies below) 265.201(g)(1) <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the waste treated, rendered, or mixed before or immediately after placement in the tank so that (A) the resulting mixture no longer meets the definition of ignitable or reactive waste and (B) the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the waste treated or stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the tank used solely for emergencies?			✓

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Item No.	40 CFR 265.201 - Subpart J Tanks Requirements for SQGs	Yes	No	N/A
3.91	If the facility treats or stores ignitable or reactive waste in a covered tank does the facility comply with the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? 265.201(g)(2)			✓
3.92	If incompatible wastes or incompatible waste and materials are placed in the same tank does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 265.201(h)(1)			✓
3.93	If hazardous waste is placed in an unwashed tank which previously held an incompatible waste or material does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 265.201(h)(2)			✓
Item No.	265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
3.94	Is there no evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? 265.31	✓		
3.95	Does the facility have an internal communication or alarm system? 265.32(a)	✓		
3.96	Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 265.32(c)	✓		
3.97	Is the fire control equipment adequate? 265.32(c)	✓		
3.98	Is spill control and decontamination equipment present? 265.32(d)	✓		
3.99	If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? 265.33	✓		
3.100	Is the emergency equipment inspected and tested periodically? 265.33	✓		
3.101	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? 265.37(a)(1)	✓		
3.102	Has the facility made emergency response arrangements with the following: 265.52(c) <input type="checkbox"/> Fire Department <input type="checkbox"/> Police <input type="checkbox"/> Hospital <input type="checkbox"/> Emergency Response Contractor	✓		
3.103	If NO has the facility attempted to do so and is the refusal documented? 265.37(b)			✓
Item No.	40 CFR 262 Subpart D -- Record keeping and Reporting	Yes	No	N/A
3.104	Is the generator keeping records of exception reports? 262.42(b)			✓
3.105	Is the generator keeping records of test results, waste analysis or other determinations made in accordance with 262.11? 262.40(c)	✓		
3.106	Are the records kept on-site? 262.40	✓		
3.107	Are records kept for a minimum of 3 years? 262.40	✓		
3.109	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.60			✓
3.111	If YES, did the generator meet all of the requirements of 40 CFR 262.60? 262.60			✓

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5.0 - Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.15	stop the release? 279.22(d)(1)	✓		
5.16	contain the released oil? 279.22(d)(2)	✓		
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)	✓		
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)	✓		
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		

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Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.28	stop the release? 62-710.850(5)(b)(1)			✓
5.29	contain the released oil? 62-710.850(5)(b)(2)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)(b)(3)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)4.			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓

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Item No.	Marketing and Processing	Yes	No	N/A
5.0.9.1	Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]			

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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.

Ileana A Hernandez

Environmental Specialist I

PRINCIPAL INSPECTOR NAME**PRINCIPAL INSPECTOR TITLE**

FDEP-SWD

06/26/2017

PRINCIPAL INSPECTOR SIGNATURE**ORGANIZATION****DATE**

Beth Knauss

Environmental Consultant

Inspector NAME**Inspector TITLE**

FDEP-SWD

ORGANIZATION

Shannon Kennedy

Environmental Specialist II

Inspector NAME**Inspector TITLE**

FDEP-SWD

ORGANIZATION

Andy Carothers

Branch Service Manager

Representative NAME**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:**

Richard M Vaughn

Inspection Approval Date:

06/27/2017