

# FLORIDA DEPARTMENT OF Environmental Protection

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

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

May 28, 2019

Mr. Brian Brown, Environmental and Property Manager Ring Power Corporation 500 World Commerce Parkway St. Augustine, FL 32092 Brian.brown@ringpower.com

> Re: Ring Power Corporation EPA/DEP ID: FLR 000 127 274 Duval County – Hazardous Waste

Dear Mr. Brown:

Department personnel conducted a compliance inspection of the above-referenced facility on February 13, 2019. 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 and any non-compliance items which may have been identified at the time of the inspection have 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 Bonnie Bradshaw at 904-256-1638 or via e-mail at bonnie.bradshaw@FloridaDEP.gov.

Sincerely,

Matthew Construe

Matthew Kershner Environmental Manager

Enclosure: Inspection Report

cc: DEP: Bonnie Bradshaw, Pam Fellabaum, Cheryl Mitchell, DEP\_NED Brook Tefft, Ring Power Corporation – <u>Brooke.Tefft@RingPower.com</u>



Florida Department of Environmental Protection Hazardous Waste Inspection Report

# FACILITY INFORMATION:

Facility Name: Ring Power	Corp			
<b>On-Site Inspection Start Dat</b>	e: 02/13/2019	<b>On-Site Inspection</b>	n End Date:	02/13/2019
ME ID#: 27798		EPA ID#: FLR0	00127274	
Facility Street Address:	330 Pecan Park Rd	Jacksonville, FL 322 <sup>2</sup>	18-1308	
Contact Mailing Address:	500 World Commer	ce Pkwy, St Augustine	, FL 32092-3788	
County Name: Duval		Contact Phone:	(904) 494-1417	

NOTIFIED AS:

Used Oil

VSQG

# **INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter facility Routine Inspection for Used Oil Transfer Facility facility Routine Inspection for Used Oil Generator facility Routine Inspection for VSQG (<100 kg/month) facility

#### **INSPECTION PARTICIPANTS:**

Principal Inspector:Bonnie M Bradshaw, InspectorOther Participants:Donnie Davis, Shop Foreman

# LATITUDE / LONGITUDE: Lat 30° 30' 51.0755" / Long 81° 37' 57.7476"

NAIC 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

# **TYPE OF OWNERSHIP:**

# Introduction:

Ring Power Corporation (Ring Power) was inspected on February 13, 2019 as an unannounced hazardous waste compliance inspection. Ring Power was last inspected by the Department's Hazardous Waste Program on March 17, 2015. The facility is registered and operating as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter and Used Oil Filter Transfer Facility. The facility is also operating as a used oil generator and Very Small Quantity Generator (VSQG) of hazardous waste. Pam Fellabaum (DEP) and Donnie Davis (Ring Power) were present throughout the inspection.

Ring Power is a dealer and service agent for trucks, heavy equipment, generators, parts and other equipment. The facility has been in operation since 2005 and has approximately 40 employees. Ring Power owns the property and the building which is connected to city water and sewer. Hours of operation are Monday – Friday from 7:00 am – 5:00 pm and on call as needed. The facility consists of offices, a Service Shop, a Parts Warehouse, a Wash Rack and a Fuel Station.

# **Process Description:**

# Mobile Servicing

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Ring Power services heavy equipment and trucks in the field. The facility transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter. Used oil, used oil filters and used antifreeze generated during field servicing activities are transported back to the facility and accumulated with the waste streams generated at the facility. The facility operates approximately 12 field trucks. One field truck is equipped with a used oil recovery tank, a used antifreeze recovery tank and a filter container. All other field

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trucks use buckets or drums to collect used oil, used antifreeze or used oil filters. There were no field trucks on site at the time of inspection. Mr. Davis stated that there have been no discharges since the previous inspection.

#### Service Shop

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Ring Power services heavy equipment, CAT rental equipment and over-road trucks in the Service Shop. There are two bays dedicated to rental fleet and customer owned heavy equipment service (Photo 1), eight bays dedicated to customer owned over-road truck service (Photo 2) and four bays dedicated to CAT rental fleet service (Photo 3). Used oil, used oil filters, used antifreeze and oily absorbents are generated by the facility's operations.

Used oil is drained into portable drain containers (Photo 4) and then pumped into a 2,000-gallon doublewalled tank located outside (Photo 5). All of the used oil drain containers and the used oil tank were in good condition and properly labeled.

Used oil filters are drained into portable drain containers before being accumulated in 30-gallon drums located in each area of the shop (Photo 6). Filters are transferred from the drums to a 330-gallon steel container located in the Wash Rack, as described below, once full (Photo 7). One 30-gallon drum of filters was labeled as "Used Filters." The facility re-labeled the drum correctly as "Used Oil Filters" during the inspection (Photo 8). Another 30-gallon drum was stored inside a cabinet labeled as "Used Oil Filters," but the drum was not labeled itself. The facility labeled the drum as "Used Oil Filters" during the inspection. All 30-gallon drums were in good condition. The 330-gallon container located in the wash rack was in good condition and properly labeled.

Used antifreeze is drained into portable drain containers (Photo 9) and then transferred into a 275-gallon tank located outside (Photo 10). All of the used antifreeze drain containers and the tank were in good condition and properly labeled.

Oil absorbent pads are also generated by maintenance activities. Oil absorbent pads are collected in 30gallon drums located in each shop area. The pads are placed into plastic bags and transferred to the 330gallon used oil filter container in the Wash Rack for transport and disposal.

The Service Shop operates four Safety-Kleen Model 250 parts washers that use Safety-Kleen Premium Solvent (hydrotreated light petroleum distillates 100%; flash point 148°F) (Photo 11). The units are on an 8-week service with Safety-Kleen, and waste solvent is managed as non-hazardous waste.

Re-usable rags are generated by maintenance activities and may be contaminated with oil, grease and/or Brakleen Brake Parts Cleaner-Non-Chlorinated (methanol 40-50%, toluene 10-20%, acetone 5-15%, 3methylhexane 5-10%, carbon dioxide 5-10%, n-heptane 5-10%, methylcyclohexane 3-5%, hydrotreated light naphtha (petroleum) 3-5%, cyclohexane 1-3%, ethylbenzene <0.2%; flash point 0°F). Spent rags contaminated with these products generate F005 hazardous waste when used as described. Rags are accumulated in closed, step containers located throughout the shop and are managed as excluded solvent contaminated wipes. There were several containers that were not labeled as "Excluded Solvent Contaminated Wipes" (Photo 12). All containers were properly labeled during the inspection (Photo 13). Rags are laundered by Cintas weekly.

Disposable blue rags and paper towels are used with Armour All Tire Foam (propane/isobutane 1-<8%, non-hazardous ingredients >2-99%; flash point >200°F) or CRC Glass Cleaner (liquefied petroleum gas 5-10%, 2-butoxyethanol 1-3%, ethanol 1-3%, ammonia <1%, methanol <0.2%; no flash point). Spent rags contaminated with these products are a non-hazardous waste.

Aerosol cans of Brakleen Brake Parts Cleaner - Non-Chlorinated, CRC Battery Terminal Protector (liquid petroleum gas 20-30%, n-heptane 10-20%, petrolatum 10-20%, 2-methylpentane 5-10%, 3-methylhexane 5-10%, petroleum naphtha 5-10%, 2-methylhexane 3-5%, heptane 3-5%, methylcyclohexane 3-5%, solvent naphtha 3-5%, 3-ethylpentane 1-3%, ethylbenzene 1-3%, n-hexane 1-3%, paraffin oils 1-3%, xylene 1-3%, 3,3-dimethylpentane <1%, toluene <0.3%, 2.2-dimethylbutane <0.2%, 2.3-dimethybutane <0.2%, 3-methylpentane <0.2%; flash point <0°F), CRC Jump Start Starting Fluid (heptane 65-85%, diethyl ether 10-30%, carbon dioxide 5-10%, ethanol <1.5%, chloroethane 0.1-1%, petroleum distillates 0.1-1%; flash point <20°F), CRC Freeze-Off Super Penetrant (1,1-difluoroethane 30-60%, petroleum distillates 20-50%,

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turpentine oil 3-7%, 2-butoxyethanol 1-5%, 4-hydroxy-4methylpentan-2-one 1-5%, petroleum naphtha 1-5%, pine oil 1-5%; flash point 126°F), WD-40 (LVP aliphatic hydrocarbon 45-50%, petroleum base oil <35%, alphatic hydrocarbon <25%, carbon dioxide 2-3%; flash point 138°F) and Catepillar Yellow or Black Standard Performance Top Coat (flash points -20.2°F – 20.2°F) are used. Liquid generated from puncturing and draining non-empty aerosol cans of these products is D001 hazardous waste. Aerosol cans of Turtle Wax Oxy Power Out Upholstery Cleaner (water >85%, propane 1-2%, isobutane 1-2%, sodium lauroyl sarcosinate 1-5%, alkylpolyglucoside <1%; flash point not available) may also generate D001 hazardous waste liquid from non-empty aerosol cans, depending on the flash point. Non-empty aerosol cans of PB Penetrating Catalyst (Bulk) (petroleum distillates 65-85%, naphthalene 0.2-2.1%, dinonylphenol 0.5-1.5%; flash point 150°F) generate a non-hazardous liquid waste when punctured and drained. Aerosol cans are accumulated in a 55gallon drum with a swing lid (Photo 14). When a significant number of cans have accumulated, the cans are removed from the drum, absorbent pads are placed into the bottom of the drum, the cans are punctured and drained into the bottom of the drum, and the absorbent pads are disposed of with the non-hazardous oily absorbent waste. This is not ensuring proper disposal of hazardous waste [40 CFR 262.14(a)(5)]. Mr. Davis stated that a 35-gallon can puncturing system was currently on order from Safety Kleen and was scheduled to be delivered the following day.

The facility operates one glove box bead blasting machine which is used to blast bare engine parts, and occasionally painted parts (Photo 15). The facility stated that spent blasting media was disposed of approximately two years ago by adding it to the Wash Rack soil. The facility provided Toxicity Characteristic Leaching Procedure (TCLP) analysis results for metals and volatiles which indicated the material is non-hazardous. The facility is reminded that if the process or materials used in the process change, additional analysis may be required.

Batteries are stored adjacent to the tank area outside on a spill pallet (Photo 16). Batteries are picked up for recycling by Deka Batteries when new batteries are delivered.

Floors are cleaned with Mean Green 9 (2-butoxyethanol 2.5-10%; no flash point). Mop and floor scrubber water is disposed of in the Wash Rack, as described below.

#### Parts Warehouse

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There is a Parts Warehouse (Photo 17) located adjacent to the Service Shop. The Parts Warehouse stores parts, issues parts and performs work on hydraulic hoses.

There is one Safety Kleen Model 33 Cyclonic Parts Washer that uses Safety-Kleen Premium Solvent (hydrotreated light petroleum distillates 100%; flash point 148°F) in this area (Photo 18). The parts washer is used to clean used hydraulic hoses. The unit is on an 8-week service with Safety-Kleen, and waste solvent is managed as non-hazardous waste.

The facility also cuts new hydraulic hoses and blows air and cotton through the hoses to collect the rubber, which could be a contaminant. The device used to collect the cotton is located adjacent to the parts washer. The Parts Warehouse also crimps hydraulic hoses and grinds down the rubber on a grinding wheel.

Fluorescent bulbs are changed out and handled by the St. Augustine Ring Power facility. Electronic waste is also handled by the St. Augustine Ring Power facility.

#### Wash Rack

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The Wash Rack is a covered area used to wash equipment potentially contaminated with oil prior to service with Mean Green 9 and/or heated water (Photo 19). The Wash Rack is equipped with a rough clean area on the west side of the structure and a polishing area on the east side of the structure. The rough clean and polishing areas are separated by a change in elevation. The rough clean area is a closed-loop system where dirt/debris is washed from equipment with high pressure water. Dirt and debris is separated from water by a weir and is removed and accumulated as needed in a three-wall pit in the Wash Rack area. Equipment is cleaned with Mean Green 9 in the polishing area. Delta Foremost 615-ES Super Transpo Wash (potassium hydroxide, sodium hydroxide; pH 11.6 – 12) is also being used on a trial basis. Water drains to a trough which is pumped to a biofiltration unit that treats the water with microbes and a defoaming agent prior to discharge to the POTW. The biofiltration unit filters are pressure washed in the rough side area of the Wash Rack as needed. Sludge that accumulates in the biofiltration unit is cleaned out approximately once per year

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and disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. TCLP metal, volatile, pesticide and herbicide analysis of the sludge has indicated that the waste is non-hazardous. Dirt and debris collected from the rough clean area is disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. TCLP metal, semi-volatile and volatile constituent analysis of the dirt and debris has indicated that the waste is non-hazardous. The facility is reminded to ensure that when sampling is conducted that a representative sample is collected and analyzed in accordance with EPA publication SW#846 "Test Methods for Evaluating Solid Waste" 3rd Edition and with Rule 62-160, Florida Administrative Code (FAC).

One 330-gallon container for consolidation of used oil filters from the Service Shop is located in the Wash Rack area. The container was in good condition, closed and properly labeled.

There were two solid waste dumpsters observed adjacent to the Wash Rack area. One dumpster contained solid waste and several marine used oil filters (Photo 20) [62-710.850(1), FAC]. The filters were removed from the dumpster at the time of inspection for management with the facility's used oil filter waste stream. The second dumpster appeared to only contain solid waste.

Fuel Station

The facility has a fueling area on-site that provides gasoline and diesel to vehicles. The tanks are registered and inspected by the Department's Storage Tank Division.

#### Records Review

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The facility is operating as VSQG of hazardous waste. Small amounts of hazardous aerosol can liquid waste is generated by the facility.

Used oil, used oil filters, used oil absorbents and used antifreeze are transported by Safety-Kleen (TXR 000 081 205).

Used oil is scheduled for pick-up by Safety-Kleen for recycling every week and was last transported on February 5, 2019. The facility is reminded that transfer facilities that store used oil for more than 35 days are subject to regulation as a used oil processor.

Used oil filters and absorbents are scheduled for pick-up every week by Safety-Kleen and were last transported on January 24, 2019.

Used antifreeze is picked-up by Safety-Kleen for recycling every week and was last transported on February 28, 2018.

Parts washers are serviced by Safety-Kleen every eight weeks and were last serviced on January 2, 2019.

Rags are laundered weekly by Cintas.

Soil from the Wash Rack is transported by Advanced Disposal to Evergreen Landfill in Valdosta, Georgia and was last transported on December 21, 2018. The Wash Rack biofiltration unit sludge was last transported to Evergreen Landfill in Valdosta, Georgia by Prichett Trucking on May 18, 2019.

The used oil registration which expires on June 30, 2019, was posted.

\*\*\*\*\*\*NOTE: As of June 18, 2018, the State of Florida has adopted the recently-updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule. As a generator of hazardous waste, your facility is impacted by the rule change.

Please see the eCFR site for a copy of the Federal rule at - https://www.ecfr.gov/cgi-bin/textidx?SID=ab7ac7e8d2fb42037c72a0de5162bcfe&mc=true&tpl=/ecfrbrowse/Title40/40cfrv28\_02.tpl#0

The November 28, 2016, Federal Register also has a good discussion about the new requirements - https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-27429.pdf

Copies of PowerPoints that discuss the new requirements may also be found here -

https://floridadep.gov/northeast/ne-compliance-assurance/content/compliance-assurance-resources

Please note that the new rule in 40 CFR 262.18 requires re-notification for LQGs every other year effective immediately and every four years for SQGs starting in 2021.

For Outstanding Items of Potential Non-Compliance

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Please review the following section – New Potential Violations and Areas of Concern. This section includes potential violations observed at your facility during this inspection. For any potential violations below that have not been corrected, please refer to the Corrective Action for each item that is suggested to bring your facility into compliance. Once the corrective action has been completed, please send documentation to the DEP NED inspector listed as the Principal Inspector on page 1 of this Inspection Report. This documentation includes, but is not limited to, photos of corrected items, manifests, SDSs or other documents that will show that each potential violation has been fully addressed.

# New Potential Violations and Areas of Concern:

# Violations

Туре:	Violation
Rule:	262.14(a)(5)
Explanation:	Spent hazardous waste liquid from aerosol cans is being managed with non-hazardous oily waste absorbent material.
Corrective Action:	No further action is required. The facility returned to compliance via two emails dated 4/24/19 that included a photo of the new drum-top aerosol can puncturing device and a statement that the device had been placed into operation and all aerosol cans would be punctured in the device and the drained liquid managed as hazardous waste.
Туре:	Violation
Rule <sup>.</sup>	00.740.050(4)
Traio.	62-710.850(1)
Explanation:	Used oil filters were observed in a solid waste dumpster at the facility.

# PHOTO ATTACHMENTS:

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# Photo 1



# Photo 3



# Photo 5



# Photo 2



# Photo 4





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# Photo 7



Photo 9



# Photo 11



# Photo 8









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Photo 15



# Photo 17



# Photo 14



# Photo 16





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# Photo 19





# 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.

#### Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	<		
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.

Bonnie M Bradshaw	Inspector	
Principal Inspector Name	Principal Inspector Title	
B. Bradenhaus	DEP	04/29/2019
Principal Inspector Signature	Organization	Date
Donnie Davis	Shop Foreman	
Representative Name	Representative Title	
	Ring Power Corporation	

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.

Organization

#### **Report Approvers:**

Approver: Pam Fellabaum

Inspection Approval Date: 04/29/2019