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

March 10, 2020

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

Re: Compliance Assistance Offer
Ring Power Corporation
EPA/DEP ID: FLR 000 119 347
St. Johns County – Hazardous Waste

Dear Mr. Brown:

A compliance inspection was conducted at your facility on December 11, 2019, under the authority of Section 403.091, Florida Statutes. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Potential non-compliance with the requirements of Chapter 403, Florida Statutes, and Chapter 62-730, Florida Administrative Code, were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the 'New Potential Violations and Areas of Concern' and respond within 30 days of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a time schedule describing how/when the issue will be addressed;
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid; or
3. Arrange for the case manager to visit your facility to discuss the Areas of Concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond appropriately may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Bonnie Bradshaw of the Northeast District Office at 904-256-1638 or via e-mail at bonnie.bradshaw@FloridaDEP.gov. We look forward to your cooperation in this matter.

Sincerely,

Matthew Kershner
Environmental Manager

Enclosure: Inspection Report

cc: DEP: Bonnie Bradshaw, Pam Fellabaum, Cheryl Mitchell, DEP_NED
Brooke Tefft, Ring Power Corporation – Brooke.Tefft@RingPower.com

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 12/11/2019 **On-Site Inspection End Date:** 12/11/2019

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

WASTE ACTIVITIES:

Generator: SQG **Used Oil:** Used Oil, Oil Filters **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Contaning Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

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

Routine Inspection for Used Oil Generator Facility

Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector

Other Participants: Brian Brown, Environmental and Property Manager

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

NAIC: 532412 - Construction, Mining, and Forestry Machinery and Equipment Rental and Leasing

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation (Ring Power, the facility) was inspected December 11, 2019, as an unannounced hazardous waste compliance inspection. Ring Power was last inspected by the Department's Hazardous Waste program on December 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 Small Quantity Generator (SQG) of hazardous waste.

Ring Power is a dealer and service agent for forklifts, trucks, heavy equipment, generators, parts and other equipment. The facility has been in operation since 2004 and has 527 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. The facility consists of offices, Maintenance and Repair Shops, a Wash Rack, a Major Component Rebuild Center, a Fabrication and Welding Shop, a Machine Shop, a Blasting and Painting Shop, a Facilities Shop, a Loading Dock, a Parts Warehouse, a Tool Room, a Power System Warehouse and a Tank Farm. Brian Brown (Ring Power) and Brook Teft (Ring Power) were present throughout the inspection.

Process Description:

Mobile Servicing

Ring Power services vehicles and equipment in the field. 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 described below. 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 is collected in either a 200-gallon tank installed on truck 19-4708 or in drums in one of the other trucks. Used oil filters are drained in sealed compartments affixed to the rear of the truck during transport back to the shop (Photo 1). A 5-gallon drum is taken to jobs to collect used antifreeze when used antifreeze will be generated. Absorbent mats and rags used to clean-up drips, leaks or spills of used oil are collected in a 5-gallon container labeled “Oily Rags.”

Maintenance and Repair Shops

The facility operates several Maintenance and Repair Shops where general maintenance and repair is performed on various vehicles and equipment. The Air Compressor Service Bays, Engine Diagnostics Shop, Truck Shop, Crane Shop, Track Shop, CAT Rental Store Shop and Heavy Equipment Shop were inspected. Used oil, used oil filters, used antifreeze, oily rags, excluded solvent contaminated wipes and aerosol cans may be generated by the Shops.

Used oil generated by Maintenance and Repair Shop operations is drained into portable drain containers (Photo 2) and then either transferred to 55-gallon drums or pumped directly to the used oil tank located in the Tank Farm described below by means of a suction piping system (Photo 3). In the Crane Shop, used oil is transferred to a 500-gallon double-walled tank located in the shop. The used oil tanks, drums and drain containers were in good condition, closed and properly labeled as “Used Oil.”

Used oil filters generated by Maintenance and Repair Shop operations are accumulated in 55-gallon drums located throughout the Shops (Photo 4). The containers were in good condition and properly labeled as “Used Oil Filters.”

Used antifreeze generated by Maintenance and Repair Shop operations is either accumulated in portable drain containers, 55-gallon drums (Photo 5) or pumped directly to the used antifreeze tank located in the Tank Farm described below by means of a suction piping system. Containers were in good condition, closed and labeled as either “Used Coolant” or “Used Antifreeze.”

Oil absorbent pads generated by Maintenance and Repair Shop operations are accumulated in 30-gallon drums lined with plastic bags. The bags are placed in the used oil filter collection containers for disposal by Safety-Kleen.

The Maintenance and Repair Shops operate one Model 33 30-gallon Safety-Kleen parts washer that uses Safety-Kleen Premium Solvent (hydrotreated light petroleum distillates 100%; flashpoint 148°F) (Photo 6). The unit is on an 8-week maintenance schedule with Safety-Kleen. The Maintenance and Repair Shops also operate two, 30-gallon Heritage-Crystal Clean parts washers that use Mirachem 500 Cleaner/Degreaser (proprietary surfactant blend <2% and water). Spent solvent is managed as non-hazardous waste, but the facility has not made an accurate hazardous waste determination on this waste stream to support this action [40 CFR 262.11]. The Maintenance and Repair Shops operate eleven Model 250 (System One) and one Model 260, 30-gallon Safety-Kleen parts washers that use Safety-Kleen Premium Solvent. The units distill the solvent. Therefore, the only waste generated is an oily sludge that is disposed of occasionally depending on usage. The units are on an 8-week maintenance schedule with Safety-Kleen to top-off any evaporated solvent. The sludge has not been disposed of in at least three years. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of the sludge.

Laundered rags are generated by Maintenance and Repair Shop operations and may be contaminated with oil, grease or dirt. Rags are accumulated in step cans or buckets. Rags are laundered weekly by Aramark.

Disposable rags are generated by the CAT Rental Store and Heavy Equipment shop operations and may be contaminated with Brakleen Brake Parts Cleaner-Non-Chlorinated (methanol 40-50%, toluene 10-20%, acetone 5-15%, 3-methylhexane 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%; flashpoint 0° F), QC-82 Pro-Strength Degreaser (water 70-80%, liquefied petroleum gas 5-10%, surfactant 5-10%, butoxyethanol 3-5%, trisodium citrate dihydrate 3-5%; no flashpoint), QD Contact Cleaner (naphtha 30-40%, 1,1 difluoroethane 20-30%, n-heptane 10-20 %, 3-methylhexane 5-10%, 2,2,4-trimethylpentane 3-5%, 2-methylhexance 3-5%, 2,3-dimethylpentane 1-3%, 3-ethylpentane 1-3%, 3,3-dimethylpentane <1%; flashpoint 15.8°F), Carquest Non-Chlorinated Brake Parts Cleaner (methanol 40-50%, toluene 35-45%, acetone 5-15%, carbon dioxide 3-8%;

flashpoint 0°F), Lectra-Motive Electric Parts Cleaner (tetrachloroethylene 90-100%, carbon dioxide 1-5%; no flashpoint), Mean Green Super Strength (2-(2-butoxyethoxy)ethanol 1-2.5%, fatty alcohol ethoxylate 1-2.5%; flashpoint 201.2°F, WD-40 Multi Use (LVP aliphatic hydrocarbon 45-50%, aliphatic hydrocarbon <25%, carbon dioxide 2-3%; flashpoint 138°F) and/or Loctite Copper Based Anti-Seize (calcium dihydroxide 10-20%, distillates 10-20%, petroleum distillates 10-20%, copper 10-20%, graphite 5-10%, quartz 0.1-1%; flashpoint >199.4°F). The disposable rags are managed as excluded solvent contaminated wipes and are accumulated in closed containers labeled as “Excluded Solvent Rags” (Photo 7). The facility is reminded that containers should be labeled “Excluded Solvent Contaminated Wipes.” The other Maintenance and Repair Shops were also using some of the solvents listed above, but did not have excluded solvent contaminated wipes accumulation containers. Based on information obtained from employees, these products are not routinely used on rags in those shops. The facility is reminded that rags contaminated with listed solvents must be either managed as hazardous waste or as excluded solvent contaminated wipes.

Aerosol cans of Brakleen Brake Parts Cleaner-Non-Chlorinated, QD Contact Cleaner, Carquest Non-Chlorinated Brake Parts Cleaner, Lectra-Motive Electric Parts Cleaner, WD-40 Multi Use, Standard Performance Topcoat Medium Gloss Black (flashpoint -20.2°F) and Standard Performance Topcoat Cat Yellow (flashpoint -20.2°F) are generated by Maintenance and Repair Shop operations. One drum-top aerosol can puncturing device is installed in the Air Compressor Service Bays (Photo 8) and a second device is shared between the CAT Rental Store and Heavy Equipment Shops (Photo 9). Aerosol cans are punctured and the liquid is drained into 30-gallon drums. Empty cans are disposed of as scrap metal. Both drums were in good condition and closed, but were not labeled as “Hazardous Waste” or with an indication of the hazards of the contents at the time of inspection [40 CFR 262.15(a)(5)]. Both drums were properly labeled during the inspection. Liquid generated from puncturing and draining non-empty aerosols cans of these products will generate a D001/U210 hazardous waste. Aerosol cans generated by other shops are punctured and drained in the Blasting and Paint Shop can puncturing device described below.

Aerosol cans of QC-82 Pro-Strength Degreaser used in the Service Shop generate non-hazardous liquid waste when punctured and drained.

There is one glovebox blasting unit installed in the Track Shop (Photo 10) and one unit installed in the CAT Rental Store Shop. Both Ring Power and customer painted and unpainted parts are blasted in the units. Spent blasting media is added to the Wash Rack dirt/sludge as described below for disposal at Evergreen Landfill in Valdosta, Georgia. Analysis of the CAT Rental Store Shop spent blasting media has indicated that it does not contain TCLP metal constituents above the TCLP regulatory limits. No TCLP analysis had been performed and no hazardous waste determination records were available at the time of inspection for the spent Track Shop blasting media [40 CFR 262.11].

Service Shop floors are cleaned with Mean Green 9 (2-butoxyethanol 2.5-10%; pH 9.0). Mop water is disposed of in the Wash Rack described below.

Spent lead acid batteries generated by the Service Shop are stored on a pallet on the loading dock. Batteries are picked up approximately every 1-2 months by East Penn Manufacturing Company, Inc. for recycling.

At the time of inspection, the facility did not generate used antifreeze filters, perform tire service or generate air bag waste.

Wash Rack

The Wash Rack is a covered area used to wash equipment that has been potentially contaminated with oil and dirt prior to repairs (Photo 11). The Wash Rack is equipped with a rough clean area on one side of the structure and a polishing area on the other 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 are separated from water by a weir and are removed and accumulated as needed in a walled pit in the Wash Rack area. Equipment is cleaned with Mean Green 9 in the polishing area. 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, approximately every six months. Sludge that accumulates in the biofiltration unit is cleaned out as needed. The unit is relatively new and therefore sludge has not yet been disposed, but analysis of the sludge has indicated that it does not contain TCLP volatile, semi-volatile, metal, pesticide or herbicide constituents above the TCLP regulatory limits. Dirt and debris collected from the rough

clean area is disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. Analysis of the dirt and debris has indicated that they do not contain TCLP volatile, semi-volatile, metal, pesticide or herbicide constituents above the TCLP regulatory limits.

Major Component Rebuild Center (MCRC)

The MCRC installs new or reconditioned parts into engines and transmissions. There are four areas in the MCRC: Radiator Pressure Testing, Engine Tear Down, Assembly and Diagnostic Controls.

Radiators are pressure tested in a large tank containing water and Barbee #54/56 Tank Block/Powder (sodium carbonate 95%, pylakor fluorescene >5%) (Photo 12). Air pressure is placed on radiators placed into the tank where bubbles indicate potential leaks. When the liquid is no longer usable, it is released to the floor drain. The floor drain is piped to the Wash Rack described above. Analysis of the spent liquid has indicated that it does not contain TCLP volatile, semi-volatile, metal, pesticide or herbicide constituents above the TCLP regulatory limits.

Engines, transmissions and parts are dismantled and washed in large parts washers for repairs in the Engine Tear Down area. This area also contains a small wash rack where equipment is washed. This small wash rack discharges to the large Wash Rack described above (Photo 13). Dirt and sludge generated by this process is accumulated with the large Wash Rack dirt/sludge described above. Used oil is drained from engines and large parts on floor grates into shallow pans contained within a concrete secondary containment below the grates. The pans are pumped approximately every 3-4 months into a grated drain area above the floor level where smaller parts are also allowed to drain (Photo 14). Used oil is pumped from this location by Safety-Kleen as needed for recycling.

After the engines and equipment are drained, they may be cleaned in one of five immersion parts washers. Tank 1 sprays Foremost 35-ES Jet Takeoff (sodium metasilicate pentahydrate, sodium carbonate; no flashpoint; pH 11.5-11.9) to clean aluminum parts. Tank 1 is cleaned out as needed based on particle testing. The spent liquid is placed into drums, the sludge is removed and drummed, the spent liquid is placed back into the tank for reuse and fresh product is added to top off the tank. The sludge has not been disposed of in at least three years, but the facility is preparing to dispose of the sludge shortly. Analysis of the spent liquid has indicated that it does not contain TCLP metal constituents above the TCLP regulatory limits.

Tanks 2-4 use heated Foremost 1195 Paint and Rust Remover (sodium hydroxide; no flashpoint; pH 12.6-13.4) to clean cast iron and steel parts with agitation (Photo 15). Tanks 2-4 are cleaned out as needed based on particle testing. The spent liquid is placed into drums, the sludge is removed and drummed, the spent liquid is placed back into the tank for reuse and fresh product is added to top off the tank. Although the liquid is reused and not disposed of as described, analysis of the spent liquid has indicated that it is a D002/D007/D008 hazardous waste. The facility has not analyzed the sludge. As a result, the facility has not made an accurate hazardous waste determination on this waste stream [40 CFR 262.11].

Tank 5 uses Safety-Kleen Premium Solvent to clean aluminum, steel and other metals. The spent liquid is managed as D039 hazardous waste under a national profile. Spent liquid was last disposed of on September 12, 2019, as D039 hazardous waste. Analysis of the spent liquid has indicated it does not contain TCLP metal constituents above the TCLP regulatory limits.

Radiators may be coated with Barbee #73-5 Asphalt Paint (Stoddard solvent, asphalt MC70, petroleum residues, carbon black pigment, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene; flashpoint 104°F), a thick, petroleum-based coating. Unused coating generates a D001 hazardous waste.

One glovebox blasting unit is installed in the Engine Tear Down area (Photo 16). Both Ring Power and customer painted and unpainted parts are blasted in the unit using glass beads. No TCLP analysis had been performed and no hazardous waste determination records were available at the time of inspection [40 CFR 262.11].

Aerosol cans of Brakleen Brake Parts Cleaner-Non-Chlorinated, QD Contact Cleaner, Carquest Non-Chlorinated Brake Parts Cleaner, Lectra-Motive Electric Parts Cleaner, Standard Performance Topcoat Medium Gloss Black and Standard Performance Topcoat Cat Yellow are generated by Engine Tear Down operations. One step can for the collection of non-empty aerosol cans that contained five aerosol cans and one drum-top aerosol can puncturing device are installed in the area. Aerosol cans are punctured and the liquid is drained into a 30-gallon drum. Empty cans are disposed of as scrap metal. Both the step can and the drum were in good condition and

closed. The step can was not labeled as “Hazardous Waste” or with an indication of the hazards of the contents (Photo 17) [40 CFR 262.15(a)(5)]. The 30-gallon drum was not labeled with an indication of the hazards of the contents (Photo 18) [40 CFR 262.15(a)(5)]. The five aerosol cans were punctured and drained into the 30-gallon drum and the 30-gallon drum was properly labeled at the time of inspection.

Components are rebuilt in the Assembly area. There are five Safety-Kleen Model 250 and one Model 33 parts washers installed in this area. The units are on an 8-week maintenance schedule with Safety-Kleen. The parts washers use Safety-Kleen Premium Solvent (hydrotreated light petroleum distillates 100%; flashpoint 148°F). Spent liquid generated by the Model 33 parts washer is managed as non-hazardous waste, but the facility has not made an accurate hazardous waste determination on this waste stream to support this action [40 CFR 262.11]. Spent sludge generated by the Model 250 has not been disposed of in at least three years. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of the sludge.

There is one excluded solvent contaminated wipes collection container installed in the Assembly area that is used to collect disposable rags that may be contaminated with oil, WD-40, Brakleen Brake Parts Cleaner-Non-Chlorinated or Loctite Threadlocker Blue 242 (oleic acid 20-30%, saccharin 1-5%, silica 1-5%, cumene hydroperoxide 1-5%, propane-1,2-diol 1-5%, cumene 0.1-1%, titanium dioxide 0.1-1%; flashpoint > 199.94°F). The step can was closed and properly labeled (Photo 19).

Water is recirculated through engines for testing purposes in the Diagnostics Control Room area. The facility is reminded that, should the water ever need to be disposed of, a hazardous waste determination should be conducted and the water analyzed for metal TCLP constituents, at a minimum.

Fabrication and Welding Shop

The Fabrication and Welding Shop fabricates and welds internal and external parts for repair. Unused welding rods are managed as scrap metal. There was one step can that contained oily rags for laundering. No hazardous waste is generated in this area.

Machine Shop

The Machine Shop machines parts for internal and external customers on a non-production basis. Only steel parts are machined. Excess material is managed as scrap metal. There was one step can that contained oily rags for laundering. No hazardous waste is generated in this area.

Blasting and Paint Shop

The facility blasts and paints both Ring Power and external customer equipment in this area (Photo 20). The facility also conducts a small amount of hand sanding when blasting is not feasible.

The facility blasts painted and unpainted parts and equipment in a large blasting booth using silica sand. The spent blast grit is collected in floor trenches and transferred to elevated hoppers that sort the material by grain size. Fine grains are sent to a dust collector which discharges spent grit to four 55-gallon drums (Photo 21). Larger particles are collected in two 55-gallon drums located upstream of the dust collector (Photo 22). Spent grit collected in the 55-gallon drums is added to the Wash Rack sludge and disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. Analysis of the spent grit has indicated semi-volatile, volatile and metal constituents are not present above the TCLP regulatory levels.

In the event that blasting is not feasible, equipment may be hand sanded. Sanding is conducted inside the building. Sanding waste is swept up and disposed of in the trash. Analysis of the sanding waste has indicated that metal constituents are not present above the TCLP regulatory levels.

After blasting or sanding, Finish Pro 6000 Wax & Grease Remover (acetone 90-100%; flashpoint -4° F) may be used on a rag to remove debris, depending on the project. Spent rags contaminated with Finish Pro 6000 Wax & Grease Remover are non hazardous waste when used as described and are disposed of as excluded solvent contaminated wipes. There was one 55-gallon drum of excluded solvent contaminated wipes accumulating (Photo 23). The drum was closed, in good condition and properly labeled.

Prior to painting, the facility may use tape to cover certain areas of the equipment. Following painting, the tape is removed and disposed of into the trash. Analysis of the tape has indicated that TCLP metal constituents are

not present above TCLP regulatory levels.

The facility uses Tufcote 2K -Polyurethane White Base (4-chlorobenzotrifluoride 48-59%, titanium dioxide 19.5%, n-pentyl propionate 1-4%, styrene 0.4%, ethylbenzene 0.3%, bis (1,2,2,6,6-pentamethyl-4-piperidinyl) sebacate 0-1%, poly(oxy-1,2-ethanediyl), alpha[3-[3-(2h-benzotriazol-2-yl)-5-(1,1-dimethylethyl)-4-hydroxy phenyl 0-1%, ultraviolet absorber 0-1%; flashpoint 113° F), Imron 3.5HG (toluene 2%, methyl amyl ketone 5-15%, acrylic polymer 16-26%, butyl acetate 5-15%, titanium dioxide 7.4%, yellow iron oxide 16-26%, ethyl acetate 5-15%, ethylene glycol monobuty-l ether acetate 1%, ethylbenzene 0.1%, organoclay 1-4%, polyester resin 16-26%; flashpoint 100°-141° F), Standard Performance Topcoat Medium Gloss Black and Standard Performance Topcoat Cat Yellow to paint parts and equipment. Excess coatings generate a D001 hazardous waste when spent. The facility should conduct a hazardous waste determination on any additional coatings utilized prior to disposal. Grow Automotive Urethane Reducer Very Slow 1390 (n-butyl acetate 30-60%, 2-methoxy-1-methylethyl acetate 15-40%, toluene 10-30%, ethyl acetate 1-5%; flashpoint 78°F) is used as needed to thin paints. The reducer generates a D001/F005 hazardous waste liquid when spent. There was one 55-gallon drum of spent paint and thinner accumulating at the time of inspection (Photo 24). The drum was closed, in good condition and properly labeled. The facility generates approximately two 55-gallon drums of paint/thinner waste per month. Two sets of paint booth filters are changed approximately every month. The paint booth filters are disposed of into the trash. Analysis of the spent paint booth filters has indicated semi-volatile and volatile constituents are not present above the TCLP regulatory levels. The facility has not analyzed the spent filters for metals. As a result, the facility has not made an accurate hazardous waste determination on this waste stream [40 CFR 262.11].

Paint booth guns, as well as staff personal paint guns, are soaked in Finish Pro 5000 General Purpose Thinner (methanol 1-100%, toluene 1-100%, acetone 1-100%, light hydrotreated distillate 1-100%; flashpoint 51.8°F) for cleaning. Paint gun liners are not used. Spent thinner generates a D001/F003/F005 hazardous waste liquid. Spent thinner generated from this process is disposed of in the 55-gallon drum of spent paint and thinner described above. The paint gun cleaner and solvent recovery unit formerly in use broke several months prior to the inspection and are no longer in use. The facility intends to replace both units at some point.

Grow Automotive Urethane Reducer or Finish Pro 5000 General Purpose may also be used on a rag for cleanup. Spent rags contaminated with these products generate an F005 hazardous waste. The rags are disposed of as excluded solvent contaminated wipes in the 55-gallon drum described above.

The 180-Day Hazardous Waste Accumulation Area (HWAA) is located in the Blasting and Paint Shop. There was one 55-gallon drum of spent paint and thinner observed at the time of inspection (Photo 25). The drum was closed, in good condition and properly labeled. There was one 30-gallon drum-top aerosol can puncturing device observed in the HWAA. The drum was closed, in good condition and properly labeled. Both drums had been accumulating waste for less than 180-days.

Facilities Shop

Lighting, electrical, air conditioning and plumbing activities for all Ring Power facilities are based out of this area. No painting or stripping is conducted. Spent florescent bulbs generated by maintenance activities are managed as universal waste. There was one box of spent florescent bulbs accumulating in this area. The box had an accumulation start date, but was not closed and was not properly labeled (Photo 26) [40 CFR 273.13(d)(1) and 40 CFR 273.14(e)]. The box was closed and properly labeled at the time of inspection. Other wastes generated by facility maintenance activities are managed with the shop waste streams in each location.

Loading Dock

Lead acid batteries are accumulated on the loading dock for recycling by East Penn Manufacturing Company, Inc. Batteries accumulating at the time of inspection appeared to be in good condition and free from signs of leakage. Additional spent fluorescent bulbs are accumulated in a storage room located adjacent to the loading dock. Seven containers of spent bulbs were not labeled properly (Photo 27) [40 CFR 273.14(e)]. The bulbs were labeled properly at the time of inspection. Although the bulbs also did not have an accumulation start date, records indicated that bulbs were last transported from the facility on May 16, 2019. The facility is reminded that it must clearly demonstrate the length of time that universal waste has been accumulated from the date it becomes a waste or is received.

Parts Warehouse/Tool Room/Power System Warehouse

These areas store parts for sale or use, tools for use and equipment for sale or rental. Hazardous waste is typically not generated in these areas, but any damaged chemical products would be managed according to the shop hazardous waste disposal process.

Tank Farm

The Tank Farm consists of four aboveground, 10,000-gallon double-walled, steel tanks located under a roof (Photo 28). Tank 5 contains product diesel engine oil. Tank 6 is compartmentalized and contains a 2,500-gallon section for used oil and a 7,500-gallon section for product hydraulic oil. Tank 7 is compartmentalized and contains product 30-weight oil and 50-weight oil. Tank 8 is compartmentalized and contains a 5,000-gallon compartment for product antifreeze and a 5,000-gallon compartment for used antifreeze. The tanks appeared to be in good condition and were properly labeled.

Records

The facility is operating as a SQG of hazardous waste. The facility typically generates approximately 800 pounds of paint and thinner waste liquids each month. Paint and thinner waste was last transported on December 5, 2019. This waste stream is manifested as D001/D005/D006/D007/D008/D035/F003/F005 hazardous waste and transported by Safety-Kleen Systems, Inc. (TXR 000 081 205) and Clean Harbors Environmental Services, Inc. (MAD 039 322 250) to Clean Harbors Florida, LLC (FLD 980 729 610) for disposal.

The Tank 5 immersion parts washer solvent was last disposed of on September 12, 2019. The facility shipped 350-gallons of D039 hazardous waste. The D039 spent solvent is transported by Safety-Kleen Systems, Inc. to Safety-Kleen (FLD 980 847 214) for disposal.

The facility notified the Department of a planned episodic event that began on June 1, 2019, and ended on July 31, 2019. The waste, which included dip tank sludge, parts washer liquid and paint waste, was shipped from the facility on July 19, 2019. The shipment included 1,600 pounds of D001/D002/D008 waste flammable liquids, 100 pounds of D001 waste flammable liquids and 3,600 pounds of D001/D005/D006/D007/F003/F005 waste paint.

A used oil acceptance monthly log is maintained for used oil transported to the facility from field operations for the 200-gallon tank truck. Used oil, used oil filters, used oil absorbents and used antifreeze are transported from the facility by Safety-Kleen (TXR 000 081 205). Used oil is transported to Safety-Kleen (FLD 980 847 214) for recycling approximately once per week. The last shipment of used oil was on December 3, 2019. Used oil filters and absorbents are transported to Safety-Kleen Ocala (FLR 000 060 301) for recycling or disposal approximately once or twice per month. The last shipment of used oil filters was on November 19, 2019. Used antifreeze is transported for recycling approximately once per week. Per Safety-Kleen, the shipments were previously recorded as used oil, but this has since been corrected.

Lead acid batteries were last transported by East Penn Manufacturing Company, Inc. for recycling on November 5, 2019. Batteries are transported approximately once per month.

Spent florescent bulbs are recycled by Lamp Sales Unlimited, Inc. The last shipment of bulbs was on May 16, 2019.

Pritchett Trucking transports Wash Rack soil to Evergreen Landfill in Valdosta, Georgia approximately every two months. The last shipment of soil was October 17, 2019.

Records indicate Aramark picks up rags weekly for laundering.

The facility’s weekly hazardous waste inspections were reviewed and appeared to be in order. Contingency plans were available adjacent to the phone in each shop. Records of arrangements with the local authorities were not available at the time of inspection [40 CFR 262.16(b)(8)(vi)(A)]. Spill kits and emergency equipment are present in each shop where hazardous waste is generated. Hazardous waste training was last conducted for service and branch managers December 3-4, 2019. Service managers are trained two times per year and conduct "tool box talks" to train shop personnel.

The used oil registration, which expires on June 30, 2020, was posted.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Explanation:	Maintenance and Repair Shops: 1. The facility did not make an accurate hazardous waste determination on the spent parts washer solvent generated by the Model 33 parts washer located in the Air Compressor Service Bays and the Heritage Crystal Clean parts washers located in the Truck Shop and the CAT Rental Store Shop. 2. The facility did not make an accurate hazardous waste determination on the spent blast grit in the Track Shop. MCRC: 3. The facility did not make an accurate hazardous waste determination on the spent blast grit in the Engine Tear Down area. 4. The facility did not make an accurate hazardous waste determination on the tanks 2-4 parts washer spent sludge in the Engine Tear Down area. 5. The facility did not make an accurate hazardous waste determination on the Model 33 parts washer spent solvent located in the Assembly area. Blasting and Painting Shop 6. The facility did not make an accurate hazardous waste determination on the paint booth filters.
Corrective Action:	In order to return to compliance, the facility should make an accurate hazardous waste determination for each waste stream listed below that has not already been analyzed. If the laboratory analysis is not sufficient to make an accurate waste determination, the facility should provide additional documentation to support its waste determination. The waste should be analyzed by a certified Florida laboratory as follows: Maintenance and Repair Shops: 1. Make a hazardous waste determination on the spent parts washer solvent by analyzing it for: -TCLP for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010 -TCLP for RCRA Volatiles, pursuant to 40 CFR 261.24, via method 8260 2. Make a hazardous waste determination on the Track Shop spent blast grit by analyzing it for: -TCLP for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010 MCRC: 3. Make a hazardous waste determination on the Engine Tear Down area spent blast grit by analyzing it for: -TCLP for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010 4. Make a hazardous waste determination on the Engine Tear Down area tanks 2-4 parts washer spent sludge by analyzing it for: -TCLP for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010 - pH, pursuant to 40 CFR 261.22, via method 9040C 5. Make a hazardous waste determination on the MCRC Model 33 parts washer spent solvent by analyzing it for: -TCLP for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010 -TCLP for Volatiles, pursuant to 40 CFR 261.24, via method 8260 Blasting and Painting Shop 6. Make a hazardous waste determination on the paint booth filters by analyzing them

for:
-TCLP for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010

A copy of the results of these waste determinations should be submitted to this NED office. None of these wastes are to be disposed of until written approval has been given by the DEP. The waste should be disposed of in a proper manner once written approval has been given by the DEP. Hazardous waste should be sent off-site to a permitted treatment, storage, or disposal facility.

NOTE: None of the samples are to be composites. The samples are to be collected and analyzed in accordance with EPA publication SW# 846 “Test Methods for Evaluating Solid Waste” 3rd Edition. All sampling and analysis shall be conducted in accordance with Rule 62-160, FAC. A National Environmental Laboratory Accreditation Program (NELAP) certified laboratory should analyze the samples.

Type:	Violation
Rule:	262.15(a)(5)
Explanation:	The 30-gallon satellite accumulation drums of aerosol can waste located in the Air Compressor Service Bays and CAT Rental Store/Heavy Equipment Shops and the step can containing non-empty aerosol cans located in the MCRC Engine Tear Down area were not labeled as "Hazardous Waste" and with an indication of the hazards of the contents. The 30-gallon satellite accumulation drum of aerosol can waste located in the MCRC Engine Tear Down area was not labeled with an indication of the hazards of the contents.
Corrective Action:	No further action is needed. The facility returned to compliance by labeling all containers properly at the time of inspection.

Type:	Violation
Rule:	262.16(b)(8)(vi)(A)
Explanation:	The facility failed to make arrangements with local authorities.
Corrective Action:	In order to return to compliance, the facility should provide documentation to the Department that it has attempted to make arrangements with the local police department, fire department and hospitals.

Type:	Violation
Rule:	273.13(d)(1)
Explanation:	The facility failed to close one box of universal waste lamps located in the Facilities Shop.
Corrective Action:	No further action is required. The facility returned to compliance by properly closing the box at the time of inspection.

Type:	Violation
Rule:	273.14(e)
Explanation:	The facility failed to label seven boxes of universal waste lamps located in the storage room adjacent to the loading dock and one box of universal waste lamps located in the Facilities Shop as "Universal Waste Lamps," Waste Lamps" or "Used Lamps."
Corrective Action:	No further action is required. The facility returned to compliance by properly labeling the boxes at the time of inspection.

PHOTO ATTACHMENTS:

Ring Power Corp Inspection Report

Inspection Date: 12/11/2019

Photo 1

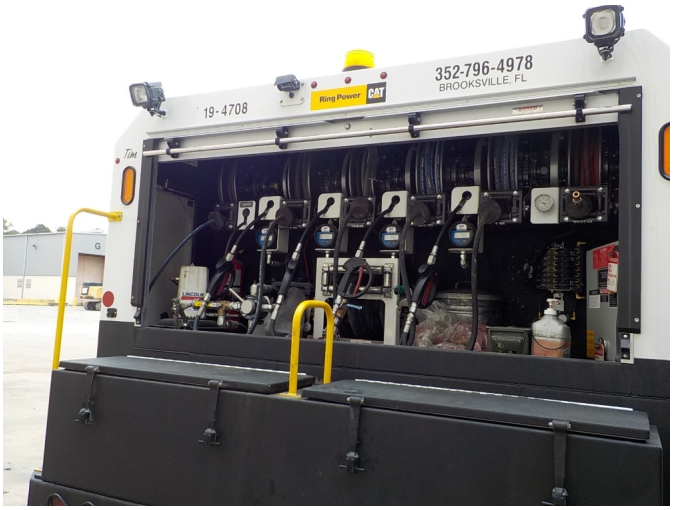
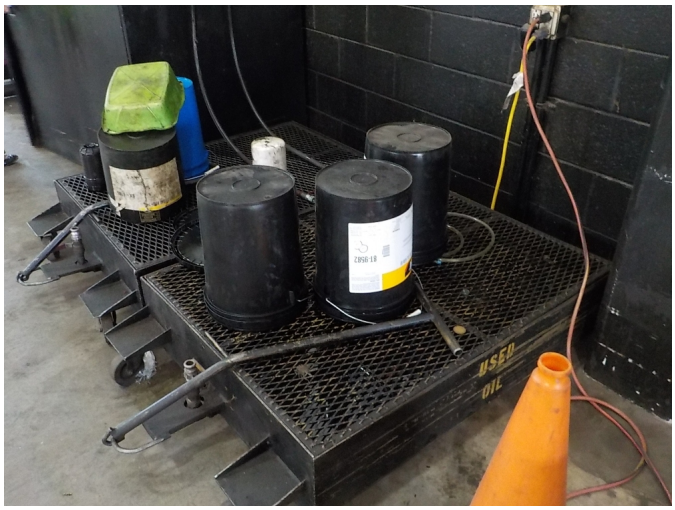


Photo 2



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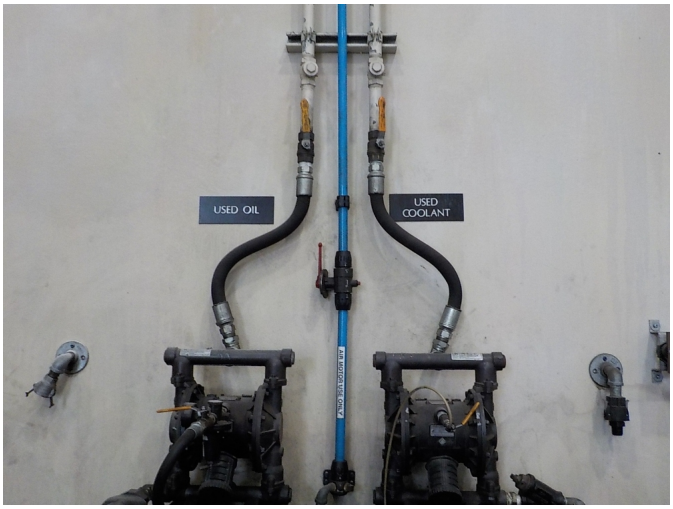
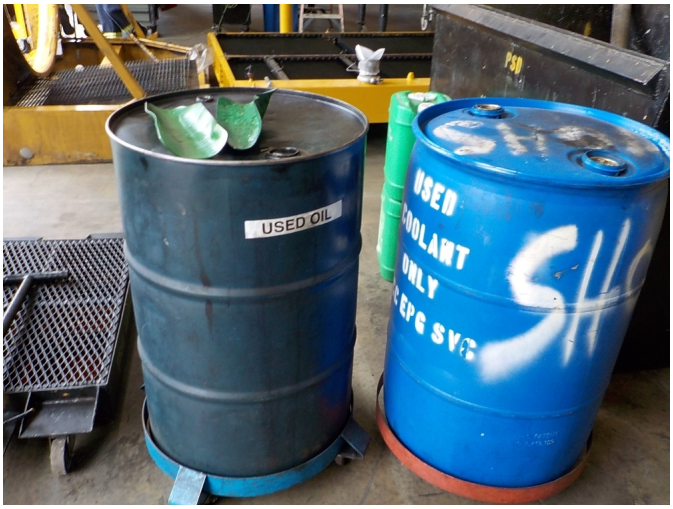


Photo 4

Photo 5



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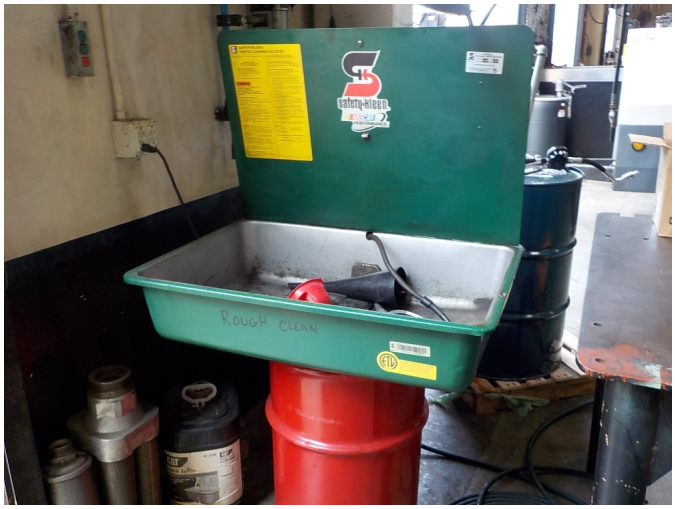

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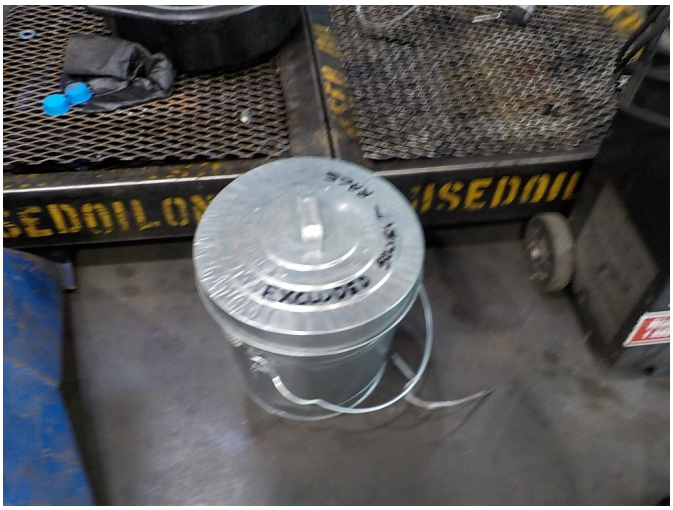
Inspection Date: 12/11/2019

Photo 7



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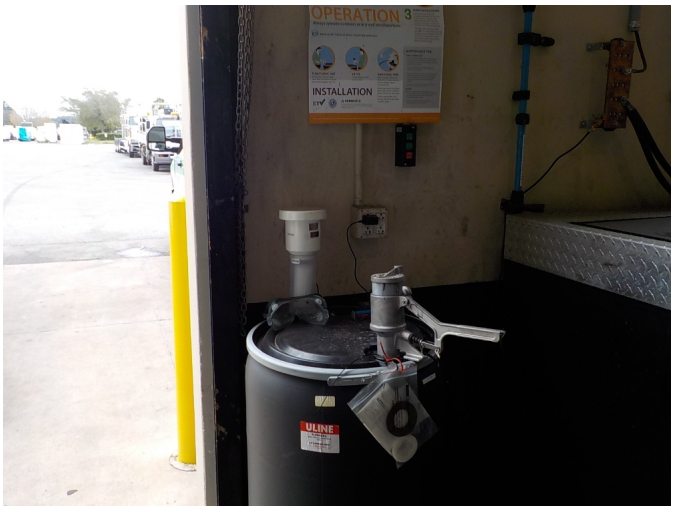

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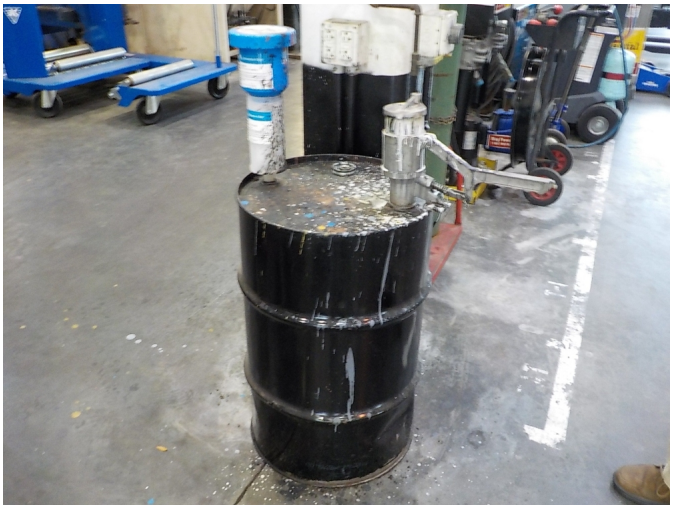

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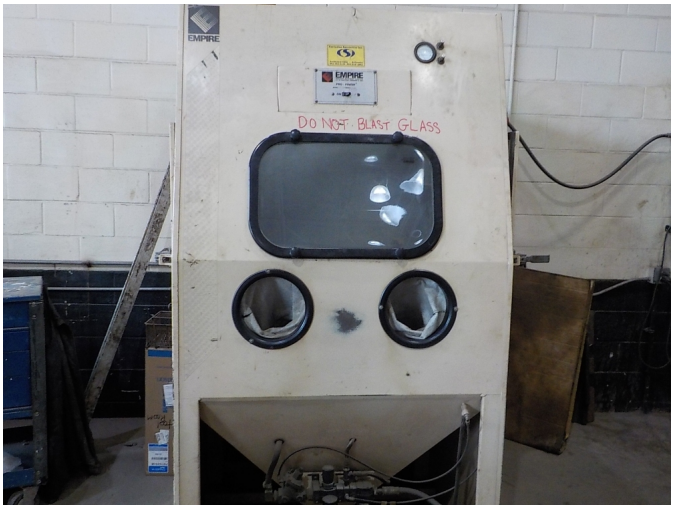

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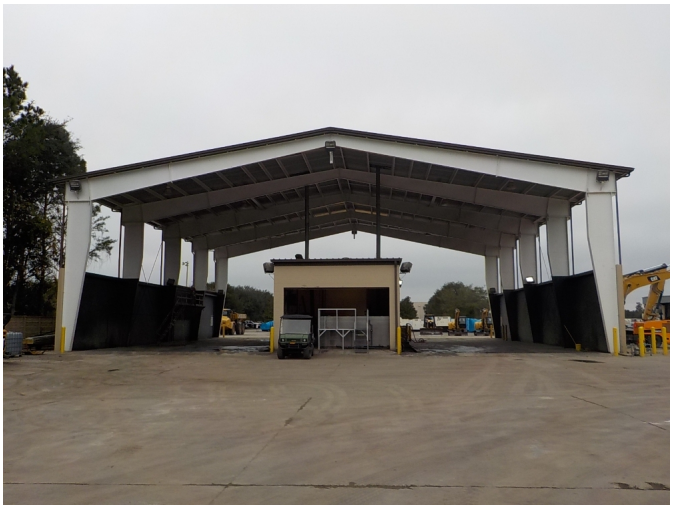

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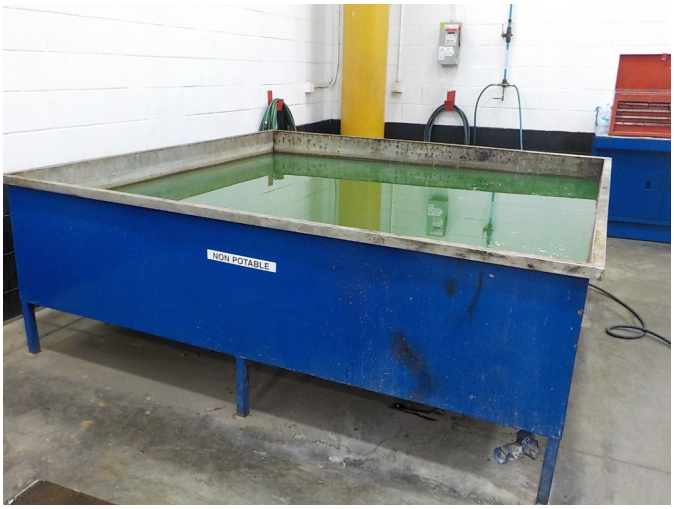

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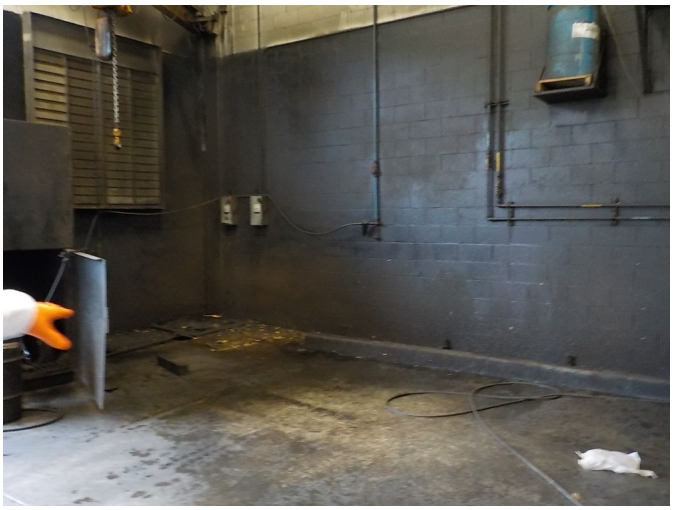
Photo 13



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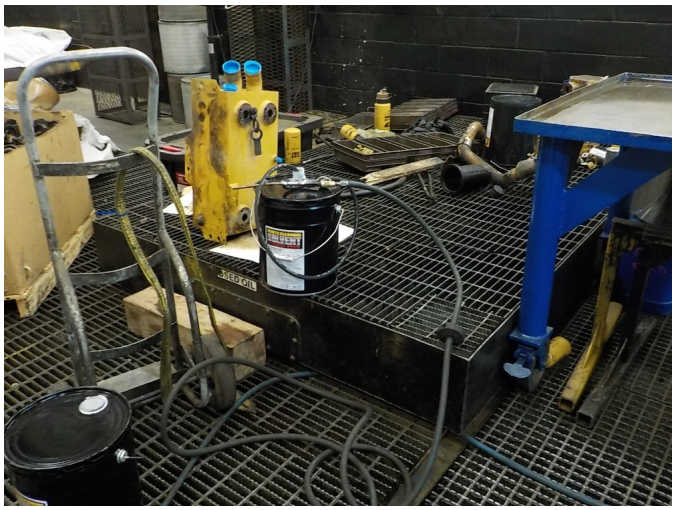

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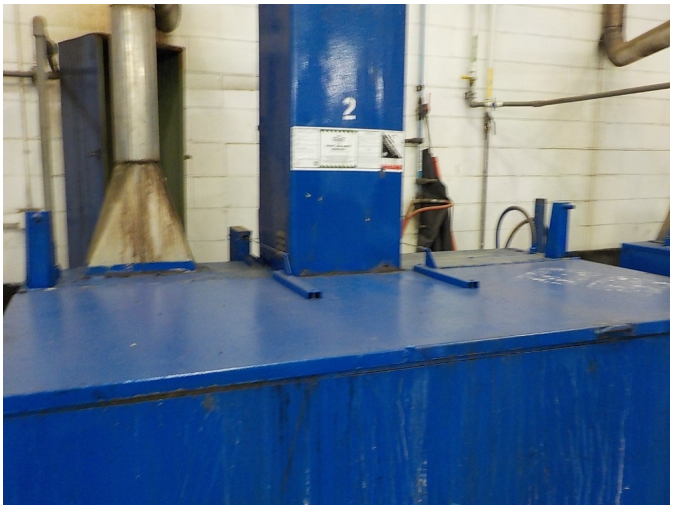

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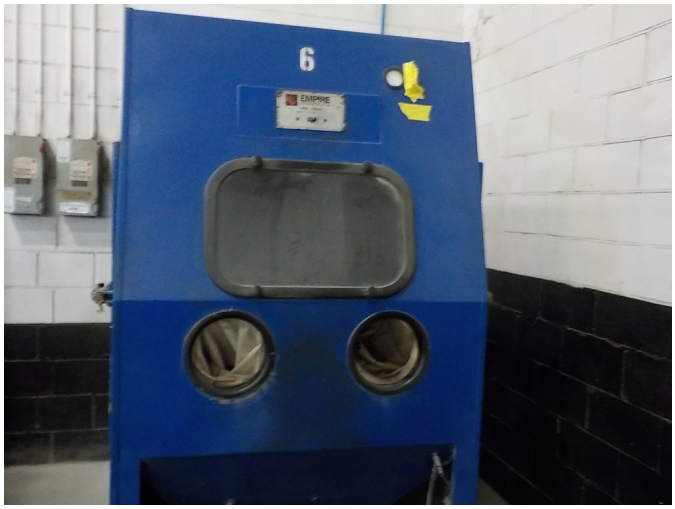

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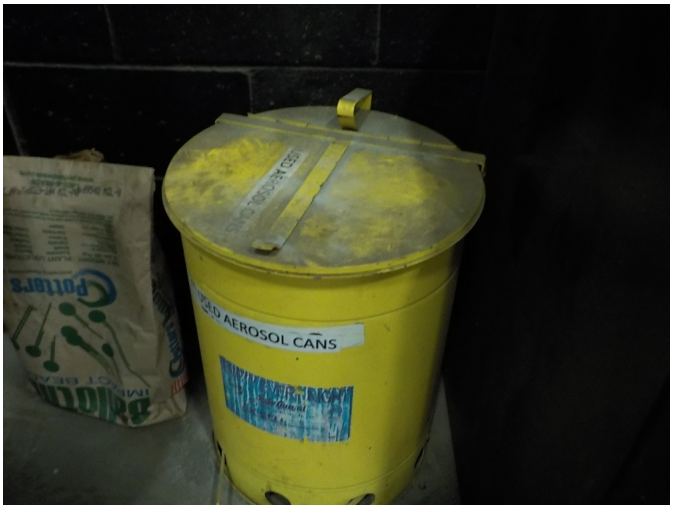

Photo 18

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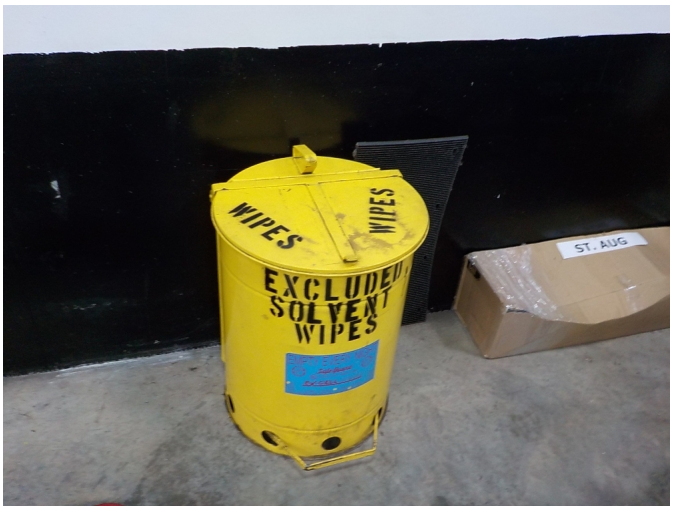
Photo 19



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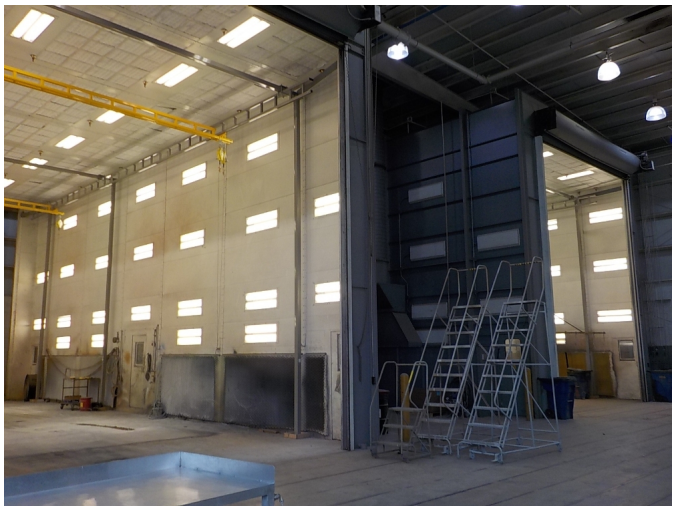

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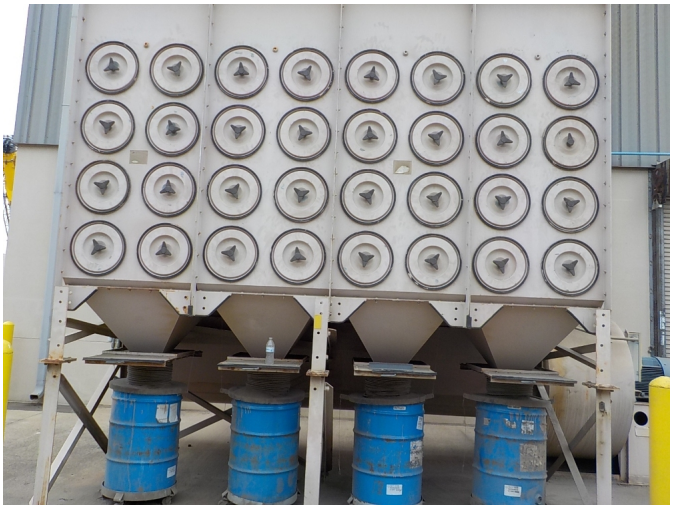

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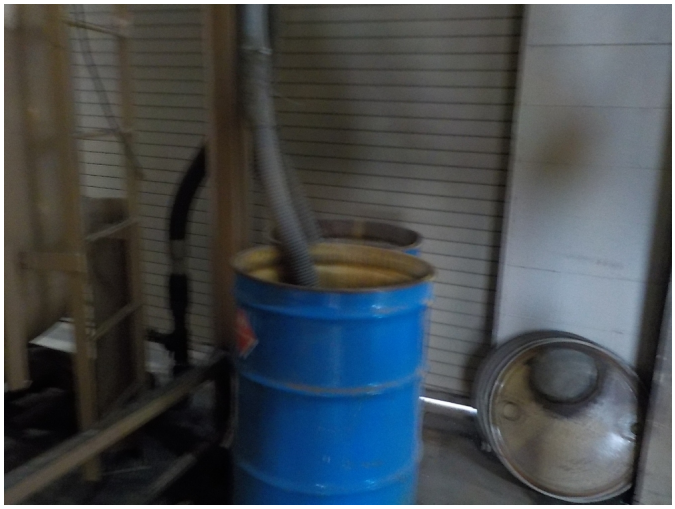

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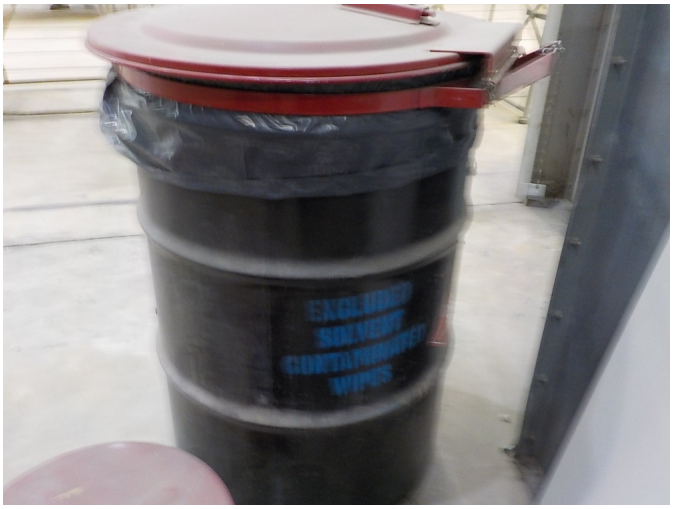

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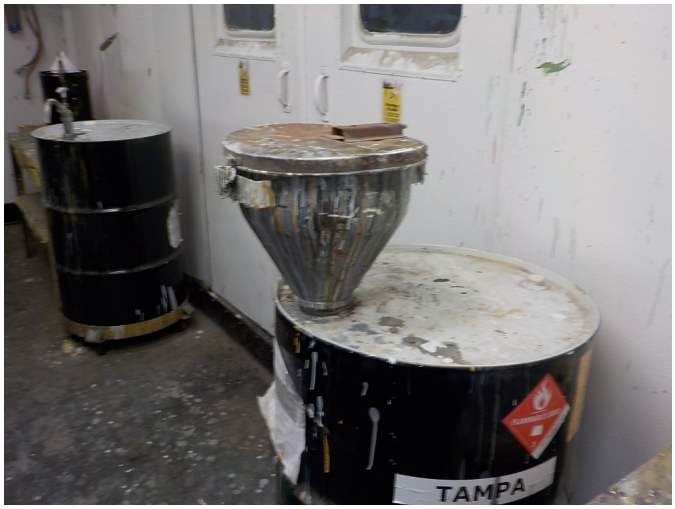

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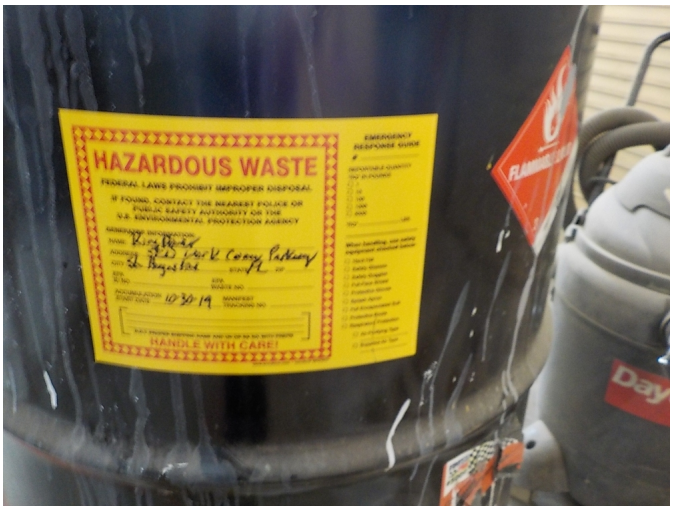
Photo 25



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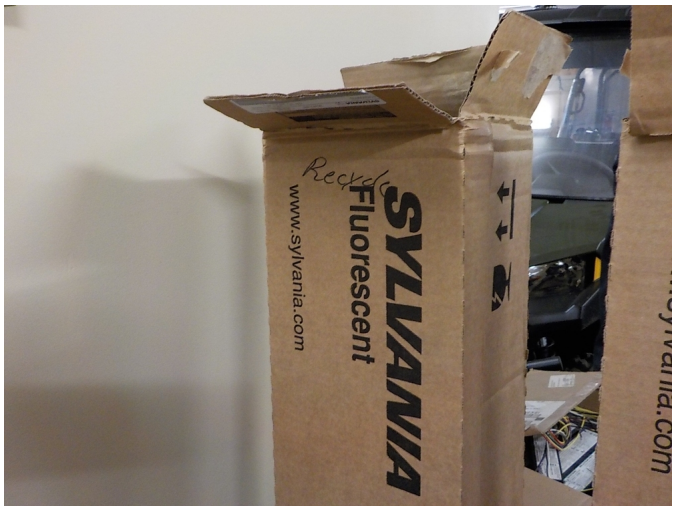

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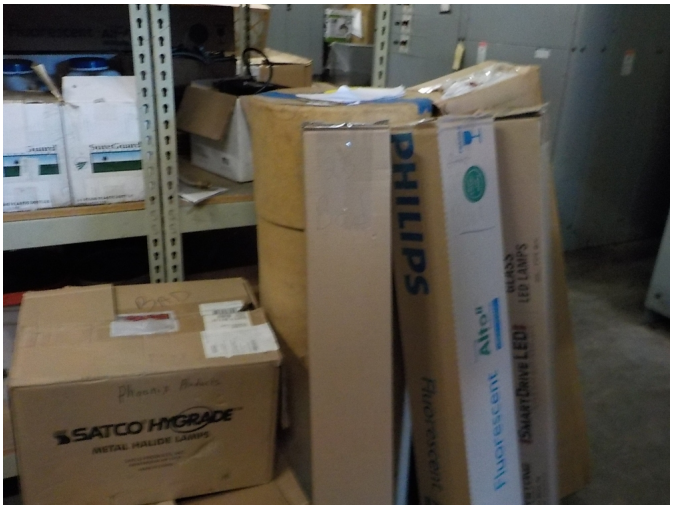

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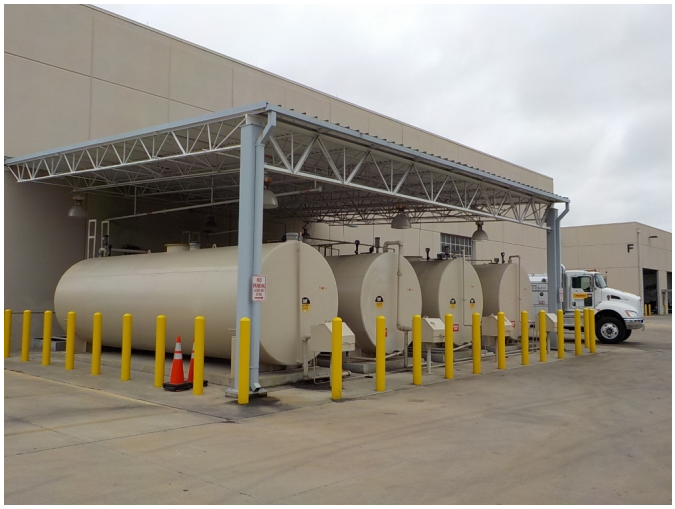

1.0: Pre-Inspection Checklist

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.

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			✓

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 Investigator Name	**Principal Investigator Title**	
BY Bradshaw	DEP	02/24/2020
Principal Investigator Signature	**Organization**	**Date**

Brian Brown	Environmental and Property Manager
Representative Name	**Representative Title**
	Ring Power
	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:	Bonnie M Bradshaw	**Inspection Approval Date:**	02/24/2020