

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

September 30, 2020

Rick Vaughn, Environmental Manager Ring Power Corporation 500 World Commerce Parkway St. Augustine, FL 32092 <u>rick.vaughn@ringpower.com</u>

Re: Compliance Assistance Offer Ring Power (Lake City) EPA/DEP ID: FLD 984 206 854 Columbia County – Hazardous Waste

Dear Mr. Vaughn:

A compliance inspection was conducted at your facility on July 15, 2020, 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 Chapters 62-710 and 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.

Ring Power (Lake City) Facility ID No.: FLD 984 206 854 Compliance Assistance Offer Page 2 of 2

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

Sincerely,

Matthew Constra

Matthew Kershner Environmental Manager

Enclosure: Inspection Report

cc: Bonnie Bradshaw, Cheryl Mitchell, DEP_NED



Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name:Ring Power CorpOn-Site Inspection Start Date:07/15/2020ME ID#:40828EPA ID#:Facility Street Address:390 SW Ring Ct, Lake City, Florida 32025-3148Contact Mailing Address:500 World Commerce Pkwy, St Augustine, Florida 32092-3788County Name:ColumbiaContact Phone:(904) 494-1417

NOTIFIED AS: Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG Used Oil: Used Oil, Oil Filters Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate: Batteries, 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 Used Oil Transfer Facility Facility Routine Inspection for VSQG (<100 kg/month) Facility Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector:Bonnie M Bradshaw, InspectorOther Participants:Rick Vaughn, Environmental Manager

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

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

NAIC: Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Lake City (RPLC, the facility) was inspected July 15, 2020, as a hazardous waste compliance inspection. RPLC's last hazardous waste inspection by the Department was on August 2, 2016. The facility is registered as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter and Used Oil Transfer Facility. The facility is also operating as a Very Small Quantity Generator (VSQG) of hazardous waste.

RPLC is a dealer and service agent for forklifts, trucks, heavy equipment, generators, parts and other equipment. The facility has been in operation at this location since 1991 and has 40 employees. Ring Power corporate owns the property and the buildings which are connected to city water and sewer. There is also one well used to supply water to Wash Rack operations, as described below. Hours of operation are Monday through Friday from 7:00 am to 5:00 pm. The facility consists of offices, Maintenance and Repair Shops, a Parts Warehouse, a Tank Farm, a Wash Rack, a 40X40 Building, a Dino Testing Building and an Equipment Yard. Rick Vaughn (Ring Power) was present throughout the inspection.

Process Description:

Maintenance and Repair Shops

The Maintenance and Repair Shops perform routine repair and preventative maintenance on both customer and

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fleet vehicles and heavy equipment. The Maintenance and Repair Shops are comprised of two distinct areas: the Heavy Equipment Shop (4 bays)/Rental Shop (4 bays) (Photo 1) and Truck Shop (6 bays) (Photo 2). Although different types of equipment are maintained in these areas, waste streams and waste management are similar. The Heavy Equipment and Rental Shop share waste accumulation containers. Maintenance operations generate used oil, used oil filters, spent antifreeze, oily rags and spent aerosol cans. Only spot painting is performed at RPLC. Major equipment painting is performed off-site at one of the other Ring Power facilities.

Used oil generated by Maintenance and Repair Shop operations is drained into portable drain containers (Photo 3) and then pumped by means of a suction piping system directly to the used oil tank described below. The containers were in good condition and properly labeled as "Used Oil."

Used oil filters generated by Maintenance and Repair Shop operations are drained into used oil containers and then accumulated in 330-gallon steel containers. There was one 330-gallon container accumulating used oil filters in the Truck Shop area (Photo 4). The container was in good condition, closed and properly labeled as "Used Oil Filters." There were two 330-gallon containers accumulating filters just outside of the Heavy Equipment area for Heavy Equipment and Rental Shop use. Both containers were in good condition and closed. One of the two containers was properly labeled as "Used Oil Filters." The second container was labeled only as "Oil Filter Bin," but was immediately properly labeled as "Used Oil Filters." Both containers were stored on what appeared to be an unsealed concrete surface that contained large cracks (Photo 5) [62-710.850(5)(a), FAC].

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. There were two 30-gallon drums accumulating pads in the Truck Shop and two 30-gallon drums accumulating pads in the Heavy Equipment/Rental Shop area.

Used antifreeze generated by Maintenance and Repair Shop operations is accumulated in portable drain containers that are emptied into 55-gallon drums. There were two 55-gallon drums accumulating used antifreeze in the Truck Shop and one 55-gallon drum accumulating used antifreeze in the Heavy Equipment/Rental Shop area. Drums were closed, in good condition and labeled as "Used Coolant."

The Maintenance and Repair Shops have a total of six parts washers. There are three Safety-Kleen Model 44 parts washers located in the Truck Shop. There are two Heritage-Crystal Clean parts washers and one Safety-Kleen Model 52 parts washer located in the Heavy Equipment/Rental Shop area. The Model 52 parts washer has not been used in several years. The Safety-Kleen parts washers use Safety Kleen Premium Gold Solvent (petroleum distillates 100%; 148°F). The Heritage-Crystal Clean parts washers use Mirachem 2750 Cleaner/Degreaser, an aqueous non-hazardous solution. Spent solvent from all parts washers is managed as non-hazardous waste, but the facility did not perform an accurate hazardous waste determination to support this action [40 CFR 262.11]. The laboratory Method Detection Limits (MDSs) for the Toxicity Characteristic Leaching Procedure (TCLP) analysis were above the regulatory limits for all semi-volatiles, volatiles (with the exception of chlorobenzene and methyl ethyl ketone) and selenium.

Reusable rags are generated by Maintenance and Repair Shop operations and may be contaminated with oil, grease or dirt. Facility personnel stated that solvents are not used on rags, but are deposited into red step cans that are labeled as either "Oily Rags" or "Excluded Solvent Contaminated Wipes." Rags are laundered weekly by Aramark. Facility personnel stated that disposable rags are used only for wiping hands and are not contaminated with any chemicals.

Aerosol cans of 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), CAT Battery Cleaner (isobutane 5-10%; flashpoint -119°F), Pitt Bull Enamel Genie Blue (flashpoint -156°F), CAT Yellow Primer (flashpoint 71°F), CAT Black Paint Medium Gloss (flashpoint -99°F), CAT Black Paint High Gloss (flashpoint 88° F) and CAT Black Paint Black Flat (flashpoint -100° F) are generated by Maintenance and Repair Shop operations. There was one 55-gallon drum accumulating aerosol cans in the Truck Shop. These cans are taken to the aerosol can drum-top puncturing device located in the Heavy Equipment/Rental Shop area where they, along with cans generated in the Heavy Equipment and Rental Shops, are punctured and drained into a 15gallon drum. Empty cans are disposed of as scrap metal. Both containers were in good condition and closed. The 55-gallon drum was labeled as "Aerosol Cans For Recycling" and the 15-gallon drum was labeled as "Hazardous Waste Disposal Cans" (Photo 6). Liquid generated from puncturing and draining non-empty aerosol cans of these products will generate a D001 hazardous waste. Aerosol cans of CRC Glass Cleaner (liquified

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petroleum gas 3-7%, 2-butoxyethanol 1-5%, ethanol 1-5%, ammonia 0.1-1%, methanol 0.1-1%, water 80-100%; no flashpoint) used in the Maintenance and Repair Shops generate a non-hazardous liquid waste when punctured and drained.

There are two glovebox blasting units installed in the Maintenance and Repair Shops: one unit is installed in the Truck Shop (Photo 2) and the second unit is installed in the Heavy Equipment/Rental Shop area (Photo 7). The units are used occasionally to blast both painted and unpainted parts. Analysis of the spent grit for both units has indicated that the spent grit does not contain TCLP metal constituents above the TCLP regulatory limits, but spent grit has not yet been disposed of. The facility should conduct a hazardous waste determination prior to disposal to ensure a representative sample.

GPS and product link electronic units are removed from vehicles during facility maintenance operations. There was one box of these units accumulating in the Heavy Equipment area (Photo 8). The units are sent to the Ring Power Tampa facility where they are picked up for recycling.

Spent bulbs are occasionally generated by facility operations. There were no spent bulbs accumulating at the time of inspection. The facility is reminded that spent bulbs should be accumulated in closed, properly labeled containers and that the facility should be able to demonstrate the accumulation start date. Spent bulbs are transported to one of the other Ring Power facilities where they are picked up for recycling. The facility is reminded that a person only collecting spent lamps from generators of 10 or less spent lamps per month and who does not accumulate more than 100 kg of lamps at one time, is not required to register with the Department, as specified in 62-737.400, FAC. Those not meeting these requirements may be required to register. In addition, trucks used for transport of spent lamps should comply with Department of Transportation requirements, be totally enclosed and in good condition and have emergency cleanup and containment procedures in the vehicle. Emergency procedures should also be maintained at the handler or transporter facility.

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

Parts Warehouse

The Parts Warehouse contains parts, equipment and materials for shipping and receiving. Lead acid batteries generated by the Maintenance and Repair Shops are accumulated in the Parts Warehouse on a spill pallet. There was one pallet of lead acid batteries accumulating in the Parts Warehouse (Photo 9). The batteries are transported by East Penn Manufacturing, Inc. for recycling approximately once per year.

Tank Farm

RPLC has one 500-gallon used oil tank located within a secondary containment structure located outside in a covered area on the northwest side of the main building (Photo 10). The tank appeared to be in good condition, was closed and properly labeled as "Used Oil." Mr. Vaughn stated that there have been no residues cleaned out from the used oil tank since at least the last inspection. There are also four additional tanks within the secondary containment structure used to store product diesel and product oil.

Wash Rack

The Wash Rack is a covered, closed-loop system used to wash equipment or vehicles that have been potentially contaminated with oil and dirt prior to repairs (Photo 11). Mean Green 9 and heated water are used to pressure wash the equipment on a concrete pad. Wash water drains to an aerated collection pit. The collection pit contains weirs that filter particulate matter from the wash water. The accumulated dirt/debris is cleaned out of the collection pit as needed and dried in an accumulation area adjacent to the Wash Rack (Photo 12). Dirt/debris collected from the collection pit is disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. Analysis of the dirt and debris indicates that it does not contain TCLP volatile, semi-volatile, metal, or pesticide constituents above the regulatory limits. The dirt and debris were analyzed for TCLP herbicides as well, however, the method detection limit for Silvex was above the regulatory limit, so a complete hazardous waste determination was not conducted [40 CFR 262.11]. Analysis indicated that the dirt and debris did not contain the herbicide dichlorophenoxyacetic acid above the regulatory limits. Water is directed from the collection pit to an oil water separator. The skimmed oil accumulates in a sump where it is removed and added to used oil from other facility operations. The water is then pumped to a biofiltration unit that treats the water

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with microbes before returning it to the process. Sludge that accumulates in the biofiltration unit is cleaned out as needed and the filters are cleaned approximately every 1-2 years. The unit is relatively new and therefore sludge has not yet been disposed of and the filters have not been cleaned. Analysis of the sludge dated May 8, 2020, however, has indicated that it does not contain TCLP metal, volatile, semi-volatile, pesticide or herbicide TCLP constituents above the regulatory limits. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of sludge.

There is an additional holding tank adjacent to the biofiltration unit used to hold water pumped from the onsite well. The water is used to refill the collection pit as needed due to evaporation.

40X40 Building/Track Shop

In the 40x40 Building (Photo 13), the facility no longer performs the new equipment tracks installation that generated paint chips. At the time of inspection, this building was being used for storage. No hazardous waste is generated in this area.

Dino Testing Building

The Dino Testing Building is used for testing engines to ensure they meet specifications. No hazardous waste was is generated in this area.

Rental Yard

The Rental Yard is an outside temporary staging area for heavy equipment and vehicles. The Yard contains both paved and dirt/gravel areas. The Yard also contains one scrap metal dumpster and one standard dumpster. There was what appeared to be a small release of used oil on the dirt/gravel portion of the yard in the area adjacent to the dumpster pad that had not been cleaned up (Photo 14) [40 CFR 279.22(d)(3)].

Mobile Servicing

RPLC services vehicles and equipment in the field. There are 16 field trucks that operate in the area and may bring waste back to the facility. Field operations may generate used oil, used oil filters, used antifreeze or oily rags. Used oil is accumulated and transported in tanks or covered drums or pails. Two trucks are equipped with 200-gallon used oil tanks and two truck are equipped with 40-gallon used oil tanks. The remaining 12 trucks use covered drums or pails to transport used oil. All 16 trucks transport the other wastestreams in covered drums or pails.

Records Review

The facility is operating as VSQG of hazardous waste. Small amounts of hazardous aerosol can liquid waste is generated by the facility. Aerosol can liquid waste has not yet been disposed of. Mr. Vaughn stated that the date indicated on the drum indicates the date at which the facility initiated a policy to dispose of the wastestream every six months, regardless of quantity.

Used oil is transported weekly by Safety-Kleen Systems, Inc. (TXR 000 081 205) to Safety-Kleen Systems, Inc. (FLD 980 847 214) for recycling. Used oil was last shipped on July 8, 2020.

Used oil filters and absorbents are transported approximately monthly by Safety-Kleen Systems, Inc. (TXR 000 081 205) to Safety-Kleen Systems, Inc. (FLR 000 060 301). Used oil filters and absorbents were last shipped on June 11, 2020.

Used antifreeze is transported quarterly by Safety-Kleen Systems, Inc. to Safety-Kleen Systems, Inc. for recycling and was last shipped on June 4, 2020.

Parts washers are serviced by Safety-Kleen every eight weeks. Spent parts washer solvent was last shipped by Safety-Kleen Systems, Inc. to Safety-Kleen Systems, Inc. on April 22, 2020. Parts washers are serviced by Heritage-Crystal Clean every eight weeks. Spent parts washer solvent was last shipped by Heritage-Crystal Clean on July 12, 2020.

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Rags are laundered weekly by Aramark.

Soil from the Wash Rack is transported by Advanced Disposal to Evergreen Landfill in Valdosta, Georgia approximately once per year. Wash rack soil was last shipped on May 8, 2020, by Pritchett Trucking.

Lead acid batteries were last transported by East Penn Manufacturing Company, Inc. for recycling on April 23, 2020. Batteries are transported approximately once per year.

The facility maintains registrations as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter and Used Oil Filter Transfer Facility for the transport of its own used oil/filters 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. A current registration certificate was displayed. The facility had a current proof of financial responsibility.

New Potential Violations and Areas of Concern:

Violations Violation Type: 262.11 Rule: Explanation: The facility did not make an accurate hazardous waste determination for the following waste streams: 1. Maintenance and Repair Shop - Model 44 and Heritage-Crystal Clean spent parts washer solvent 2. Wash Rack - Dirt and debris cleaned out of Wash Rack collection pits In order to return to compliance, the facility should perform and fully document hazardous Corrective Action: waste determinations on the following wastestreams by having a representative sample of each of the wastestreams analyzed separately by a certified laboratory for the following: 1. Maintenance and Repair Shop - Model 44 and Heritage-Crystal Clean spent parts washer solvent - Toxicity Characteristic Leaching Procedure (TCLP) for: -RCRA metal selenium, pursuant to 40 CFR 261.24, via method 6010 -RCRA volatiles (with exception of chlorobenzene and methyl ethyl ketone), pursuant to 40 CFR 261.24, via method 8260 -RCRA semi-volatiles, pursuant to 40 CFR 261.24, via method 8270 -flashpoint, pursuant to 40 CRF 261.21, via methods 1010 or 1020 2. Wash Rack - Dirt and debris cleaned out of Wash Rack collection pits- No further action is required. The facility returned to compliance via an email dated September 24, 2020, providing additional hazardous waste determination information regarding Silvex. A copy of the results of these waste determinations should be submitted to the 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. Alternative methods for hazardous waste determinations should be approved by DEP. Type: Violation Rule: 279.22(d)(3)

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Explanation: Corrective Action:	The facility failed to clean up a small release of used oil on the dirt/gravel portion of the Rental Yard in the area adjacent to the dumpster pad. No further action is required. The facility returned to compliance via an email dated September 22, 2020, indicating that the release had been cleaned up.	
Туре:	Violation	
Rule:	62-710.850(5)(a)	
Explanation:	Used oil filters were accumulating in containers located on an unsealed concrete surface that contained large cracks outside of the Heavy Equipment area of the Maintenance and Repair Shops.	
Corrective Action:	No further action is required. The facility returned to compliance via an email dated September 21, 2020, indicating that the containers had been relocated to an oil-impervious surface.	

PHOTO ATTACHMENTS:

<image><caption>

Photo 2







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Photo 5



Photo 7



Photo 9



Photo 6



Photo 8



Photo 10



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Photo 11



Photo 13



Photo 12



Photo 14



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			
B. Biodyhaw	DEP	09/25/2020		
Principal Investigator Signature	Organization	Date		
Rick Vaughn	Environmental 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:

09/25/2020