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
rick.vaughn@ringpower.com

Re: Compliance Assistance Offer
Ring Power (Perry)
EPA/DEP ID: FLD 981 480 205
Taylor 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 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: Bonnie Bradshaw, Cheryl Mitchell, DEP_NED

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 07/15/2020 **On-Site Inspection End Date:** 07/15/2020

ME ID#: 39549 **EPA ID#:** FLD981480205

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

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

County Name: Taylor **Contact Phone:** (904) 494-1417

NOTIFIED AS:

SQG (100-1000 kg/month), Used Oil

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, Inspector
Other Participants: Rick Vaughn, Environmental Manager

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

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

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Perry (RPP, the facility) was inspected July 15, 2020, as a hazardous waste compliance inspection. RPP's last hazardous waste inspection by the Department was on September 15, 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.

RPP is a dealer and service agent for forklifts, trucks, heavy equipment, generators, parts and other equipment. The facility has been in operation for approximately 27 years at this location and has 12 employees. Ring Power corporate owns the property and the building which is connected to city water and sewer. There is also one well used to supply water to landscaping and Wash Rack operations, as described below. Hours of operation are Monday through Friday from 7:30 am to 5:00 pm. The facility consists of offices, the Maintenance and Repair Shop, a Parts Warehouse, a Wash Rack, an Equipment Yard and a Storage Loft. Rick Vaughn (Ring Power), Rion Baker (RPP), Jeff Terrell (RPP) and Johnny Batton (RPP) were present throughout the inspection.

Process Description:

Maintenance and Repair Shop

The Maintenance and Repair Shops perform routine repair and preventative maintenance on both customer and fleet vehicles and heavy equipment. Maintenance operations generate used oil, used oil filters, spent antifreeze, oily rags and spent aerosol cans. Only spot painting is performed at RPP. 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 1) 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.”

There is one 500-gallon, double-walled used oil tank located just outside the Maintenance and Repair Shop adjacent to the building (Photo 2). 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.

Used oil filters generated by Maintenance and Repair Shop operations are drained into used oil containers and then accumulated in a 330-gallon steel container. There was one 330-gallon container accumulating used oil filters (Photo 3). The container was stored on an impervious surface, in good condition, closed and properly labeled as “Used Oil Filters.”

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 was one 30-gallon drum accumulating pads in the Maintenance and Repair Shop.

Used antifreeze generated by Maintenance and Repair Shop operations is accumulated in portable drain containers that are emptied into an approximately 250-gallon tote for re-use (Photo 4). The facility representative stated that used antifreeze contained in the tote is recycled onsite and has not been disposed of in at least the past 15 years. The tote was closed, in good condition and labeled as “Antifreeze Coolant.” The facility is reminded that the tote should be labeled “Used Antifreeze” to comply with the Department’s “Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities.” There is an empty 55-gallon drum available for spent antifreeze that cannot be re-used.

The Maintenance and Repair Shop operates a total of four parts washers. There are two Safety-Kleen Model 33 parts washers and one recently installed Model 250 parts washer located in the general Shop area and one Safety-Kleen Model 30 parts washer located in the Hose Room area of the shop. The Safety-Kleen parts washers use Safety Kleen Premium Gold Solvent (petroleum distillates 100%; 148°F). Spent solvent from the Model 30 and Model 33 parts washers is managed as non-hazardous waste, but the facility did not perform a hazardous waste determination to support this action [40 CFR 262.11]. The Model 250 parts washer distills the solvent and generates only an oily sludge that is disposed of occasionally based on usage. The sludge has not yet been disposed of. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of the sludge.
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Spent 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. There was one metal trash can accumulating soiled rags at the time of inspection. It was labeled “Used Rags.” 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), CAT Standard Performance Topcoat-CAT Yellow (flashpoint -20.2°F), CAT Yellow Primer Paint (flashpoint 71°F), CAT Black Paint High Gloss (flashpoint 88°F), CAT Black Muffler Paint (flashpoint -99°F) and CRC Insect Repellent (isopropyl alcohol 30-40%, liquified petroleum gas 20-30%, N,N-diethyl-m-toluamide (DEET) 25%, N-octyl bicycloheptene 5%, di-n-propyl isocinchomeronate 2.5%, acetone 1-3%, propylene glycol 1-3%; flashpoint 75°F) are generated by Maintenance and Repair Shop operations. One drum-top aerosol can puncturing device is installed in the Maintenance and Repair Shop. Aerosol cans are punctured and the liquid is drained into a 55-gallon drum. Empty cans are disposed of as scrap metal. The drum was in good condition, closed and labeled as “Hazardous Waste Disposal Aerosol Can Discharge” with an

accumulation start date of July 10, 2020 (Photo 5). Liquid generated from puncturing and draining non-empty aerosols of these products will generate a D001 hazardous waste.

There is one glovebox blasting unit installed in the Maintenance and Repair Shop (Photo 6). The unit is used occasionally to blast both painted and unpainted parts. The spent media has not been disposed of yet. The facility is reminded to perform TCLP analysis for RCRA metals on the spent blasting media and manage the waste appropriately.

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. Hazardous waste is not generated in this area.

Wash Rack

The Wash Rack is a closed-loop system used to wash equipment or vehicles that have been potentially contaminated with oil and dirt prior to repairs (Photo 7). Mean Green 9 and heated water are used to pressure wash the equipment on a concrete pad. Wash water drains to a collection pit. When the water reaches a certain level in the collection pit, it overflows into a series of weirs that filter particulate matter from the wash water. The first weir allows water to underflow and contains any free oil. According to the standard operating procedures, if free oil is observed in the weir, an oil absorbent pad would be used to absorb the oil and the pad would be disposed of in the absorbent pad drum. The accumulated dirt and debris is cleaned out of the collection pits as needed, approximately every 8-9 months. The dirt and debris is dried in a covered accumulation area adjacent to the Wash Rack (Photo 8) and 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. The solids were last transported by Pritchett Trucking on June 3, 2019.

Equipment Yard

The Equipment Yard is an outside temporary staging area for heavy equipment and vehicles. The Yard also contains one scrap metal dumpster. The Yard contains both paved and dirt/gravel areas. No hazardous waste is generated in this area.

Storage Loft

The Storage Loft, located on the second story of the building, contains an area for conducting training, a maintenance closet and an open-air storage loft. Spent bulbs occasionally generated by facility operations are stored in the maintenance closet in the Storage Loft. 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.

Lead acid batteries generated by the Maintenance and Repair Shops are accumulated in the open-air area of the Storage Loft on a pallet. There was one pallet of lead acid batteries accumulating in the Storage Loft (Photo 9). The batteries are transported by East Penn Manufacturing, Inc. for recycling as needed.

Mobile Servicing

RPP services vehicles and equipment in the field. The facility operates four field trucks. Used oil, used oil filters used antifreeze and rags generated during field servicing activities are transported back to the facility and accumulated with the waste streams generated at the facility, as described above. 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. Waste is collected on the trucks in covered drums or pails that are 55-gallons or less in capacity.

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 is transported approximately once per year by Safety-Kleen Systems, Inc. (TXR 000 081 205) to Safety-Kleen Systems, Inc. (KYD 053 348 108) for disposal. Aerosol can liquid waste was last shipped on July 10, 2020. The shipment included one 150-pound drum of D001/D005/D006/D007/F003/F005 hazardous waste. Mr. Vaughn stated that the drum only contained approximately 5-gallons of liquid waste.

Used oil is transported approximately every two to three months. Used oil was last shipped on April 7, 2020, by Safety-Kleen (TXR 000 081 205) to Safety-Kleen Systems, Inc. (FLD 982 133 159) for recycling.

Used oil filters and absorbents are transported as needed by Safety-Kleen. Used oil filters and absorbents were last shipped on May 12, 2020, by Safety-Kleen (TXR 000 081 205) to Safety-Kleen Systems, Inc. (FLR 000 060 301).

Parts washers are serviced by Safety-Kleen approximately every eight weeks. Spent parts washer solvent was last shipped by Safety-Kleen to Safety-Kleen Systems, Inc. on February 28, 2020.

Rags are laundered weekly by Aramark.

Soil from the Wash Rack is transported by Advanced Disposal to Evergreen Landfill in Valdosta, Georgia approximately as needed. Wash rack soil was last shipped on June 3, 2019.

Lead acid batteries were last transported by East Penn Manufacturing Company, Inc. for reclamation on November 1, 2018. Batteries are transported once three pallets of batteries are accumulated.

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. Documentation of financial responsibility expiring July 1, 2021, was provided.

For Outstanding Items of Potential Non-Compliance

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

Type:	Violation
Rule:	262.11
Explanation:	The facility did not make an accurate hazardous waste determination for the following

waste streams:
1. Maintenance and Repair Shop - Model 33 and Model 30 spent parts washer solvent
2. Wash Rack - Dirt and debris cleaned out of Wash Rack collection pits

Corrective Action: In order to return to compliance, the facility should perform and fully document hazardous 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 33 and Model 30 spent parts washer solvent - Toxicity Characteristic Leaching Procedure (TCLP) for:
-RCRA metals, pursuant to 40 CFR 261.24, via method 6010
-RCRA volatiles, 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, that included 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.

PHOTO ATTACHMENTS:

Photo 1

Photo 2

Ring Power Corp Inspection Report

Inspection Date: 07/15/2020

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

Ring Power Corp Inspection Report

Inspection Date: 07/15/2020

Photo 9

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. Bradshaw	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