



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp
On-Site Inspection Start Date: 12/03/2020 **On-Site Inspection End Date:** 12/03/2020
ME ID#: 2114 **EPA ID#:** FLD984178194
Facility Street Address: 9901 Ringhaver Dr, Orlando, Florida 32824-7040
Contact Mailing Address: 500 World Commerce Pkwy, St Augustine, Florida 32092-3788
County Name: Orange **Contact Phone:** (904) 494-1417

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: SQG **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Mercury Containing 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

INSPECTION PARTICIPANTS:

Principal Inspector: Miranda Rothenberger, Inspector
Other Participants: Dalton Chesser, Branch Service Manager

LATITUDE / LONGITUDE: Lat 28° 25' 14.5153" / Long 81° 21' 4.9777"

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

NAIC: Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

On December 3, 2020, Miranda Rothenberger, Florida Department of Environmental Protection (FDEP or Department), inspected Ring Power Corporation (Ring Power or Facility), located at 9901 Ringhaver Dr, Orlando, Florida, for compliance with state and federal used oil transporter and hazardous waste regulations. Dalton Chesser, Branch Service Manager, represented the facility.

The Department received the 2019 "Annual Report by Used Oil and Used Oil Filter Handlers" on February 19, 2020 and was issued registration number FLD984178194. This registration will expire on June 30, 2021. Ring Power managed 61,831 gallons of used oil in 2019 from automotive sources. A certificate of liability insurance was received on August 7, 2020.

Ring Power originally notified the state as a Small Quantity Generator (SQG) of hazardous waste on September 14, 1990 and received EPA identification number FLD984178194. The facility most recently notified the state as an SQG on March 27, 2013 and retains EPA identification number FLD984178194.

Inspection History (5 Years)

Ring Power was last inspected for compliance with state and federal used oil transporter requirements on December 10, 2015 and was not in compliance at the time of the inspection. The facility failed to label drums of used oil filters with the words "Used Oil Filters". Corrective actions were received, and the case was resolved without formal enforcement on December 29, 2015.

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Process Description:

Ring Power is a heavy equipment rental company who operates several service bays. Used oil is generated from vehicle service and hard piped to used oil tanks outside. Oil is no longer transported from other Ring Power locations but the used oil transporter registration is maintained. Throughout the shop floor were several disposal containers for "oily rags" which are laundered through Aramark.

In secondary containment, and under cover of an awning was one 5,000-gallon tank of used oil properly labelled "Used Oil" and one 3,500-gallon tank of used antifreeze properly labelled "Used Antifreeze". Located next to the containment area were four 200-gallon containers of used oil filters. The labels were partially obstructed, the facility was reminded to clearly label all containers containing used oil filters with the words "Used Oil Filters".

In a maintenance area the facility punctures aerosol cans. Outside the maintenance area was a satellite accumulation area (SAA) with one 55-gallon drum of used aerosol cans that was labelled "aerosol cans for recycling" but were unpunctured [40 CFR 262.15(a)(5)]. An email from Rick Vaughn, Environmental Manager, dated January 6, 2021, included a photograph of the drum labelled "hazardous waste" and marked with the hazard "ignitable". In the same area was one 55-gallon drum labelled "excluded solvent contaminated wipes". When the drum was opened it was noted that it contained trash amongst the rags. It was recommended that the facility cease this activity as to not pose issues with laundering. Records for disposal or laundering of these rags was requested via email on December 8, 2020. Records for the last year of laundering through Aramark were received via email on December 29, 2020 from Mr. Vaughn and were found to be in compliance.

Inside the maintenance area was the puncture unit consisting of one 55-gallon drum of hazardous waste labeled "hazardous waste" and marked flammable with a DOT diamond. The drum was not marked with an accumulation start date [40 CFR 262.16(b)(6)(i)(C)]. An email dated December 29, 2020 from Mr. Vaughn contained a photograph of the drum dated 12/23/2020. The puncture device is removable and replaced with a closed funnel when not in use. The drum, funnel, and surrounding areas exhibited signs of paint splatter [40 CFR 262.16(b)(8)(i)]. An email dated December 29, 2020 from Mr. Vaughn contained a photograph of the area documenting that paint splatters had been cleaned up. The filter on the puncture drum did not have a service date, this date was requested from the facility via email on December 8, 2020. An email dated December 29, 2020 from Mr. Vaughn contained a photograph of a new filter installed on the puncture drain drum.

Records

Used oil disposal receipts were reviewed for the past 3 years. Safety-Kleen Systems, Inc. using EPA identification number TXR000081205 is on contract to visit every week but only takes used oil off site approximately once a quarter. Safety-Kleen Systems, Inc. also disposes of the used oil filters and used antifreeze. The records on site were complete and were found to be in compliance.

Hazardous waste shipping manifests for the last three years were reviewed and found to be in compliance. "Waste Paint" related wastes are disposed of as hazardous waste using EPA waste codes F003, F005, D001, D005, D006, and D007. Brian Phelps signs the manifests on behalf of Ring Power. Safety-Kleen Systems, Inc. using EPA identification number TXR000081205 is used as a transporter. Clean Harbors El Dorado LLC, using EPA identification number ARD069748192, and Safety-Kleen Systems, Inc., using EPA identification number KYD053348108, are used as designated facilities.

Weekly inspection records for the central accumulation area (CAA) were requested via email on December 8, 2020. Weekly inspection records for September through March were submitted for review via email on December 29, 2020 but the year was not specified. The facility has no other weekly inspection records [62-730.160(3), F.A.C.]. In an email dated January 5, 2021, from Mr. Vaughn stated that staff will begin conducting weekly inspections immediately in accordance with 62-730.160(3), F.A.C.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.15(a)(5)
Explanation:	A generator must mark or label its container with the following : (i) The words "Hazardous

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Waste" and (ii) An indication of the hazards of the contents [...]

Corrective Action: The facility failed to label one 55-gallon satellite accumulation area drum with the words "Hazardous Waste" and an indication of the hazards of the contents.
The facility is required to label all satellite accumulation area containers with the words "Hazardous Waste" and an indication of the hazards of the contents.

An email from Rick Vaughn, Environmental Manager, dated January 6, 2020, included a photograph of the drum labelled "hazardous waste" and marked with the hazard "ignitable".

Type: Violation

Rule: 262.16(b)(6)(i)(C)

Explanation: (i) A small quantity generator must mark or label its containers with the following: (C) The date upon which each period of accumulation begins clearly visible for inspection on each container.

Corrective Action: The facility failed to label one 55-gallon drum of hazardous waste with an accumulation start date.
The facility is required to label each container of hazardous waste with an accumulation start date.

An email dated December 29, 2020 from Mr. Vaughn contained a photograph of the drum dated 12/23/2020.

Type: Violation

Rule: 262.16(b)(8)(i)

Explanation: A small quantity generator must maintain and operate its facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Corrective Action: The facility failed to prevent releases of flammable hazardous waste to surrounding drums and walls.
The facility is required to maintain and operate its facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

An email dated December 29, 2020 from Mr. Vaughn contained a photograph of the area documenting that paint splatters had been cleaned up.

Type: Violation

Rule: 62-730.160(3)

Explanation: Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.16, and 262.17 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 CFR Part 265 [as adopted in subsection 62-730.180(2), F.A.C.], and 40 C.F.R 262.16 and 262.17 [as adopted in subsection 62-730.160(1), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

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Corrective Action: The facility failed to conduct weekly inspections consistently for the last three years and maintain records in accordance to the requirements in the above reference citation.
The facility is required to conduct weekly inspections in accordance with 62-730.160(3), Florida Administrative Code, and maintain records for three years.

In an email dated January 5, 2020, from Mr. Vaughn stated that staff will begin conducting weekly inspections immediately in accordance with 62-730.160(3), F.A.C.

Conclusion:

Ring Power was inspected for compliance with state and federal used oil transporter and hazardous waste requirements on December 3, 2020 and was found to be out of compliance at the time of the inspection. As of January 6, 2020, all corrective actions have been received and no further action is required.

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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	✓		

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Miranda Rothenberger	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	01/12/2021
Principal Investigator Signature	Organization	Date
Dalton Chesser	Branch Service Manager	
Representative Name	Representative Title	
	Ring Power Corporation	
	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:	Daniel K. Hall	Inspection Approval Date:	01/14/2021
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