Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 12/01/2016 **On-Site Inspection End Date:** 12/01/2016

ME ID#: 7786 **EPA ID#:** FLD093856318

Facility Street Address: 6200 N US 301/441, Ocala, FL 34475

Contact Mailing Address: 390 SW Ring Court, Lake City, FL 32025

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

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Zachary R West, Inspector

Other Participants: John White, Inspector; Jeff Lusher, Heavy Equipment Service Manager

LATITUDE / LONGITUDE: Lat 29° 15' 3.2478" / Long 82° 9' 13.1002"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

On December 1, 2016, Zachary West and John White, Florida Department of Environmental Protection, inspected Ring Power Corp. for compliance with state and federal hazardous waste and used oil regulations. Ring Power Corp. was represented by Jeff Lusher, Heavy Equipment Service Manager. The facility was inspected as a used oil transporter and transfer facility. The only on-site operations inspected at this time was the heavy equipment shop and paint shop. Based on a hazardous waste generation rate of less than 100 kilograms per month Ring Power Corp. was also inspected as a conditionally exempt small quantity generator of hazardous waste and as a used oil generator.

Ring Power Corp., located at 6200 N U.S. Highway 441, Ocala, Florida, was issued EPA identification number FLD093856318 on November 5, 1986, following the facility's notification of its hazardous waste activity as a generator. The most recent notification in March 2013 was for hazardous waste activities as a small quantity generator of hazardous waste, small quantity handler of universal waste batteries and lamps, used oil transporter and transfer facility, and used oil filter transporter and transfer facility.

The facility is approximately sixty-two acres in size and includes nine buildings housing offices, sales and leasing operations, and maintenance and painting operations.

INSPECTION HISTORY:
Ring Power Corp. has not been inspected for compliance with state and federal hazardous waste and used oil regulations in the past 5 years.

Process Description:

Ring Power Corp.'s Ocala facility leases and services heavy equipment. The facility operates a 12-bay heavy equipment maintenance shop, a multi-bay truck maintenance ship, and an under-carriage shop.

Eleven to twelve parts washers using mineral spirits solvent are in use on the property. The parts washers are

serviced by Safety-Kleen Systems under their “continued use program” where the solvent is reused by Safety-Kleen Systems in their drum washing operations. Because the solvent is reused without any treatment it is still considered a product and does not count towards Ring Power Corp.’s hazardous waste generation rate.

Heavy Equipment Shop:
In the heavy equipment shop rolling pans and 5-gallon size pails are used to collect used oil removed from equipment (see figure 1). All equipment used to collect used oil was labeled “Used Oil.” Containers used to collect spent antifreeze are labeled as such. A 55-gallon drum staged inside the shop was accumulating used oil filters. The drum was labeled “Used Oil” and inspectors asked the facility to include the word “filter” of the label (see figure 2). This was done immediately.

The used oil and antifreeze collection containers are pumped out at a pumping station and directed to holding tanks. Located outside the heavy equipment shop is a 2,500-gallon above ground used oil collection tank (see figure 3). The tank is double-walled and was labeled “Used Oil.”

Paint Shop:
The facility operates one large paint booth for painting heavy equipment. An eyewash stations is located near the paint booth (see Figure 4). Located just outside the paint booth, along an inside wall to the paint shop, were three 55-gallon drums for waste accumulation. One drum for “Paint Waste” was dated 6-11-16 and was staged on a containment pallet. The drum was equipped with a closed funnel. Mr. Lusher was asked to replace the device with a funnel that has a gasket. A second drum, also staged on a containment pallet, was equipped with an aerosol can puncturing device and filter (see Figure 5). The drum was labeled with a “Hazardous Waste” label and dated 4-25-16. The filter was marked with the date it was installed. There was evidence of paint splatter on the wall and floor around the drums. Mr. Lusher was asked to have the wall painted so he will be able to identify new releases immediately. The third drum was equipped with a flip-top lid and was labeled “Excluded Solvent Contaminated Wipes.” The drum contained disposable wipes that were to be managed as hazardous waste and not as excluded solvent contaminated wipes under either of the exclusions in 40 CFR 261.4(a)(26) or 261.4(b)(18) (see figure 6).

In other areas of the facility red flip-top cans are used to accumulate wipes that will be laundered by Cintas. These wipes are just used by mechanics for wiping hands, 40 CFR 261.4(a)(26). Mr. Lusher indicated he would correct the label on the container of hazardous waste wipes in the paint shop.

Paint booth filters are disposed of in the trash as non-hazardous waste (see Figure 7). Inspectors discussed the issue of the requirement for testing of the solvent contaminated wipes to ensure they meet the requirements of the exclusion and paint booth filters for hazardous waste characteristics identified in 40 CFR Part 261 Subpart C. Mr. Lusher indicated the facility has tested the paint booth filter in the past; however, he was not sure how long ago this was. The facility ships waste paint related material off-site with the waste codes for non-halogenated (F003/F005) listed solvents and the waste codes for barium (D005), cadmium (D006), and chromium (D007). The wipes that are laundered under the exclusion and spent paint booth filters cannot exhibit a hazardous waste characteristic for heavy metals.

On December 2, 2016, John White spoke with Brian Brown, Environmental Manager for Ring Power Corp. regarding sampling requirements. Mr. Brown indicated he would verify when the last testing of waste was done at the facility and retest if necessary.

On February 6, 2017, Brian Brown, Environmental Manager for Ring Power Corp. submitted new determination results for the waste paint and spent paint booth filters. The results indicated the waste paint and the paint booth filters did not exhibit characteristics identified in 40 CFR part 261 Subpart C and were nonhazardous.

RECORDS:
The facility has registered as a used oil transporter in accordance with the requirements of Florida Administrative Code (F.A.C.) 62-710.500(1)(a). The current registration as a Used Oil Handler Facility was approved on February 9, 2016 and is valid until July 1, 2017. The current registration was prominently displayed as required by F.A.C. 62-710.500(4). The current “Used Oil Certificate of Liability Insurance” was received by the Department on April 13, 2016. The current insurance expires April 1, 2017.

An annual report for the volume of used oil shipped off-site during the 2015 calendar year by the facility was provided as required by F.A.C. 62-710.510(5). The report indicates 11,576 gallons of used oil was transferred

to another facility for storage or processing.

Ring Power Corp. transports its own used oil generated at non-contiguous operations to the facility and, per F.A.C. 62-710.510(3), is not subject to the record keeping and reporting requirements of F.A.C. 62-710.510. Work orders are used to track the volume of used oil removed from off-site equipment during maintenance operations and transported to the facility.

Synergy Recycling is the used oil transporter that transports used oil from the facility. No issues were noted during a review of the used oil shipping papers.

Training of staff is done on an annual basis. The training is on-line and is completed at the beginning of each year.

PHOTO ATTACHMENTS:

1. Used Oil Sled

2. Used Oil Drum

3. Used Oil Storage

4. Eye Wash Station

5. Used Paint

6. Contaminated Paper Towels

7. Painting Bay

Conclusion:

Ring Power Corporation was inspected as a used oil transporter and conditionally exempt small quantity generator of hazardous waste and no violations were cited during this inspection.

2.0 - CESQG Checklist

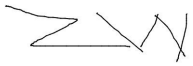
Requirements:

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.

Item No.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5			✓
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5			✓
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 ☐ Is it excluded under 261.4? ☐ Is it listed in subpart D of 261 or appendix IX of 261? ☐ Has the waste been analyzed? ☐ Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) ☐ Name and address of the generator and TSD/authorized facility. ☐ Type and amount of hazardous waste delivered. ☐ Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

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.

Zachary R West	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	DEP	02/06/2017
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

John White	Inspector
Inspector NAME	**Inspector TITLE**
	FDEP
	ORGANIZATION

Jeff Lusher	Heavy Equipment Service Manager
Representative NAME	**Representative TITLE**
	Ring Power Corp
	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: Reginald F. Phillips **Inspection Approval Date:** 02/06/2017