



FLORIDA DEPARTMENT OF Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

August 9, 2022

Sent electronically to: david.harriman@ringpower.com

Mr. David Harriman, Environmental Manager
Ring Power Corporation
500 World Commerce Pkwy.
St. Augustine, FL 32092

Re: Compliance Assistance Offer
Ring Power Corporation (Gainesville)
EPA/DEP ID: FLD982150237
Alachua County – Hazardous Waste

Dear Mr. Harriman:

A compliance inspection was conducted at your facility on May 31, 2022, 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.

Specifically, potential non-compliance with the requirements of Chapter 403, Florida Statutes, and Chapters 62-710 and 62-730, Florida Administrative Code, was 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 Corporation (Gainesville)
Facility ID No.: FLD982150237
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 bonnie.bradshaw@FloridaDEP.gov. We look forward to your cooperation in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joni Petry".

Joni Petry
Environmental Administrator

Enclosure: Inspection Report

cc: FDEP-NED: Bonnie Bradshaw, Cheryl Mitchell, DEP_NED
Ring Power Corp.: Brian Brown – brian.brown@ringpower.com
Alachua County EPD: Julie Pocklington – jpocklington@alachuacounty.us



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

FACILITY INFORMATION:

Facility Name: Ring Power Corporation
On-Site Inspection Start Date: 05/31/2022 **On-Site Inspection End Date:** 05/31/2022
ME ID#: 15436 **EPA ID#:** FLD982150237
Facility Street Address: 4900 N Main St , Gainesville, Florida 32609-1407
Contact Mailing Address: 500 World Commerce Parkway, St Augustine, Florida 32092
County Name: Alachua **Contact Phone:** (904) 494-7445

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 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 VSQG (<100 kg/month) Facility
Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector
Other Participants: Richard Morris, Heavy Equipment Lead Man

LATITUDE / LONGITUDE: Lat 29° 41' 57.8963" / Long 82° 19' 4.6522"

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

NAIC: Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation (Ring Power, the facility) was inspected May 31, 2022, as an unannounced hazardous waste compliance inspection. Richard Morris (Ring Power), Sean Kopman (Ring Power) and Emma Sacchitello (DEP) were present throughout the inspection. Ring Power was last inspected by the Department's Hazardous Waste Program on November 1, 2018. 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 last notified as a Small Quantity Generator (SQG) of hazardous waste. The facility is operating as a Very Small Quantity Generator (VSQG) of hazardous waste and as a Used Oil Generator.

Ring Power is a dealer and service agent for trucks, heavy equipment, generators parts and other equipment. The facility has been in operation since 1987 and has approximately 20 employees. Ring Power owns the property and the building which is connected to city water and sewer. Hours of operation are Monday through Friday from 7:00 am to 5:00 pm and on call as needed. The facility consists of offices, a Service Shop, a Parts Warehouse, a Wash Rack and a Yard. The facility operates several repair trucks and two lube trucks.

Process Description:

Used Oil Transportation

Ring Power services generators, heavy equipment and trucks 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

Ring Power Corporation Inspection Report

Inspection Date: 05/31/2022

waste streams generated at the facility. The lube trucks, which are equipped with 200-gallon used oil tanks and oil filter trays with collection pans, are typically used for jobs requiring oil removal. Used antifreeze is collected in 55-gallon drums. 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.

The facility is reminded that records of used oil acceptance (name/address/EPA ID of generator, quantity, date, signature) and delivery records (name/address/EPA ID of receiving facility/transporter, quantity, date, signature) should be maintained when more than 55-gallons of used oil is transported at any one time.

Service Shop

General maintenance is performed on a variety of vehicles in the 7-bay Service Shop. Used oil, used oil filters and used antifreeze are generated by the facility's operations and sent off-site for recycling. Used oil is drained into portable drain containers and then pumped into a 1,000-gallon double-walled tank located outside of the Service Shop (Photo 1). There was one 5-gallon drain container that contained used oil that was not properly labeled as "Used Oil" (Photo 2) [40 CFR 279.22(c)(1)]. The container was properly labeled at the time of inspection. The used oil tank was properly labeled, in good condition and closed. Used oil filters are drained into portable drain containers before being accumulated in a 330-gallon steel container located outside of the Service Shop. The container was in good condition, closed and properly labeled, but was not located on an oil impermeable surface (Photo 3) [62-710.850(5)(a)]. Used antifreeze is drained into portable drain containers and then transferred into a 250-gallon double-walled tank located outside the Service Shop (Photo 4). The tank was closed and properly labeled.

Oil absorbent pads are also generated by maintenance activities. Spent pads are accumulated in a plastic bag-lined drums in the Service Shop. Once full, the bag is closed and placed into the used oil filter collection container for disposal by Safety-Kleen (TXR000081205).

Rags are generated by maintenance activities and may be contaminated with oil, grease, Brakleen Brake Parts Cleaner – Non-Chlorinated (Brakleen) (methanol 40-50%, toluene 10-20%, acetone 5-15%, ethylbenzene <0.2%), PB Penetrating Catalyst (PB) or WD-40. Rags are managed as Excluded Solvent Contaminated Wipes and laundered by Cintas weekly. There was one container of wipes that was not properly labeled as "Excluded Solvent Contaminated Wipes" (Photo 5) [40 CFR 261.4(a)(26)(i)]. The container was properly labeled at the time of inspection.

Non-empty aerosol cans of Brakleen, PB, WD-40 and Caterpillar Yellow, White or Black Standard Performance Top Coat may be generated by Service Shop operations. Waste aerosol cans are punctured and drained into a 15-gallon drum with a drum-top aerosol can puncturing device. The drained liquid is managed as hazardous waste and the punctured and drained cans are managed as scrap metal.

The facility operates three Safety-Kleen System One parts washers that use Safety-Kleen Premium Solvent (flashpoint 148° F) (Photo 6). The units distill the spent solvent within the unit and pump clean solvent into the basin. The units are on a 16-week service with Safety-Kleen to add clean solvent as needed. The sludge is collected and disposed of as D006/D007/D008 hazardous waste as needed. The last shipment was in 2012. The facility is reminded that additional waste codes may apply.

Since the previous inspection, the facility has installed a 15-gallon drum-top Caterpillar parts washer that uses CAT Heavy Duty Pressure Wash (Hydrosolv 4165) (pH 12.8) to clean hydraulic cylinders. Hydrosolv 4165 generates a D002 hazardous waste if disposed of. Additional hazardous waste characteristics may also apply to spent solvent. The facility has not yet disposed of the spent solvent, but is reminded to conduct a hazardous waste determination including Toxicity Characteristic Leaching Procedure (TCLP) for RCRA metals and volatiles, ignitability analysis and pH analysis, at a minimum, prior to disposal.

The facility operates one glove box bead blasting machine with a dust collector which is used to blast bare engine parts (Photo 7). Painted parts are sent to another Ring Power facility for blasting. Caterpillar Glass Beads 9U-5271 are used as the media. Mr. Morris stated that the spent blasting media has not been disposed of in at least 10 years, as the machine is rarely used. The dust collector does not appear to generate a spent media waste stream. TCLP analysis conducted in 2018 indicated the blast media was not hazardous at that time. The facility is reminded that if the process or materials used in the process changes, additional analysis may be required. The facility is also reminded to conduct a hazardous waste determination on the dust collector

Ring Power Corporation Inspection Report

Inspection Date: 05/31/2022

filters should they need to be disposed of.

Floors are cleaned with Mean Green 9. Mop water is disposed of as used oil.

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

Parts Warehouse

There is a Parts Warehouse located adjacent to the Service Shop (Photo 8). Parts Warehouse operations generate Excluded Solvent Contaminated Wipes. There was one closed, properly labeled container for the accumulation of wipes observed. Spent lead acid batteries generated by maintenance activities are stored on a secondary containment pallet outside of the Parts Warehouse. Batteries are sent back to Caterpillar for recycling by East Penn Manufacturing. Fluorescent bulbs are changed out and disposed of by the St. Augustine Ring Power facility.

Wash Rack

The Wash Rack is a covered, closed-loop system used to wash equipment potentially contaminated with oil prior to service with heated and/or pressurized water (Photo 9). Approximately one machine is washed per week. Wash water drains to a collection pit. The oil skimmer referenced in the previous inspection report is no longer utilized. Wash water is pumped from the pit to a biological filtration system that was installed approximately two years ago. TA-10X Defoamer and 55FSHCLF Bio-Treat are used in conjunction with filters in the filtration system. The facility has yet to dispose of the filters, but is reminded to conduct a hazardous waste determination on the filters prior to disposal. Filtered water is discharged back to the pit. Dirt that does not drain to the pit is accumulated with sludge/dirt cleaned out of the pit approximately every 2-3 years on a portion of the concrete pad of the Wash Rack that is enclosed by an "L" shaped concrete wall. TCLP metal and volatile analysis has indicated that the sludge/dirt is non-hazardous and is transported to a solid waste landfill as needed.

There is an area within the Wash Rack used to store drums and totes. Empty drums and drums of new antifreeze were stored in the area. There was also one 250-gallon tote and one 55-gallon drum of used antifreeze accumulating. The facility is reminded that the containers should be labeled as "Used Antifreeze." There was one roll-off container for accumulating wood pallet waste and one roll-off for accumulating scrap metal located behind the Wash Rack.

Yard

The Yard is used to store heavy equipment and vehicles. There are two metal storage buildings located in the Yard used for storage of miscellaneous items. The facility has also installed a fueling station since the previous inspection. The aboveground storage tank is currently in the process of being registered. There were two small areas of soil/gravel staining located in an area of the Yard near the fueling station. The staining appeared to be a release of hydraulic oil that was not cleaned up and appeared to have occurred recently (Photos 10 and 11) [40 CFR 279.22(d)(3)]. The facility was instructed to properly clean up the releases within the required 30 days.

Records

Used oil, used oil filters, used oil absorbents and used antifreeze are transported by Safety-Kleen (TXR000081205). Records indicate used oil is scheduled for transport by Safety-Kleen for recycling every two weeks and was last transported May 23, 2022. The facility is reminded that transfer facilities that store used oil for more than 35 days are subject to regulation as a used oil processor.

Records indicate used oil filters and absorbents are scheduled for transport every two weeks by Safety-Kleen and were last transported May 26, 2022. Records indicate used antifreeze was last transported October 21, 2021. Records indicate parts washers are serviced every 16 weeks and were last serviced April 27, 2022.

One hundred pounds of aerosol can liquid was last disposed of on March 16, 2021, and was managed as D001/D005/D006/D007/D008/D035/F003/F005 hazardous waste by Safety-Kleen.

Ring Power Corporation Inspection Report

Inspection Date: 05/31/2022

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	261.4(a)(26)(i)
Explanation:	Service Shop: There was one container of excluded solvent contaminated wipes that was not properly labeled as "Excluded Solvent Contaminated Wipes."
Corrective Action:	No further action is required. The facility returned to compliance by properly labeling the container at the time of inspection.
Type:	Violation
Rule:	279.22(c)(1)
Explanation:	Service Shop: There was one container of used oil that was not properly labeled as "Used Oil."
Corrective Action:	No further action is required. The facility returned to compliance by properly labeling the container at the time of inspection.
Type:	Violation
Rule:	279.22(d)(3)
Explanation:	Yard: There were two areas of soil/gravel that were stained with what appeared to be hydraulic oil that had not been properly cleaned up.
Corrective Action:	In order to return to compliance, the facility should properly clean up the stained areas and properly dispose of the impacted soil/gravel and any clean-up materials.
Type:	Violation
Rule:	62-710.850(5)(a)
Explanation:	Service Shop: The 330-gallon container of used oil filters was not stored on an oil-impermeable surface.
Corrective Action:	In order to return to compliance, the facility should store the container of used oil filters on an oil-impermeable surface.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Inspection Date: 05/31/2022

Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Inspection Date: 05/31/2022

Photo 9



Photo 10



Photo 11



Inspection Date: 05/31/2022

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			✓

Inspection Date: 05/31/2022

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**Principal Investigator Name**Inspector**Principal Investigator Title**B. Bradshaw**Principal Investigator Signature**DEP**Organization**08/05/2022**Date**Richard Morris**Representative Name**Heavy Equipment Lead Man**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:**Bonnie M Bradshaw**Inspection Approval Date:**08/05/2022