



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

May 23, 2022

Sent via email: david.harriman@ringpower.com

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

RE: Warning Letter No. WL22-131 (Significant Non-Complier)
Ring Power Corporation
EPA/DEP ID: FLR 000 119 347
St. Johns County – Hazardous Waste

Dear Mr. Harriman:

A Hazardous Waste Compliance Inspection was conducted at your facility on Tuesday, February 22, 2022. During this inspection, possible violations of Chapters 376 and 403, Florida Statutes (Fla. Stat.), and Chapters 62-710, 62-730 and 62-737, Florida Administrative Code (Fla. Admin. Code), were observed.

During this inspection, Department personnel noted the following:

- The facility did not conduct complete and accurate hazardous waste determinations on seven (7) waste streams;
- The facility did not keep one (1) hazardous waste satellite container closed;
- The facility did not properly label three (3) hazardous waste satellite containers;
- The facility did not properly label one (1) hazardous waste accumulation container;
- The facility disposed of five (5) hazardous waste aerosol cans, three (3) hazardous waste wipe wastestreams and the hazardous waste “Ozzy Mat” wastestream improperly;
- The facility did not keep one (1) box of universal waste lamps closed;
- The facility did not properly label one (1) box of universal waste lamps;

- The facility did not provide adequate secondary containment for one (1) container of used oil; and
- The facility did not properly label two (2) containers of used oil filters.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 376.121 and 403.121, Florida Statutes.

Please contact Bonnie Bradshaw at (904) 256-1638, or via email at Bonnie.Bradshaw@FloridaDEP.gov, within 15 days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts that you may have which might assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing our investigation and resolving this as soon as possible.

Sincerely,



Gregory J. Strong
District Director

Attachment: Final Inspection Report

Tec: FDEP-NED: Bonnie Bradshaw, Cheryl Mitchell, Joni Petry, DEP_NED
Ring Power: Brian Brown – brian.brown@ringpower.com



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp
On-Site Inspection Start Date: 02/22/2022 **On-Site Inspection End Date:** 02/22/2022
ME ID#: 36377 **EPA ID#:** FLR000119347
Facility Street Address: 500 World Commerce Pkwy , St Augustine, Florida 32092-3788
Contact Mailing Address: 500 World Commerce Pkwy, Saint Augustine, Florida 32092-3788
County Name: St. Johns **Contact Phone:** Data is missing from FIESTA

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: SQG **Used Oil:** Used Oil, Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility
Routine Inspection for SQG (100-1000 kg/month) Facility
Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector
Other Participants: David Harriman, Environmental Manager

LATITUDE / LONGITUDE: Lat 29° 58' 32.3117" / Long 81° 27' 30.4177"

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 February 22, 2022, as an unannounced hazardous waste compliance inspection. Ring Power was last inspected by the Department's Hazardous Waste program on December 11, 2019. Department Division of Waste Management staff requested that a follow-up inspection be conducted within two years to confirm compliance with the Small Quantity Generator (SQG) and Used Oil requirements during the case review process for this inspection. 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 is also operating as a used oil generator and SQG of hazardous waste.

Ring Power is a dealer and service agent for forklifts, trucks, heavy equipment, generators, parts and other equipment. The facility has been in operation since 2004 and has 565 employees. Ring Power owns the property and the building which is connected to city water and sewer. Hours of operation are Monday – Friday from 7:00 am – 5:00 pm. The facility consists of offices, Maintenance and Repair Shops, a Wash Rack, a Major Component Rebuild Center, a Fabrication and Welding Shop, a Machine Shop, a Hydraulic Shop, a Blasting and Painting Shop, a 180-Day Hazardous Waste Accumulation Area (HWAA), a Facilities Shop, a Loading Dock, a Parts Warehouse, a Tool Room, a Power System Warehouse and a Tank Farm. Brian Brown (Ring Power), David Harriman (Ring Power), Jeff Geisler (Ring Power) and Emma Sacchitello (DEP) were present throughout the inspection.

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

PROCESS DESCRIPTION

Mobile Servicing

Ring Power services vehicles and equipment 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 waste streams generated at the facility described below. 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. Used oil is collected in the tanks that are installed on some trucks or in drums for trucks not equipped with tanks. Used oil filters are drained in sealed compartments affixed to the rear of the truck during transport back to the shop. A 5-gallon drum is taken to jobs to collect used antifreeze when used antifreeze will be generated. Absorbent mats and rags used to clean-up drips, leaks or spills of used oil are collected in a 5-gallon container labeled "Oily Rags."

Maintenance and Repair Shops

The facility operates several Maintenance and Repair Shops where general maintenance and repair is performed on various vehicles and equipment. The Air Compressor/PSD Service Bays, Generator Shop, Engine Diagnostics Shop (PSD Test Bay), Truck Shop, Crane Shop, Hydraulic Shop, Track Shop, CAT Rental Store Shop and Heavy Equipment Shop were inspected. Used oil, used oil filters, used antifreeze, oily rags, oily absorbents, excluded solvent contaminated wipes and aerosol cans may be generated by the shops.

Used oil generated by Maintenance and Repair Shop operations is drained into portable drain containers and then pumped directly to the used oil tank located in the Tank Farm, described below, by means of a suction piping system. In the Crane Shop, used oil is transferred into a 500-gallon, double-walled tank located in the shop. The used oil tanks, drums and drain containers were in good condition, closed and properly labeled as "Used Oil."

Used oil filters generated by Maintenance and Repair Shop operations are accumulated in 55-gallon drums located throughout the shops. One 55-gallon drum of used oil filters was improperly labeled as "Used Filters" in the Heavy Equipment Shop (Photo 1) and one 55-gallon drum of used oil filters was not labeled in the Crane Shop [62-710.850(5)(a), FAC]. Both containers were properly labeled as "Used Oil Filters" during the inspection. There were two D001 hazardous waste aerosol cans observed in the used oil filter drum in the Heavy Equipment Shop at the time of inspection (Photo 2) [40 CFR 262.20(a)(1)]. The cans were removed from the drum and punctured and drained in the aerosol can puncturing device, described below, during the inspection.

Process Description:

CONTINUED

Used antifreeze generated by Maintenance and Repair Shop operations is accumulated in portable drain containers and then pumped directly to the used antifreeze tank located in the Tank Farm, described below, by means of a suction piping system. Containers were in good condition and labeled as either "Used Coolant" or "Used Antifreeze."

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 as non-hazardous waste.

The Maintenance and Repair Shops operate two Model 33 and fourteen Model 250 30-gallon Safety-Kleen parts washers that use Safety-Kleen Premium Solvent (hydrotreated light petroleum distillates 100%; flashpoint 148°F) and two Heritage-Crystal Clean parts washers that use Mirachem 500 Cleaner/Degreaser (proprietary surfactant blend <2% and water). The units are on 8-week maintenance schedules. Spent solvent from the Model 33 and Heritage-Crystal Clean units is disposed of as non-hazardous waste. Analysis of the spent solvents has indicated that they do not contain TCLP metal, volatile and most semi-volatile constituents above the TCLP regulatory limits. The Method Detection Limits for three semi-volatile constituents were not at or below the regulatory TCLP limits. An inventory of products used in the shops has indicated that 2,4-dinitrotoluene, hexachlorobenzene and hexachlorobutadiene are not present and therefore are not expected to be present in the spent solvent.

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

The Model 250 (System One) Safety-Kleen parts washers distill the solvent. Therefore, the only waste typically generated is an oily sludge that is disposed of occasionally depending on usage. The units are on an 8-week maintenance schedule with Safety-Kleen to top-off any evaporated solvent. The sludge has not been disposed of in at least three years. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of the sludge and/or spent solvent.

Since the previous inspection, the facility installed a CRC SmartWasher in the Truck Shop (Photo 3). The parts washer uses Ozzy Juice (flashpoint 148°F). Ozzy Juice is designed to be a self-cleaning solution and is therefore not typically disposed of. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of the spent solvent, if ever required. Ozzy Juice parts washers are also equipped with an Ozzy Mat. The Ozzy Mat traps large particles of grease and oil cleaned off dirty parts, as well as any particulate matter. The facility representative stated that the Ozzy Mats are disposed of as non-hazardous waste approximately once per month, but the facility had not conducted an adequate hazardous waste determination to support this action at the time of inspection [40 CFR 262.11]. Subsequent to the inspection, the facility provided analytical data for an Ozzy Mat sample collected on March 14, 2022, which indicated that spent Ozzy Mats are a D008 hazardous waste [40 CFR 262.20(a)(1)].

Laundered rags generated by Maintenance and Repair Shop operations that are contaminated with oil, grease or dirt are accumulated in step cans or buckets labeled as "Oily Rags" or "Used Rags." The container in the Crane Shop was not labeled. Rags are laundered weekly by Cintas.

Disposable or launderable wipes may be used with 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) in the Heavy Equipment Shop, Crane Shop, Track Shop, Air Compressor Service Bays/PSD and Generator Shop. Wipes used with Brakleen generate an F005 hazardous waste. The wipes used in the Heavy Equipment Shop are managed as excluded solvent contaminated wipes. Accumulation containers were closed and properly labeled as "Excluded Solvent Contaminated Wipes" (Photo 4). Wipes used with Brakleen in the Crane Shop, Track Shop and Air Compressor/PSD Service Bays are placed into the oily rag collection containers and managed as non-hazardous waste (Photos 5-7) [40 CFR 262.20(a)(1)]. If all conditions of the solvent contaminated wipes exclusions outlined in 40 CFR 261.4(a)(26) or 261.4(b)(18) are not met, the facility should manage rags used with Brakleen as F005 hazardous waste.

Aerosol cans of Brakleen Brake Parts Cleaner-Non-Chlorinated, QD Contact Cleaner, CRC Battery Cleaner, CRC Pro-Strength Degreaser, CRC Battery Terminal Protector (flashpoint 32°F), WD-40 Multi Use (flashpoint 138°F), Standard Performance Topcoat Medium Gloss Black (flashpoint -20.2°F) and Standard Performance Topcoat Cat Yellow (flashpoint -20.2°F) are generated by Maintenance and Repair Shop operations. One drum-top, 30-gallon aerosol can puncturing device is installed in the Air Compressor/PSD Service Bays (Photo 8) and a second 15-gallon device is shared between the CAT Rental Store and Heavy Equipment Shops. Aerosol cans are punctured and the liquid is drained into the drums. Empty cans are disposed of as scrap metal and the drained liquid is managed as D001/D006/D008/D010/D018/D019/D021/D035/D039/D040 hazardous waste. Both drums were in good condition and closed. The CAT Rental/Heavy Equipment Shop device had been opened prior to the photo being taken in order to puncture a can. The CAT Rental/Heavy Equipment Shop device was not labeled as "Hazardous Waste" or with an indication of the hazards of the contents at the time of inspection (Photo 9) [40 CFR 262.15(a)(5)]. The drum was properly labeled during the inspection. There were three non-punctured, non-empty D001 hazardous waste aerosol cans in the scrap metal collection container located adjacent to the puncturing device in the Heavy Equipment Shop (Photo 10) [40 CFR 262.20(a)(1)]. The aerosol cans were removed, punctured and drained at the time of inspection. Aerosol cans generated by the Crane Shop are collected in a 15-gallon drum labeled as "Aerosol Cans" before being taken to the Blasting and Paint Shop, described below, to be punctured and drained. The drum was not closed [40 CFR 262.15(a)(4)] and was not labeled as "Hazardous Waste" or with an indication of the hazards of the contents (Photo 11) [40 CFR 262.15(a)(5)]. Aerosol cans generated by the Hydraulic Shop are collected in a 15-gallon drum labeled as "Used Aerosol Cans" before being taken to the Blasting and Paint Shop to be punctured and drained. Although there was no waste accumulating in this container, the facility is reminded that the drum should be closed and properly labeled as "Hazardous Waste" and with an indication of the hazards of the contents.

There is one glovebox blasting unit installed in the Track Shop (Photo 12) and one unit installed in the CAT Rental Store Shop (Photo 13). Both Ring Power and customer painted and unpainted parts are blasted in the units. Spent blasting media is added to the Wash Rack dirt/sludge, described below, for disposal at Evergreen Landfill in Valdosta, Georgia. Analysis of the Track Shop and CAT Rental Store Shop spent blasting media has

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

indicated that it does not contain TCLP metal constituents above the TCLP regulatory limits.

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

Spent lead acid batteries generated by the Service Shop are stored on a pallet on the loading dock. Batteries are picked up approximately every 1-2 months by East Penn Manufacturing Company, Inc. for reclamation.

The facility does not generate used antifreeze filters, perform tire service or generate air bag waste.

Wash Rack

The Wash Rack is a covered area used to wash equipment that has been potentially contaminated with oil and dirt prior to repairs (Photo 14). The Wash Rack is equipped with a rough clean area on one side of the structure and a polishing area on the other side of the structure. The rough clean and polishing areas are separated by a change in elevation. The rough clean area is a closed-loop system where dirt/debris is washed from equipment with high pressure water. Dirt and debris are separated from water by a weir and are removed and accumulated as needed in a walled pit in the Wash Rack area. Equipment is cleaned with Mean Green 9 in the polishing area. Water drains to a trough which is pumped to a biofiltration unit that treats the water with microbes and a defoaming agent prior to discharge to the POTW. The biofiltration unit filters are pressure washed in the rough side area of the Wash Rack as needed, approximately every six months. Sludge that accumulates in the biofiltration unit is cleaned out as needed. Analysis of the sludge has indicated that it does not contain TCLP volatile, semi-volatile, metal, pesticide or herbicide constituents above the TCLP regulatory limits. Dirt and debris collected from the rough clean area is disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. Analysis of the dirt and debris has indicated that they do not contain TCLP volatile, semi-volatile, metal, pesticide or herbicide constituents above the TCLP regulatory limits.

Major Component Rebuild Center (MCRC)

The MCRC installs new or reconditioned parts into engines and transmissions. There are four areas in the MCRC: Radiator Pressure Testing, Engine Tear Down, Assembly and Diagnostic Controls.

Radiators are pressure tested in a large tank containing Barbee #54/56 Tank Block/Powder (sodium carbonate 95%, pyalor fluorescene >5%) and water (Photo 15). Air pressure is placed on radiators placed into the tank where bubbles indicate potential leaks. When the liquid is no longer usable, it is released to the floor drain. The floor drain is piped to the Wash Rack, described above. Analysis of the spent liquid has indicated that it does not contain TCLP volatile, semi-volatile, metal, pesticide or herbicide constituents above the TCLP regulatory limits.

Engines, transmissions and parts are dismantled and washed in large parts washers prior to repair in the Engine Tear Down area. This area also contains a small wash rack where equipment is washed. This small wash rack discharges to the large Wash Rack described above. Dirt and sludge generated by this process are accumulated with the large Wash Rack dirt/sludge described above. Used oil is drained from engines and large parts on drain tables (Photo 16). Used oil that accumulates in the drain table compartments is pumped to a grated drain container. The single-walled drain container is not equipped with secondary containment and is located adjacent to a large, roll-up door (Photo 17) [62-710.401(6), FAC]. Used oil is pumped from this drain container by Safety-Kleen every two weeks or as needed for recycling.

After the engines and equipment are drained, they may be cleaned in one of five immersion parts washers. Tank 1 sprays Foremost 35-ES Jet Takeoff (sodium metasilicate pentahydrate, sodium carbonate; no flashpoint; pH 11.5-11.9) to clean aluminum parts. Tank 1 is cleaned out as needed based on particle testing. The spent liquid is placed into drums, the sludge is removed and drummed, the spent liquid is placed back into the tank for reuse and fresh product is added to top off the tank. It was not clear how this wastestream was being managed or when it was last disposed of. Records of the hazardous waste determination conducted on the sludge were not available [40 CFR 262.11].

Tanks 2-4 use heated Foremost 1195 Paint and Rust Remover (sodium hydroxide; no flashpoint; pH 12.6-13.4) to clean cast iron and steel parts with agitation. Tanks 2-4 are cleaned out as needed based on particle testing. The liquid is placed into drums, the sludge is removed and drummed, the liquid is placed back into the tank for reuse and fresh product is added to top off the tank. Although the liquid is reused and not disposed of, analysis

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

of the liquid has indicated that it is a D002/D007/D008 hazardous waste. Analysis of the sludge has indicated that it does not contain TCLP volatile, semi-volatile or metal constituents above the TCLP regulatory limits.

Tank 5 uses Safety-Kleen Premium Solvent to clean aluminum, steel and other metals. Analysis of the spent solvent has indicated it does not contain TCLP metal constituents above the TCLP regulatory limits, but the spent solvent is managed as D039 hazardous waste under a national profile.

Radiators are no longer coated with Barbee #73-5 Asphalt Paint (Stoddard solvent, asphalt MC70, petroleum residues, carbon black pigment, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene; flashpoint 104°F). The facility is reminded that any unused coating in inventory generates a D001 hazardous waste and should be properly disposed of if it cannot be used for its intended purpose.

One glovebox blasting unit is installed in the Engine Tear Down Area (Photo 18). Both Ring Power and customer painted and unpainted parts are blasted in the unit using glass beads. Analysis of the spent blast media has indicated that it does not contain TCLP metal constituents above the TCLP regulatory limits.

Aerosol cans of Brakleen Brake Parts Cleaner-Non-Chlorinated, QD Contact Cleaner, Standard Performance Topcoat Medium Gloss Black and Standard Performance Topcoat Cat Yellow are generated by Engine Tear Down operations. Aerosol cans are punctured and the liquid is drained into a 15-gallon drum. Empty cans are disposed of as scrap metal and the drained liquid is managed as hazardous waste. The drum was in good condition and closed, but was not labeled as "Hazardous Waste" or with an indication of the hazards of the contents (Photo 19) [40 CFR 262.15(a)(5)]. The drum was properly labeled at the time of inspection. The facility is also reminded that any spills or splashes should be cleaned up immediately.

Brakleen Brake Parts Cleaner-Non-Chlorinated may be used on a disposable wipe in the Engine Tear Down Area. Wipes used with Brakleen are managed as excluded solvent contaminated wipes. There was one approximately 20-gallon container of excluded solvent contaminated wipes accumulating at the time of inspection. The container was closed and properly labeled.

Since the previous inspection, the facility installed a Torrent 500 parts washer that uses Torrent 1101 Solution in the Engine Tear Down Area (Photo 20). Solvent is stored in an approximately 35-gallon drum and is filtered through an internal filter for reuse. The technician, who was present during the inspection, stated that approximately once per month, he washes the filter in the unit and disposes of the filter in the trash. He drains the spent solvent to the Wash Rack, described above. The facility has not conducted a complete waste determination to support management of the spent solvent and filters as non-hazardous waste [40 CFR 262.11]. Subsequent to the inspection, the facility provided analytical data for a spent solvent sample collected on March 14, 2022, which indicated the spent solvent was not ignitable and did not contain RCRA metal constituents above the regulatory levels. There was no documentation, however, that the RCRA volatile sample had been held at the proper temperature of 4-6° F. Therefore, the hazardous waste determination on the spent solvent remains incomplete at report issuance.

Components are rebuilt in the Assembly area. There are four Safety-Kleen Model 250 parts washers installed in this area. The units are on an 8-week maintenance schedule with Safety-Kleen. The parts washers use Safety-Kleen Premium Solvent. Spent sludge generated by the Model 250 units has not been disposed of in at least three years. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of the sludge and/or spent solvent.

There is one excluded solvent contaminated wipes collection container installed in the Assembly area that is used to collect disposable rags that may be contaminated with oil, WD-40, Brakleen Brake Parts Cleaner-Non-Chlorinated or Loctite Threadlocker Blue 242. The step can was closed and properly labeled.

Water is recirculated through engines for testing purposes in the Diagnostics Control Room area. The facility is reminded that, should the water ever need to be disposed of, a hazardous waste determination should be conducted and the water analyzed for RCRA metal constituents via TCLP, at a minimum.

Fabrication and Welding Shop

The Fabrication and Welding Shop fabricates and welds internal and external parts for repair. Unused welding rods are managed as scrap metal. No hazardous waste is generated in this area.

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

Machine Shop

The Machine Shop machines parts for internal and external customers on a non-production basis. Only steel parts are machined. Excess material is managed as scrap metal. There was one step can that contained oily rags for laundering. No hazardous waste is generated in this area.

Hydraulic Shop

Hydraulic cylinders are disassembled, cleaned and reassembled in the Hydraulic Shop. Brakleen Brake Parts Cleaner-Non-Chlorinated may be sprayed directly on the cylinders and air dried. The shop supervisor stated that Brakleen is not used with a wipe or rag. There was one 15-gallon drum for the collection of aerosol cans. Although there was no waste accumulating at the time of inspection, the facility is reminded that the drum should be closed and labeled as "Hazardous Waste" with an indication of the hazards of the contents.

Hydrosolv 57 (11.5-12.5 pH at 5% dilution) is diluted with water and used in a cleaning bath. The shop supervisor stated that the liquid is never disposed of and only replaced as needed due to evaporation. The facility is reminded that if the spent solution were to be disposed of, that a complete hazardous waste determination should be conducted and that unused product may generate at least a D002 hazardous waste if disposed of.

There was one 55-gallon drum of oily absorbents labeled as "Used Oil Filters" accumulating. It was recommended that the drum be properly labeled for clarity.

Blasting and Paint Shop

The facility blasts and paints both Ring Power and external customer equipment in this area (Photo 21). The facility also conducts a small amount of hand sanding when blasting is not feasible.

The facility blasts painted and unpainted parts and equipment in a large blasting booth using Starlight silica sand. The spent blast grit is collected in floor trenches and transferred to elevated hoppers that sort the material by grain size. Fine grains are sent to a dust collector which discharges spent grit to four 55-gallon drums. Larger particles are collected in two 55-gallon drums located upstream of the dust collector. Spent grit collected in the 55-gallon drums is added to the Wash Rack sludge and disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. Analysis of the spent grit has indicated TCLP semi-volatile, volatile and metal constituents are not present above the TCLP regulatory levels.

In the event that blasting is not feasible, equipment may be hand sanded. Sanding is conducted inside the building. Sanding waste is swept up and added to the Wash Rack sludge. Analysis of the sanding waste has indicated that TCLP metal constituents are not present above the TCLP regulatory levels.

After blasting or sanding, Finish Pro 6000 Wax & Grease Remover (acetone 90-100%; flashpoint -4° F) may be used on a rag to remove debris, depending on the project. Spent rags contaminated with Finish Pro 6000 Wax & Grease Remover are non hazardous waste when used as described and are disposed of as excluded solvent contaminated wipes. There was one 55-gallon drum of excluded solvent contaminated wipes accumulating. The drum was closed and properly labeled.

The facility uses Tufcote 2K -Polyurethane White Base (flashpoint 113°F), Imron 3.5HG (flashpoint 100°-141°F), Standard Performance Topcoat Medium Gloss Black and Standard Performance Topcoat Cat Yellow to paint parts and equipment. Excess coatings generate a D001 hazardous waste when spent. The facility has begun using Hempel Acrylithane 2.8 Urethane Black (flashpoint 53.6°F), Hempel Acrylithane 2.8 White (barium sulphate 5-10%; flashpoint 84.2 °F) and Hempel Curing Agent 941JB Clear (flashpoint 107.6°F) since the previous inspection. In addition to being a D001 hazardous waste, the Acrylithane 2.8 White may generate a D005 hazardous waste due to the barium. Grow Automotive Urethane Reducer Very Slow 1390 (toluene 10-30%; flashpoint 78°F) is used as needed to thin paints. The reducer generates a D001/F005 hazardous waste liquid when spent or a D001 hazardous waste if unused. Excess coatings and thinner are accumulated together in a 55-gallon satellite drum. There was one nearly full 55-gallon drum and one nearly empty 55-gallon drum of spent paint and thinner accumulating at the time of inspection in the paint mixing room. The drums were closed, in good condition and properly labeled. The facility is reminded that a maximum of 55 gallons of paint/thinner waste should be accumulated in a satellite accumulation area. Quantities in excess of 55 gallons should be dated with the date the excess amount began accumulating and shipped off site or taken to the 180-Day

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

Hazardous Waste Accumulation Area (HWAA), described below, within three days. Although it did not appear that more than 55 gallons of paint/thinner were accumulating, the facility relocated the full drum to the HWAA at the time of inspection. The facility generates approximately two 55-gallon drums of paint/thinner waste per month. Paint/thinner is managed as D001/D005/D006/D007/F003/F005 hazardous waste.

Prior to painting, the facility may use tape to cover certain areas of the equipment. Following painting, the tape is removed and disposed of into the trash. Previous analysis of the tape has indicated that TCLP metal constituents are not present above TCLP regulatory levels. However, since use of Hempel Acrylithane 2.8 has been initiated since the analysis, additional analysis for barium is required. The facility had not conducted an adequate hazardous waste determination on the tape waste at the time of the inspection [40 CFR 262.11]. Subsequent to the inspection, the facility provided analytical data for a sample of the tape collected on March 14, 2022, indicating the tape did not contain RCRA metal or volatile constituents above the regulatory levels.

Two sets of paint booth filters are changed approximately every month. The paint booth filters are disposed of into the trash. Analysis of the spent paint booth filters in the past has indicated that metal, semi-volatile and volatile constituents are not present above the TCLP regulatory levels. However, since use of Hempel Acrylithane 2.8 has been initiated since the analysis, additional analysis for barium is required. The facility had not conducted an adequate hazardous waste determination on the spent paint booth filters at the time of the inspection [40 CFR 262.11]. Subsequent to the inspection, the facility provided analytical data for a sample of the paint booth filters collected on March 14, 2022, indicating the filters did not contain RCRA metal or volatile constituents above the regulatory levels.

Paint booth guns, as well as staff personal paint guns, are cleaned in a paint gun cleaner using Klean-Strip Gun Cleaner (methanol 5-15%, toluene 5-10%, acetone 20-40%, xylene 20-35%; flashpoint 1°F). Paint gun liners are not used. The cleaner is reused for 3-6 months before it is spent. Spent cleaner generates a D001/F003/F005 hazardous waste liquid. Spent cleaner generated from this process is disposed of in the 55-gallon drum of spent paint and thinner that is managed as D001/D005/D006/D007/F003/F005 hazardous waste, described above.

The facility operates one Uni-ram Solvent Recycler System (Photo 22). Approximately three gallons of liquid from the paint/thinner drum, described above, is recycled in the unit approximately 1-2 times per month for use on rags. The facility is reminded that the liquid recycled in the unit must be counted toward the facility's generator status because it is accumulated before being recycled. The recycling process generates solvent distillation bottoms that appear to be managed as D006/D007/D008 hazardous waste. Distillation bottoms, however, generate an F005 and possibly a D005 hazardous waste. Therefore, the facility has not conducted an adequate hazardous waste determination on the distillation bottoms [40 CFR 262.11]. Subsequent to the inspection, the facility provided analytical data for a sample of the distillation bottoms collected on March 14, 2022, indicating the distillation bottoms did not contain RCRA metal constituents above the regulatory levels, however the F005 code still applies.

Grow Automotive Urethane Reducer or Finish Pro 5000 General Purpose (methanol 5-15%, toluene 5-10%, acetone 20-40%, xylene 20-35%; flashpoint 1°F) may be used on a rag for cleanup. Rags used with these products generate an F005 hazardous waste. The rags are disposed of as excluded solvent contaminated wipes in the 55-gallon drum described above.

180-Day HWAA

The 180-Day HWAA is located in the Blasting and Paint Shop. There were two 55-gallon drums of spent paint and thinner observed at the time of inspection. The drums were closed, labeled as "Hazardous Waste" and had been accumulating for less than 180 days, but one of the drums was not labeled with an indication of the hazards of the contents (Photo 23) [40 CFR 262.16(b)(6)(i)(B)]. The drum was labeled during the inspection. There was one 30-gallon drum-top aerosol can puncturing device observed in the HWAA. The drum was closed, in good condition and properly labeled. Appropriate emergency equipment was available in the HWAA.

Facilities Shop

Lighting, electrical, air conditioning and plumbing activities for all Ring Power facilities are based out of this area. No painting or stripping is conducted. Spent fluorescent lamps generated by maintenance activities are managed as universal waste by Lamp Sales Unlimited, Inc. as needed. There was one box of universal waste lamps accumulating in this area. The box had an accumulation start date, but was not closed and was not properly

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

labeled (Photos 24 and 25) [40 CFR 273.13(d)(1) and 40 CFR 273.14(e)]. The box was closed and properly labeled during the inspection. Other wastes generated by facility maintenance activities are managed with the shop waste streams in each location.

Loading Dock

Lead acid batteries are accumulated on the loading dock for recycling by East Penn Manufacturing Company, Inc. Batteries accumulating at the time of inspection appeared to be in good condition and free from signs of leakage. Additional universal waste lamps are accumulated in a storage room located adjacent to the loading dock. Two containers of universal waste lamps were accumulating. The lamps were closed, properly labeled and dated.

Parts Warehouse/Tool Room/Power System Warehouse

These areas store parts for sale or use, tools for use and equipment for sale or rental. Hazardous waste is typically not generated in these areas, but any damaged chemical products would be managed according to the shop hazardous waste disposal process.

Tank Farm

The Tank Farm consists of four aboveground, 10,000-gallon double-walled, steel tanks located under a roof. Tank 5 contains product diesel engine oil. Tank 6 is compartmentalized and contains a 2,500-gallon section for used oil and a 7,500-gallon section for product hydraulic oil. Tank 7 is compartmentalized and contains product 30-weight oil and 50-weight oil. Tank 8 is compartmentalized and contains a 5,000-gallon compartment for product antifreeze and a 5,000-gallon compartment for used antifreeze. The tanks appeared to be in good condition and were properly labeled.

Records

The facility is operating as an SQG of hazardous waste. The facility ships 2-4 drums of paint and thinner approximately every 1-2 months. Paint and thinner waste was last transported on January 13, 2022, by Safety-Kleen Systems, Inc. (TXR 000 081 205) and Clean Harbors Environmental Services, Inc. (MAD 039 322 250) to Clean Harbors Florida, LLC (FLD 980 729 610) for disposal. Records indicate that approximately 100 pounds of distillation bottoms are transported approximately once per year by Safety-Kleen Systems, Inc. to Safety-Kleen Systems, Inc (KYD 053 348 108) and were last transported September 1, 2021.

One hundred and fifty pounds of drained aerosol can liquid hazardous waste was last transported January 21, 2022, by Safety-Kleen Systems, Inc., Clean Harbors Environmental Services, Inc and Tri State Motor Transit (MOD 095 038 998) to Clean Harbors Deer Park, LLC (TXD 055 141 378).

The Tank 5 immersion parts washer solvent was last disposed of on May 28, 2020. The facility shipped 350-gallons of D039 hazardous waste. The D039 spent solvent is transported by Safety-Kleen Systems, Inc. to Safety-Kleen (FLD 980 847 214) for disposal.

An electronic log of the quantity and staff dispensing oil during field operations is maintained. The same quantity of used oil is presumed to be collected in the field. Used oil, used oil filters, used oil absorbents and used antifreeze are transported from the facility by Safety-Kleen (TXR 000 081 205). Used oil is transported to Safety-Kleen (FLD 980 847 214) for recycling approximately once per week. The last shipment of used oil was on February 21, 2022. Used oil filters and absorbents are transported to Safety-Kleen Ocala (FLR 000 060 301) for recycling or disposal approximately once every two weeks. The last shipment of used oil filters was on February 8, 2022. Used antifreeze is transported for recycling approximately once per week. Used antifreeze was last transported on January 21, 2022.

Pritchett Trucking transports Wash Rack soil to Evergreen Landfill in Valdosta, Georgia approximately every two months. The last shipment of soil was December 1, 2021.

Cintas picks up rags weekly for laundering.

The facility's weekly hazardous waste inspections were reviewed and appeared to be in order. Records of the attempts to make arrangements with local emergency responders was available. The used oil registration,

Inspection Date: 02/22/2022

which expires on June 30, 2022, was posted.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Explanation:	The facility has not conducted a complete hazardous waste determination on the following wastestreams: 1. Truck Shop - Smartwasher spent Ozzy Mats 2. MCRC Engine Tear Down Area - Tank 1 sludge 3. MCRC Engine Tear Down Area - Torrent 500 parts washer spent solvent 4. MCRC Engine Tear Down Area - Torrent 500 parts washer spent filters 5. Blasting and Painting Shop - Tape contaminated with Hempel Acrylithane 2.8 6. Blasting and Painting Shop - Paint booth filters contaminated with Hempel Acrylithane 2.8 7. Blasting and Painting Shop -Distillation bottoms generated by solvent recovery process
Corrective Action:	1. Truck Shop - Smartwasher spent Ozzy Mats No further action is required. The facility returned to compliance via an email dated May 6, 2022. 2. MCRC Engine Tear Down Area - Tank 1 sludge In order to return to compliance, the facility should perform and fully document a hazardous waste determination prior to disposal by having a representative sample of the sludge analyzed by a Florida certified laboratory for the following: TCLP for: RCRA metals, pursuant to 40 CFR 261.24, via method 6010. 3. MCRC Engine Tear Down Area - Torrent 500 parts washer spent solvent The facility provided analytical data on May 6, 2022, indicating that the spent solvent was not ignitable and did not contain RCRA metal or volatile constituents above the TCLP regulatory limits. However, the chain-of custody did not indicate that the volatile sample had been properly preserved at 4-6 degrees F. In order to return to compliance, the facility should either provide documentation from the lab that the sample was held at the proper temperature or conduct a TCLP for RCRA volatiles, pursuant to 40 CFR 261.24, via method 8260 ensuring the proper holding temperature are maintained and documented. 4. MCRC Engine Tear Down Area - Torrent 500 parts washer spent filters In order to return to compliance, the facility should perform and fully document a hazardous waste determination prior to disposal by having a representative sample of the filters analyzed by a Florida certified laboratory for the following: TCLP for: RCRA metals, pursuant to 40 CFR 261.24, via method 6010. 5. Blasting and Painting Shop - Tape contaminated with Hempel Acrylithane 2.8 No further action is required. The facility returned to compliance via an email dated May 6, 2022. 6. Blasting and Painting Shop - Paint booth filters contaminated with Hempel Acrylithane 2.8 No further action is required. The facility returned to compliance via an email dated May 6, 2022. 7. Blasting and Painting Shop -Distillation bottoms generated by solvent recovery process

Inspection Date: 02/22/2022

In order to return to compliance, the facility should update the waste profile to apply the F005 waste code.

Type: Violation
Rule: 262.15(a)(4)
Explanation: Crane Shop: There was one 15-gallon drum of hazardous waste aerosol cans that was not closed.
Corrective Action: No further action is required. The facility returned to compliance via an email dated May 6, 2022.

Type: Violation
Rule: 262.15(a)(5)
Explanation: CAT Rental/Heavy Equipment Shop: There was one 15-gallon drum of hazardous waste drained aerosol can liquid that was not labeled as "Hazardous Waste" or with an indication of the hazards of the contents.
Crane Shop: There was one 15-gallon drum of hazardous waste aerosol cans that was not labeled as "Hazardous Waste" or with an indication of the hazards of the contents.
MCRC-Engine Tear Down: There was one 15-gallon drum of hazardous waste aerosol can liquid that was not labeled as "Hazardous Waste" or with an indication of the hazards of the contents.
Corrective Action: CAT Rental/Heavy Equipment Shop: No further action is required. The facility returned to compliance at the time of inspection by properly labeling the drum.
Crane Shop: In order to return to compliance, the facility should properly label the drum with the hazards of the contents. The facility provided an email on May 6, 2022, demonstrating the drum was labeled as "Hazardous Waste."
MCRC-Engine Tear Down: No further action is required. The facility returned to compliance at the time of inspection by properly labeling the drum.

Type: Violation
Rule: 262.16(b)(6)(i)(B)
Explanation: 180-Day HWAA: There was one 55-gallon drum of hazardous waste paint and thinner that was not labeled with the hazards of the contents.
Corrective Action: No further action is required. The facility returned to compliance at the time of inspection by properly labeling the drum.

Type: Violation
Rule: 262.20(a)(1)
Explanation: Heavy Equipment Shop: There were two hazardous waste aerosol cans observed in the used oil filter drum and three hazardous waste aerosol cans observed in the scrap metal collection container.
Truck Shop: D008 hazardous waste spent Ozzy Mats were being disposed of as non-hazardous waste in the trash.
Crane Shop/Track Shop/Air Compressor Service Bays: F005 hazardous waste wipes were being managed as non-hazardous waste.
Corrective Action: Heavy Equipment Shop: No further action is required. The facility returned to compliance at the time of inspection by removing the aerosol cans from the drum/container and properly managing the cans as hazardous waste.
Truck Shop: In order to return to compliance, the facility should begin collecting spent Ozzy Mats and managing them as D008 hazardous waste.
Crane Shop/Track Shop/Air Compressor/PSD Service Bays: In order to return to compliance, the facility should either begin managing the wipes as F005 hazardous waste or as Excluded Solvent Contaminated Wipes in accordance with 40 CFR 261.4(a)(26) or 40 CFR 261.4(b)(18).

Ring Power Corp Inspection Report

Inspection Date: 02/22/2022

Type: Violation
 Rule: 273.13(d)(1)
 Explanation: Facilities Shop: There was one box of universal waste lamps that was not closed.
 Corrective Action: No further action is required. The facility returned to compliance at the time of inspection by closing the container.

Type: Violation
 Rule: 273.14(e)
 Explanation: Facilities Shop: There was one box of universal waste lamps that was not properly labeled as Universal Waste-Lamp(s) or Waste Lamp(s) or Used Lamp(s).
 Corrective Action: No further action is required. The facility returned to compliance at the time of inspection by properly labeling the container.

Type: Violation
 Rule: 62-710.401(6)
 Explanation: MCRC-Engine Tear Down: There was a single-walled, grated used oil drain container located adjacent to a roll-up door that was not equipped with secondary containment.
 Corrective Action: MCRC-Engine Tear Down: In order to return to compliance, the facility should:
 1. Relocate the grated used oil drain container to an area of the shop where it can be demonstrated that the building provides secondary containment; OR
 2. Ensure that the container is either double-walled or equipped with secondary containment which has the capacity to hold 110% of the volume of the largest container within the containment area.

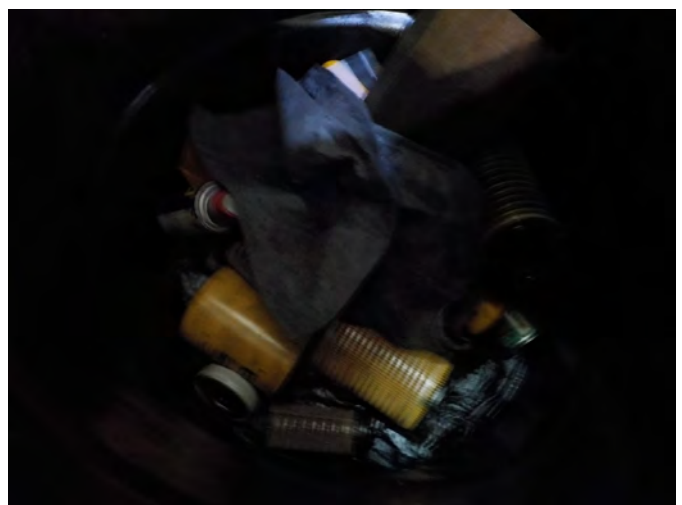
Type: Violation
 Rule: 62-710.850(5)(a)
 Explanation: Heavy Equipment Shop: One 55-gallon drum of used oil filters was improperly labeled as "Used Filters."
 Crane Shop: One 55-gallon drum of used oil filters was not properly labeled.
 Corrective Action: No further action is required. The facility returned to compliance at the time of inspection by properly labeling the drums.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Inspection Date: 02/22/2022

Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Inspection Date: 02/22/2022

Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14



Inspection Date: 02/22/2022

Photo 15



Photo 16



Photo 17



Photo 18



Photo 19



Photo 20



Inspection Date: 02/22/2022

Photo 21



Photo 22



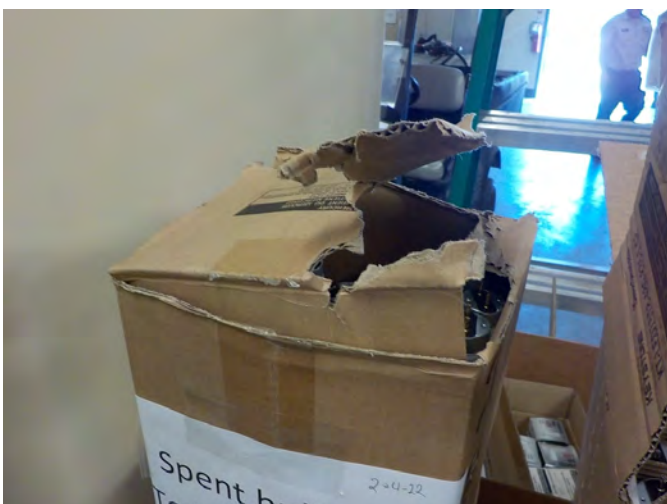
Photo 23



Photo 24



Photo 25



Inspection Date: 02/22/2022

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: 02/22/2022

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	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	05/06/2022
Principal Investigator Signature	Organization	Date
David Harriman	Environmental 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:	Bonnie M Bradshaw	Inspection Approval Date:	05/06/2022
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