



FLORIDA DEPARTMENT OF Environmental Protection

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

June 5, 2023

David R. Harriman II, Environmental Manager
Ring Power Corporation
500 World Commerce Pkwy
St. Augustine, FL 32092
David.Harriman@ringpower.com

Re: Compliance Assistance Offer
Ring Power Corporation
HW Facility ID# FLD093856318
Marion County

Dear Mr. Harriman:

An inspection was conducted at your facility on April 6, 2023. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of chapter 403, Florida Statutes, and Chapter 62-710 Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the items of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a 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 items 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 promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Gina Laddick of the Central District Office at (407) 897-4309 or via e-mail at Gina.Laddick@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel K. Hall".

Daniel K. Hall, Environmental Manager
Central District
Florida Department of Environmental Protection

Enclosures: Inspection Report

cc: Daniel K. Hall, CD DEP, Daniel.K.Hall@FloridaDEP.gov
Gina Laddick, CD DEP, Gina.Laddick@FloridaDEP.gov
Wanda Robles, CD DEP, Wanda.Robles@FloridaDEP.gov
Charles Brown, Ring Power, Charles.Brown@RingPower.Com
Jeff Geisler, Ring Power, Jeff.Geisler@RingPower.Com
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Jackie Bostic, Ring Power, Jackie.Bostic@RingPower.Com
Travis Flowers, Ring Power, Travis.Flowers@RingPower.Com



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

FACILITY INFORMATION:

Facility Name: Ring Power Corporation

On-Site Inspection Start Date: 04/06/2023

On-Site Inspection End Date: 04/06/2023

ME ID#: 7786

EPA ID#: FLD093856318

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

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

County Name: Marion

Contact Phone: Data is missing from FIESTA

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: SQG Used Oil: Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Gina Laddick, Inspector

Other Participants: Michael Eckoff, Environmental Consultant, Wanda Robles, Environmental Specialist II, Charles Brown, Shop Foreman

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

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

TYPE OF OWNERSHIP: Private

Introduction:

On April 6, 2023, Gina Laddick, Wanda Robles, and Michael Eckoff, Florida Department of Environmental Protection (FDEP or Department) inspected Ring Power Corporation (Ring Power or Facility), located at 6200 N US 301/441, Ocala, FL 34475, for compliance with state and federal hazardous waste and used oil regulations. Charles Brown, Shop Forman, represented the facility.

Ring Power Corporation most recently notified the department as a Small Quantity Generator of hazardous waste and a used oil transporter and transfer facility on February 2, 2022. The facility maintains EPA identification number: FLD093856318.

Process Description:

Ring Power rents light-duty and heavy-duty construction equipment and vehicles. As part of the rental agreement, the facility will come to a job site and service its equipment and vehicles. The wastes are then transported back to the facility for proper disposal; as such, the facility is registered as a used oil and used oil filter transporter and transfer facility.

The facility has one 5,000-gallon used oil tank. At the time of the inspection, the used oil tank was not properly labeled with the words "Used Oil" [40 CFR 279.22(c)(1)]. On April 26, 2023, the facility provided photo documentation via email that the used oil tank has been correctly labeled.

Two small dumpsters contained used oil filters, one of the dumpsters was not labeled with the words "Used Oil Filters" [62-710.850(5)(a), F.A.C.]. On April 26, 2023, the facility provided photo documentation via email that the dumpster has been correctly labeled.

Records:

Inspection Date: 04/06/2023

Used oil and used oil filters are picked up by Safety-Kleen. Disposal records from the last three years were provided during the inspection.

The facility has a current liability insurance policy that expires on July 1, 2023.

Annual training records were requested by the department via email on April 18, 2023 and were received by the department on May 24, 2023. Hazardous waste and spill prevention and response training is provided to employees annually.

Pick up forms as required in 62-710.510(1), F.A.C. were requested via email on April 18, 2023 and were received by the department on May 24, 2023, however the facility did not include several items as required, including the address, telephone number, and EPA identification number of the transporter; the type of used oil received using the type code; the destination or end use of the used oil; and a documentation of halogen screening.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1)
Explanation:	Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."
Corrective Action:	<p>Specifically, Ring Power failed to label the used oil tank with the words "Used Oil".</p> <p>The facility is required to label containers and aboveground tanks used to store used oil with the words "Used Oil".</p> <p>On April 26, 2023, the facility provided photo documentation via email that the used oil tank has been correctly labeled.</p>

Inspection Date: 04/06/2023

Type:	Violation
Rule:	62-710.510(1), 62-710.510(1)(a), 62-710.510(1)(d), 62-710.510(1)(f), 62-710.510(1)(g)
Explanation:	<p>Each registered person shall maintain records on DEP Form 62-710.901(2), "Used Oil and Used Oil Filter Record Keeping Form and Instructions," effective date 4-23-13, which is hereby adopted and incorporated by reference (http://www.flrules.org/Gateway/reference.asp?No=Ref-02069), or on substantially equivalent forms which contain at least the same information as the Department form. This form can be obtained on the internet at https://floridadep.gov/waste/permitting-compliance-assistance/content/used-oil-forms or by contacting the Permitting and Compliance Assistance Program, MS 4500, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. These records shall include the following information:</p> <ul style="list-style-type: none">(a) The name, business address, telephone number and EPA identification number of the transporter;(d) The type of used oil received, using the type code designation found in the form instructions;(f) The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and,(g) Documentation of halogen screening in accordance with the requirements of 40 C.F.R. Part 279 [as adopted in subsection 62-710.210(2), F.A.C.]. <p>Specifically, Ring Power failed to include several items as required by 62-710.510(1) including:</p> <ul style="list-style-type: none">(a) The name, business address, telephone number and EPA identification number of the transporter;(d) The type of used oil received, using the type code designation found in the form instructions;(f) The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and,(g) Documentation of halogen screening in accordance with the requirements of 40 C.F.R. Part 279 [as adopted in subsection 62-710.210(2), F.A.C.].
Corrective Action:	<p>The facility is required to maintain records as required by 62-710.510(1).</p> <p>Within 15 days of the receipt of this letter, provide updated forms to include the missing items:</p> <ul style="list-style-type: none">(a) The name, business address, telephone number and EPA identification number of the transporter;(d) The type of used oil received, using the type code designation found in the form instructions;(f) The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and,(g) Documentation of halogen screening in accordance with the requirements of 40 C.F.R. Part 279 [as adopted in subsection 62-710.210(2), F.A.C.].

Inspection Date: 04/06/2023

Type: Violation

Rule: 62-710.850(5)(a)

Explanation: All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface.

Specifically, Ring Power failed to label two containers of used oil filters with the words "Used Oil Filters".

Corrective Action: The facility is required to label containers of used oil filters with the words "Used Oil Filters".

On April 26, 2023, the facility provided photo documentation via email that the dumpster has been correctly labeled.

Conclusion:

Ring Power Corporation was inspected on April 6, 2023 for compliance with state and federal hazardous waste regulations was found to be out of compliance at that time.

Inspection Date: 04/06/2023

1.0: Pre-Inspection Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Signed:

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

Gina Laddick**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**06/05/2023**Date**Michael Eckoff**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Wanda Robles**Representative Name**Environmental Specialist II**Representative Title**DEP**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.

Charles Brown**Representative Name**Shop Foreman**Representative Title**Ring Power**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:**Approver:**Daniel K. Hall**Inspection Approval Date:**06/05/2023