DEPARTMENTAL DECISION

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ring Power Corporation

On-Site Inspection Start Date: 05/13/2024 On-Site Inspection End Date: 05/13/2024

ME ID#: 2114 **EPA ID#**: FLD984178194

Facility Street Address: 9901 Ringhaver Dr, Orlando, Florida 32824-7040

Contact Mailing Address: 500 World Commerce Pkwy, St Augustine, Florida 32092-3788
County Name: Orange
Contact Phone: (813) 638-9332

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: SQG Used Oil: Oil Filters

INSPECTION TYPE:

Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Gina Laddick, Inspector

Other Participants: Jennifer Parker, Inspector, James Bryne, Security and Housekeeping

Manager

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

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

Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

On May 13, 2024, Gina Laddick and Jennifer Parker, Florida Department of Environmental Protection (FDEP or Department), inspected Ring Power Corporation (Ring Power or Facility), located at 9901 Ringhaver Dr, Orlando, Florida, for compliance with state and federal used oil transporter and hazardous waste regulations. James Byrne, Security and Housekeeping Manager, represented the facility.

The Department received the 2023 "Annual Report by Used Oil and Used Oil Filter Handlers" on March 7, 2024 and was issued registration number FLD984178194. This registration will expire on June 30, 2025. Ring Power managed 79,065 gallons of used oil in 2023. A certificate of liability insurance was received on July 11, 2023.

Ring Power originally notified the state as a Small Quantity Generator (SQG) of hazardous waste on September 14, 1990 and received EPA identification number FLD984178194. The facility most recently notified the state as an SQG on February 22, 2022 and retains EPA identification number FLD984178194.

Inspection History (5 Years):

Ring Power was last inspected for compliance with state and federal used oil transporter requirements on December 3, 2020 and was not in compliance at the time of the inspection. The facility failed to label containers of hazardous waste with the words "Hazardous Waste" and an indication of the hazards of the contents, failed to label containers of hazardous waste with an accumulation start date, failed to prevent releases of hazardous waste to surrounding drums and walls, and failed to conduct weekly inspections consistently for the past three years. The facility submitted corrective actions and the case was closed without formal enforcement.

Process Description:

Ring Power is a heavy equipment rental company that operates several service bays. Used oil is generated from vehicle service and hard piped to used oil tanks outside. Used oil and used oil filters are also transported

Inspection Date: 05/13/2024

to the facility when employees perform services on equipment and vehicles from a job site outside of the facility.

Located within secondary containment, and under a covered awning, was one 5,000-gallon tank of used oil which was labeled with the words "Used Oil" and one 3,500-gallon tank of used antifreeze labeled "Used Antifreeze". Next to the containment area were five small dumpsters of used oil filters. The dumpsters were labeled with the words "Used Oil Filters".

No hazardous waste was inspected; however, the facility was reminded of SQG requirements per 40 CFR 262.16.

Records:

Used oil disposal receipts were reviewed following the inspection. Safety-Kleen Systems, Inc. disposes of the used oil, used oil filters and used antifreeze.

Annual employee training records relative to used oil transportation were not available for review during or following the inspection [Rule 62-710.600(2)(b), F.A.C.].

The used oil registration and liability insurance policy was posted at the time of the inspection.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 62-710.600(2)(b), 62-710.600(2)(c)

Explanation: (2) To become certified and to maintain certification, used oil transporters shall:

(c) Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review by Department personnel during

inspections;

Specifically, Ring Power failed to provide employee training for review.

Corrective Action: In an email dated June 25, 2024, the facility provided an email stating that training will

soon be conducted for all employees.

The facility shall provide documentation of training records to the department.

Conclusion:

Ring Power was inspected for compliance with state and federal used oil and used oil filter transporter requirements on May 13, 2024, and was found to be out of compliance.

Inspection Date: 05/13/2024

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		
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: 05/13/2024

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		Inspector		
Principal Investigator Name Principal Investigator Signature		Principal Investigator Title		
		DEP Organization	07/10/2024 Date	
Jennifer Park	er	Inspector		
Inspector Name		Inspector Title		
		DEP		
		Organization		
James Bryne Representative Name		Security and H Manager	lousekeeping	
		Representative Ti	itle	
		Ring Power Corp		
		Organization		
	nitting to the accuracy of a	e Representative only acknowledge ny of the items identified by the Dep	•	· ·
Report Appro	overs:			
Approver:	Daniel K. Hall	Inspection App	oroval Date:	07/10/2024