



# 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

July 11, 2024

David R. Harriman II, Environmental Manager  
Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)

Re: Compliance Assistance Offer  
Ring Power Corporation  
HW Facility ID# FLD984178194  
Orange County

Dear Mr. Harriman:

An inspection was conducted at your facility on May 13, 2024. 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](mailto: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](mailto:Daniel.K.Hall@FloridaDEP.gov)  
Gina Laddick, CD DEP, [Gina.Laddick@FloridaDEP.gov](mailto:Gina.Laddick@FloridaDEP.gov)  
Jennifer Parker, CD DEP, [Jennifer.Parker@FloridaDEP.gov](mailto:Jennifer.Parker@FloridaDEP.gov)  
Howard Donaway, Ring Power, [Howard.Donaway@RingPower.Com](mailto:Howard.Donaway@RingPower.Com)  
Jame Byrne, Ring Power, [James.Byrne@ringpower.com](mailto:James.Byrne@ringpower.com)



**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 Byrne, 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:<br>(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;<br><br>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.<br><br>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.

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: 05/13/2024

**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**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**07/10/2024**Date**Jennifer Parker**Inspector Name**Inspector**Inspector Title**DEP**Organization**James Bryne**Representative Name**Security and Housekeeping  
Manager**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:**Daniel K. Hall**Inspection Approval Date:**07/10/2024