



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

FACILITY INFORMATION:

Facility Name: Ring Power Corp

On-Site Inspection Start Date: 06/27/2024

On-Site Inspection End Date: 06/27/2024

ME ID#: 39549

EPA ID#: FLD981480205

Facility Street Address: 2920 S Byron Butler Pkwy, Perry, Florida 32348-6314

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

County Name: Taylor

Contact Phone: (904) 494-7480

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: SQG **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, 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 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: Emma L Sacchitello, Inspector

Other Participants: Jeff Terrell, Branch Manager

LATITUDE / LONGITUDE: Lat 30° 5' 1.579" / Long 83° 34' 1.8334"

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

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power Corporation (Ring Power, the facility) was inspected on June 27, 2024, as an unannounced hazardous waste compliance inspection. The facility is registered as a Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter and Used Oil Transfer Facility. The facility notified the Department of Environmental Protection (DEP) as a Small Quantity Generator (SQG) of hazardous waste on August 31, 2021. The facility was last inspected by the Department's Hazardous Waste Program on July 15, 2020. Jeff Terrell (Branch Manager) and Greg Grant (Technician) were present throughout the inspection.

At the time of the current inspection, the facility was operating as a Small Quantity Generator (SQG) of hazardous waste.

The facility has been in operation since 1985 and has approximately 12 employees. Ring Power owns the property and the building which is connected to city water and sewer. There is also one well used to supply water for Wash Rack operations. The facility operates Monday through Friday, 7:00 AM to 5:00 PM. Ring Power is a dealer and service agent for trucks, heavy equipment, generators, parts and other equipment. The facility consists of offices, a Maintenance and Repair Shop, a Parts Warehouse, the Hose Room, an Equipment Yard, a Storage Loft, a Wash Rack and Mobile Servicing.

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Process Description:**Maintenance and Repair Shop**

The Maintenance and Repair Shop performs routine repair and preventative maintenance on both customer and fleet vehicles and heavy equipment. Maintenance operations generate used oil, used oil filters, spent antifreeze, oily rags and spent aerosol cans. Only spot painting is performed at this facility. Major equipment painting is performed off-site at one of the other Ring Power facilities.

Used oil is drained into portable drain containers (Photo 1) and then pumped into a 500-gallon double-walled tank, described below. All used oil drain containers observed during the inspection were properly labeled and in good condition.

There is one 500-gallon, double-walled used oil tank located just outside the Maintenance and Repair Shop adjacent to the building (Photo 2). The tank was properly labeled.

Used oil filters generated by Maintenance and Repair Shop operations are drained into used oil containers and then accumulated in a 330-gallon steel container. There was one 330-gallon container accumulating used oil filters (Photo 3). The container was closed, properly labeled and stored on an oil-impervious surface.

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. There was one 30-gallon drum accumulating pads in the Maintenance and Repair Shop.

Spent antifreeze generated by Maintenance and Repair Shop operations is accumulated in portable drain containers that are emptied into a 55-gallon container. The container was closed, in good condition and labeled as "Waste Antifreeze" (Photo 4)

There are two Safety-Kleen Model 30 parts washers that utilize Safety-Kleen Premium Solvent in this area. The facility could not provide information regarding how spent parts washer solvent from either unit is managed. The facility has records indicating that spent parts washer solvent may be managed as either D039 hazardous waste or D001/D018 hazardous waste. The facility has not conducted and documented a complete hazardous waste determination on the spent parts washer solvent [40 CFR 262.11].

Reusable wipes are generated by maintenance activities and may be contaminated with oil, grease and/or CRC Brakleen Non-Chlorinated Brake Parts Cleaner (flashpoint 15.8°F). Spent wipes are accumulated in an approximately 20-gallon container and are managed as excluded solvent contaminated wipes (Photo 5). The container was closed and properly labeled. Excluded solvent contaminated wipes are laundered by Cintas weekly.

Aerosol products such as Brakleen Brake Parts Cleaner-Non-Chlorinated (flashpoint 0°F), CAT Battery Cleaner (flashpoint -119°F), CRC Battery Terminal Protector (flashpoint: <0°F), CAT Standard Performance Topcoat-CAT Yellow (flashpoint -20.2°F), CAT Yellow Primer Paint (flashpoint 71°F), CAT Black Paint High Gloss (flashpoint 88°F) and CAT Black Muffler Paint (flashpoint -99°F) are generated by Maintenance and Repair Shop operations. Non-empty cans of these products would generate a D001 hazardous waste if disposed of.

Aerosol cans generated throughout the facility are punctured and drained in an aerosol can puncturing device attached to the top of a 15-gallon container (Photo 6). Any residual liquid in the aerosol cans drains into the drum below the puncturing device. The liquid is managed as D001/D005/D006/D007/F003/F005 waste. The container was closed and properly labeled. The empty punctured cans are accumulated in a 55-gallon drum next to this device and are managed as scrap metal. Scrap metal is picked up as needed by Leon Iron & Metal. There is one glovebox blasting unit installed in the Maintenance and Repair Shop. The unit is used occasionally to blast both painted and unpainted parts. Spent blasting media is managed as non-hazardous waste and disposed of with the dirt from the Wash Rack, described below, based on 2020 TCLP testing for RCRA metals

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conducted on spent blasting media from the St. Augustine Ring Power facility that a facility representative has stated is representative of this waste.

Maintenance and Service Shop floors are cleaned with Mean Green 9. Wastewater from cleaning the floors is managed as non-hazardous waste and disposed of in the Wash Rack, described below.

Parts Warehouse

The Parts Warehouse contains parts, equipment and materials for shipping and receiving. No hazardous waste is generated in this area.

Hose Room

Work is performed on hydraulic hoses in this area.

There is one Safety-Kleen Model 30 parts washer in this area used to clean newly manufactured hydraulic hoses. The facility could not provide information regarding how spent parts washer solvent from this unit is managed. The facility has records indicating that spent parts washer solvent may be managed as either D039 hazardous waste or D001/D018 hazardous waste. The facility has not conducted and documented a complete hazardous waste determination on the spent parts washer solvent [40 CFR 262.11].

Equipment Yard

The Equipment Yard is an outside temporary staging area for heavy equipment and vehicles. The Yard also contains one scrap metal dumpster. The Yard contains both paved and dirt/gravel areas. No hazardous waste is generated in this area.

Storage Loft

The Storage Loft, located on the second story of the building, contains an area for conducting training, a maintenance closet and an open-air storage loft. No waste is generated in this area.

Wash Rack

The Wash Rack is a closed-loop system used to wash equipment or vehicles that have been potentially contaminated with oil and dirt prior to repairs. Mean Green 9 and heated water are used to pressure wash the equipment on a concrete pad. Wash water drains to a collection pit. When the water reaches a certain level in the collection pit, it overflows into a series of weirs that filter particulate matter from the wash water. The first weir allows water to underflow and contains any free oil. According to the standard operating procedures, if free oil is observed in the weir, an oil absorbent pad would be used to absorb the oil and the pad would be disposed of in the absorbent pad drum. The accumulated dirt and debris are cleaned out of the collection pits as needed, approximately every 8-9 months. The dirt and debris are dried in a covered accumulation area adjacent to the Wash Rack (Photo 7) and disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. Analysis of the dirt and debris indicates that it does not contain TCLP volatile, semi-volatile, metal, or pesticide constituents above the regulatory limits. The facility has TCLP analysis and generator knowledge that the dirt does not contain herbicides above the regulatory limits.

Mobile Servicing

Ring Power services vehicles and equipment in the field. The facility operates five field trucks. Used oil, used oil filters, used antifreeze and rags generated during field servicing activities are transported back to the facility and accumulated with the waste streams generated at the facility, as described above. The facility transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior

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to having its used oil picked up by a certified used oil transporter. Waste is collected on the trucks in covered drums or pails that are 55-gallons or less in capacity.

Record Review

The facility is currently a Small Quantity Generator of hazardous waste.

Used oil and used oil filters are transported by Safety-Kleen (TXR 000 081 205). The last shipment of used oil was May 24, 2024, and the last shipment of used oil filters was May 28, 2024. 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.

Spent parts washer solvent was last transported on June 7, 2024, when 28-gallons of D001/D018 hazardous waste and 16-gallons of D039 hazardous waste was transported by Safety Kleen to Safety-Kleen (FLD 980 847 214).

Liquid from the aerosol can puncturing device was last transported on October 28, 2021, when 100 pounds of D001/D005/D006/D007/F003/F005 hazardous waste was transported by Safety-Kleen to Clean Harbors Florida, LLC (FLD 980 729 610).

Excluded Solvent Contaminated Wipes are laundered by Cintas weekly.

Soil from the Wash Rack was last transported by Pritchett Trucking to Evergreen Landfill in Valdosta, Georgia on May 24, 2022.

The current used oil registration was not posted (Photo 8) [62-710.500(4), FAC]. The used oil registration expires on June 30, 2025. The facility had current proof of financial responsibility.

A review of the facility's records was conducted. All records reviewed appeared to be in order except as described below:

1. The facility could not provide documentation that showed an attempt had been made to make emergency response arrangements with the local Police Department, the Fire Department, other Emergency Response Teams, other Emergency Response contractors, equipment suppliers, and local Hospitals, taking into account the types and quantities of hazardous wastes handled at the facility [40 CFR 262.16(b)(8)(vi)(A)].
2. The location of fire extinguishers, spill control equipment and if present, fire alarm was not posted next to a telephone or in areas directly involved in the generation and accumulation of hazardous waste [40 CFR 262.16 (b)(9)(ii)]. The name and emergency telephone number of the emergency coordinator and the telephone number for the fire department were posted.

For Outstanding Items of Potential Non-Compliance

Please review the following section – New Potential Violations and Areas of Concern. This section includes potential violations observed at your facility during this inspection. For any potential violations below that have not been corrected, please refer to the Corrective Action for each item that is suggested to bring your facility into compliance. Once the corrective action has been completed, please send documentation to the Principal Inspector listed on page 1 of this Inspection Report. This documentation includes, but is not limited to, photos of corrected items, manifests, SDSs or other documents that will show that each potential violation has been fully addressed.

New Potential Violations and Areas of Concern:

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Violations

Type:	Violation
Rule:	262.11
Explanation:	The facility has not conducted and documented a complete hazardous waste determination on the following wastestreams: 1. Maintenance and Repair Shop: spent parts washer solvent 2. Hose Room: spent parts washer solvent
Corrective Action:	In order to return to compliance, prior to the next routine disposal or within four months, the facility should conduct and fully document a hazardous waste determination by having a representative sample of the wastestreams analyzed separately by a certified Florida laboratory for the following:

Toxicity Characteristic Leaching Procedure (TCLP) for:

- RCRA metals, pursuant to 40 CFR 261.24, via method 6010;
- RCRA volatiles, pursuant to 40 CFR 261.24, via method 8260; and
- Flashpoint, pursuant to 40 CFR 261.21, via methods 1010 or 1020.

Alternatively, the facility may provide existing documentation of the hazardous waste determinations for these wastestreams.

Waste determinations that include lab analysis should be made by having a representative sample of the wastestream analyzed separately by a Florida certified laboratory. Documentation of the results of these waste determinations should be submitted to this office for review. These waste streams are not to be disposed of until written approval has been given by DEP. The wastes should be disposed of in a proper manner once written approval has been given by DEP. Hazardous waste should be sent off-site to a permitted treatment, storage, or disposal facility. NOTE: None of the samples are to be composites. The samples are to be collected and analyzed in accordance with EPA publication SW# 846 "Test Methods for Evaluating Solid Waste" 3rd Edition. All sampling and analysis shall be conducted in accordance with Rule 62-160, Florida Administrative Code (FAC). A National Environmental Laboratory Accreditation Program (NELAP) certified laboratory should analyze the samples.

Volatile samples should be iced within 15 minutes of collection and maintained at 4-6°C. This information should be documented on the chain-of-custody. It is recommended that results be reported to the Method Detection Limits (MDLs). Full lab reports including the chain-of-custody should be provided. Alternative methods for hazardous waste determinations should be approved by DEP.

Type: Violation
Rule: 262.16(b)(8)(vi)(A)
Explanation: The facility could not provide documentation that showed an attempt had been made to make emergency response arrangements with the local Police Department, the Fire Department, other Emergency Response Teams, other Emergency Response contractors, equipment suppliers, and local Hospitals, taking into account the types and quantities of hazardous wastes handled at the facility.
Corrective Action: In order to return to compliance, the facility should make arrangements with the local Police Department, the Fire Department, other Emergency Response Teams, other Emergency Response contractors, equipment suppliers, and local Hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. The emergency arrangements coordination is to familiarize the above organizations with the layout of the facility, the properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes as well as the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. The facility should submit documentation to DEP that emergency arrangements exist with these organizations or that attempts to make such arrangements were made (e.g. certified return receipts, read receipts, etc.).

Type: Violation
Rule: 262.16(b)(9)(ii)
Explanation: The emergency postings throughout the facility did not include the location of fire extinguishers, spill kits/spill control material, and, if present, fire alarm.
Corrective Action: In order to return to compliance, the facility should post the name and emergency telephone number of the emergency coordinator, the location of fire extinguishers and spill control material, and, if present, fire alarm, and the telephone number of the fire department (unless the facility has a direct alarm) next to a telephone or in areas directly involved in the generation and accumulation of hazardous waste.

Type: Violation
Rule: 62-710.500(4)
Explanation: The facility did not have the current used oil registration posted.
Corrective Action: In order to return to compliance, the facility should post the current used oil registration.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



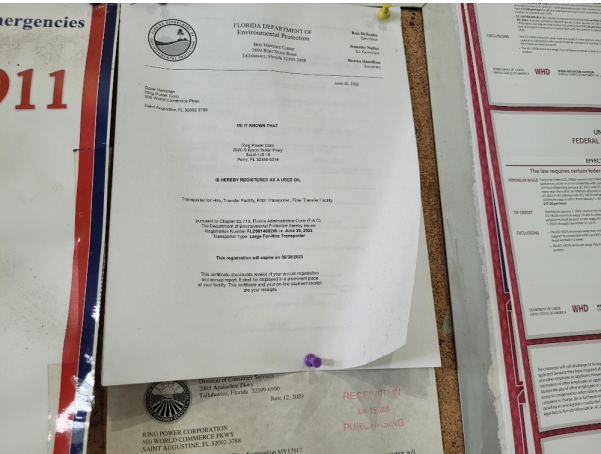
Photo 6



Photo 7



Photo 8



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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

Emma L Sacchitello
Principal Investigator Name

Inspector
Principal Investigator Title


Principal Investigator Signature

DEP
Organization

08/30/2024
Date

Jeff Terrell
Representative Name

Branch Manager
Representative Title

Rin
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: Emma L Sacchitello

Inspection Approval Date: 08/30/2024