Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:
Facility Name: Ring Power Corp
On-Site Inspection Start Date: 09/24/2024 **On-Site Inspection End Date:** 09/24/2024
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:** (813) 638-9332

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

WASTE ACTIVITIES:
Generator: SQG **Used Oil:** Used Oil, Oil Filters **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** 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: Chris Green, Heavy Equipment Service Manager

LATITUDE / LONGITUDE: Lat 29° 58' 32.3117" / Long 81° 27' 30.4177"
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 September 24, 2024, as an unannounced formal enforcement follow-up inspection. Ring Power was last inspected by the Department's Hazardous Waste program on February 22, 2022. The inspection resulted in formal enforcement. The enforcement case (File No. 22-2275) was resolved by a consent order executed on February 1, 2023, and the facility was issued a case closure letter on February 21, 2023. 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 Small Quantity Generator (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 555 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 (MCRC), a Fabrication and Welding Shop, a Machine Shop, a Hydraulic Shop, a Blasting and Painting Shop, a Paint Shop Central Accumulation Area (CAA), a Facilities Shop, a Storage Room, a Loading Dock, a Parts Warehouse/Tool Room/Power System Warehouse, a Tank Farm and a Used Filter Shed. Chris Green (Heavy Equipment Service Manager) was present throughout the inspection.

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 noncontiguous 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 Heavy Equipment Shop, CAT Rental Store Shop, Air Compressor/PSD Service Bays, PSD Generator Shop, Engine Diagnostics Shop (PSD Test Bay), Utilities Shop, Crane Shop, Hydraulic Shop and Track Shop were inspected. The Truck Shop was inspected during the previous inspection, but was no longer in operation at the time of this inspection. 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. There was one 15-gallon container of used oil in the Heavy Equipment Shop that was not properly labeled with the words “Used Oil” (Photo 1) [40 CFR 279.22(c)(1)]. All other observed 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. All observed containers were in good condition and properly labeled as “Used Oil Filters.”

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. All observed 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 thirteen Safety-Kleen Model 250 30-gallon parts washers, one Safety-Kleen Model 81 parts washer and one Safety-Kleen Model 33 parts washer that utilize Safety-Kleen Premium Solvent and one Safety-Kleen AQ-1 Aqueous Multi-Purpose Parts Washer that utilizes ArmaKleen Heavy Duty Aqueous Cleaner. The units are on 8-week maintenance schedules. Spent solvent from the Model 33 unit is managed as non-hazardous waste based on Toxicity Characteristic Leaching Procedure (TCLP) analysis data and generator knowledge that has indicated that the solvent does not contain RCRA metal, volatile or semi-volatile constituents above the regulatory limits.

At the time of report issuance, it was unclear how spent solvent from the Model 81 and AQ-1 unit was being managed. The facility has not conducted and documented an adequate hazardous waste determination on the spent solvent from these units [40 CFR 262.11].

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. At the time of the previous inspection, sludge had never been disposed of from these units. At the time of report issuance, it was unclear whether the sludge has been disposed of since the previous inspection. The facility has not conducted and documented an adequate hazardous waste determination on the sludge [40 CFR 262.11].

The Maintenance and Repair Shops also operate four Crystal Clean Model 2725 Aqueous Combination Parts Cleaners that utilizes Mirachem M2750 Cleaner/Degreaser. At the time of the previous inspection, the Crystal Clean units utilized Mirachem 500 Cleaner/Degreaser and spent solvent was managed as non-hazardous waste based on TCLP analysis data and generator knowledge that indicated that the solvent did not contain RCRA metal, volatile or semi-volatile constituents above the regulatory limits. However, since the use of Mirachem M2750 Cleaner/Degreaser has been initiated since the analysis, additional analysis is required [40 CFR 262.11].

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.” Rags are laundered weekly by Cintas.

Disposable or launderable wipes may be used with Brakleen Non-Chlorinated Brake Parts Cleaner (toluene 10-20%; 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. Wipes used with Brakleen are managed as Excluded Solvent Contaminated Wipes. There was one 10-gallon step container in the Crane Shop and one 10-gallon step container in the Track Shop that were properly labeled, but were not closed (Photos 2 & 3) [40 CFR 261.4(a)(26)(i)]. The container in Track Shop did not allow for the lid to sit properly against the container. All other accumulation containers were closed and properly labeled as “Excluded Solvent Contaminated Wipes.”

Aerosol cans of Brakleen, 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. The facility has several drum-top aerosol can puncturing devices throughout the shops. The aerosol cans are punctured and the liquid is drained into the containers. 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.

There was one 30-gallon drum-top aerosol puncturing device that is shared between the Heavy Equipment Shop and CAT Rental Shop that was not closed [40 CFR 262.15(a)(4)] and was not properly labeled as “Hazardous Waste” [40 CFR 262.15(a)(5)(i)] or marked with an indication of the hazards of the contents (Photo 4) [40 CFR 262.15(a)(5)(ii)]. The area around the puncturing device was also covered with splashes [40 CFR 262.16(b)(8)(i)]. The facility is reminded that any spills or splashes should be cleaned up immediately. There was also one non-empty aerosol can of Loctite MR 5426 (DOT Division 2.1 flammable compressed gas) accumulating on the lid of the device that was not properly labeled as “Hazardous Waste” [40 CFR 262.15(a)(5)(i)] or marked with an indication of the hazards of the contents (See Photo 4) [40 CFR 262.15(a)(5)(ii)].

There was one 55-gallon drum-top aerosol puncturing device in the PSD Generator Shop and one 55-gallon drum-top top aerosol puncturing device in the Air Compressor Shop that were closed and properly labeled as “Hazardous Waste,” but were not marked with an indication of the hazards of the contents (Photos 5 & 6) [40 CFR 262.15(a)(5)(ii)]. Both containers were marked as “Ignitable,” but not “Toxic.”

There was one 15-gallon container of aerosol cans in the Track Shop that was properly labeled with the words “Hazardous Waste,” but was not closed [40 CFR 262.15(a)(4)] and was not marked with an indication of the hazards of the contents (Photo 7) [40 CFR 262.15(a)(5)(ii)]. The lid of the container was marked as “Toxic,” but the lid was not on the container and the “Ignitable” hazard is also required.

There was one 15-gallon container of aerosol cans in the Crane Shop that was closed, properly labeled as “Hazardous Waste” and marked with an indication of the hazards of the contents.

There is one glovebox blasting unit installed in between the Heavy Equipment Shop and CAT Rental Shop. Both Ring Power and customer painted and unpainted parts are blasted in the unit. Spent blasting media is added to the Wash Rack dirt/sludge, described below, for disposal at Chesser Island Road Landfill in Folkston, Georgia. TCLP analysis of the spent blasting media has indicated that it does not contain RCRA metal constituents above the regulatory limits.

Service Shop floors are cleaned with Mean Green 9. Mop water is disposed of in the Wash Rack described below.

Spent lead acid batteries generated by Maintenance and Repair Shop operations are stored on a pallet on the Loading Dock, described below. Batteries are picked up 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 8). 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. TCLP analysis of the sludge has indicated that it does not contain RCRA metal, volatile, semi-volatile, pesticide or herbicide constituents above the regulatory limits. Dirt and debris collected from the rough clean area is disposed of as non-hazardous waste at Evergreen Landfill in Valdosta, Georgia. TCLP analysis of the dirt and debris has indicated that they do not contain RCRA metal, volatile, semi volatile, pesticide or herbicide constituents above the regulatory limits.

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/Disassembly, Assembly and Diagnostic Controls.

Radiators are pressure tested in a large tank containing Barbee #54/56 Tank Block/Powder and water (Photo 9). 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. TCLP analysis of the spent liquid has indicated that it does not contain RCRA volatile, semi-volatile, metal, pesticide or herbicide constituents above the 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 10). Used oil that accumulates in the drain table compartments is pumped to a single-walled grated drain container that is located adjacent to a large, roll-up door (Photo 11). Subsequent to the previous inspection, a berm was installed across the overhead doorway opening in the Engine Tear Down area to provide adequate secondary containment for this container. At the time of this inspection, the container had been moved to the other side of the Engine Tear Down Area but was still next to an overhead doorway. At the time of report issuance, it was unclear whether either doorway was equipped with a berm as it was not observed during the inspection. The facility is reminded that containers of used oil that are not double-walled are required to have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area.

Used oil is pumped from the 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 four immersion parts washers. At the time of the previous inspection, there were five immersion parts washers (Tanks 1-5). Staff working in the area at the time of the inspection stated that Tank 4 has since been removed. Subsequent to the inspection, a facility representative stated that Tank 5 had been removed. At the time of report issuance, it was unclear which of these tanks was still in use.

Tank 1 sprays Foremost 35-ES Jet Takeoff 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 drummed and removed, the spent liquid is placed back into the tank for reuse and fresh product is added to top off the tank. TCLP analysis data on the sludge has indicated that it does not contain RCRA metals above the regulatory limits.

Tanks 2 and 3 use heated Foremost 1195 Paint and Rust Remover (pH 12.6-13.4) to clean cast iron and steel parts with agitation. Tanks 2 and 3 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 of the liquid has indicated that it is a D002/D007/D008 hazardous waste. TCLP analysis data on the sludge has indicated that it does not contain RCRA metal, volatile or semi-volatile constituents above the regulatory limits. At the time of the previous inspection, Tank 4 also utilized Foremost 1195 Paint and Rust Remover, and waste was managed the same as the waste from Tanks 2 and 3.

At the time of the previous inspection, Tank 5 used Safety-Kleen Premium Solvent to clean aluminum, steel and other metals. TCLP analysis of the spent solvent had indicated that it did not contain RCRA metal constituents above the regulatory limits, but the spent solvent was managed as D039 hazardous waste under a national profile.

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 30-gallon container. Empty cans are disposed of as scrap metal and the drained liquid is managed as hazardous waste. The 30-gallon drum-top aerosol puncturing device was closed and properly labeled as “Hazardous Waste,” but was not marked with an indication of the hazards of the contents (Photo 12) [40 CFR 262.15(a)(5)(ii)].

There is a Torrent 500 parts washer that uses Torrent 1101 Solution in the Engine Tear Down Area. Solvent is stored in an approximately 35-gallon drum and is filtered through an internal filter for reuse. Approximately once per month, the filter is washed in the unit and is then managed as non-hazardous waste and disposed of in the trash. TCLP analysis data on the sludge has indicated that it does not contain RCRA metals constituents above the regulatory limit. The spent solvent is drained to the Wash Rack, described above. TCLP analysis data and generator knowledge indicate that the spent solvent does not contain RCRA metal or volatile constituents above the regulatory limits and is not ignitable.

There are two Safety-Kleen Model 250 parts washers that utilize Safety- Kleen Premium Solvent installed in the Disassembly area. The units are on an 8-week maintenance schedule with Safety-Kleen. At the time of the previous inspection, sludge had never been disposed of from these units. At the time of report issuance, it was unclear whether the sludge has been disposed of since the previous inspection. The facility has not conducted and documented an adequate hazardous waste determination on the sludge [40 CFR 262.11].

Components are rebuilt in the Assembly area. There are four Safety-Kleen Model 250 parts washers that utilize Safety- Kleen Premium Solvent installed in this area. The units are on an 8-week maintenance schedule with Safety-Kleen. At the time of the previous inspection, sludge had never been disposed of from these units. At the time of report issuance, it was unclear whether the sludge has been disposed of since the previous inspection. The facility has not conducted and documented an adequate hazardous waste determination on the sludge [40 CFR 262.11].

There is one 20-gallon container of excluded solvent contaminated wipes in the Assembly area that is used to collect disposable wipes that may be contaminated with oil, WD-40, Brakleen 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.

There was one 15-gallon container of aerosol cans that was closed, but not properly labeled as “Hazardous Waste” [40 CFR 262.15(a)(5)(i)] or marked with an indication of the hazards of the contents (Photo 13) [40 CFR 262.15(a)(5)(ii)].

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 may be sprayed directly on the cylinders and air dried. The shop supervisor stated that Brakleen is not used with a wipe or rag.

Spent aerosol cans are taken to a puncturing device located in the Used Filter Room, described below.

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. According to a facility representative, used oil filters are not generated in this shop. It is 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. 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. Larger particles are collected in large boxes 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. TCLP analysis of the spent grit has indicated that it does not contain RCRA metal, volatile and semi-volatile constituents above the regulatory limits.

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. TCLP analysis of the sanding waste has indicated that it does not contain RCRA metal constituents above the regulatory limits.

After blasting or sanding, High Teck 7800-1 Wipeout Surface Prep (flashpoint: -156°F) may be used on a disposable wipe to remove debris, depending on the project. Spent wipes used with this product generate a non hazardous waste when used as described. Spent wipes are managed as excluded solvent contaminated wipes and accumulated in a 55-gallon container in this area. The container was closed and properly labeled (Photo 14).

The facility uses Rival 3.5 VOC White (flashpoint: 20.5°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 if disposed of. Hempel products including 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) may be used if supplied by the customer. In addition to being a D001 hazardous waste, the Acrylithane 2.8 White may generate a D005 hazardous waste due to the barium. The facility has begun using Lumabase 2K Urethane Primer Gray (4-15% methyl ethyl ketone (MEK); flashpoint: 37°F) since the previous inspection. Excess primer generates a D001 and possibly a D035 hazardous waste if disposed of. 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 55-gallon container of spent paint and thinner accumulating at the time of inspection in the paint mixing room. The container was closed and properly labeled as “Hazardous Waste,” but was not marked with an indication of the hazards of the contents (Photo 15) [40 CFR 262.15(a)(5)(ii)]. The container was marked as “Ignitable,” but the “Toxic” hazard is also required. The facility generates approximately two 55-gallon drums of paint/thinner waste per month. Paint/thinner is managed as D001/D005/D006/D007/D008/D035/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 TCLP analysis of the tape has indicated that it does not contain RCRA metal constituents above the regulatory limits. However, since use of Lumabase 2K Urethane Primer Gray has been initiated since the analysis, additional analysis for MEK is required. The facility has not conducted and documented an adequate hazardous waste determination on the tape waste [40 CFR 262.11].

Two sets of paint booth filters are changed approximately every month. The paint booth filters are managed as non-hazardous waste and disposed of in the trash. Previous TCLP analysis of the tape has indicated that it does not contain RCRA metal, volatile and semi-constituents above the regulatory limits. However, since use of Lumabase 2K Urethane Primer Gray has been initiated since the analysis, additional analysis for MEK is required. The facility has not conducted and documented an adequate hazardous waste determination on the spent paint booth filters [40 CFR 262.11].

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) (Photo 16). 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 container of spent paint and thinner that is managed as D001/D005/D006/D007/D008/D035/F003/F005 hazardous waste, described above.

The facility previously operated a Uni-ram Solvent Recycler System to recycle spent paint thinner. The unit was no longer in use at the time of the inspection.

Grow Automotive Urethane Reducer or Finish Pro 5000 General Purpose (toluene 5-10; flashpoint 1°F) may be used on a wipe for cleanup. Wipes used with these products generate a F005 hazardous waste. The rags are managed as excluded solvent contaminated wipes and accumulated in the 55-gallon container described above.

Paint Shop CAA

The CAA is located in the Blasting and Paint Shop. There was no hazardous waste accumulating at the time of inspection.

There was some emergency equipment in the area, but there was no spill kit in close proximity to the CAA. The facility is reminded that in all areas that generate or accumulate hazardous waste must be equipped with fire extinguishers, spill control equipment and decontamination equipment.

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 florescent lamps generated by maintenance activities are managed as universal waste by Lamp Sales Unlimited, Inc. as needed. Universal waste lamps are stored in the Storage Room, described below.

Other wastes generated by facility maintenance activities are managed with the shop waste streams in each location.

Storage Room

This room is adjacent to the Loading Dock, described below, and is used to store universal waste lamps.

There were two boxes of universal waste lamps accumulating that were closed, properly labeled and dated.

There was one box of universal waste lamps that was closed, properly labeled, but not marked with an accumulation start date (Photo 17) [40 CFR 273.15(c)].

There were twelve boxes of universal waste lamps that were closed, but not properly labeled [40 CFR 273.14 (e)] and the facility was unable to demonstrate the length of time that the lamps had been accumulating (Photos 18, 19 & 20) [40 CFR 273.15(c)].

There was one box of universal waste lamps that was not closed [40 CFR 273.13(d)(1)] or properly labeled [40 CFR 273.14(e)], and the facility was unable to demonstrate the length of time that the lamps had been accumulating (Photo 21) [40 CFR 273.15(c)].

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.

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 (Photo 22). 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.

Used Filter Shed

This area is used to store used oil filters generated in some of the repair shops. There were two 330-gallon containers for used oil filter in this area that were properly labeled. There were no used oil filters accumulating at the time of the inspection.

There was one 200-gallon used oil tank accumulating in this area. The container was stored in secondary containment and was properly labeled.

There was one 30-gallon drum-top aerosol puncturing device in this area that was not closed [40 CFR 262.15(a)(4)] and was not properly labeled as “Hazardous Waste” [40 CFR 262.15(a)(5)(i)] or marked with an indication of the hazards of the contents (Photo 23) [40 CFR 262.15(a)(5)(ii)]. The area around the puncturing device was also covered with splashes [40 CFR 262.16(b)(8)(i)]. The facility is reminded that any spills or splashes should be cleaned up immediately. The device was closed during the inspection.

Record Review

The facility is currently a Small Quantity Generator of hazardous waste. A review of the facility’s records revealed that the facility’s generation rate is not consistent. The facility appears to have operated as a LQG of hazardous waste during the review period.

The facility is reminded that if hazardous waste is generated in excess of the SQG limit, it would be required to re-notify as a Large Quantity Generator (LQG) and comply with the LQG regulations, unless the activity meets the definition of an episodic event and is managed in accordance with 40 CFR 262 Subpart L.

The facility appears to have operated as a LQG in July of 2024, when 2,085 pounds of D039 hazardous waste, 300 pounds of D001/D006/D008/D018/D019/D035/D021/D035/D039/D040 hazardous waste and 2,800 pounds of D001/D005/D006/D007/D008/D035/F003/F005 hazardous waste was shipped off-site. The facility did not notify as a LQG of hazardous waste for this calendar month [62-730.150(2)(b), FAC].

The most recent hazardous waste disposal was on September 9, 2024, when 1,000 pounds of D001/D005/D006/D007/D008/D035/F003/F005 hazardous waste was shipped off-site. Waste is currently transported by Safety-Kleen Systems, Inc. (TXR 000 081 205) and is shipped to Clean Harbors Florida LLC (FLD 980 729 610).

Disposal records for used oil, used oil filters and spent antifreeze were requested but were not provided prior to

inspection report issuance. This is an Area of Concern. 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.

Excluded solvent contaminated wipes are laundered by Cintas weekly.

The current used oil registration was not posted [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 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.

2. The facility did not provide documentation of used oil acceptance and delivery records [40 CFR 279.46(a) & (b)].

3. The facility could not provide documentation of weekly inspections of the central accumulation area [40 CFR 262.16(b)(2)(iv); 40 CFR 262.17(a)(1)(v); 62-730.160(3), FAC].

4. 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); 40 CFR 262.256(a)].

5. The facility did not maintain the required hazardous waste training documentation [40 CFR 262.17(a)(7)(iv)]. The facility is reminded that training is required annually when operating as an LQG.

6. The facility did not prepare or submit a Contingency Plan [40 CFR 262.260(a)].

7. The facility did not prepare or submit a quick reference guide of the Contingency Plan [40 CFR 262.262(b)].

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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.
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Areas of Concern:
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1. The facility did not provide disposal records for used oil, used oil filters or spent antifreeze. The facility should provide disposal records for used oil, used oil filters and spent antifreeze.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	261.4(a)(26)(i)
Explanation:	Maintenance and Repair Shops: One 10-gallon step container in the Crane Shop and one 10-gallon step container in the Track Shop of Excluded Solvent Contaminated Wipes were not closed.
Corrective Action:	No further action is required, the facility returned to compliance via an email dated October 29, 2024.

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 Shops: Spent solvent from the Safety-Kleen Model 81 parts washer 2. Maintenance and Repair Shops: Spent solvent from the Safety-Kleen AQ-1 Aqueous Multi-Purpose Parts Washer 3. Maintenance and Repair Shops: Spent sludge from the Safety-Kleen Model 250 parts washers 4. Maintenance and Repair Shops: Spent solvent from the Crystal Clean Model 2725 Aqueous Combination Parts Cleaners 5. MCRC: Spent sludge from the Safety-Kleen Model 250 parts washers 6. Blasting and Paint Shop: Tape waste 7. Blasting and Paint Shop: Spent paint booth filters
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: Items 1-5: Toxicity Characteristic Leaching Procedure (TCLP) for: - RCRA metals, pursuant to 40 CFR 261.24, via method 6010; and - RCRA volatiles, pursuant to 40 CFR 261.24, via method 8260. Flashpoint, pursuant to 40 CFR 261.21, via methods 1010 or 1020. Items 6-7: TCLP for: - RCRA volatile MEK, pursuant to 40 CFR 261.24, via method 8260. Alternatively, the facility may provide generator knowledge determined to be adequate by DEP for the above wastestreams. 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. Further enforcement action is possible, pending the results of the analytical tests."

Type:	Violation
Rule:	262.15(a)(4)
Explanation:	Maintenance and Repair Shops: One 30-gallon aerosol puncturing device between the Heavy Equipment Shop and CAT Rental Shop one 15-gallon container of aerosol cans in the Track shop were not closed. Used Filter Shed: One 30-gallon aerosol puncturing device was not closed.
Corrective Action:	Regarding the containers in the Maintenance and Repair Shops: In order to return to compliance, the facility should close the containers. Regarding the container in the Used Filter Shed: No further action is required. The facility returned to compliance during the inspection.

Type:	Violation
Rule:	262.15(a)(5)(i)
Explanation:	Maintenance and Repair Shops: One 30-gallon aerosol puncturing device and one aerosol can of Loctite MR 5426 located between the Heavy Equipment Shop and CAT Rental Shop were not properly labeled with the words “Hazardous Waste." Fabrication and Welding Shop: One 15-gallon container of waste aerosol cans was not properly labeled with the words “Hazardous Waste." Used Filter Shed: One 30-gallon aerosol puncturing device was not properly labeled with the words “Hazardous Waste."
Corrective Action:	Regarding the containers in the Maintenance and Repair Shops: In order to return to compliance, the facility should label the containers as "Hazardous Waste." Regarding the containers in the Fabrication and Welding Shop and Used Filter Shed: No further action is required. The facility returned to compliance via an email dated October 29, 2024.

Type:	Violation
Rule:	262.15(a)(5)(ii)
Explanation:	Maintenance and Repair Shops: One 30-gallon aerosol puncturing device and one non-empty aerosol can of Loctite MR 5426 located between the Heavy Equipment Shop and CAT Rental Shop were not marked with an indication of the hazards of the contents. One 55-gallon aerosol puncturing device in the PSD Generator Shop, one 55-gallon aerosol puncturing device in the Air Compressor Shop and one 15-gallon container of aerosol cans in the Track Shop were not marked with an indication of the hazards of the contents. MCRC: One 30-gallon puncturing device was not marked with an indication of the hazards of the contents. Fabrication and Welding Shop: One 15-gallon container of aerosol cans was not marked with an indication of the hazards of the contents. Blasting and Painting Shop: One 55-gallon container of spent paint and thinner was not marked with an indication of the hazards of the contents. Used Filter Shed: One 30-gallon aerosol puncturing device was not marked with an indication of the hazards of the contents.
Corrective Action:	Regarding the containers in the Heavy Equipment Shop/CAT Rental Shop, Track Shop and Blasting and Paint Shop: In order to return to compliance, the facility should mark the containers with an indication of the hazards of the contents. Regarding the containers in the PSD Generator Shop, Air Compressor Shop, MCRC, Fabrication and Welding Shop and Used Filter Shed: No further action is required. The facility returned to compliance via an email date October 29, 2024.

Type:	Violation
Rule:	262.16(b)(2)(iv), 262.17(a)(1)(v), 62-730.160(3)
Explanation:	The facility could not provide documentation of weekly inspections of the central accumulation area.
Corrective Action:	In order to return to compliance, the facility should conduct and document weekly inspections of central accumulation areas. The records must include the date and time of the inspection, the legibly printed name of the inspector, the number of hazardous waste containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Type:	Violation
Rule:	262.16(b)(8)(i)
Explanation:	Maintenance and Repair Shops: The area surrounding the aerosol puncturing device located between the Heavy Equipment Shop and CAT Rental Shop was covered in splashes that had not been cleaned up. Used Filter Shed: The area surrounding the aerosol puncturing device was covered in splashes that had not been cleaned up.
Corrective Action:	Regarding the Maintenance and Repair Shops: In order to return to compliance, the facility should ensure that all spills/splashes are cleaned up and that spill cleanup material is containerized and properly managed immediately. Regarding the Used Filter Shed: No further action is required. The facility returned to compliance via an email dated October 29, 2024.

Type:	Violation
Rule:	262.16(b)(8)(vi)(A), 262.256(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:	262.17(a)(7)(iv)
Explanation:	The facility did not maintain the required hazardous waste training documentation.
Corrective Action:	No further action is required. The facility returned to SQG status, but is reminded to maintain the following training documentation prior to operating as an LQG in the future: 1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; 2. A written job description for each position listed under 40 CFR 262.17(a)(7)(iv)(A). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; 3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under 40 CFR 262.17(a)(7)(iv)(A); 4. Records that document that the training or job experience, required under 40 CFR 262.17(a)(7)(i), (ii), and (iii), has been given to, and completed by, facility personnel.

Type:	Violation
Rule:	262.260(a)
Explanation:	The facility did not prepare or submit a Contingency Plan.
Corrective Action:	No further action is required. The facility returned to SQG status, but is reminded to prepare and submit a Contingency Plan that includes all of the elements required under 40 CFR 262.262 prior to operating as a LQG in the future.

Type:	Violation
Rule:	262.262(b)
Explanation:	The facility did not prepare or submit a quick reference guide of the Contingency Plan.
Corrective Action:	No further action is required. The facility returned to SQG status, but is reminded to prepare a quick reference guide that includes the following elements prior to operating as a LQG in the future: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7 /24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator. The facility is reminded that it must submit the quick reference guide to the local emergency responders identified in 40 CFR 262.262(a) or, as appropriate, the Local Emergency Planning Committee.

Type:	Violation
Rule:	273.13(d)(1)
Explanation:	Storage Room: One box of universal waste lamps was not stored in a closed container.
Corrective Action:	No further action is required. The facility returned to compliance via an email dated November 26, 2024.

Type:	Violation
Rule:	273.14(e)
Explanation:	Storage Room: Thirteen boxes of universal waste lamps were not properly labeled as "Universal Waste-Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)."
Corrective Action:	No further action is required. The facility returned to compliance via an email dated November 26, 2024.

Type:	Violation
Rule:	273.15(c)
Explanation:	Storage Room: The facility was unable to demonstrate the length of time that fourteen boxes of universal waste lamps had been accumulating.
Corrective Action:	No further action is required. The facility returned to compliance via an email dated November 26, 2024.

Type:	Violation
Rule:	279.22(c)(1)
Explanation:	Maintenance and Repair Shops: One 15-gallon container of used oil in the Heavy Equipment Shop was not properly labeled with the words "Used Oil."
Corrective Action:	No further action is required. The facility returned to compliance via an email dated October 29, 2024.

Type:	Violation
Rule:	279.46(a), 279.46(b)
Explanation:	The facility could not provide documentation of used oil acceptance and delivery records.
Corrective Action:	In order to return to compliance, the facility should provide documentation of used oil acceptance records that include: (1) The name and address of the generator, transporter, or processor/re-refiner who provided the used oil for transport; (2) The EPA identification number (if applicable) of the generator, transporter, or processor/re-refiner who provided the used oil for transport; (3) The quantity of used oil accepted; (4) The date of acceptance; and (5) the signature, dated upon receipt of the used oil, of a representative of the generator, transporter, or processor/re-refiner who provided the used oil for transport. The facility should provide documentation of used oil delivery records that include: (1) The name and address of the receiving facility or transporter; (2) The EPA identification number of the receiving facility or transporter; (3) The quantity of used oil delivered; (4) The date of delivery; (5) the signature, dated upon receipt of the used oil, of a representative of the receiving facility or transporter.

Type:	Violation
Rule:	62-710.500(4)
Explanation:	The current used oil registration was not posted.
Corrective Action:	No further action is required. The facility returned to compliance via an email dated October 29, 2024.

Type:	Violation
Rule:	62-730.150(2)(b)
Explanation:	The facility did not notify as a LQG of hazardous waste in July of 2024 when the facility appeared to operate as a LQG and did not re-notify of its return to SQG status.
Corrective Action:	In order to return to compliance, the facility should submit an 8700-12 FL form and confirm its current SQG status. The facility is reminded to properly notify of all changes in generator status in the future.

PHOTO ATTACHMENTS:

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

Photo 9

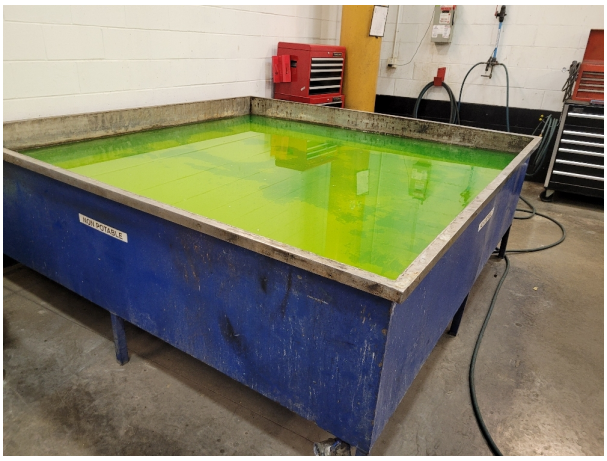

Photo 10

Photo 11

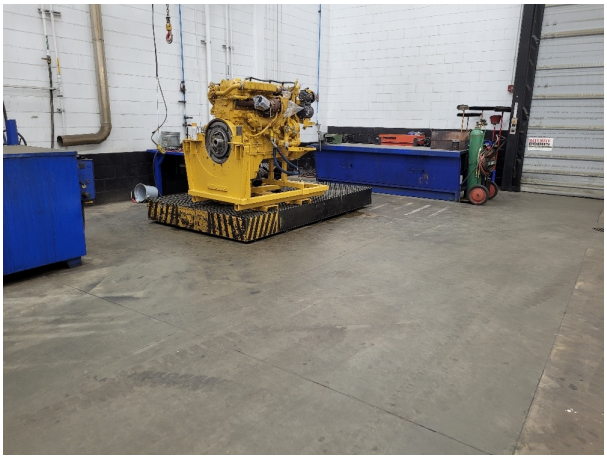

Photo 12

Photo 13

Photo 14

Photo 15

Photo 16

Photo 17

Photo 18

Photo 19

Photo 20

Photo 21

Photo 22

Photo 23

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	Inspector
Principal Investigator Name	**Principal Investigator Title**
E. Sacchitello	DEP / 12/03/2024
Principal Investigator Signature	**Organization** / **Date**

Chris Green	Heavy Equipment Service Manager
Representative Name	**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: Emma L Sacchitello **Inspection Approval Date:** 12/03/2024