

**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Branden Hawkins](#); [Butch Peterson](#); [Travis Anders](#)  
**Subject:** RE: Notification of Hazardous Waste Activity - Used Batteries Tracking System  
**Date:** Friday, January 31, 2025 6:02:08 AM  
**Attachments:** [image005.png](#)  
[image007.png](#)  
[SOP - Used Battery Return-Handling-Storage-Removal.pdf](#)

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**EXTERNAL MESSAGE**

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Good morning David:

Attached is our SOP for Used Battery Return, Handling, Storage, and Removal. Reference page 2 "Employees" section (snapshot below):

**Employees:**

- **Parts Warehouse Personnel**
  - Maintain open pathway to used battery collection/storage area(s)
  - Help in the unloading, handling, and stacking of batteries, as needed
  - Maintain labeling at used battery collection/storage area(s); Minimum labeling shall include:
    - "UNIVERSAL WASTE – BATTERIES"
    - "COLLECTION START DATE: \_\_\_\_\_"
  - Storage of batteries shall not exceed 1-year from the collection start date posted
  - Inspect used battery storage area(s) for signs of damaged batteries, damaged secondary containment, leaking batteries, etc.
  - Assist in neutralizing spilled acidic contents from batteries that have become damaged and/or have leaked while in storage
  - Ask for assistance when lifting batteries if weight exceeds 50lbs.
    - Assistance in lifting/lowering is required when weight of batteries exceeds 70lbs.
  - Ensure adherence to contractor and regulatory procedures of all used batteries and used battery storage area(s)

Pages following the above include safety/spill precautions, packaging and shipping. Deka/East Penn is our vendor that picks up the batteries from our RPC facilities. The count the batteries on each pallet and provide us an acceptance receipt.

This should complete the submission of all requested documents for compliance.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)

(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <David.Petti@FloridaDEP.gov>  
**Sent:** Monday, January 27, 2025 8:53 AM  
**To:** David Harriman <David.Harriman@ringpower.com>  
**Subject:** RE: Notification of Hazardous Waste Activity

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David

Provide the used oil acceptance records for January 23, 2022, January 23, 2023 and January 23, 2024

Describe the tracking system you have put in place to track time on site for used battery's

Training documentation still outstanding

Modified contingency plan posted still outstanding

Provide the outstanding items by the end of the week, We need to wrap this up



**David Petti**  
**Environmental Specialist III/ Ecologist**  
Florida Department of Environmental Protection  
Southwest District - Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Butch Peterson](#)  
**Subject:** FW: Notification of Hazardous Waste Activity - UMO Transportation Documents  
**Date:** Wednesday, January 29, 2025 10:15:13 AM  
**Attachments:** [image004.png](#)  
[1573781.pdf](#)  
[1573738.pdf](#)  
[1573737.pdf](#)  
[1573537.pdf](#)  
[AA34088.pdf](#)

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**EXTERNAL MESSAGE**

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David:

Attached are the UMO transportation documents. Please direct any questions to Travis. Thank you.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Travis Anders <Travis.Anders@RingPower.Com>  
**Sent:** Wednesday, January 29, 2025 9:00 AM  
**To:** David Harriman <David.Harriman@ringpower.com>  
**Subject:** Re: Notification of Hazardous Waste Activity - Emergency Equipment Map (Posting)

David the first date in 22 is on a Sunday. We usually do not work on Sunday.

*Travis Anders*

*Sarasota Ring Power Service Manager/Ambassador*

[Travis.Anders@ringpower.com](mailto:Travis.Anders@ringpower.com)

Office: (941)359-6058

Cell : (941)650-5212

Fax : (941)359-6001

---

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Monday, January 27, 2025 8:53 AM  
**To:** David Harriman <[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)>  
**Subject:** RE: Notification of Hazardous Waste Activity

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Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Branden Hawkins](#); [Butch Peterson](#); [Travis Anders](#)  
**Subject:** RE: Notification of Hazardous Waste Activity - HAZ Waste/Manifest Training  
**Date:** Wednesday, January 29, 2025 9:39:43 AM  
**Attachments:** [image002.png](#)  
[image004.png](#)  
[HAZ Waste Handling \(Training Signature Sheet\).pdf](#)  
[HAZ Manifest Signatory \(Training Signature Sheet\).pdf](#)  
[1-Introduction to Manifests.pdf](#)  
[1-Management of Hazardous Waste.pdf](#)

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Good morning David, the following documents are attached:

- HAZ Waste Management PP Training
- HAZ Waste Handling (Training Signature Sheet)
- HAZ Manifest Signature Requirements PP Training
- HAZ Manifest Signatory (Training Signature Sheet)

Travis will be working on compiling the requested UMO transportation documents and I will submit the SOP and protocol for monitoring the Used Batteries Universal Waste.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

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**From:** David Harriman <David.Harriman@ringpower.com>  
**Sent:** Monday, January 27, 2025 3:08 PM  
**To:** Petti, David <David.Petti@FloridaDEP.gov>  
**Cc:** Branden Hawkins <Branden.Hawkins@ringpower.com>; Butch Peterson <Butch.Peterson@RingPower.com>; Travis Anders <Travis.Anders@RingPower.com>  
**Subject:** RE: Notification of Hazardous Waste Activity - Emergency Equipment Map (Posting)

Attached are pictures of the posted Emergency Equipment Location Maps.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
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[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

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[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



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Just an FYI, one response back.

Respectfully,

**David R. Harriman II, CES**  
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[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

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**From:** Brian Hodges <[bhodes@smfr.com](mailto:bhodes@smfr.com)>  
**Sent:** Wednesday, January 22, 2025 7:08 AM  
**To:** David Harriman <[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)>  
**Subject:** RE: Notification of Hazardous Waste Activity

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Mr. Harriman,  
Thank you for providing this information. I will pass it along to our Hazardous materials team leader for planning and tactical measures.

**Brian Hodges**  
Fire Training Officer  
Southern Manatee Fire Rescue  
[2451 Trailmate Dr](#)  
[Sarasota, FL 34243](#)  
941-720-7620  
**"Pride Through Performance"**



---

**From:** David Harriman <[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)>

**Sent:** Tuesday, January 21, 2025 7:50 AM

**To:** Brian Hodges <[bhodes@smfr.com](mailto:bhodes@smfr.com)>; [Info@SarasotaPD.org](mailto:Info@SarasotaPD.org); [Info@SMH.com](mailto:Info@SMH.com); [Info@scgov.net](mailto:Info@scgov.net)

**Cc:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>; Branden Hawkins <[Branden.Hawkins@ringpower.com](mailto:Branden.Hawkins@ringpower.com)>

**Subject:** Notification of Hazardous Waste Activity

In accordance with 40 CFR 262.16(b)(8)(vi), Small Quantity Generators (SQGs) of hazardous waste are required to contact the local municipal services and our contractors; letter is attached (snapshot below).

**Ring Power®**



500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-1237

January 21, 2025

Fire Dept.  
7611 Prospect Rd.  
Sarasota, FL 34243  
[Info@smfr.com](mailto:Info@smfr.com)

Police Dept.  
2099 Adams Ln.  
Sarasota, FL 34237  
[Info@SarasotaPD.org](mailto:Info@SarasotaPD.org)

Sarasota Memorial Hospital  
1700 S. Tamiami Trail  
Sarasota, FL 34239  
[Info@SMH.com](mailto:Info@SMH.com)

Sarasota County  
Emergency Management  
6040 Porter Way  
Sarasota, FL 34232  
[Info@scgov.net](mailto:Info@scgov.net)

To Whom It May Concern:

Re: Notification of Hazardous Waste Activity

In accordance with 40 CFR 262.16(b)(8)(vi), Small Quantity Generators (SQGs) of hazardous waste are required to contact the local hospital, emergency response teams, police and fire departments for emergency planning purposes. We are notifying you that our business (construction equipment servicing) generates hazardous waste. In the unfortunate event of an emergency that we may require your assistance. The property location is:

**Ring Power Corporation  
7500 26<sup>th</sup> Ct East  
Sarasota, FL 34243**

The resultant hazardous wastes generated, and the quantities typically observed at our site include:

- **Aerosol Liquid Waste\***  
Not more than (NMT) 30 gallons total onsite
  - **Used Diesel\*** contaminated with water (NMT 10% water)  
NMT 120 gallons (usually contained in 55-gallon containers and/or 320-gallon totes)
- NOTE: Waste Diesel is typically removed from site within 7-10 days  
\*Typical Waste Profile attached

Attached is a site diagram showing the facility layout including locations where hazardous wastes are managed. Personnel are typically located throughout the facility, to include all shop buildings, offices and exterior laydown areas. Potential injuries could range from mild to 3<sup>rd</sup> degree burns, dismemberment, exposure to toxic chemicals (as a result of a security threat/terrorism, spill/discharge, fire, explosion),

Our effort is to mitigate or eliminate possible unfortunate events by properly managing our hazardous wastes. However, in the unfortunate event of an emergency we may require your assistance. Please let us know if you need additional information; you may contact me at (813) 638-9332 or [David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com) if you wish to schedule a site visit for planning purposes. Thank you for your time and attention concerning this matter.

Respectfully,

David R. Harriman II, CES  
Corporate Environmental Manager

cc: [Brandon.Hawkings@RingPower.com](mailto:Brandon.Hawkings@RingPower.com); [David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

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[Environmental@RingPower.com](mailto:Environmental@RingPower.com)



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Branden Hawkins](#); [Butch Peterson](#); [Travis Anders](#)  
**Subject:** RE: Notification of Hazardous Waste Activity - Emergency Equipment Map (Posting)  
**Date:** Monday, January 27, 2025 3:08:42 PM  
**Attachments:** [image004.png](#)  
[image006.png](#)

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Attached are pictures of the posted Emergency Equipment Location Maps.

Respectfully,

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Environmental Manager

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[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

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**Subject:** RE: Notification of Hazardous Waste Activity

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David

Provide the used oil acceptance records for January 23, 2022, January 23, 2023 and January 23, 2024

Describe the tracking system you have put in place to track time on site for used battery's

Training documentation still outstanding

Modified contingency plan posted still outstanding

Provide the outstanding items by the end of the week, We need to wrap this up



**David Petti**

**Environmental Specialist III / Ecologist**  
Florida Department of Environmental Protection  
Southwest District – Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



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Just an FYI, one response back.

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St. Augustine, FL 32092  
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[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
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**To:** David Harriman <[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)>  
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Mr. Harriman,

Thank you for providing this information. I will pass it along to our Hazardous materials team leader for planning and tactical measures.

**Brian Hodges**

Fire Training Officer

Southern Manatee Fire Rescue

2451 Trailmate Dr

Sarasota, FL 34243

941-720-7620

*"Pride Through Performance"*



---

**From:** David Harriman <[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)>

**Sent:** Tuesday, January 21, 2025 7:50 AM

**To:** Brian Hodges <[bhodes@smfr.com](mailto:bhodes@smfr.com)>; [Info@SarasotaPD.org](mailto:Info@SarasotaPD.org); [Info@SMH.com](mailto:Info@SMH.com); [Info@scgov.net](mailto:Info@scgov.net)

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**Ring Power®**



500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-1237

January 21, 2025

Fire Dept.  
7611 Prospect Rd.  
Sarasota, FL 34243  
[Info@smfr.com](mailto:Info@smfr.com)

Police Dept.  
2099 Adams Ln.  
Sarasota, FL 34237  
[Info@SarasotaPD.org](mailto:Info@SarasotaPD.org)

Sarasota Memorial Hospital  
1700 S. Tamiami Trail  
Sarasota, FL 34239  
[Info@SMH.com](mailto:Info@SMH.com)

Sarasota County  
Emergency Management  
6040 Porter Way  
Sarasota, FL 34232  
[Info@scgov.net](mailto:Info@scgov.net)

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Respectfully,

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Corporate Environmental Manager

cc: [Brandon.Hawkings@RingPower.com](mailto:Brandon.Hawkings@RingPower.com); [David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)

Respectfully,

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Environmental Manager

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**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Subject:** RE: Notification of Hazardous Waste Activity  
**Date:** Monday, January 27, 2025 8:59:13 AM  
**Attachments:** [image004.png](#)  
[image006.png](#)

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**EXTERNAL MESSAGE**

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Good morning:

I'm heading to Sarasota today (traveling from Daytona) to complete the training. I should have the other noted items completed this week as well. Thanks for the updates.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

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Temple Terrace, FL 33637

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Fire Training Officer

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**"Pride Through Performance"**



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**Sent:** Tuesday, January 21, 2025 7:50 AM

**To:** Brian Hodges <[bhodes@smfr.com](mailto:bhodes@smfr.com)>; [Info@SarasotaPD.org](mailto:Info@SarasotaPD.org); [Info@SMH.com](mailto:Info@SMH.com); [Info@scgov.net](mailto:Info@scgov.net)

**Cc:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>; Branden Hawkins <[Branden.Hawkins@ringpower.com](mailto:Branden.Hawkins@ringpower.com)>

**Subject:** Notification of Hazardous Waste Activity

In accordance with 40 CFR 262.16(b)(8)(vi), Small Quantity Generators (SQGs) of hazardous waste are required to contact the local municipal services and our contractors; letter is attached (snapshot below).

**Ring Power®**



500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-1237

January 21, 2025

Fire Dept.  
7611 Prospect Rd.  
Sarasota, FL 34243  
[Info@smfr.com](mailto:Info@smfr.com)

Police Dept.  
2099 Adams Ln.  
Sarasota, FL 34237  
[Info@SarasotaPD.org](mailto:Info@SarasotaPD.org)

Sarasota Memorial Hospital  
1700 S. Tamiami Trail  
Sarasota, FL 34239  
[Info@SMH.com](mailto:Info@SMH.com)

Sarasota County  
Emergency Management  
6040 Porter Way  
Sarasota, FL 34232  
[Info@scgov.net](mailto:Info@scgov.net)

To Whom It May Concern:

Re: Notification of Hazardous Waste Activity

In accordance with 40 CFR 262.16(b)(8)(vi), Small Quantity Generators (SQGs) of hazardous waste are required to contact the local hospital, emergency response teams, police and fire departments for emergency planning purposes. We are notifying you that our business (construction equipment servicing) generates hazardous waste. In the unfortunate event of an emergency that we may require your assistance. The property location is:

**Ring Power Corporation  
7500 26<sup>th</sup> Ct East  
Sarasota, FL 34243**

The resultant hazardous wastes generated, and the quantities typically observed at our site include:

- **Aerosol Liquid Waste\***  
Not more than (NMT) 30 gallons total onsite
  - **Used Diesel\*** contaminated with water (NMT 10% water)  
NMT 120 gallons (usually contained in 55-gallon containers and/or 320-gallon totes)
- NOTE: Waste Diesel is typically removed from site within 7-10 days  
\*Typical Waste Profile attached

Attached is a site diagram showing the facility layout including locations where hazardous wastes are managed. Personnel are typically located throughout the facility, to include all shop buildings, offices and exterior laydown areas. Potential injuries could range from mild to 3<sup>rd</sup> degree burns, dismemberment, exposure to toxic chemicals (as a result of a security threat/terrorism, spill/discharge, fire, explosion),

Our effort is to mitigate or eliminate possible unfortunate events by properly managing our hazardous wastes. However, in the unfortunate event of an emergency we may require your assistance. Please let us know if you need additional information; you may contact me at (813) 638-9332 or [David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com) if you wish to schedule a site visit for planning purposes. Thank you for your time and attention concerning this matter.

Respectfully,

David R. Harriman II, CES  
Corporate Environmental Manager

cc: [Brandon.Hawkings@RingPower.com](mailto:Brandon.Hawkings@RingPower.com); [David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Subject:** FW: Notification of Hazardous Waste Activity  
**Date:** Wednesday, January 22, 2025 8:27:15 AM  
**Attachments:** [image003.png](#)

---

**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Just an FYI, one response back.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Brian Hodges <bhodges@smfr.com>  
**Sent:** Wednesday, January 22, 2025 7:08 AM  
**To:** David Harriman <David.Harriman@ringpower.com>  
**Subject:** RE: Notification of Hazardous Waste Activity

CAUTION [EXTERNAL]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Harriman,  
Thank you for providing this information. I will pass it along to our Hazardous materials team leader for planning and tactical measures.

**Brian Hodges**  
Fire Training Officer  
Southern Manatee Fire Rescue  
[2451 Trailmate Dr](#)  
[Sarasota, FL 34243](#)  
941-720-7620  
**"Pride Through Performance"**



---

**From:** David Harriman <[David.Harriman@ringpower.com](mailto:David.Harriman@ringpower.com)>

**Sent:** Tuesday, January 21, 2025 7:50 AM

**To:** Brian Hodges <[bhodes@smfr.com](mailto:bhodes@smfr.com)>; [Info@SarasotaPD.org](mailto:Info@SarasotaPD.org); [Info@SMH.com](mailto:Info@SMH.com); [Info@scgov.net](mailto:Info@scgov.net)

**Cc:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>; Branden Hawkins <[Branden.Hawkins@ringpower.com](mailto:Branden.Hawkins@ringpower.com)>

**Subject:** Notification of Hazardous Waste Activity

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January 21, 2025

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Respectfully,

David R. Harriman II, CES  
Corporate Environmental Manager

cc: [Brandon.Hawkings@RingPower.com](mailto:Brandon.Hawkings@RingPower.com); [David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

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[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** [David Harriman](#)  
**To:** [Toby.Collard@Crystal-Clean.com](#); [ed.fries@safety-kleen.com](#); [Jason Huffman](#); [Guardian Fueling Technologies - Tony](#)  
**Cc:** [Petti, David](#); [Branden Hawkins](#)  
**Subject:** Notification of Hazardous Waste Activities  
**Date:** Tuesday, January 21, 2025 8:23:16 AM  
**Attachments:** [image001.png](#)  
[Location Map - Emergency Equipment-Flammables.pdf](#)  
[Notification of Hazardous Waste Activity - Sarasota \(Contractors\).pdf](#)

---

**EXTERNAL MESSAGE**

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(904) 494-1237

January 21, 2025

Emergency Response Contractor  
A-C-T  
[Jason.Huffman@  
a-c-t.com](mailto:Jason.Huffman@a-c-t.com)

Equipment Supplier  
Safety-Kleen  
[Ed.Fries@  
safety-kleen.com](mailto:Ed.Fries@safety-kleen.com)

Equipment Supplier  
Guardian Fueling  
[TRichardson@  
GuardianFuelTech.com](mailto:TRichardson@GuardianFuelTech.com)

Equipment Supplier  
Crystal Clean  
[Toby.Collard@  
Crystal-Clean.com](mailto:Toby.Collard@Crystal-Clean.com)

**Re: Notification of Hazardous Waste Activity**

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cc: [Brandon.Hawkings@RingPower.com](mailto:Brandon.Hawkings@RingPower.com); [David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)

Respectfully,

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[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** [David Harriman](#)  
**To:** [Info@smfr.com](#); [Info@SarasotaPD.org](#); [Info@SMH.com](#); [Info@scgov.net](#)  
**Cc:** [Petti, David](#); [Branden Hawkins](#)  
**Subject:** Notification of Hazardous Waste Activity  
**Date:** Tuesday, January 21, 2025 7:51:06 AM  
**Attachments:** [image001.png](#)  
[Location Map - Emergency Equipment-Flammables.pdf](#)

---

**EXTERNAL MESSAGE**

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January 21, 2025

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Corporate Environmental Manager

cc: [Brandon.Hawkings@RingPower.com](mailto:Brandon.Hawkings@RingPower.com); [David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)

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Environmental Manager

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[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Subject:** FW: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Monday, January 20, 2025 9:45:52 AM  
**Attachments:** [image002.png](#)  
[1588388.pdf](#)  
[1588078.pdf](#)

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**EXTERNAL MESSAGE**

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Good morning David:

I meant to include Travis's note on the UMO transportation. He said that the Sarasota site does 3-5 PMs per night. Hence, we could generate paperwork for a couple hundred UMP pickups/transport in a month. The couple documents attached are just an indication of the data we collect on each pickup. Would you like to come back in and review our database? I could send more on particular dates, trucks, clients. Else it would be quite exhaustive of downloading even a year's worth of records. Either way, we will make it happen.

I should have the map for the emergency equipment to you by today, and the contacts for municipal services (Fired Dept, Police, Hospital, Emergency Mgmt).

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** David Harriman <David.Harriman@RingPower.com>  
**Sent:** Friday, January 17, 2025 10:44 AM  
**To:** Petti, David <David.Petti@FloridaDEP.gov>

**Cc:** Travis Anders <Travis.Anders@RingPower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>; Branden Hawkins <Branden.Hawkins@ringpower.com>; Mark Carter <Mark.Carter@RingPower.com>; Butch Peterson <Butch.Peterson@RingPower.com>  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024

Mr. Petti:

- Pictures attached of the boxed batteries (and shipping doc) that were shipped out (with the CAUTION label attached).
- Documents attached for UMO transported over the road. Note: most of the oil changes are conducted at the Ring Power facility. Also, the amount shipped is far below 55-gallons, but the PM trucks have 200-gallon tank capacity.

I will continue working on the other remaining non-conformances that we discussed.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

## UNIVERSAL WASTE BATTERIES

### 40 CFR 273.14 Labeling/marking

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases:

“Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

## HAZARDOUS WASTE

### Manifest

#### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

- (i) The words "Hazardous Waste" and
- (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action- Properly label your paint waste container as required above and send me photo documentation.**

## Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

## USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action-Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**

**Environmental Specialist III / Ecologist**

Florida Department of Environmental Protection

Southwest District - Temple Terrace

13051 N. Telecom Pkwy, #101

Temple Terrace, FL 33637

[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)

Office: 813.470.5748



| |



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#); [Branden Hawkins](#); [Mark Carter](#); [Butch Peterson](#)  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Friday, January 17, 2025 10:46:18 AM  
**Attachments:** [image002.png](#)  
[1588388.pdf](#)  
[1588078.pdf](#)

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St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

## UNIVERSAL WASTE BATTERIES

### 40 CFR 273.14 Labeling/marking

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases:

“Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

## HAZARDOUS WASTE

### Manifest

#### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest**

**from 8/2024 that was missing from your files**

40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

(A) The name and emergency telephone number of the emergency coordinator;

(B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and

(C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

(i) The words “Hazardous Waste” and

(ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action-Properly label your paint waste container as required above and send me photo documentation.**

#### Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

#### USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action-Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be

labeled “Used Oil Filters”

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**

**Environmental Specialist III/ Ecologist**

Florida Department of Environmental Protection

Southwest District - Temple Terrace

13051 N. Telecom Pkwy, #101

Temple Terrace, FL 33637

[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)

Office: 813.470.5748



| |



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#); [Branden Hawkins](#); [Mark Carter](#); [Butch Peterson](#)  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Monday, December 30, 2024 6:13:17 AM  
**Attachments:** [image002.png](#)

---

**EXTERNAL MESSAGE**

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Thank you. We are working on the map and the Emergency Spill Coordinator contact info will be on the map. Travis collated the UMO transportation documents; after I review them I will submit them.

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <David.Petti@FloridaDEP.gov>  
**Sent:** Friday, December 27, 2024 10:08 AM  
**To:** David Harriman <David.Harriman@RingPower.com>  
**Cc:** Travis Anders <travis.anders@ringpower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>; Branden Hawkins <Branden.Hawkins@ringpower.com>; Mark Carter <Mark.Carter@RingPower.com>; Butch Peterson <Butch.Peterson@RingPower.com>  
**Subject:** FW: Department hazardous waste inspection (Sarasota) 12/11/2024

**CAUTION [EXTERNAL]:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The only thing lacking on your posting of the ?Emergency Coordinator and fire Dept number is the location of emergency equipment. This can be done on a map or a list

Dave

---

**From:** Petti, David  
**Sent:** Friday, December 27, 2024 8:59 AM  
**To:** David Harriman <David.Harriman@RingPower.com>  
**Cc:** Travis Anders <travis.anders@ringpower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>; [Branden.Hawkins@ringpower.com](#); [Mark.Carter@RingPower.com](#); [Butch.Peterson@RingPower.com](#)  
**Subject:** FW: Department hazardous waste inspection (Sarasota) 12/11/2024

David

Also I am seeing in my notes, sorry for not asking for this sooner, Travis said he needed to find used oil acceptance records. These are records of used oil that you guys pick up.

Thanks

Dave

---

**From:** Petti, David  
**Sent:** Friday, December 27, 2024 8:52 AM  
**To:** David Harriman <David.Harriman@ringpower.com>  
**Cc:** Travis Anders <Travis.Anders@RingPower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>; Branden Hawkins <Branden.Hawkins@ringpower.com>; Mark Carter <Mark.Carter@RingPower.com>; Butch Peterson <Butch.Peterson@RingPower.com>  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024

David

This battery pallet photo is not of the boxes of batteries that I photographed during the inspection I need photos of those boxes properly labeled as "used batteries" with an accumulation start date. See photo attached for reference

Dave

**From:** David Harriman <David.Harriman@ringpower.com>  
**Sent:** Thursday, December 26, 2024 2:37 PM  
**To:** Petti, David <David.Petti@FloridaDEP.gov>  
**Cc:** Travis Anders <Travis.Anders@RingPower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>; Branden Hawkins <Branden.Hawkins@ringpower.com>; Mark Carter <Mark.Carter@RingPower.com>; Butch Peterson <Butch.Peterson@RingPower.com>  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024

**EXTERNAL MESSAGE**

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Completed Line Items:

**Line Item 1:** Used Batteries Packaged with labeling and shipping document (picture attached)

**Line Item 4:** Emergency Spill Response Coordinators posted

**Line Item 11:** UMO Registration posted

Sarasota DEP HAZ Waste Inspection			12/11/2024
Line Item	Status	Non-Conformance Description	Resolution
1	COMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification <b>12/26/2024:</b> Packaged batteries with label and shipping document
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	COMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	COMPLETE	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action-Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
10a	IN WORK	Provide halogen sampling records from Safety-Kleen	<b>12/26/2024:</b> Line Item added
10b	IN WORK	Provide name of Safety-Kleen testing equipment (halogens)	<b>12/26/2024:</b> Line Item added
10c	COMPLETE	Provide shipping documentation for UMO pickup	<b>12/26/2024:</b> Line Item added

11	COMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility 12/26/2024: Current document posted
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14	COMPLETE	Describe Spill Control and Decon equipment	12/26/2024: Follow-up Questions added
15	COMPLETE	How often is emergency equipment tested	12/26/2024: Follow-up Questions added
16	COMPLETE	Does RPC sell parts to the general public	12/26/2024: Follow-up Questions added
17			
18			
19			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>

**Sent:** Thursday, December 26, 2024 12:36 PM

**To:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>

**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>; Branden Hawkins <[Branden.Hawkins@ringpower.com](mailto:Branden.Hawkins@ringpower.com)>; Mark Carter <[Mark.Carter@RingPower.com](mailto:Mark.Carter@RingPower.com)>; Butch Peterson <[Butch.Peterson@RingPower.com](mailto:Butch.Peterson@RingPower.com)>

**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024

- Line Item 3 Complete, HAZ Waste Shipping Manifest (attached)
- Line Items 10a, 10b and 10c added
- Line Item 10c complete (2024 UMO shipping documents attached)
- Line Items 14, 15 and 16 added and completed (follow-up questions below):

Follow-up Questions (responses highlighted):

- Describe spill control and Decon equipment  
There are Spill Kits at both the Bulk Fuel and Oil (New & Used) tanks; also throughout the shop work areas, there are boxes of PIG matts to contain small quantity spills due to servicing of equipment
- How often is emergency equipment tested?  
Annual Operability Testing is completed on bulk tanks (over 550-gal) and monthly tank inspections check the Overfill/high level alarms and the interstitial on the UMO bulk tanks; daily tank levels are electronically observed by purchasing/Environmental groups
- Does RP also sell parts to the general public.  
Yes, ring power sells parts due to servicing of equipment needs as well as the general public purchasing parts through our Parts Department.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-mainfest system.  
Manifest attached

Updated as of 12/26/2024

**Sarasota DEP HAZ Waste Inspection**

**12/11/2024**

Line Item	Status	Non-Conformance Description	Resolution
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1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	COMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action- Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
10a	INCOMPLETE	Provide halogen sampling records from Safety-Kleen	12/26/2024: Line Item added
10b	INCOMPLETE	Provide name of Safety-Kleen testing equipment (halogens)	12/26/2024: Line Item added
10c	COMPLETE	Provide shipping documentation for UMO pickup	12/26/2024: Line Item added
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14	COMPLETE	Describe Spill Control and Decon equipment	12/26/2024: Follow-up Questions added
15	COMPLETE	How often is emergency equipment tested	12/26/2024: Follow-up Questions added
16	COMPLETE	Does RPC sell parts to the general public	12/26/2024: Follow-up Questions added
17			
18			
19			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation

500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 26, 2024 8:47 AM  
**To:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

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David

Regarding the halogen testing its fine that SK is performing this test, however, records of these tests are required to be available at the facility during inspection.

Provide me with three years of presumptive rebuttal records along with the corresponding used oil pickup receipt. Also, provide me with the name of the testing equipment used.

Follow up questions:

- Describe spill control and Decon equipment
- How often is emergency equipment tested?
- Does RP also sell parts to the general public.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-manifest system.

Please provide timely responses to my follow-up questions as I need the answers to complete my report which is due tomorrow at close of business.

Regards,

Dave

**From:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Sent:** Friday, December 20, 2024 3:04 PM  
**To:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

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Line Items that are completed are attached and are indicated below, slow but it’s a start.

Attachments:

- **Line Item 6:** As stated/requested, FD phone number is posted  
NOTE: this does not take the place of Line Item 7 for making contact with the emergency municipal services
- **Line Item 8:** Aerosol Recover System with proper labeling (HAZARDOUS WASTE – IGNITABLE – TOXIC)  
(NOTE: stencil or decal will be applied)
- **Line Item 10:** UMO Halogen Determination
- **Line Item 12:** Storage container for UMO-Filters
- **Line Item 13:** Container for Cintas (used shop rags to be laundered)

Sarasota DEP HAZ Waste Inspection 12/11/2024

Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”	Correctly label batteries, submit photo verification

		<ul style="list-style-type: none"> <li>• Discussion &amp; Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.</li> </ul>	
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	INCOMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action-Propriety label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14			
15			
16			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>

**Sent:** Thursday, December 19, 2024 9:12 AM

**To:** Travis Anders <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>; David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>

**Subject:** FW: Department hazardous waste inspection 12/11/2024

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Travis

I expected to see corrective actions for the numerous violations at your facility by now.

I have left a couple messages on you VM.

The key to avoiding formal enforcement proceedings being initiated against your facility is being responsive and coming into compliance quickly.

Provide responses to the questions below and the required corrective actions to the violations itemized below by close of business on Friday so I can complete my report and give your facility a clean bill of health.

Regards

Dave

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:10 AM  
**To:** 'travis.anders@ringpower.com' <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>  
**Subject:** FW: Hazardous waste inspection

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

#### UNIVERSAL WASTE BATTERIES

##### 40 CFR 273.14 Labeling/markings

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

##### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

#### HAZARDOUS WASTE

##### Manifest

##### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

- (i) The words "Hazardous Waste" and
- (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action- Properly label your paint waste container as required above and send me photo documentation.**

Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action- Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**  
**Environmental Specialist III / Ecologist**  
Florida Department of Environmental Protection  
Southwest District – Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#); [Branden Hawkins](#); [Mark Carter](#); [Butch Peterson](#)  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Thursday, December 26, 2024 2:37:19 PM  
**Attachments:** [image002.png](#)

**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Completed Line Items:

**Line Item 1:** Used Batteries Packaged with labeling and shipping document (picture attached)

**Line Item 4:** Emergency Spill Response Coordinators posted

**Line Item 11:** UMO Registration posted

Sarasota DEP HAZ Waste Inspection			12/11/2024
Line Item	Status	Non-Conformance Description	Resolution
1	COMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification <b>12/26/2024:</b> Packaged batteries with label and shipping document
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	COMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	COMPLETE	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action-Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
10a	IN WORK	Provide halogen sampling records from Safety-Kleen	<b>12/26/2024:</b> Line Item added
10b	IN WORK	Provide name of Safety-Kleen testing equipment (halogens)	<b>12/26/2024:</b> Line Item added
10c	COMPLETE	Provide shipping documentation for UMO pickup	<b>12/26/2024:</b> Line Item added
11	COMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility <b>12/26/2024:</b> Current document posted
			Photo documentation of proper labeling

12	COMPLETE	Contained UMO Filters	
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14	COMPLETE	Describe Spill Control and Decon equipment	12/26/2024: Follow-up Questions added
15	COMPLETE	How often is emergency equipment tested	12/26/2024: Follow-up Questions added
16	COMPLETE	Does RPC sell parts to the general public	12/26/2024: Follow-up Questions added
17			
18			
19			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** David Harriman <David.Harriman@RingPower.com>  
**Sent:** Thursday, December 26, 2024 12:36 PM  
**To:** Petti, David <David.Petti@FloridaDEP.gov>  
**Cc:** Travis Anders <Travis.Anders@RingPower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>; Branden Hawkins <Branden.Hawkins@ringpower.com>; Mark Carter <Mark.Carter@RingPower.com>; Butch Peterson <Butch.Peterson@RingPower.com>  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024

- Line Item 3 Complete, HAZ Waste Shipping Manifest (attached)
- Line Items 10a, 10b and 10c added
- Line Item 10c complete (2024 UMO shipping documents attached)
- Line Items 14, 15 and 16 added and completed (follow-up questions below):

Follow-up Questions (responses highlighted):

- Describe spill control and Decon equipment  
There are Spill Kits at both the Bulk Fuel and Oil (New & Used) tanks; also throughout the shop work areas, there are boxes of PIG matts to contain small quantity spills due to servicing of equipment
- How often is emergency equipment tested?  
Annual Operability Testing is completed on bulk tanks (over 550-gal) and monthly tank inspections check the Overfill/high level alarms and the interstitial on the UMO bulk tanks; daily tank levels are electronically observed by purchasing/Environmental groups
- Does RP also sell parts to the general public.  
Yes, ring power sells parts due to servicing of equipment needs as well as the general public purchasing parts through our Parts Department.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-manifest system.  
Manifest attached

Updated as of 12/26/2024

Sarasota DEP HAZ Waste Inspection			12/11/2024
Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies),"	Correctly label batteries, submit photo verification

		or "Waste Battery(ies)," or "Used Battery(ies);" Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	COMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action-Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
10a	INCOMPLETE	Provide halogen sampling records from Safety-Kleen	12/26/2024: Line Item added
10b	INCOMPLETE	Provide name of Safety-Kleen testing equipment (halogens)	12/26/2024: Line Item added
10c	COMPLETE	Provide shipping documentation for UMO pickup	12/26/2024: Line Item added
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14	COMPLETE	Describe Spill Control and Decon equipment	12/26/2024: Follow-up Questions added
15	COMPLETE	How often is emergency equipment tested	12/26/2024: Follow-up Questions added
16	COMPLETE	Does RPC sell parts to the general public	12/26/2024: Follow-up Questions added
17			
18			
19			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)

(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 26, 2024 8:47 AM  
**To:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

CAUTION [EXTERNAL]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

David

Regarding the halogen testing its fine that SK is performing this test, however, records of these tests are required to be available at the facility during inspection.

Provide me with three years of presumptive rebuttal records along with the corresponding used oil pickup receipt. Also, provide me with the name of the testing equipment used.

Follow up questions:

- Describe spill control and Decon equipment
- How often is emergency equipment tested?
- Does RP also sell parts to the general public.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-mainfest system.

Please provide timely responses to my follow-up questions as I need the answers to complete my report which is due tomorrow at close of business.

Regards,

Dave

**From:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Sent:** Friday, December 20, 2024 3:04 PM  
**To:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.  
Line Items that are completed are attached and are indicated below, slow but it’s a start.

Attachments:

- **Line Item 6:** As stated/requested, FD phone number is posted  
NOTE: this does not take the place of Line Item 7 for making contact with the emergency municipal services
- **Line Item 8:** Aerosol Recover System with proper labeling (HAZARDOUS WASTE – IGNITABLE – TOXIC)  
(NOTE: stencil or decal will be applied)
- **Line Item 10:** UMO Halogen Determination
- **Line Item 12:** Storage container for UMO-Filters
- **Line Item 13:** Container for Cintas (used shop rags to be laundered)

Sarasota DEP HAZ Waste Inspection			12/11/2024
Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);” • Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However,	Correctly label batteries, submit photo verification

		once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	INCOMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action-Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14			
15			
16			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

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500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 19, 2024 9:12 AM  
**To:** Travis Anders <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>; David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Subject:** FW: Department hazardous waste inspection 12/11/2024

**CAUTION [EXTERNAL]:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Travis

I expected to see corrective actions for the numerous violations at your facility by now.

I have left a couple messages on you VM.

The key to avoiding formal enforcement proceedings being initiated against your facility is being responsive and coming into compliance quickly.

Provide responses to the questions below and the required corrective actions to the violations itemized below by close of business on Friday so I can complete my report and give your facility a clean bill of health.

Regards

Dave

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:10 AM  
**To:** 'travis.anders@ringpower.com' <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>  
**Subject:** FW: Hazardous waste inspection

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

#### UNIVERSAL WASTE BATTERIES

##### 40 CFR 273.14 Labeling/marketing

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

##### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

#### HAZARDOUS WASTE

##### Manifest

##### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

##### 40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response

measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

- (i) The words "Hazardous Waste" and
- (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action- Properly label your paint waste container as required above and send me photo documentation.**

Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action- Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**  
**Environmental Specialist III / Ecologist**  
Florida Department of Environmental Protection  
Southwest District - Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#); [Branden Hawkins](#); [Mark Carter](#); [Butch Peterson](#)  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Thursday, December 26, 2024 12:37:13 PM  
**Attachments:** [image002.png](#)  
[HAZ Manifest 009200728 - Sarasota \(2024-0813\).pdf](#)  
[UMO Shipping 2024-1015 \(Ref 95493994 - 2405067427\).pdf](#)  
[UMO Shipping 2024-0909 \(Ref 95284362 - 2404523031\).pdf](#)  
[UMO Shipping 2024-0715 \(Ref 94863282 - 2403396379\).pdf](#)  
[UMO Shipping 2024-0617 \(Ref 94652013 - 2402837563\).pdf](#)  
[UMO Shipping 2024-0520 \(Ref 94442671 - 2402285125\).pdf](#)  
[UMO Shipping 2024-0422 \(Ref 94236985 - 2401744108\).pdf](#)  
[UMO Shipping 2024-0325 \(Ref 93997559 - 2401163540\).pdf](#)  
[UMO Shipping 2024-0226 \(Ref 93799713 - 2400636096\).pdf](#)  
[UMO Shipping 2024-0129 \(Ref 93601350 - 2400094964\).pdf](#)  
[UMO Shipping 2024-0102 \(Ref 93412539 - 2306582806\).pdf](#)  
[UMO Shipping 2024-1202 \(Ref 95917230 - 2406204592\).pdf](#)  
[UMO Shipping 2024-1104 \(Ref 95707136 - 2405641276\).pdf](#)

**EXTERNAL MESSAGE**

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- Line Item 3 Complete, HAZ Waste Shipping Manifest (attached)
- Line Items 10a, 10b and 10c added
- Line Item 10c complete (2024 UMO shipping documents attached)
- Line Items 14, 15 and 16 added and completed (follow-up questions below):

Follow-up Questions (responses highlighted):

- Describe spill control and Decon equipment  
There are Spill Kits at both the Bulk Fuel and Oil (New & Used) tanks; also throughout the shop work areas, there are boxes of PIG matts to contain small quantity spills due to servicing of equipment
- How often is emergency equipment tested?  
Annual Operability Testing is completed on bulk tanks (over 550-gal) and monthly tank inspections check the Overfill/high level alarms and the interstitial on the UMO bulk tanks; daily tank levels are electronically observed by purchasing/Environmental groups
- Does RP also sell parts to the general public.  
Yes, ring power sells parts due to servicing of equipment needs as well as the general public purchasing parts through our Parts Department.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-manifest system.  
Manifest attached

Updated as of 12/26/2024

**Sarasota DEP HAZ Waste Inspection**

**12/11/2024**

Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	COMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms

6	COMPLETE	C] Post Telephone of Fire Department	
7	IN WORK	Failure to attempt to make arrangements with the required entities: Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	Failure to mark SAA: Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action- Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	Required Training: Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
10a	INCOMPLETE	Provide halogen sampling records from Safety-Kleen	12/26/2024: Line Item added
10b	INCOMPLETE	Provide name of Safety-Kleen testing equipment (halogens)	12/26/2024: Line Item added
10c	COMPLETE	Provide shipping documentation for UMO pickup	12/26/2024: Line Item added
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14	COMPLETE	Describe Spill Control and Decon equipment	12/26/2024: Follow-up Questions added
15	COMPLETE	How often is emergency equipment tested	12/26/2024: Follow-up Questions added
16	COMPLETE	Does RPC sell parts to the general public	12/26/2024: Follow-up Questions added
17			
18			
19			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <David.Petti@FloridaDEP.gov>  
**Sent:** Thursday, December 26, 2024 8:47 AM  
**To:** David Harriman <David.Harriman@RingPower.com>  
**Cc:** Travis Anders <Travis.Anders@RingPower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

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David

Regarding the halogen testing its fine that SK is performing this test, however, records of these tests are required to be available at the facility during inspection.

Provide me with three years of presumptive rebuttal records along with the corresponding used oil pickup receipt. Also, provide me with the name of the testing equipment used.

Follow up questions:

- Describe spill control and Decon equipment
- How often is emergency equipment tested?
- Does RP also sell parts to the general public.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-manifest system.

Please provide timely responses to my follow-up questions as I need the answers to complete my report which is due tomorrow at close of business.

Regards,

Dave

---

**From:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>

**Sent:** Friday, December 20, 2024 3:04 PM

**To:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>

**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>

**Subject:** RE: Department hazardous waste inspection 12/11/2024

**EXTERNAL MESSAGE**

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Line Items that are completed are attached and are indicated below, slow but it's a start.

Attachments:

- **Line Item 6:** As stated/requested, FD phone number is posted  
NOTE: this does not take the place of Line Item 7 for making contact with the emergency municipal services
- **Line Item 8:** Aerosol Recover System with proper labeling (HAZARDOUS WASTE – IGNITABLE – TOXIC  
(NOTE: stencil or decal will be applied)
- **Line Item 10:** UMO Halogen Determination
- **Line Item 12:** Storage container for UMO-Filters
- **Line Item 13:** Container for Cintas (used shop rags to be laundered)

**Sarasota DEP HAZ Waste Inspection**

**12/11/2024**

Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" • Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	INCOMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector

8	COMPLETE	Failure to mark SAA: Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action- Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	Required Training: Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14			
15			
16			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 19, 2024 9:12 AM  
**To:** Travis Anders <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>; David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Subject:** FW: Department hazardous waste inspection 12/11/2024

CAUTION [EXTERNAL]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Travis

I expected to see corrective actions for the numerous violations at your facility by now.

I have left a couple messages on you VM.

The key to avoiding formal enforcement proceedings being initiated against your facility is being responsive and coming into compliance quickly.

Provide responses to the questions below and the required corrective actions to the violations itemized below by close of business on Friday so I can complete my report and give your facility a clean bill of health.

Regards

Dave

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:10 AM  
**To:** 'travis.anders@ringpower.com' <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>  
**Subject:** FW: Hazardous waste inspection

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

#### UNIVERSAL WASTE BATTERIES

##### 40 CFR 273.14 Labeling/markings

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

##### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

#### HAZARDOUS WASTE

##### Manifest

##### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

##### 40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know.**

**Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

(i) The words "Hazardous Waste" and

(ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action-Properly label your paint waste container as required above and send me photo documentation.**

Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action-Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**  
**Environmental Specialist III / Ecologist**  
Florida Department of Environmental Protection  
Southwest District - Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#)  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Thursday, December 26, 2024 10:10:26 AM  
**Attachments:** [image002.png](#)

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Follow-up questions have been added to the Line Item Summary and will be addressed. Also, your inquiry of Line Item 3, I will be researching that for the location (at the moment, I'm working on DEP Wastewater Inspection at another facility).

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 26, 2024 8:47 AM  
**To:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

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David

Regarding the halogen testing its fine that SK is performing this test, however, records of these tests are required to be available at the facility during inspection.

Provide me with three years of presumptive rebuttal records along with the corresponding used oil pickup receipt. Also, provide me with the name of the testing equipment used.

Follow up questions:

- Describe spill control and Decon equipment
- How often is emergency equipment tested?
- Does RP also sell parts to the general public.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-manifest system.

Please provide timely responses to my follow-up questions as I need the answers to complete my report which is due tomorrow at close of business.

Regards,

Dave

---

**From:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Sent:** Friday, December 20, 2024 3:04 PM  
**To:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

**EXTERNAL MESSAGE**

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Line Items that are completed are attached and are indicated below, slow but it's a start.

Attachments:

- **Line Item 6:** As stated/requested, FD phone number is posted  
NOTE: this does not take the place of Line Item 7 for making contact with the emergency municipal services
- **Line Item 8:** Aerosol Recover System with proper labeling (HAZARDOUS WASTE – IGNITABLE – TOXIC)  
(NOTE: stencil or decal will be applied)
- **Line Item 10:** UMO Halogen Determination
- **Line Item 12:** Storage container for UMO-Filters
- **Line Item 13:** Container for Cintas (used shop rags to be laundered)

**Sarasota DEP HAZ Waste Inspection**

**12/11/2024**

Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" • Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification
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3	INCOMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
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5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action-Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training: --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14			
15			
16			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 19, 2024 9:12 AM  
**To:** Travis Anders <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>; David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Subject:** FW: Department hazardous waste inspection 12/11/2024

CAUTION [EXTERNAL]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Travis

I expected to see corrective actions for the numerous violations at your facility by now.

I have left a couple messages on you VM.

The key to avoiding formal enforcement proceedings being initiated against your facility is being responsive and coming into compliance quickly.

Provide responses to the questions below and the required corrective actions to the violations itemized below by close of business on Friday so I can complete my report and give your facility a clean bill of health.

Regards

Dave

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:10 AM  
**To:** 'travis.anders@ringpower.com' <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>  
**Subject:** FW: Hazardous waste inspection

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

#### UNIVERSAL WASTE BATTERIES

##### 40 CFR 273.14 Labeling/markings

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

##### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal

waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

## HAZARDOUS WASTE

### Manifest

#### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

- (i) The words "Hazardous Waste" and
- (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action-Propriety label your paint waste container as required above and send me photo documentation.**

### Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

## USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored

at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action-Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**  
**Environmental Specialist III / Ecologist**  
Florida Department of Environmental Protection  
Southwest District - Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#)  
**Subject:** RE: Department hazardous waste inspection (Sarasota) 12/11/2024  
**Date:** Thursday, December 26, 2024 9:43:28 AM  
**Attachments:** [image002.png](#)

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**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Good morning Mr. Petti:

1. Request was submitted to our contractor (Safety-Kleen) to pull their sampling records; this may take a few days.
2. I will retrieve/provide the UMO pickup/transport documentation
3. Provide the name of the testing equipment (request has been sent to our contractor, Safety-Kleen).

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <David.Petti@FloridaDEP.gov>  
**Sent:** Thursday, December 26, 2024 8:47 AM  
**To:** David Harriman <David.Harriman@RingPower.com>  
**Cc:** Travis Anders <Travis.Anders@RingPower.com>; Tiffany Hudson <Tiffany.Hudson@RingPower.com>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

**CAUTION [EXTERNAL]:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

David

Regarding the halogen testing its fine that SK is performing this test, however, records of these tests are required to be available at the facility during inspection.

Provide me with three years of presumptive rebuttal records along with the corresponding used oil pickup receipt. Also, provide me with the name of the testing equipment used.

Follow up questions:

- Describe spill control and Decon equipment
- How often is emergency equipment tested?
- Does RP also sell parts to the general public.
- Regarding the manifest (Your line item 3) I need some information from that manifest so provide me the DF copy or if you have not located it yet the generator copy. It does not seem that they were uploaded to the E-manifest system.

Please provide timely responses to my follow-up questions as I need the answers to complete my report which is due tomorrow at close of business.

Regards,

Dave

---

**From:** David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Sent:** Friday, December 20, 2024 3:04 PM  
**To:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Cc:** Travis Anders <[Travis.Anders@RingPower.com](mailto:Travis.Anders@RingPower.com)>; Tiffany Hudson <[Tiffany.Hudson@RingPower.com](mailto:Tiffany.Hudson@RingPower.com)>  
**Subject:** RE: Department hazardous waste inspection 12/11/2024

**EXTERNAL MESSAGE**

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Line Items that are completed are attached and are indicated below, slow but it's a start.

Attachments:

- **Line Item 6:** As stated/requested, FD phone number is posted  
NOTE: this does not take the place of Line Item 7 for making contact with the emergency municipal services
- **Line Item 8:** Aerosol Recover System with proper labeling (HAZARDOUS WASTE – IGNITABLE – TOXIC)  
(NOTE: stencil or decal will be applied)
- **Line Item 10:** UMO Halogen Determination
- **Line Item 12:** Storage container for UMO-Filters
- **Line Item 13:** Container for Cintas (used shop rags to be laundered)

**Sarasota DEP HAZ Waste Inspection**

**12/11/2024**

Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" • Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	INCOMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action- Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training; --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	Used Oil: Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
11	INCOMPLETE	Used Oil: Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14			
15			
16			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

Ring Power Corporation  
500 World Commerce Pkwy  
St. Augustine, FL 32092  
(904) 494-7445 (Corporate office)  
(813) 671-3700 (Tampa office)

[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)  
[Environmental@RingPower.com](mailto:Environmental@RingPower.com)

---

**From:** Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Sent:** Thursday, December 19, 2024 9:12 AM  
**To:** Travis Anders <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>; David Harriman <[David.Harriman@RingPower.com](mailto:David.Harriman@RingPower.com)>  
**Subject:** FW: Department hazardous waste inspection 12/11/2024

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Travis

I expected to see corrective actions for the numerous violations at your facility by now.

I have left a couple messages on you VM.

The key to avoiding formal enforcement proceedings being initiated against your facility is being responsive and coming into compliance quickly.

Provide responses to the questions below and the required corrective actions to the violations itemized below by close of business on Friday so I can complete my report and give your facility a clean bill of health.

Regards

Dave

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:10 AM  
**To:** 'travis.anders@ringpower.com' <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>  
**Subject:** FW: Hazardous waste inspection

---

**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

UNIVERSAL WASTE BATTERIES

40 CFR 273.14 Labeling/markings

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

## HAZARDOUS WASTE

### Manifest

#### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

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40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

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40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

- (i) The words "Hazardous Waste" and
- (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action-Properly label your paint waste container as required above and send me photo documentation.**

### Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA
- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
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## USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action-Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



**David Petti**  
**Environmental Specialist III / Ecologist**  
Florida Department of Environmental Protection  
Southwest District - Temple Terrace  
13051 N. Telecom Pkwy, #101  
Temple Terrace, FL 33637  
[David.Petti@floridadep.gov](mailto:David.Petti@floridadep.gov)  
Office: 813.470.5748



**From:** [David Harriman](#)  
**To:** [Petti, David](#)  
**Cc:** [Travis Anders](#); [Tiffany Hudson](#)  
**Subject:** RE: Department hazardous waste inspection 12/11/2024  
**Date:** Friday, December 20, 2024 3:06:04 PM  
**Attachments:** [image002.png](#)  
[Line Item 10 - UMO Halogen Determination.pdf](#)

**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Line Items that are completed are attached and are indicated below, slow but it's a start.

Attachments:

- **Line Item 6:** As stated/requested, FD phone number is posted  
NOTE: this does not take the place of Line Item 7 for making contact with the emergency municipal services
- **Line Item 8:** Aerosol Recover System with proper labeling (HAZARDOUS WASTE – IGNITABLE – TOXIC)  
(NOTE: stencil or decal will be applied)
- **Line Item 10:** UMO Halogen Determination
- **Line Item 12:** Storage container for UMO-Filters
- **Line Item 13:** Container for Cintas (used shop rags to be laundered)

**Sarasota DEP HAZ Waste Inspection**

**12/11/2024**

Line Item	Status	Non-Conformance Description	Resolution
1	INCOMPLETE	<b>Universal Waste - Batteries:</b> (i.e., each battery), or a container in which the batteries are contained, <b>must be labeled</b> or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);" • Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.	Correctly label batteries, submit photo verification
2	INCOMPLETE	<b>Universal Waste - Batteries: Accumulation time limits.</b> Handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Provide documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.
3	INCOMPLETE	<b>HAZARDOUS WASTE Manifest:</b> A generator must keep a copy of each manifest signed	Provide the Designated Facility copy of the manifest from 8/2024 that was missing from your files
4	IN WORK	<b>A] Emergency Coordinator:</b> Failure to have employees designated	Assign/designate employees as emergency coordinators; post information
5	IN WORK	<b>B] Map of Emergency equipment:</b> Failure to post	Post map that identifies locations of Fire Extinguishers, Spill Control Kits, Fire Alarms
6	COMPLETE	<b>C] Post Telephone of Fire Department</b>	
7	IN WORK	<b>Failure to attempt to make arrangements with the required entities:</b> Fire, Medical, Police, Emergency Mgmt, Vendors, Emergency Contractors	Contact listed agencies (email and cc DEP Inspector
8	COMPLETE	<b>Failure to mark SAA:</b> Need labels for HAZARD WASTE and type of hazard (TOXIC and IGNITABLE)	Corrective Action- Properly label your paint waste container as required above and send me photo documentation
9	INCOMPLETE	<b>Required Training:</b> Management of Hazardous Waste & Manifest Signing	Provide instructor lead training: --> A syllabus that will show that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA --> Documentation that shows who is receiving this training --> Job descriptions of the trained
10	COMPLETE	<b>Used Oil:</b> Ensure total halogen content is LT 1K ppm	See attachment. Provide three years of the required records
11	INCOMPLETE	<b>Used Oil:</b> Failed to properly display UMO registration as a handler	Provide photo documentation of valid registration form and is prominently

			displayed at your facility
12	COMPLETE	Contained UMO Filters	Photo documentation of proper labeling
13	COMPLETE	Used Shop Rags	Provide photo showing collection of used shop rags for Cintas pick up
14			
15			
16			

Respectfully,

**David R. Harriman II, CES**  
Environmental Manager

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**From:** Petti, David <David.Petti@FloridaDEP.gov>  
**Sent:** Thursday, December 19, 2024 9:12 AM  
**To:** Travis Anders <travis.anders@ringpower.com>; David Harriman <David.Harriman@RingPower.com>  
**Subject:** FW: Department hazardous waste inspection 12/11/2024

**CAUTION [EXTERNAL]:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Travis

I expected to see corrective actions for the numerous violations at your facility by now.

I have left a couple messages on you VM.

The key to avoiding formal enforcement proceedings being initiated against your facility is being responsive and coming into compliance quickly.

Provide responses to the questions below and the required corrective actions to the violations itemized below by close of business on Friday so I can complete my report and give your facility a clean bill of health.

Regards

Dave

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**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:10 AM  
**To:** 'travis.anders@ringpower.com' <[travis.anders@ringpower.com](mailto:travis.anders@ringpower.com)>  
**Subject:** FW: Hazardous waste inspection

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**From:** Petti, David  
**Sent:** Thursday, December 12, 2024 11:03 AM  
**To:** [travid.anders@ringpower.com](mailto:travid.anders@ringpower.com)  
**Subject:** Hazardous waste inspection

Travis

It was a pleasure meeting you at the Departments hazardous waste inspection of your facility yesterday.

Below is a list of violations that require immediate corrective actions:

UNIVERSAL WASTE BATTERIES

#### 40 CFR 273.14 Labeling/markings

(a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

- Discussion & Corrective Action-The open-air area where you had spent batteries on pallets with the labels on the wall was ok. However, once they go in the boxes for shipment they need to be labeled as stated above in (a). **Provide me with a photo showing the full boxes of batteries are now correctly labeled with one of the examples above.**

#### 40 CFR 273.15 Accumulation time limits.

(a) A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

- Discussion & Corrective Action-you need to come up with some sort of tracking system to track time on site for your batteries. The easiest way to do this would be to put a logbook on the wall where the batteries are first stored. The begin date for each pallet should be the date the first battery is placed on the pallet. This is just a suggestion on how to handle this. **Provide me with documentation that shows you have now instituted some sort of tracking system to document time on site for your universal waste batteries.**

### HAZARDOUS WASTE

#### Manifest

##### 262.40 Recordkeeping

(a) A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

- **Corrective Action-Provide me with the Designated Facility copy of the manifest from 8/2024 that was missing from your files**

#### 40 CFR 262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste.

Failure to have employees designated as Emergency Coordinator and an alternate

40 CFR 262.16(b)(9)(ii) 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

- **Corrective action: see next violation**

Failure to have emergency coordinator and first responder information posted

40 CFR 262.16(b)(9)(ii) states in part (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

- (A) The name and emergency telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

- **Corrective Action-post the required information at the paint waste accumulation area. Since you have a direct alarm to the fire dept. (c) is not required but it could not hurt to have it there. You could place it in the glass case as well if you want.**

Failure to attempt to make arrangements with the required entities

40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, 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.

**Corrective Action: Make the attempt and provide me with documentation. If you want to discuss the best way to go about this let me know. Keep this documentation on file for future inspections by the Department.**

Failure to mark SAA contains with the words hazardous waste and an indication of the hazards of the contents

40 CFR 262.15 Satellite accumulation area regulations for small and large quantity generators.

262.15(5) (5) A generator must mark or label its container with the following:

- (i) The words "Hazardous Waste" and
- (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic);

**Corrective Action-Propriety label your paint waste container as required above and send me photo documentation.**

#### Hazardous Waste Training

Provide me with:

- A syllabus that will show me that you are conducting training that is applicable to the management of hazardous waste as defined by RCRA

- Documentation that shows who is receiving this training (Note. Only employees who are directly involved managing HW ie. labeling drums, signing manifests, conducting inspections ect. Require this training)
- Job descriptions of the trained

40 CFR 262.16(b)(9)(iii) states in part: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies

#### USED OIL

40 CFR 279.44 Rebuttable presumption for used oil.

The facility failed to provide rebuttal presumption records 279.44 (a) states: to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. Example of testing equipment: Clor-D-Tect 1000 Chlorine Halogen Test Kit.

- **Corrective Action-Provide me with three years of the required records**

Facility failed to display a valid registration form and identification number in a prominent location inside the facility.

62-710.500 (FAC) Registration and Notification.

62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

- **Corrective Action-provide me with photo documentation that your valid registration form is now prominently displayed at your facility. Your glass case would be a good place to post it.**

Also,

Please provide me with a photo showing your spent used oil filters. The container should be labeled "Used Oil Filters"

Please provide me with a photo showing how you are collecting used shop rags for Cintas pick up

Alright Travis, I think that covers it for now. Let me know if I missed anything that is on your list.

Let me know if you have any questions.

Regards



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