

**From:** [White, John](#)  
**To:** ["brian.brown@ringpower.com"](mailto:brian.brown@ringpower.com)  
**Cc:** [West, Zachary](#)  
**Subject:** RE: Inspection of Ring Power Corp 6200 N US Hwy 301 Ocala FL  
**Date:** Monday, December 12, 2016 9:26:00 AM

---

Brian,

I got a response from Pam Fellabaum in the North-East District regarding the sampling done at the Jacksonville facility. It appears the sampling was done on waste from a blast booth and it failed for chromium. That is not a surprise since most engine parts can have cadmium plating.

If you have information that is different please let me know. Otherwise, please have a sample taken of a contaminated wipe and a spent paint booth filter to document they do not exhibit any hazardous waste characteristics.

Thank you,

John

John White  
Environmental Consultant  
Florida Department of Environmental Protection  
407-897-4305  
[John.white@dep.state.fl.us](mailto:John.white@dep.state.fl.us)

---

**From:** White, John  
**Sent:** Friday, December 02, 2016 10:01 AM  
**To:** brian.brown@ringpower.com  
**Cc:** West, Zachary <Zachary.West@dep.state.fl.us>  
**Subject:** Inspection of Ring Power Corp 6200 N US Hwy 301 Ocala FL

Mr. Brown,

On December 1, 2016, Mr. Zachary West and I inspected the Ring Power Corp facility at 6200 N US Hwy 301, Ocala FL – FLD093856318 for compliance with state and federal hazardous waste generator and used oil transporter standards.

In order to complete the inspection, we require information regarding training provided to staff for hazardous waste and used oil management. Specifically, for Mr. Jeff Lusher and the two other individuals involved in the daily management of the wastes.

Also, the facility is claiming the “Excluded Solvent Contaminated Wipe” exclusion in 40 CFR 261.4(a)

(26) for solvent contaminated wipes sent for cleaning and reuse. Please provide documentation that the wipes do not exhibit any hazardous waste characteristic identified in 40 CFR 261 Subpart C that is not associated with the listed solvents. Specifically, the facility is shipping hazardous waste paint related materials off-site with the EPA waste codes for Barium (D005), Cadmium (D006), and Chromium (D007).

The same issue was raised when discussing spent paint booth filters. The filters are disposed of in the trash yet the facility has certified on the manifests that the waste contains heavy metals.

Please provide updated information on waste determinations conducted on spent solvent contaminated wipes sent for cleaning and reuse and spent paint booth filters.

Thank you,

John White  
Environmental Consultant  
Florida Department of Environmental Protection  
407-897-4305  
[John.white@dep.state.fl.us](mailto:John.white@dep.state.fl.us)