



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

FACILITY INFORMATION:

Facility Name: Cummins Power South LLC

On-Site Inspection Start Date: 09/28/2011

On-Site Inspection End Date: 09/28/2011

ME ID#: 44923

EPA ID#: FLD046702122

Facility Street Address: 5910 E Hillsborough Ave, Tampa, Florida 33610-5419

Contact Mailing Address: 5125 Highway 85, Atlanta, Georgia 30349-5976

County Name: Hillsborough

Contact Phone: (404) 765-5131

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Manager

Other Participants: Gary Blessin, Operations Manager; Allen Evans, Service Manager

LATITUDE / LONGITUDE: Lat 27° 59' 49.7393" / Long 82° 23' 20.0183"

SIC CODE: 5084 - Wholesale trade - industrial machinery and equipment

TYPE OF OWNERSHIP: Private

Introduction:

Cummins Power primarily repairs and services diesel engines in trucks and motor coaches. The facility also services marine engines and generators on site and in the field. The company changed this facility's generator status to conditionally exempt in June 2008. Gary Blessin and Alan Evans provided assistance during the inspection, which confirmed that the facility is conditionally exempt. The facility currently has about 50 employees and has municipal water service. Sanitary wastes are disposed of in a septic system, and industrial waste water is treated and recycled on site.

Process Description:

The facility consists of two main buildings plus a structure that houses the transmission dynamometer. No waste is generated in that structure.

The facility has 20 service bays, most in the west building. The west building has two Safety Kleen SystemOne parts washers, and the still bottoms are disposed of with the facility's used oil, which is permissible for conditionally exempt small quantity generators. One of the washers is in the Rebuild area in the building's south end. The rebuild area also includes various machine tools and a bead blaster. Mr. Blessin did not know when the unit was last cleaned out, but said it is company policy to conduct hazardous waste determinations before disposal. A wash bay was adjacent to this area for steam cleaning parts. The waste water is collected and treated in a recirculating treatment system which is cleaned out once per year by Southern Industrial, with the waste disposed of to Safety Kleen as non hazardous. Analytical results for this material were on site.

The second SystemOne parts washer was located at the north end of the building. Zep X-4402 heptane based solvent is also used with refillable spray cans and rags for cleaning. The rags are laundered. Coolant removed from the engines is held on site and returned to the vehicle once repairs are complete if possible. Coolant that can't be re-used is placed in a labeled tank for recycling through Safety Kleen. The used oil, oil filter and antifreeze storage tanks were all indoors

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and had secondary containment. A number of collection pans had faded labels, and a collection dolly was labeled "waste oil" rather than "used oil." These were re-labeled after the inspection with stencils that were provided to the facility. Propane fueled forklifts are serviced by a contractor. Batteries are usually stored indoors, but on the day of the inspection several were staged outside for collection. Interstate picks up the used batteries for core credit once a week. Universal waste lamps were on site in open boxes, but all the lamps were green tip or Ecolux non hazardous lamps. They are recycled in accordance with Florida regulations.

The east building is mainly a warehouse with some offices. Generators are serviced in part of the building. A paint booth located in the building is not in service. It was used in a previous manufacturing process, not on vehicles. The only painting conducted now is touch ups using spray cans. One unlabeled 55 gallon metal drum of used antifreeze was found on the pavement outside the building, staged for transfer to the waste storage area in the west building. A Certified Labs Pure Wash parts washer was in this building, connected to a ChemChamp movable still. The still can be exchanged between parts washers and constitutes a closed loop recycling system, returning cleaned solvent to the parts washer. Distillation bottoms are disposed of with the facility's used oil.

Records were in order and available for inspection. The facility had one manifest on site for disposal of 300 pounds of diesel fuel as D001 waste. The last vacuum service on the waste water recycle system was in March 2011. The facility disposes of used oil and antifreeze every 4 to 8 weeks, generating an average of 700 gallons per service. Filters are picked up less often. The last disposal was in May 2011, when 2,700 pounds of filters were shipped.

New Potential Violations and Areas of Concern:**Checklist Independent Potential Violations and Areas of Concern**

Type: Violation
Rule: 279.22(c)(1)
Explanation: A used oil dolly was improperly labeled, and oil transfer containers had deteriorated labeling. (Corrected)
Corrective Action: Used oil containers must be clearly labeled with the words "used oil."

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 279.22(c)(1)		09/28/2011	A used oil dolly was improperly labeled, and oil transfer containers had deteriorated labeling. (Corrected)

Areas of Concern

No Areas of Concern

Conclusion:

Cummins Power has corrected the used oil labeling issue noted during the inspection and is now in compliance with Florida hazardous waste regulations.

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Elizabeth Knauss

PRINCIPAL INSPECTOR NAME

Environmental Manager

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

10/7/2011

DATE

Gary Blessin

REPRESENTATIVE NAME

Operations Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Cummins Power

ORGANIZATION

Allen Evans

REPRESENTATIVE NAME

Service Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Cummins Power

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.