From: Reis, Juliana
To: philip.alcantara@cummins.com
Subject: FW: Cummins Inc. (EPAID FLR000147975) Exit Interview
Date: Friday, November 13, 2020 1:40:00 PM
Attachments: UOT record keeping form.pdf

Good afternoon Mr. Alcantara,

Per our phone conversation yesterday, in order to comply with the Used Oil Transporter (UOT) requirements, please provide the following:

9. (62-710.500(4)FAC) Display the registration form and notification number in a prominent place at each facility location.

Provide a corrective action picture of the UOT notification posted at the facility wall.

10. Standard Operation Procedure (SOP) or any other guidance document about the management of the used oil picked-up from the client's site. This document shall describe the methods of halogen screening, instruments specifications and capabilities, calibration and frequency, and procedures for loads in excess of 1,000 ppm.

Provide a guidance document for halogen screening performed at the transported used oil.

11. (62-710.510(1) (a-d) FAC) Transporters are required to maintain the following records from the transported used oil: name, address, phone number, total number of gallons received from the source, including oily wastes, the type of used oil (using the type codes- instructions attached), date receipt, destination or end use, and halogen screening test. Please see attached DEP form 62-710.901(2) instructions.

Provide the used oil transported records from the last three years, accordingly.

12. (40 CFR 279.43(b)) Trucks used for used oil transportation shall have: DOT placards displayed, UOT notification form, liability insurance and contingency plan within the vehicle.

Provide corrective action pictures of trucks displaying a DOT placard and the requested documentation within vehicles.

Please provide these documents along with the requested previously in the exit interview, as they are available, **by 11/23/2020**.

In case of questions or concerns, please contact me.

Kind regards,

Juliana Reis
Environmental Specialist I
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Juliana.Reis@floridadep.gov
Office: 561.681.6642

The Department of Environmental Protection values your feedback as a customer. Please take a few minutes to comment on the quality of service you received by completing the DEP Customer Survey.

From: Philip Alcantara <philip.alcantara@cummins.com>
Sent: Thursday, November 12, 2020 11:07 AM
To: Reis, Juliana <Juliana.Reis@FloridaDEP.gov>
Subject: RE: Cummins Inc. (EPAID FLR000147975) Exit Interview

Good morning,

I am in receipt of your email, and will provide what you request. Thank you.

Regards,
Philip Alcantara
General Manager
Cummins Sales and Service
3754 Interstate Park Way
Riviera Beach, FL, 33404

(561) 721-7207 Direct
(561) 840-7704 Fax
philip.alcantara@cummins.com
salesandservice.cummins.com

From: Reis, Juliana <Juliana.Reis@FloridaDEP.gov>
Sent: Wednesday, November 11, 2020 3:52 PM
To: Philip Alcantara <philip.alcantara@cummins.com>
Subject: Cummins Inc. (EPAID FLR000147975) Exit Interview

External Sender

Good afternoon,

This email serves as an exit interview for the Compliance Evaluation Inspection (CEI) conducted on Thursday, November 5, 2020, by the Florida Department of Environmental Protection (FDEP) to determine this facility compliance with the hazardous waste Federal and state regulations.

Thank you for your time and assistance throughout the inspection.

<Please confirm upon receipt>

Please provide the following to Department's review:

1. **Notification as Transfer facility (40 CFR 279.42(a) & 62-710.500(a)(1)**

This facility is registered as a Used Oil Transporter and as Small Quantity Generator of hazardous waste.

During the inspection it was observed that the used oil is stored for more than 24h.

Please verify your status as used oil transporter or used oil generator.

If this facility decides to remain as a used oil transporter it shall be properly registered as a Used Oil transfer facility.

Please refill the 8700-12FL form (attached) and submit it to the Division of Waste Management in Tallahassee (instructions attached).

2. **Please renotify the Department using the 8700-12 FL form regarding the closure of Cummins Power South LLC (EPA ID FLR000147975) located at the 3777 Interstate Park Rd N, West Palm Beach, FL.**

3. **Provide the last three years shipment records of used oil transported from generators.**

4. Per 62-730.030(2) FAC generators shall keep hazardous waste shipment records from the last three years**.**

   Provide record from the last shipment of the aerosol puncturer container contents.

5. **Universal Waste Batteries and Lamps**
   a. Per 40 CFR 273.13(a), spent batteries shall be stored in a way to prevent release.

   Provide a corrective action picture from the spent batteries protected from the elements.

   b. Per 40 CFR 273.14(e)Spent mercury lamps shall be specifically labeled "universal waste-mercury-containing lamps", "waste mercury-containing lamps" or "used mercury-containing lamps". **Provide a corrective action picture of the spent mercury lamp's container properly labeled.**
   c. **Provide records from last shipments of spent batteries for recycling.**
   d. **Provide records from last spent mercury lamps for recycling.**

6. Per 62-710.850(5)(a) FAC used oil filter container shall be kept closed. **Provide a corrective action picture of the used oil filters and used oil absorbents properly closed.**

7. Per 40 CFR 279.22(c)(1) used oil containers shall be labeled as "used oil". **Provide a corrective action picture of the used oil containers (picture attached) properly labeled.**

8. **Provide shipment records from oily rags and uniform laundered.**

Please provide this information and documentation to the Department as they are available within **10 days (by 11/23/2020).**

In case of questions or concerns please contact me.

Kind regards,

Juliana Reis
Environmental Specialist I
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Juliana.Reis@floridadep.gov
Office: 561.681.6642

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Dep Customer Survey