From: Reis, Juliana
To: philip.alcantara@cummins.com
Subject: Cummins Inc. (EPAID FLR000147975) Exit Interview
Date: Wednesday, November 11, 2020 3:51:00 PM
Attachments: DSCF5174.JPG
8700-12 form.pdf
8700-12 instructions.pdf

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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