From: Lancellotti, Romina
To: michael.erlick@cummins.com; nicole.m.johnson@cummins.com
Cc: Scott, Patrick; Pajunen, Cole
Subject: Cummins LLC. (EPA ID FLR000233379) - Exit Interview
Date: Thursday, June 17, 2021 4:46:00 PM

Good afternoon Mr. Erlick,

This email serves as follow up to the routine compliance evaluation inspection conducted on June 15, 2021 by the Florida Department of Environmental Protection (FDEP). I appreciate you for taking the time to conduct the walkthrough of Cummins LLC. located at (EPA ID FLR000233379); located at 6350 NW 167th St. Miami Lakes, FL 33014. As discussed during the inspection, the facility is required to submit the following documentation to the Department:

1. Please provide bill of lading of pickups of used oil and used oil filters, for the last three years.
2. Explain how the facility keeps track of the storage time of used oil and used oil filers.
3. Training certificates for employees. Per 62-710.600(2)(b) F.A.C., any used oil transporter shall show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a certification that the used oil transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, and has an annual and new employees training program in place covering the applicable rules. The files shall indicate the type of training received along with the dated signature of those receiving and providing the training.
4. Provide all disposal/shipping records for universal waste lamps, for the last three years.
5. Provide shipping records of oily rags, and spent solvent for the last three years.
6. Provide samples of shipping records of spent lead acid batteries, to demonstrate proper management.
7. Please relocate universal waste batteries in a place that is protected from the weather and provide a photographic evidence to the Department.
8. Display the registration form and notification number in a prominent place at the facility and provide a picture of the UOT notification posted at the facility wall.
9. The Spill Prevention, Control, and Countermeasure (SPCC) of the facility.
10. During the inspection, the inspectors observed the facility punctures aerosol cans. Please provide a written procedure detailing how to safely puncture and drain the universal waste aerosol can (including proper assembly, operation and maintenance of the unit, segregation of incompatible wastes, and proper waste management practices to prevent fires or releases), 40 CFR 273.13(e)(4)(ii).

The EPA added aerosol cans to the universal waste regulations and it was adopted by the state of Florida. Therefore, the facility has to comply with the Aerosol Can Rules in Ch. 62-730 F.A.C. now effective (as of 10/30/2020). If facility elects to keep managing aerosol cans as universal

waste, it must comply with all requirements described under 40 CFR 273.13(e), 273.14(f), 273.15, 273.16, 273.17, and 273.18.

Please provide the above mentioned documents by July 1, 2021. Should you have any additional questions or concerns, feel free to contact me at this email address or the below phone number.

Best Regards,

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