From:	Steven Posey
То:	Taylor, Kaitlyn A
Cc:	Polycart, Johanna
Subject:	RE: Exit Interview - Signature Marine LLC (FLR000261305)
Date:	Monday, October 23, 2023 4:53:47 PM
Attachments:	Form 101 Tank cleaning and pump out training 5-18-23.docx
	pump tuck image.png
	Truck mainfests.pdf
	World Invoice 10-12-23.pdf
	World invoice 10-20-23.pdf
	World Invoice 8-31-23.pdf

#### **EXTERNAL MESSAGE**

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See attached requested forms please let me know of any questions or concerns.



## Steve Posey

President / CEO | Signature Marine phone: <u>954-513-7976</u> website: <u>SignatureMarinellc.com</u> email: <u>Steve@SignatureMarinellc.com</u>

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From: Taylor, Kaitlyn A
Sent: Monday, October 23, 2023 2:24 PM
To: Steven Posey
Cc: Polycart, Johanna
Subject: Exit Interview - Signature Marine LLC (FLR000261305)

Good afternoon Steven,

This email serves as an Exit Interview for the routine Compliance Evaluation Inspection conducted over the phone for your facility Signature Marine LLC located at 13635 86<sup>th</sup> Rd N, West Palm Beach 33412 on 10/23/2023. First, I want to thank you for your time and cooperation.

As discussed during our phone call, I am reaching out to you to request some additional information

and supporting documentation to facilitate the completion of the inspection report that would count toward your compliance status. Please provide the following by **11/06/2023**.

- 1. Photo of your Used Oil truck.
- 2. Photo of the Wearhouse the truck gets stored in.
- 3. Copy of all Used oil Manifests (acceptance and delivery records) since beginning operation under this EPAID number **(40 CFR 279.46).**
- 4. Training records for all employees that handle used oil (62-710.600(2)(c), FAC).

If you have any questions or concerns please feel free to contact me.

Kind regards,



### Kaitlyn Taylor Environmental Specialist III

Florida Department of Environmental Protection Southeast District – West Palm Beach 3301 Gun Club Road, MSC 7210-1 West Palm Beach, FL 33406 Kaitlyn.A.Taylor@floridadep.gov Office: 561.681.6628

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 <u>DEP Customer Survey</u>.



From:	Steven Posey		
То:	Taylor, Kaitlyn A		
Subject:	RE: Exit Interview - Signature Marine LLC (FLR000261305)		
Date:	Thursday, October 26, 2023 8:27:33 PM		
Attachments:	DOT HazMat General Awareness Training Charles Conner.pdf		
	dot hazmat general awareness training Steven Posey.pdf		

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See attached training certifications.



Steve Posey President / CEO | Signature Marine phone: <u>954-513-7976</u> website: <u>SignatureMarinellc.com</u> email: <u>Steve@SignatureMarinellc.com</u>

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From: Taylor, Kaitlyn A
Sent: Thursday, October 26, 2023 11:28 AM
To: Steven Posey
Subject: RE: Exit Interview - Signature Marine LLC (FLR000261305)

Good afternoon,

Thank you for that clarification. Yes, that training course is an acceptable training program.

Please complete the course and submit the training certificate for all employees involved in the handling or transportation of used oil/oily water by 11/06/2023.

Best,

**Kaitlyn Taylor Environmental Specialist III** Florida Department of Environmental Protection Southeast District – West Palm Beach



3301 Gun Club Road, MSC 7210-1 West Palm Beach, FL 33406 Kaitlyn.A.Taylor@floridadep.gov Office: 561.681.6628

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 <u>DEP Customer Survey</u>.

From: Steven Posey <posey1107@gmail.com>
Sent: Wednesday, October 25, 2023 3:10 PM
To: Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>
Subject: RE: Exit Interview - Signature Marine LLC (FLR000261305)

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- 1. Received I'll include a space for the EPA id number from world petroleum on the future forms.
- 2. Also I've emailed World petroleum about halogen test results. And there answer as per PCW my waste given to World Petroleum and stated on my waste manifests from them my waste is classified as oily water as it is from tank cleaning (Pumpable liquids from petroleum tank cleaning operations) and no halogen testing is available for oily water. I do not pump, transfer or dispose of 100% oil.
- 3. I've found a DOT hazmat general awareness training course on 360 training campus and we will complete this course ASAP and issue you the certifications. (Please verify this meets your requirements prior to purchase and training. <u>https://www.360training.com/course/dot-hazmat-general-awareness-training</u>



# Steve Posey

President / CEO | Signature Marine phone: <u>954-513-7976</u> website: <u>SignatureMarinellc.com</u> email: <u>Steve@SignatureMarinellc.com</u>

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upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and destroy any copies of this information.

From: Taylor, Kaitlyn A
Sent: Wednesday, October 25, 2023 2:18 PM
To: Steven Posey
Subject: RE: Exit Interview - Signature Marine LLC (FLR000261305)

Good afternoon,

I discussed your questions with my manager to get clarification, and just reviewing the regulations cannot be considered a training program that satisfies the requirements. The training program should be specific to spill control, halogen screening, used oil regulations, and used oil management practices.

A commonly used training program is DOT Hazmat training.

In regards to the manifest records you submitted, they do not show the results of halogen testing and do not include the EPA ID number for the designated facility (world petroleum).

- 1. Please provide the records that show the halogen test results for the used oil transported.
- 2. Please start including the EPA ID number of the designated facility on your manifests.

Kind regards,



#### Kaitlyn Taylor

Environmental Specialist III Florida Department of Environmental Protection Southeast District – West Palm Beach 3301 Gun Club Road, MSC 7210-1 West Palm Beach, FL 33406 Kaitlyn.A.Taylor@floridadep.gov Office: 561.681.6628

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 <u>DEP Customer Survey</u>.

From: Steven Posey posey1107@gmail.com
Sent: Tuesday, October 24, 2023 4:22 PM
To: Taylor, Kaitlyn A <<u>Kaitlyn.A.Taylor@FloridaDEP.gov</u>
Cc: Polycart, Johanna <<u>Johanna.Polycart@FloridaDEP.gov</u>
Subject: RE: Exit Interview - Signature Marine LLC (FLR000261305)

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From the attached forms you sent I'm seeing these sections for training documentation and records. Please review and let me know if that meets your request. Thank you

- 1. Are me and my foreman (We are the only two that operates and transports) required to read and review the latest version of 62-710.600(2)(b-c) F.A.C. and document when it was performed annually?
- 2. Part C The maintain of training in the company operating tasks I already sent to you in the last email.
- 3. And part D appears to repeat the same requirements in part B just requires the submission of those records of the review and understanding.

b) 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;

(c) Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review by Department personnel during inspections;

(d) Submit to the Department an annual certification in conjunction with the annual registration required under rule 62-710.500, F.A.C., which states that the used oil transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, has an annual and new employees training program in place covering the applicable rules that is still operating and is being adhered to and is annually reviewed and updated to address changes in regulations which apply to the operation, and which provides an explanation of any modifications to the training program; and,

> Steve Posey President / CEO | Signature Marine



## phone: 954-513-7976 website: <u>SignatureMarinellc.com</u> email: <u>Steve@SignatureMarinellc.com</u>

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From: Taylor, Kaitlyn A
Sent: Tuesday, October 24, 2023 9:51 AM
To: Steven Posey
Cc: Polycart, Johanna
Subject: RE: Exit Interview - Signature Marine LLC (FLR000261305)

Here is a copy of the full used oil transporter rule 62-710 F.A.C and a copy of the specific section that discusses training requirements 62-710.600(2)(b-c) F.A.C.

Please submit updated training records by **11/06/2023.** 

If you have any questions or concerns please feel free to contact me.

Best,



Kaitlyn Taylor Environmental Specialist III Florida Department of Environmental Protection Southeast District – West Palm Beach 3301 Gun Club Road, MSC 7210-1 West Palm Beach, FL 33406 Kaitlyn.A.Taylor@floridadep.gov Office: 561.681.6628

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From: Steven Posey cposey1107@gmail.com
Sent: Tuesday, October 24, 2023 9:28 AM
To: Taylor, Kaitlyn A <<u>Kaitlyn.A.Taylor@FloridaDEP.gov</u>>

**Cc:** Polycart, Johanna <<u>Johanna.Polycart@FloridaDEP.gov</u>> **Subject:** Re: Exit Interview - Signature Marine LLC (FLR000261305)

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I am not familiar with that or the requirements of you can send that info over I'd love to get up to standard for that

Sent from my iPhone

On Oct 24, 2023, at 9:24 AM, Taylor, Kaitlyn A <<u>Kaitlyn.A.Taylor@floridadep.gov</u>> wrote:

Good morning Steven,

Thank you for the submittals, they will be added to your file for review.

For training records do you have any that cover "applicable Florida and federal laws and rules governing used oil transportation" **per 62-710.600 F.A.C** 

Best,

<image002.jpg>

Kaitlyn Taylor Environmental Specialist III Florida Department of Environmental Protection Southeast District – West Palm Beach 3301 Gun Club Road, MSC 7210-1 West Palm Beach, FL 33406 Kaitlyn.A.Taylor@floridadep.gov Office: 561.681.6628

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To: Taylor, Kaitlyn A <<u>Kaitlyn.A.Taylor@FloridaDEP.gov</u>>
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Subject: RE: Exit Interview - Signature Marine LLC (FLR000261305)

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# <image003.jpg> Steve Posey President / CEO | Signature Marine phone: <u>954-513-7976</u> website: <u>SignatureMarinellc.com</u> email: <u>Steve@SignatureMarinellc.com</u>

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Subject: Exit Interview - Signature Marine LLC (FLR000261305)

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- 2. Photo of the Wearhouse the truck gets stored in.
- 3. Copy of all Used oil Manifests (acceptance and delivery records) since beginning operation under this EPAID number **(40 CFR 279.46).**

4. Training records for all employees that handle used oil (62-710.600(2)(c), FAC).

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Kind regards,



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