PICK-n-PULL
SELF-SERVICE AUTO & TRUCK DISMANTLERS

WENF JUL 01 2013

June 28, 2013

U.S. Environmental Protection Agency, Region 7
Attn: Michael Boeglin (WWPD/WENF)
11201 Renner Boulevard
Lenexa, KS 66219

RE: Section 308 Information Request | NPDES Permit No. MOR60A347

Dear Mr. Boeglin,

This document is prepared in response to EPA's 'Section 308 Information Request' received by the Pick-n-Pull on 10-June-2013. Pursuant to a telephone conversation between Mr. Ray Bosch of EPA and Pick-n-Pull's attorney, Mr. Dale Guariglia, Mr. Bosch agreed that Pick-n-Pull's response to the Information Request could be submitted by June 28, 2013.

Background

On December 19, 2012, Pick-n-Pull completed the purchase from U-Pick-It, Inc. and its owners Harry and Elizabeth Hansen, of certain assets associated with the self-service automobile dismantling and recycling business at 7700 East Winner Road, Kansas City, Mo. However, Pick-n-Pull did not purchase the real estate at 7700 East Winner Road as part of the asset purchase, but instead is leasing the property from Hansen Property Development, Inc. pursuant to a lease effective December 19, 2012. Harry Hansen is the President of Hansen Property Development, Inc. The asset purchase and the lease were arms-length transactions and there was no relation between Pick-n-Pull and any of the following persons or companies prior to the asset purchase and lease: U-Pick-It, Harry and Elizabeth Hansen, and Hansen Property Development, Inc. Pick-n-Pull had no ownership or operational interest or control over the Winner Road facility until just a few hours before EPA commenced its inspection on December 19, 2012.

A few days after Pick-n-Pull acquired the facility and began operating it, Pick-n-Pull filed with the Missouri Department of Natural Resources (MDNR) an application to transfer the above-referenced stormwater permit to Pick-n-Pull. On April 12, 2013, MDNR sent a letter to Pick-n-Pull issuing the permit to Pick-n-Pull, thereby making Pick-n-Pull the permitee on the permit effective April 10, 2013.

EPA Information Request Items:

Request 1 At the time of the EPA inspection, Pick-n-Pull lacked documentation of employee training on the subjects of material handling/storage and housekeeping of dismantling, repair, rebuilding, or storage areas. Pursuant to your NPDES permit, Requirements, Paragraph 2, please submit documentation of any training that Pick-n-Pull's Kansas City facility has provided to its employees in these subject areas. Training documentation must describe which topics were covered, who attended the training, and the date(s) the training occurred.

NPDES MOR60S347 | Requirements | Paragraph 2
"All involved personnel shall be provided training by the owner in material handling and storage, and housekeeping of dismantling, repair, rebuilding or storage areas. Proof of training shall be submitted on request."

Pick-n-Pull's Response to Request 1:

Below is a list of the training that Pick-n-Pull has conducted for personnel at the Winner Road facility since Pick-n-Pull purchased the business and began operating it on December 19, 2012. Some of this same information was included in Pick-n-Pull's December 31, 2012 letter in response to EPA's inspection of the Winner Road facility on December 19 and 21, 2012. Although Request 1 states that "at the time of the EPA inspection, Pick-n-Pull lacked documentation of employee

training", Pick-n-Pull respectfully submits that its obligations to maintain such documentation was limited since, as discussed above, at the time of the inspection, Pick-n-Pull had only been in control of the facility a few hours and was not the official permitee.

Wednesday, December 19, 2012, and Thursday, December 20, 2012 – Day 1 Training. Pick-n-Pull conducted Day 1 Environmental, Health and Safety training for all personnel at the Winner Road location prior to any production activities being conducted. The training is referred to as "Day 1" training since it was the first day that Pick-n-Pull began operating the facility. The training consisted of Computer Based Training (CBTs), and Power Point presentations.

Training Conducted By: Donald Sexton / Director of EHS

TABLE 1: Training Roster - Opening Day

				Safety Culture	PPE	Mobile Equipment	Confined Spaces	Fall Protection	Hazardous Energy Control / LOTO	Hearing Conservation	Electrical Safety	Machine Guarding	WHMIS / HazComm	Stormwater
Last	First	Title	Date of Training											
Brennan	Adam	Store Manager	12/20/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Arevalo	Oscar	Production Crew	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Rodriguez	Thelmo	Production Crew	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Jaquez	Francisco	Production Crew	12/20/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Libby	Derik	CSA	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Wayman	Deborah	CSA	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Ayer	Brian	Production Crew (termed 05/15/13)	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Fritz	Daniel	Production Crew (termed - 04/05/13)	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Hale	Stacy	VPA (termed - 12/26/12)	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Maun	Dustin	Production Crew (termed - 04/04/13)	12/20/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Trent	Ronny	Production Crew (termed - 12/26/12)	12/19/2012	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass

Materials Reviewed:

- Environmental Compliance Orientation PowerPoint *Attachment A*
  - General Introduction to Environmental Compliance
- PNP Process and Environmental BMP Presentation *Attachment B*
  - This is the onboarding Environmental presentation for new employees

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April 04, 2013 – General Environmental Mentoring / Assistance Visit
Conducted by: Gerald DeRego / Regional EHS Engineer III

TABLE 2: General Environmental Mentoring / Assistance Visit - Participation Roster

			General Housekeeping Expectations	Storm Water BMP Selection and Placement
Last	First	Title		
Wood	Ryan	Regional Director	4/4/2013	4/4/2013

Materials / Topics Reviewed:

- Storm Water BMPs: How to properly protect a drain inlet (DI) *Attachment C*
  - Outlines expectations regarding the proper techniques for properly protecting drain inlets
- Groundskeeping Procedures *Attachment D*
  - This procedure outlines Pick-n-Pulls housekeeping activities developed to eliminate/minimize Stormwater impact from our processing and customer yard activities.
- Storm Water BMPs: Oil Spot Removal *Attachment E*
  - Outlines expectations for the removal of stained soils and spills out in the yard (pervious surfaces)

- Storm Water BMPs: Carpets & Trunk Mats *Attachment F*
  - Outlines a program which Pick-n-Pull established for placing car mats or recycled carpet mats under the engine compartment of vehicles in the customer yard, in an attempt to eliminate/reduce petroleum product leaks due to customer parts removal

- Storm Water BMPs: Burnt Vehicles *Attachment G*
  - Outlines expectations that vehicles damaged by fire, be covered and protected from contact with storm water.

May 20th & 21st, 2013 – Storm Water Mentoring Visit
Conducted by: Robert Ellsworth / Corporate Sustainability Program Analyst / Environmental Administrator

TABLE 3: Environmental Expectations Mentoring - Participation Roster

			SWPPP / SPCCC Review	Stormwater Monitoring Expectations	Modified HMBP	Hands-On Stormwater Protection Exercise
Last	First	Title				
Brennan	Adam	Store Manager	5/21/2013	5/21/2013	5/21/2013	5/21/2013

Materials Reviewed:

- Storm Water BMPs: Spill Clean-Ups *Attachment H*
  - Outlines expectations for cleaning up spills on impervious surfaces, and the steps taken in the cleaning process

- Storm Water BMPs: How to properly protect a drain inlet (DI) *Attachment C*
  - Outlines expectations regarding the proper techniques for properly protecting drain inlets

- Spill Prevention Control & Countermeasures *Attachment I*
  - Outlines expectations in regards to SPCC requirements

- Pre Rain Event – Storm Water BMP Prep *Attachment J*
  - Outlines expectations during rain events (inspections, etc.), and the expectation that oily parts are properly protected from coming into contact with storm water (covering, removal, and storage under cover)

- Post Rain Event - Managing Storm Water BMPs *Attachment K*
  - Outlines post rain event inspections of BMPs, to ensure that they are still in operable condition for the next event.

- Storm Water BMPs: Carpets & Trunk Mats *Attachment F*
  - Outlines a program which Pick-n-Pull established for placing car mats or recycled carpet mats under the engine compartment of vehicles in the customer yard, in an attempt to eliminate/reduce petroleum product leaks due to customer parts removal

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Request 2. Part I Standard Conditions of your NPDES Permit, Section A, Paragraph 7, requires that copies of all records and reports produced in accordance with the permit must be maintained for a period of at least three years. Please submit a copy of any records or reports, aside from any training information specified in the previous paragraph, that you have produced since Pick-n-Pull acquired the Kansas City facility.

NPDES MOR60S347 | Part I | Standard Conditions | Section A | Paragraph 7
"The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

Pick-n-Pull's Response to Request 2:

The permit has very few recordkeeping requirements since there is no requirement under the permit to conduct monitoring. In addition, since Pick-n-Pull has only owned/operated the facility for approximately six months, there have been very few records produced since Pick-n-Pull acquired the facility. For example, the main recordkeeping/reporting requirement under the permit is set forth on page 4 of the permit regarding "Annual Reporting", which requires an annual operating report be submitted by October 28 of each year. Pick-n-Pull's first obligation to file an annual report will be October 28, 2013.

The following are the records that Pick-n-Pull has maintained as part of the normal operations of the facility as required by the permit and since Pick-n-Pull acquired the facility:

- Pick-n-Pull's Application for Transfer of Operating Permit. *Attachment L*
- April 12, 2013 MDNR letter to PNP and modified Missouri State Operating Permit *Attachment M*

Although the following documents are not required to be maintained pursuant to the permit, below is a list of plans/programs which Pick-n-Pull has put in place since acquiring the facility in order to manage stormwater runoff and other operations at the facility that may affect stormwater..

Records / Documents Created Since December 19, 2012:

- Spill Prevention, Control, and Countermeasures (SPCC) Plan *Attachment N*
- Storm Water Pollution Prevention (SWPP) Plan *Attachment O*
- Hazardous Material Business Plan - PNP Modified Best Practice *Attachment P*
- Storm Water Monitoring Documents *Attachment Q*

As you are aware, a release incident occurred at the facility on May 31, 2013. The following is a list of documents which have been generated in connection with the incident:

- Report sent to MDNR summarizing the incident and the response *Attachment R*
- Laboratory report of sampling of released material *Attachment S*

At Pick N Pull, we take storm water quality very seriously and we take your concerns about the site just as seriously. We feel that our BMP's and the planned improvements at our site, once fully in-place, will deliver improvements in the quality of storm water leaving the site. We look forward to working with you on storm water issues and projects going forward.

Please do not hesitate to contact me with any questions you may have.

for Sincerely,

Donald Sexton By Gerald H [signature] EHS Engineer III

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