MAR 2 1 2012

Mr. Adam Moran
General Manager
U-Pick-It
7700 East Winner Road
Kansas City, Missouri 66103

RE: U-Pick-It
Kansas City, Missouri
EPA RCRA ID No.: Non-notifier

Dear Mr. Moran:

On February 9-10, 2012, a representative of the U.S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of the inspection report is enclosed for your information.

The EPA is presently reviewing the findings of the report to determine your facility's compliance with the applicable statutes, permits, or regulations. If it is determined that violations exist, the EPA reserves all rights it may have to take appropriate enforcement action, regardless if any violations were subsequently corrected.

If there are any questions regarding this report or actions that you may want to take, please contact me at (913) 551-7164.

Sincerely,

Deborah Bredehoft
Compliance Officer
Waste Enforcement and Materials Management Branch

Enclosure

cc: Mr. Dennis Hansen, Missouri Department of Natural Resources
Missouri Department of Natural Resources Kansas City Regional Office

bcc: Ms. Dedriel L. Newsome, ENSV

AWMD/WEMM/Terry/mrw:03/20/2012:H:AWMD/WEMM/Cores12:DB:U-Pick-It.MO.TIRL.doc

WEMM	WEMM
Terry	Bredehoft
03/21/12	03/21/12

515259
RCRA

APR 24 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article No.: 7010-2780-0001-2211-6121

Mr. Adam Moran
General Manager
U-Pick-It
7700 E. Winner Road
Kansas City, Missouri 66103

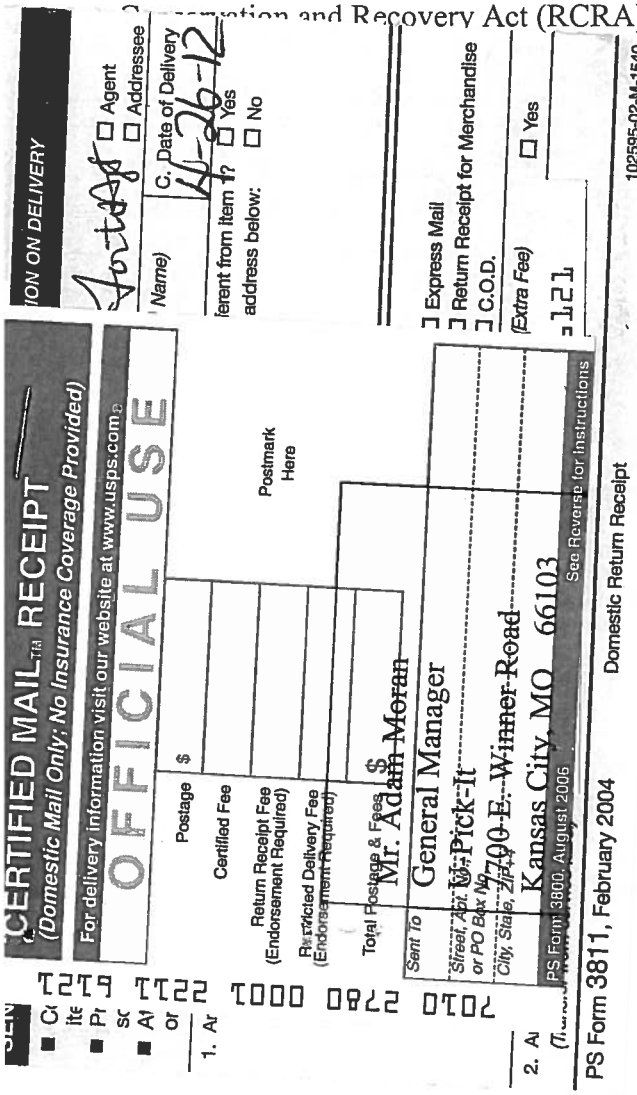
RE: U-Pick-It
Kansas City, Missouri

Dear Mr. Moran:

Letter of Warning/Request for Information

On February 9-10, 2012, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource [illegible]ervation and Recovery Act (RCRA).

[illegible]t, and your February 23, 2012, response to the Notice of [illegible]ations of RCRA were documented. We are requesting [illegible]lity's compliance status. Enclosed is a list of violations, a list [illegible] and instructions to be used in providing your response. [illegible]ructions. Your response to this request in accordance with the [illegible]f RCRA and substantial penalties may result from not [illegible]ves its right to pursue appropriate enforcement actions, [illegible]red as a result of the inspection, regardless of whether the



2012:H:AWMD/WEMM/Cores12:SB:U Pick It LOW.doc

	CNSL	WEMM
12	Johnson 04/20/2012	TOENSING 04/24/2012

515258
RCRA

Within thirty (30) calendar days of receiving this letter, please mail your response to: Ms. Deborah Bredehoft, AWMD/WEMM, U. S. Environmental Protection Agency, 901 North 5th Street, Kansas City, Kansas 66101. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Ms. Bredehoft, of my staff, at (913) 551-7164.

Sincerely,

Donald Toensing, Chief
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

Enclosures (3)

cc: Mr. Dennis Hansen, Missouri Department of Natural Resources
Missouri Department of Natural Resources Kansas City Regional Office

bcc: Dedriel L. Newsome, ENSV

List of Violations
U-Pick-It
Kansas City, Missouri

1. Title 10 Code of State Regulations (10 CSR) 25-11.279(2)(B)4.B. – Failure to clean up used oil releases.

2. * 10 CSR 25-11.279(2)(D)2. – Failure to notify the Missouri Department of Natural Resources of used oil collection.

3. 10 CSR 25-5.262(1) incorporating Title 40 Code of Federal Regulations (40 CFR) 262.11 – Failure to make hazardous waste determinations on the following:
    a. five, 55-gallon drums of unknown material (three, approximately full drums and two, partially full drums);
    b. two, 5-gallon pails of unknown material generated while removing trash from cars;
    c. spent lamps;
    d. six, spent gasoline filters in the tank containment and two, spent gasoline filters outside the tank containment; and
    e. mercury switches and mercury ampules.

*This violation was adequately addressed through previous correspondence.

Requested Information
U-Pick-It
Kansas City, Missouri

1. With regard to Violation Number 1, please provide the following:
   a. a narrative and supporting removal paperwork including disposal costs and photographic documentation that the used oil spills are being cleaned up;
   b. the estimated clean up date for the used oil spills observed during the inspection; and
   c. a narrative outlining how releases will be prevented in the future.

2. With regard to Violation Numbers 3A, 3B, and 3D, please conduct a hazardous waste determined on each of the cited wastes. A hazardous waste determination includes the following:
   a. a determination of whether or not the waste has been excluded from regulation under Title 40 Code of Federal Regulations (40 CFR) 261.4.
   b. a determination of whether or not the waste has been listed as a hazardous waste in Subpart D of 40 CFR 261. **If the waste is a listed waste, please provide the listed waste code in your response**; and
   c. a determination of whether or not the waste is identified in 40 CFR 261 Subpart C. To determine whether the waste fails any of the characteristics in Subpart C, the waste may need to be analyzed using one of the methods found in Subpart C of 40 CFR 261, or by applying knowledge of the waste characteristics based upon the materials or processes used. Any laboratory analyses used to make this determination must be provided to the EPA as well as a detailed description as to how each sample was taken. The laboratory analyses required may include ignitability tests (40 CFR 261.21), corrosivity tests (40 CFR 261.22), reactivity tests (40 CFR 261.23), and/or toxicity characteristic leaching procedure (TCLP) testing. **If the waste is a characteristic hazardous waste, please provide the characteristic waste code in your response.**
   d. If your facility elects to apply knowledge to make a waste determination of the waste streams identified in Violation Number 3, you must provide a detailed explanation and your reasoning regarding the basis for this determination. Material Safety Data Sheets (MSDS) may provide information to supplement your response. **Also, if you apply knowledge to make the determination, please include all hazardous waste codes for the wastes in your response.**
   e. Additionally, for each of the waste streams that is determined to be hazardous, please provide:
      i. a narrative and supporting documentation (i.e., manifests, bills of lading, etc.) outlining how the hazardous wastes will be disposed;
      ii. the one-time or monthly generation rate of the waste at U-Pick-It;
      iii. the length of time the waste was generated at U-Pick-It;
      iv. how long the waste is currently stored at U-Pick-It; and
      v. photographic documentation of how the waste is currently managed at U-Pick-It.

3. With regard to Violation 3C, please provide the following:
    a. documentation (i.e., photographs, logs, etc.) showing that the length of accumulation is tracked and that the lamps are currently stored in containers that are closed and labeled; and
    b. a narrative outlining how U-Pick-It will ensure that lamps are not accumulated for greater than one year.

4. With regard to Violation 3E, please provide the following:
    a. the amount of mercury switches at your facility;
    b. the amount of mercury ampules at your facility;
    c. documentation (i.e., photographs, logs, a narrative, purchase records, receipts, etc.) that U-Pick-It is complying with all the universal waste requirements outlined in 40 CFR 273.13(c)(3);
    d. if the observed mercury switches or ampules have been removed from your facility, please provide documentation (i.e., bill(s) of lading, manifest(s), etc.) of the removal of the mercury switches and ampules; and
    e. with regard to the previous disposal of the mercury switches and ampules through the program titled End of Life Vehicle Solutions (ELVS), discussed on page 13 of the inspection report, please provide the following:
        i. a narrative and supporting documentation (i.e., as universal waste, under manifest, as routine mail, etc.) outlining how the mercury ampules and/or mercury switches were removed from your facility;
        ii. how many mercury ampules and/or mercury switches were sent off-site through the ELVS program; and
        iii. where the mercury ampules and/or mercury switches were sent.

5. With regard to the approximately one-inch of waste gasoline in the storage tank containment, as discussed on page 7 of the EPA's inspection report, the inspector provided U-Pick-It will a copy of the Missouri Department of Natural Resource's fact sheet titled "Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems." Please indicate:
    a. whether your facility intends to manage the waste gasoline as a solid waste or as a used oil;
    b. if your facility intends to manage the waste gasoline as a used oil, please provide a narrative and supporting documentation outlining how your facility has removed or is managing the waste gasoline;
    c. if your facility intends to manage the waste gasoline as a solid waste, please conduct a hazardous waste determination. A hazardous waste determination includes the following:
        i. a determination of whether or not the waste has been excluded from regulation under Title 40 Code of Federal Regulations (40 CFR) 261.4.
        ii. a determination of whether or not the waste has been listed as a hazardous waste in Subpart D of 40 CFR 261. **<u>If the waste is a listed waste, please provide the listed waste code in your response</u>**; and

iii. a determination of whether or not the waste is identified in 40 CFR 261 Subpart C. To determine whether the waste fails any of the characteristics in Subpart C, the waste may need to be analyzed using one of the methods found in Subpart C of 40 CFR 261, or by applying knowledge of the waste characteristics based upon the materials or processes used. Any laboratory analyses used to make this determination must be provided to the EPA as well as a detailed description as to how each sample was taken. The laboratory analyses required may include ignitability tests (40 CFR 261.21), corrosivity tests (40 CFR 261.22), reactivity tests (40 CFR 261.23), and/or toxicity characteristic leaching procedure (TCLP) testing. **If the waste is a characteristic hazardous waste, please provide the characteristic waste code in your response.**

iv. If your facility elects to apply knowledge to make a waste determination of the waste streams identified in Violation Number 3, you must provide a detailed explanation and your reasoning regarding the basis for this determination. Material Safety Data Sheets (MSDS) may provide information to supplement your response. **Also, if you apply knowledge to make the determination, please include all hazardous waste codes for the wastes in your response.**

v. Additionally, for each of the waste streams that is determined to be hazardous, please provide:
   1) a narrative and supporting documentation (i.e., manifests, bills of lading, etc.) outlining how the hazardous waste will be disposed;
   2) the one-time or monthly generation rate of the waste gasoline at U-Pick-It; and
   3) how long the waste gasoline was stored at U-Pick-It.

6. During the inspection, the inspector requested additional information. The requests are reiterated within the inspection report on the listed pages below along with requests for additional information:
   a. On page 6 of the inspection report, the inspector outlined the request for verification that used oil sent to Heritage-Crystal Clean was not being sent directly to a burner. Please indicate:
      i. whether the Heritage-Crystal Clean that picks up the used oil is a burner; and
      ii. if Heritage-Crystal Clean is a burner, please provide documentation outlining how U-Pick-It will comply with the used oil marketer requirements found at 10 CSR 25-11.279(2)(H).
   b. On page 7 of the inspection report, the inspector outlined the request for verification regarding the amount of late model vehicles (after 1995) processed for the last three anti-freeze shipments. Within the NOV response, the EPA was informed that U-Pick-It's spent antifreeze is bulked from various sources and is presumed to be non-hazardous as long as it is not mixed with other listed or characteristic waste. For the shipments on January 4, 2012; September 13, 2011; and July 28, 2011; please indicate the number of vehicles, prior to 1996, from which used anti-freeze was generated.

c. On page 7 of the inspection report, the inspector asked for the following information regarding the waste gasoline fuel tank:
    i. the date when the fuel tank was last cleaned;
    ii. the name(s) of the individual(s) that cleaned the tank; and
    iii. a narrative and supporting documentation outlining what was done with any fuel/waste gasoline removed from the fuel tank.
d. On page 11 of the inspection report, the inspector observed multiple drains in the areas where used oil was spilled and inquired where the drains discharged. Within U-Pick-It's February 23, 2012, response, U-Pick-It stated that their consultant, E&A Consulting Group, Inc. was applying for a Missouri State Operating Permit for motor vehicle salvage yards and scrap metal recycling operations that authorizes storm water discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System. Please provide the following:
    i. indicate whether U-Pick-It had a storm water permit at the time of the inspection;
    ii. a narrative and a map outlining exactly where the drains discharged; and
    iii. either a copy of the Missouri State Operating Permit for motor vehicle salvage yards and scrap metal recycling operations or the application for the Missouri State Operating Permit for motor vehicle salvage yards and scrap metal recycling operations.

7. The generation of the following wastes is also discussed within the inspection report on the provided pages. Please provide the following information:
    a. On page 8 of the inspection report, the inspector stated that Rapid Recovery collects used CFC refrigerants from two cylinders. Please provide the following:
        i. a narrative outlining how Rapid Recovery handles the mixed refrigerant (i.e., reclaimed or disposed); and
        ii. a narrative and supporting documentation outlining who collected U-Pick-It's CFC refrigerants prior to Rapid Recovery.
    b. On page 10 of the inspection report, the inspector was informed that some contaminated floor dry as generated by the previous General Manager. Please provide the following:
        i. the contaminant(s) of the previously disposed floor dry;
        ii. the amount removed;
        iii. a narrative and supporting documentation on when, how, and where it was disposed; and
        iv. a map outlining exactly where it was located.

3007 RESPONSE INSTRUCTIONS

- Identify the Person(s) responding to this request on your behalf.
- Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- For each numbered item, identify all persons consulted in the preparation of the answer.
- For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at www.epa.gov/epahome/cfr40.htm.
- This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to $37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.

AUG 01 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article No.: 7010-2780-0001-2211-5933

Mr. Adam Moran
General Manager
U-Pick-It
7700 E. Winner Road
Kansas City, Missouri 66103

RE: U-Pick-It
Kansas City, Missouri

Dear Mr. Moran:

Letter of Warning/Request for Information

On February 9-10, 2012, a representative of the U. S. Environmental Protection Agency (EPA) inspected
d under the authority of Section 3007 of the Resource

t, your February 23, 2012, response to the Notice of Violation
sponses to the EPA's April 24, 2012, Letter of
rmined that violations of RCRA were documented. We are
g your facility's compliance status. Enclosed is a list of
sted information, and instructions to be used in providing your
these instructions. Your response to this request in
d by Section 3007 of RCRA and substantial penalties may
t the EPA reserves its right to pursue appropriate enforcement
discovered as a result of the inspection, regardless of whether
d.

012:H:AWMD/WEMM/Cores12:SB:U Pick It LOW.doc

	CNSL	WEMM
2	Johnson	TOENSING
	07/31/2012	07/31/2012

SENDER: C
■ Complete item 4 if R
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■ Attach thi or on the
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2. Article Nur (Transfer fr...
PS Form 3811, February 2004
Domestic Return Receipt
102595-02-M-1540
DELIVERY
☐ Agent
☐ Addressee
C. Date of Delivery
8/2/12
n item 1? ☐ Yes
below: ☐ No
s Mail
Receipt for Merchandise
☐ Yes
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For delivery information visit our website at www.usps.com®
OFFICIAL USE
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Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees
Postmark Here
Sent To
Mr. Adam Moran
General Manager
U-Pick-It
Street, Apt. No. or PO Box No.
7700 E. Winner Road
City, State, ZIP+4
Kansas City, MO 66103
PS Form 3800, August 2006
See Reverse for Instructions

Within thirty (30) calendar days of receiving this letter, please mail your response to: Ms. Deborah Bredehoft, AWMD/WEMM, U. S. Environmental Protection Agency, 901 North 5th Street, Kansas City, Kansas 66101. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Ms. Bredehoft, of my staff, at (913) 551-7164.

Sincerely,

Donald Toensing, Chief
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

Enclosures (3)

cc: Mr. Dennis Hansen, Missouri Department of Natural Resources
Missouri Department of Natural Resources Kansas City Regional Office

bcc: Dedriel L. Newsome, ENSV
Kent Johnson, CNSL

List of Violations
U-Pick-It
Kansas City, Missouri

1. Title 10 Code of State Regulations (10 CSR) 25-11.279(1) incorporating Title 40 Code of Federal Regulations (40 CFR) 279.22(d) – Failure to clean up used oil releases.

2. * 10 CSR 25-11.279(2)(D)2. – Failure to notify the Missouri Department of Natural Resources of used oil collection.

3. 10 CSR 25-5.262(1) incorporating 40 CFR 262.11 – Failure to make hazardous waste determinations on the following:
    a. five, 55-gallon drums of unknown material (three, approximately full drums and two, partially full drums);
    b. two, 5-gallon pails of unknown material generated while removing trash from cars;
    c. spent lamps;
    d. six, spent gasoline filters in the tank containment and two, spent gasoline filters outside the tank containment; and
    e. mercury switches and mercury ampules.

*This violation was adequately addressed through previous correspondence.

Requested Information
U-Pick-It
Kansas City, Missouri

1. With regard to Violation Number 1, please provide the following:
    a. color photographs documenting that the used oil has been removed;
    b. copies of the removal paperwork, specifically highlighting which shipments included the oily soil generated from the clean-up of oil spills in response to the EPA's inspection; and
    c. within the June 22, 2012, response, your consultant advised you to purchase microbes to degrade the oil in the soil and advised you to spray an amount of microbes proportional to the degree of the oil spills observed during routine inspections of the facility. Although the microbes may aid in degrading the oil in the soil, it does not meet the requirement to clean up and manage properly the released used oil and other materials as is required under 40 CFR 279.22(d)(3). Please provide a narrative outlining how your facility will ensure compliance with the requirement to clean up and manage properly the released used oil and other materials.

2. With regard to Violation Numbers 3.a. and 3.b., you stated that these containers are excluded from the regulations under 40 CFR 261.4. To back up your claim, you provided (1) analysis for two samples of oily soil; (2) four waste profiles for used oil from oil changes (provided two copies), oily dirt/soil, and oily absorbent; and (3) bills of lading/manifests. Based on the information provided, it appears that the 5, 55-gallon containers were sent off-site on manifest number 003145294SKS as used oil and absorbent mixture and the 2, 5-gallon containers were sent off-site on the same manifest as non-RCRA/non-DOT regulated liquid material. Please provide the following:
    a. which of the containers were sampled;
    b. a narrative outlining how the 5, 55-gallon containers were determined to hold used oil and absorbent mixture; and
    c. a narrative outlining how the 2, 5-gallon containers were determined to contain non-RCRA/non-DOT regulated liquid material.

3. With regard to Violation 3E, please provide the amount of mercury switches and/or ampules sent to End of Life Vehicle Solutions (ELVS) between July 29, 2009, and April 29, 2012.

4. With regard to the approximately one-inch of waste gasoline in the storage tank containment, as discussed on page 7 of the EPA's inspection report, the inspector provided U-Pick-It with a copy of the Missouri Department of Natural Resource's fact sheet titled "Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems." Within the EPA's April 24, 2012, Letter of Warning/Request for Information, the EPA had inquired if you intended to manage the waste gasoline as used oil or as a solid waste. In your response, you had indicated that you intended to manage the waste gasoline as a used oil and dispose of it utilizing Safety-Kleen. Upon further review of the Missouri Department of Natural Resources's guidance and the regulations, managing of the waste gasoline as a used oil is only an option provided that your facility remains a conditionally exempt small quantity generator and that the waste gasoline is mixed with the used oil (in accordance with 40 CFR 261.5(j)). Please provide the following:
    a. when the waste gasoline within the secondary containment was removed; and
    b. copies of the shipping documents utilized to remove the waste gasoline.

5. During the inspection, the inspector requested additional information. The requests are reiterated within the inspection report on the listed pages below along with requests for additional information:
    a. On page 7 of the inspection report, the inspector stated that you had told her that the tank was cleaned out within the previous five years, but that you did not know the details of the tank clean out. Please indicate if any documents were found that outline the following information regarding the waste gasoline fuel tank:
        i. the date when the fuel tank was last cleaned;
        ii. the name(s) of the individual(s) that cleaned the tank; and
        iii. a narrative and supporting documentation outlining what was done with any fuel/waste gasoline removed from the fuel tank.
    b. On page 11 of the inspection report, the inspector observed multiple drains in the areas where used oil was spilled and inquired where the drains discharged. Within U-Pick-It's February 23, 2012, response, U-Pick-It stated that their consultant, E&A Consulting Group, Inc. was applying for a Missouri State Operating Permit for motor vehicle salvage yards and scrap metal recycling operations that authorizes storm water discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System. Within your June 22, 2012, response, you provided copies of the Missouri State Operating Permit that was issued on June 12, 2012, and the Motor Vehicle Salvage Business License that was issued on July 1, 2012. Additionally, you provided a map.
        i. You indicated that you had a storm water permit at the time of the inspection; please provide a copy of the storm water permit that was in effect at the time of the inspection.
        ii. You provided a map of the property that included a legend; however, the map did not specifically outline the drain locations or where the drains discharged. Please provide a revised map that specifically outlines the drain locations and where the drains discharge.

SEP 05 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article Number: 7010-2780-0001-2211-5322

Mr. Adam Moran
General Manager
U-Pick-It
7700 E. Winner Road
Kansas City, Missouri 66103

RE: Extension Request
U-Pick-It
Kansas City, Missouri

Dear Mr. Moran:

This letter is in response to your consultant's August 28, 2012, request for an extension of time, until October 1, 2012, to submit a response to the U. S. Environmental Protection Agency's August 1, 2012, ...Warning/Request for Information. It is my understanding that this extension is needed in order ... they wish to provide within their response.

...l, which was due on September 1, 2012, is now due in this ...uestions, please contact me at (913) 551-7164.

Sincerely,

Deborah Bredehoft
Compliance Officer
Waste Enforcement and Materials Management Branch

...partment of Natural Resources
...Resources Kansas City Regional Office

...ronmental Management, Inc.

.../2012:H:AWMD/WEMM/Cores12:DB:Extension

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For delivery information visit our website at www.usps.com®
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Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees
Postmark Here
Sent To Mr. Adam Moran General Manager U-Pick-It
Street, Apt. No.; or PO Box No. 7700 E. Winner Road
City, State, ZIP+4 Kansas City, MO 66103
PS Form 3800, August 2006
See Reverse for Instructions
SENDER: COMPLETE THIS SECTION
■ Complete items 1 item 4 if Restricte
■ Print your name a so that we can re
■ Attach this card t or on the front if s
1. Article Addressed to Mr. Ada General U-Pick-I 7700 E. Kansas (
COMPLETE THIS SECTION ON DELIVERY
☒ Agent
☐ Addressee
Date of Delivery
☐ Yes
☐ No
7010 2780 0001 2211 5322
2. Article Number (Transfer from servic
PS Form 3811, Febi
☐ Yes
or Merchandise

RCRA
519372

MAY 15 2013

MEMORANDUM

SUBJECT: Review of a Compliance Inspection Report dated February 9-10, 2012, for U-Pick-It, 7700 E. Winner Road, Kansas City, Missouri 66103

FROM: Deborah Bredehoft, RCRA Compliance Officer
Waste Enforcement and Materials Management Branch

Raymond Bosch, Assistant Regional Counsel
Chemical Management Branch

THRU: Don Toensing, Branch Chief
Waste Enforcement and Materials Management Branch

Elizabeth Koesterer, RCRA Enforcement Missouri State Coordinator
Waste Enforcement and Materials Management Branch

TO: Kathy Flippin, Compliance/Enforcement Section Chief
Missouri Department of Natural Resources

The purpose of this memorandum is to document the referral of portions of the EPA's February 9-10, 2012, Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) report for the above-listed facility.

In response to the CEI, the above-listed facility was cited for the following violations:

1. Title 10 Code of State Regulations (10 CSR) 25-11.279(2)(B)4.B. – Failure to clean up used oil releases.
2. 10 CSR 25-11.279(2)(D)2. – Failure to notify the Missouri Department of Natural Resources of used oil collection.

AWMD/WEMM/Bredehoft/mrw:05/09/2013:H:AWMD/WEMM/Cores13:DB:U Pick It Referral Memo to MDNR.doc

WEMM	WEMM	CNSL	WEMM
Bredehoft	Koesterer EAK	Bosch RCB	Toensing
05/ 13 /2013	05/ 13 /2013	05/ 14 /2013	05/ 15 /2013

BMB