

FILED

2007 JUN 13 AM 8:50

U.S. EPA REGION IX
REGIONAL HEARING CLERK

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX

In the matter of

RHS Lee, Inc.

EPA ID No. HI0000076851

Respondent

U.S. EPA Docket No.
RCRA-9-2007-0012

CONSENT AGREEMENT AND
FINAL ORDER PURSUANT TO
40 C.F.R. SECTIONS 22.13 AND
22.18

CONSENT AGREEMENT

A. PRELIMINARY STATEMENT

1. This is a civil administrative enforcement action instituted pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. § 6928(a)(1), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits, 40 Code of Federal Regulations ("C.F.R.") Part 22, as revised by 64 Fed. Reg. 141 (July 23, 1999).
2. The United States Environmental Protection Agency, Region 9 ("EPA") and RHS Lee Inc. ("RHS Lee" or "Respondent"), agree to settle this matter and consent to the entry of this Consent Agreement and Final Order ("CA/FO"). This CA/FO, which contains the elements of a complaint required by 40 C.F.R. sections 22.14(a)(1)-(3) and (8), simultaneously commences and concludes this matter in accordance with 40 C.F.R. sections 22.13 and 22.18.
3. The parties agree that settlement of the relevant matters without litigation will save time and resources, that it is in the public interest, that it is consistent with the provisions and objectives of RCRA and applicable regulations, and that entry of this CA/FO is the most appropriate means of resolving such matters.
4. This action is based on EPA's allegations that Respondent failed to: (1) make a hazardous waste determination, a violation of Hawaii Administrative Rules ("H.A.R.") § 11-262-11 [see also 40 C.F.R. § 262.11]; (2) respond to a release of used oil, a violation of H.A.R. §

11-279-22(d) [see also 40 C.F.R. § 279.22(d)]; (3) store used oil in containers in good condition, a violation of H.A.R. §§ 11-279-22(b)(1) & (2) [see also 40 C.F.R. §§ 279.22(b)(1) & (2)]; (4) mark containers of used oil with the words "used oil," a violation of H.A.R. § 11-279-22(c)(1) [see also 40 C.F.R. § 279.22(c)(1)]; (5) store used oil in compliance with SPCC regulations, a violation of H.A.R. § 11-279-22 [see also 40 C.F.R. § 279.22]; (6) properly manage universal waste batteries, a violation of H.A.R. § 11-273-33(a)(1) [see also 40 C.F.R. § 273.33(a)(1)]; (7) label or mark universal waste, a violation of H.A.R. §§ 11-273-34(a) & (c) [see also 40 C.F.R. §§ 273.34(a) & (c)]; and (8) meet the accumulation time limit requirements for universal waste, a violation of H.A.R. § 11-273-35 [see also 40 C.F.R. § 273.35]. These are all in violation of Section 3001 et seq. of RCRA, 42 U.S.C. § 6921 et seq., and state regulations adopted pursuant thereto.¹

5. Complainant is the EPA.

6. Respondent is RHS Lee, Inc.

7. Respondent is a specialty contracting firm with emphasis in grading, site preparation, excavation, demolition, and trucking. Its facility is located at 96-1414 Waihona Place, in Pearl City, Hawaii (the "Facility"). Respondent employs 100 people. The business was founded in 1950. Respondent's EPA ID number is HI 0000076851.

B. JURISDICTION

8. On November 13, 2001, the State of Hawaii received authorization to administer the hazardous waste management program in lieu of the federal program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, and 40 C.F.R. Part 271. The authorized program is established pursuant to Hawaii Revised Statutes ("HRS") Chapter 342, and the regulations promulgated thereunder at Hawaii Administrative Rules, Title 11, Chapters 11-260 through 11-279. The State of Hawaii has been authorized for all the regulations referenced in this CA/FO.

9. Respondent is a "person" as defined in H.A.R. 11-260-10 [see also 40 C.F.R. § 260.10].

10. Respondent is the "operator" of a facility as defined in H.A.R. 11-260-10 [see also 40 C.F.R. § 260.10].

11. Respondent is a "conditionally exempt small quantity generator" of RCRA hazardous waste

¹ All citations to the "H.A.R." refer to Title 11 of the current Hawaii Administrative Rules. EPA is enforcing Hawaii hazardous waste management program requirements as approved and authorized by the United States on November 13, 2001 (see 66 Fed. Reg. 55115, November 1, 2001). Corresponding Federal citations are provided in brackets.

as defined in H.A.R. 11-261-5 [see also 40 C.F.R. § 261.5].

12. Respondent is or has been engaged in "storage" of hazardous waste as defined in H.A.R. 11-260-10 [see also 40 C.F.R. § 260.10].
13. Respondent generates and accumulates, or has generated and accumulated, materials that are "wastes" as defined in H.A.R. 11-260-10 and H.A.R. 11-261-2 [see also 40 C.F.R. §§ 260.10 and 261.2 for definition of "solid waste"].
14. At the Facility, Respondent generates and accumulates, or has generated and accumulated, "hazardous waste" as defined in H.A.R. 11-260-10, and H.A.R. 11-261-3 [see also RCRA Section 1004(5), and 40 C.F.R. §§ 260.10 and 261.3]. These hazardous wastes include, but are not limited to: waste gasoline, waste trichloroethylene, and paint waste (RCRA waste code D001).
15. At the Facility, Respondent generates "universal waste" as defined in H.A.R. § 11-273-9 [see also 40 C.F.R. § 273.9].
16. At the Facility Respondent had accumulated more than 5,000 kilograms of universal waste, and so was a "large quantity handler" of universal waste as defined in H.A.R. § 11-273-9 [see also 40 C.F.R. § 273.9].
17. On May 28, 2004, EPA conducted a RCRA Compliance Evaluation Inspection ("CEI") at the Facility. Based upon the findings EPA made during the inspection, and additional information obtained subsequent to the inspection, EPA determined that Respondent had violated HRS 342-J [see also RCRA Sections 3001, 3002, 3004, and 3005, 42 U.S.C. §§ 6921, 6922, 6924, and 6925] and the regulations adopted pursuant thereto, as approved and authorized by the United States.
18. Section 3006 of RCRA, 42 U.S.C. § 6926 provides, inter alia, that authorized state hazardous waste programs are carried out under Subtitle C of RCRA. Therefore, a violation of any requirement of law under an authorized state hazardous waste program is a violation of a requirement of Subtitle C of RCRA.
19. A violation of Hawaii's authorized hazardous waste program constitutes a violation of Subtitle C of RCRA and, therefore, a person who violates California's authorized hazardous waste program is subject to the powers vested in the EPA Administrator by Section 3008 of RCRA, 42 U.S.C. § 6928.
20. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes the EPA Administrator to issue orders requiring compliance immediately or within a specified time for violation of any

requirement of Subtitle C of RCRA, Section 3001 of RCRA et seq., 42 U.S.C. § 6921 et seq.

21. Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), provides that when a violation of Subtitle C of RCRA occurs in a state which has been authorized under Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator must notify an authorized state prior to issuing an order under Section 3008 of RCRA in that state. EPA notified the State of Hawaii as required by Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).
22. The Administrator has delegated the authority under Section 3008 of RCRA to the EPA Regional Administrator for Region 9, who has redelegated this authority to the Director of the Waste Management Division.

C. ALLEGED VIOLATIONS

Count I

Failure to Make a Hazardous Waste Determination

23. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
24. H.A.R. § 11-261-5 [see also 40 C.F.R. § 261.5] provides that conditionally exempt small quantity generators must meet certain requirements, including H.A.R. § 11-262-11 [see also 40 C.F.R. § 262.11]. H.A.R. § 11-262-11 requires that a person who generates a solid waste, as defined in H.A.R. § 11-261-2 [see also 40 C.F.R. § 261.2], must determine if that waste is a hazardous waste.
25. At the time of the CEI, EPA Inspectors observed that Respondent had not made hazardous waste determinations for the following wastes: one 55-gallon container of waste gasoline, two 5-gallon containers of waste trichloroethylene, and thirty-two containers of paint waste. After the inspection Respondent determined that all of these wastes are hazardous (RCRA waste code D001).
26. Therefore, EPA alleges that Respondent has violated H.A.R. § 11-262-11 [see also 40 C.F.R. § 262.11].

Count II

Failure to Respond to a Release of Used Oil

27. Paragraphs 1 through 26 above are incorporated herein by this reference as if they were set forth here in their entirety.

28. H.A.R. § 11-279-22(d) [see also 40 C.F.R. § 279.22(d)] requires that a generator of used oil must take the following steps upon detection of a release of used oil: (1) stop the release; (2) contain the released used oil; (3) clean up and manage properly the released used oil and other materials; and (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.
29. During the CEI, the EPA Inspectors noted several containers that were releasing used oil onto the ground.
30. Respondent had not taken any steps to stop the release, contain the released material, or clean up any of the released used oil.
31. Therefore EPA alleges that Respondent violated H.A.R. § 11-279-22(d) [see also 40 C.F.R. § 279.22(d)].

Count III

Failure to Store Used Oil in Containers in Good Condition

32. Paragraphs 1 through 31 above are incorporated herein by this reference as if they were set forth here in their entirety.
33. H.A.R. § 11-279-22(b) [see also 40 C.F.R. § 279.22(b)] requires that containers and aboveground tanks used to store used oil must be (1) in good condition (no severe rusting, apparent structural defects or deterioration); and (2) not leaking (no visible leaks).
34. During the CEI, the EPA Inspectors observed more than forty containers of used oil onsite. Approximately half of the containers were not in good condition, and many were visibly leaking.
35. Therefore EPA alleges that Respondent violated H.A.R. § 11-279-22(b) [see also 40 C.F.R. § 279.22(b)].

Count IV

Failure to Mark Containers of Used Oil

36. Paragraphs 1 through 35 above are incorporated herein by this reference as if they were set forth here in their entirety.
37. H.A.R. § 11-279-22(c) [see also 40 C.F.R. § 279.22(c)] provides that containers used to store used oil at generator facilities must be labelled or marked clearly with the words "used oil."
38. During the CEI, Inspectors observed more than forty 55-gallon containers of used oil and

environment.

49. Therefore EPA alleges that Respondent violated H.A.R. §§ 11-273-33(a) [*see also* 40 C.F.R. § 273.33(a)].

Count VII

Failure to Label or Mark Universal Waste

50. Paragraphs 1 through 49 above are incorporated herein by this reference as if they were set forth here in their entirety.
51. H.A.R. § 11-273-34 [*see also* 40 C.F.R. § 273.34] states that a large quantity handler of universal waste must label or mark universal waste to identify the type of universal waste. H.A.R. § 11-273-34(a) states that universal waste batteries or a container or tank in which the batteries are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)." H.A.R. § 11-273-34(e) states that each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."
52. At the time of the CEI, EPA Inspectors observed that none of the waste batteries and none of the sixteen universal waste lamps onsite were marked as required.
53. Therefore EPA alleges that Respondent violated H.A.R. § 11-273-34 [*see also* 40 C.F.R. § 273.34].

Count VIII

Failure to Meet Accumulation Time Limit Requirements

54. Paragraphs 1 through 53 above are incorporated herein by this reference as if they were set forth here in their entirety.
55. H.A.R. § 11-273-35(a) states that a large quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph 11-273-35(b) are met [*see also* 40 C.F.R. §§ 273.35(a) and (b)].
56. H.A.R. § 11-273-35(b) [*see also* 40 C.F.R. 273.35(b)] states that a large quantity handler of universal waste may accumulate universal waste for longer than one year from the date the universal waste is generated, or received from another handler, if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. That section also states that the handler bears the burden of proving that such activity was solely for the purpose of accumulation of such

quantities of universal waste as necessary to facilitate proper recovery, treatment or disposal.

57. At the time of the CEI Respondent was not able to show that its accumulation of universal waste was solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. The universal waste appeared weathered as though it had been onsite for a long time.
58. H.A.R. § 11-273-35(c) [see also 40 C.F.R. § 273.35(c)] states that a large quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.
59. At the time of the CEI, Respondent was unable to demonstrate the length of time the waste had been onsite.
60. Therefore EPA alleges that Respondent violated H.A.R. §§ 11-273-35 [see also 40 C.F.R. § 273.35].

D. CIVIL PENALTY

66. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), as adjusted by the Debt Collection Improvement Act of 1996, see 61 Fed. Reg. 69360 (Dec. 31, 1996) and 69 Fed. Reg. 7121 (Feb. 13, 2004), authorizes a civil penalty of up to THIRTY TWO THOUSAND, FIVE HUNDRED DOLLARS (\$32,500) per day for violations of Subtitle C of RCRA, 42 U.S.C. § 6921 et seq., occurring on March 15, 2004 or thereafter. Based upon the facts alleged herein and upon those factors which EPA must consider pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), the June 2003 RCRA Civil Penalty Policy, including the seriousness of the violations, any good faith efforts by Respondent to comply with applicable requirements, and the Respondent's ability to pay, as well as such other matters as justice may require, EPA proposes that Respondent be assessed a total of TEN THOUSAND DOLLARS (\$10,000.00) as the civil penalty for the violations alleged herein. Under the penalty policy, EPA uses a penalty assessment matrix to determine a gravity-based penalty. That penalty amount is then adjusted to take into account multi-day violations, the economic benefit gained from non-compliance, and where appropriate, case-specific circumstances.

E. ADMISSIONS AND WAIVERS OF RIGHTS

67. For the purposes of this proceeding, Respondent admits to the jurisdictional allegations set forth in Section B of this CA/FO, and agrees not to contest EPA's jurisdiction and authority to enter into and issue this CA/FO and to enforce its terms. Further, Respondent will not contest EPA's jurisdiction and authority to compel compliance with this CA/FO in any enforcement proceedings, either administrative or judicial, or to impose sanctions for

violations of this CA/FO.

68. Respondent neither admits nor denies any allegations of fact or law set forth in Section C of this CA/FO. Respondent hereby waives any rights Respondent may have to contest the allegations set forth in this CA/FO, waives any rights Respondent may have to a hearing on any issue relating to the factual allegations or legal conclusions set forth in this CA/FO, including without limitation a hearing pursuant to Section 3008(b) of RCRA, 42 U.S.C. § 6928(b) and hereby consents to the issuance of this CA/FO without adjudication. In addition, Respondent hereby waives any rights Respondent may have to appeal the Final Order attached to this Consent Agreement and made part of this CA/FO.

F. PARTIES BOUND

69. This CA/FO shall apply to and be binding upon Respondent and its agents, successors and assigns and upon all persons acting under or for Respondent, until such time as the civil penalty required under Sections D and G has been paid in accordance with Section G and any delays in performance and/or stipulated penalties have been resolved. Conclusion of those matters shall constitute full settlement of the violations alleged herein.
70. No change in ownership or corporate, partnership or legal status relating to the Facility will in any way alter Respondent's obligations and responsibilities under this CA/FO.
71. Respondent shall give notice of this CA/FO to any successor in interest prior to transfer of operation of the Facility and shall notify EPA within seven (7) days prior to such transfer until the termination of this CA/FO.
72. The undersigned representative of Respondent hereby certifies that he or she is fully authorized by Respondent to enter into this CA/FO, to execute and to legally bind Respondent to it.

G. PAYMENT OF CIVIL PENALTY

73. Respondent consents to the assessment of and agrees to pay a civil penalty of TEN THOUSAND DOLLARS (\$10,000.00) in full settlement of the federal civil penalty claims set forth in this CA/FO.
74. Respondent shall submit payment of the TEN THOUSAND DOLLAR (\$10,000.00) civil penalty within thirty (30) calendar days of the Effective Date of this CA/FO. The Effective Date of this CA/FO is the date the Final Order, signed by the Regional Judicial Officer, is filed with the Regional Hearing Clerk. Payments shall be made by certified or cashier's check payable to the U.S. Environmental Protection Agency and sent to:

Mellon Bank

U.S. Environmental Protection Agency - Region 9
P.O. Box 371099M
Pittsburgh, PA 15251.

At the time each payment is so made, a copy of the check shall be sent to:

Danielle Carr
Regional Hearing Clerk (RC-1)
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105

and

Matt Reed (WST-3)
Waste Management Division
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105.

75. In accordance with the Debt Collection Act of 1982 and U.S. Treasury directive (TFRM 6-8000), the payment must be received within thirty (30) calendar days of the Effective Date of this CA/FO to avoid additional charges. If payment is not received within thirty (30) calendar days, interest will accrue from the Effective Date of this CA/FO at the current rate published by the United States Treasury as described at 40 C.F.R. §13.11. A late penalty charge of \$15.00 will be imposed after thirty (30) calendar days with an additional \$15.00 charge for each subsequent 30-day period. A 6% per annum penalty will further apply on any principal amount not paid within ninety (90) calendar days of the due date. Respondent further will be liable for stipulated penalties as set forth below for any payment not received by its due date.

H. DELAY IN PERFORMANCE/STIPULATED PENALTIES

76. In the event Respondent fails to meet any requirement set forth in this CA/FO, Respondent shall pay stipulated penalties as follows: for failure to submit a payment to EPA by the time required in this CA/FO, FIVE HUNDRED DOLLARS (\$500) per day for first to fifteenth day of delay, ONE THOUSAND DOLLARS (\$1,000) per day for sixteenth to thirtieth day of delay, and FIFTEEN HUNDRED DOLLARS (\$1,500) per day for each day of delay thereafter.
77. All penalties shall begin to accrue on the date that performance is due or a violation occurs, and shall continue to accrue through the final day of correction of the noncompliance. Nothing herein shall prevent the simultaneous accrual of separate penalties for separate

violations.

78. All penalties owed to EPA under this Section shall be due within thirty (30) days of receipt of a notification of noncompliance. Such notification shall describe the noncompliance and shall indicate the amount of penalties due. Interest at the current rate published by the United States Treasury, as described at 40 C.F.R. §13.11, shall begin to accrue on the unpaid balance at the end of the thirty-day period.
79. All penalties shall be made payable by certified or cashier's check to the U.S. Environmental Protection Agency and shall be remitted to:

Mellon Bank
U.S. Environmental Protection Agency - Region 9
P.O. Box 371099M
Pittsburgh, PA 15251.

80. All payments shall indicate the name of the Facility, EPA identification number of the Facility, Respondent's name and address, and the EPA docket number of this action. At the time payment is made, Respondent shall send a copy of the payment transmittal to:

Danielle Carr
Regional Hearing Clerk (RC-1)
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105

and

Matt Reed (WST-3)
Waste Management Division
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105.

81. The payment of stipulated penalties shall not alter in any way Respondent's obligation to complete the performance required hereunder.
82. The stipulated penalties set forth in this Section do not preclude EPA from pursuing any other remedies or sanctions which may be available to EPA by reason of Respondent's failure to comply with any of the requirements of this CA/FO.

I. RESERVATION OF RIGHTS

83. EPA hereby reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, including the right to require that Respondent perform

tasks in addition to those required by this CA/FO. EPA further reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, which may pertain to Respondent's failure to comply with any of the requirements of this CA/FO, including without limitation, the assessment of penalties under Section 3008(c) of RCRA, 42 U.S.C. § 6928(c). This CA/FO shall not be construed as a covenant not to sue, release, waiver or limitation of any rights, remedies, powers or authorities, civil or criminal, which EPA has under RCRA, the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, or any other statutory, regulatory or common law enforcement authority of the United States.

- 84. Compliance by Respondent with the terms of this CA/FO shall not relieve Respondent of its obligations to comply with RCRA or any other applicable local, State or federal laws and regulations.
- 85. The entry of this CA/FO and Respondent's consent to comply shall not limit or otherwise preclude EPA from taking additional enforcement actions should EPA determine that such actions are warranted except as they relate to Respondent's liability for federal civil penalties for the specific alleged violations and facts as set forth in Section C of this CA/FO.
- 86. This CA/FO is not intended to be nor shall it be construed as a permit. This CA/FO does not relieve Respondent of any obligation to obtain and comply with any local, State or federal permits.

J. OTHER CLAIMS

- 87. Nothing in this CA/FO shall constitute or be construed as a release from any other claim, cause of action or demand in law or equity by or against any person, firm, partnership, entity or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from the Facility.

K. MISCELLANEOUS

- 88. This CA/FO may be amended or modified only by written agreement executed by both EPA and Respondent.
- 89. The headings in this CA/FO are for convenience of reference only and shall not affect interpretation of this CA/FO.

90. The Effective Date of this CA/FO is the date the Final Order, signed by the Regional Judicial Officer, is filed with the Regional Hearing Clerk.

IT IS SO AGREED.

03/30/07

Date

Richard H.S. Lee

Richard H.S. Lee, President
R.H.S. Lee, Inc.

6/6/07

Date

Jeff Scott

Director, Waste Management Division
United States Environmental Protection Agency,
Region IX

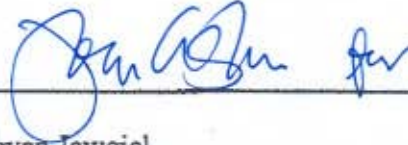
FINAL ORDER

IT IS HEREBY ORDERED that this Consent Agreement and Final Order Pursuant to 40 C.F.R. Sections 22.13 and 22.18 ("CA/FO") (U.S. EPA Docket No. RCRA-9-20070012 be entered and that R.H.S. Lee, Inc. pay a civil penalty of TEN THOUSAND DOLLARS (\$10,000.00) by certified or cashier's check made out to U.S. Environmental Protection Agency, and sent to Mellon Bank, P.O. Box 371099M, Pittsburgh, PA, 15251, within thirty (30) days after the Effective Date of this CA/FO. A copy of the check shall be sent to the EPA Region 9 addresses specified in Section G of this CA/FO within such 30-day period.

This Final Order shall be effective upon filing with the Regional Hearing Clerk.

6.13.07

Date



Steven Jawgiel
Regional Judicial Officer
United States Environmental Protection Agency,
Region IX

CERTIFICATE OF SERVICE

I hereby certify that on the date below, the original copy of the foregoing Complaint, Consent Agreement and Final Order, was filed with the Regional Hearing Clerk, Region IX, and that copies were sent by certified mail, return receipt requested, to:

Richard Lee
President
96-1414 Waiihona Place
Pearl City, HI
96707

6-18-07¹⁹
Date

Danielle E. Carr
Danielle Carr
Regional Hearing Clerk
Office of Regional Counsel, Region IX

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
7000 0520 0021 6107 1880	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Postmark Here	
Recipient's Name (Please Print Clearly) (To be completed by mailer)	
Mr. Richard H. S. Lee / R.H.S. Lee, Inc.	
Street, Apt. No., or PO Box No.	
96-1414 Waiihona Place	
City, State, ZIP+4	
Pearl City, HI 96707	
PS Form 3800, February 2000	
See Reverse for Instructions	