

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: WILLIAM HUNNEKE
Facility ID Number: NCR000157750
Facility Name: RITE AID #11425
Document Group: Inspection/Investigation (I)
Document Type: I - Compliance Evaluation Inspection (CEI)
Description for File (for CARA): Never Inspected LQG. No violations.
Date of Document: 11/20/2014
Author(s) of Document: William Hunneke

Inspector ID #: NC060 **Suborganization:** Eastern Region
Comments for RCRAInfo: Never Inspected LQG. No violations.
County (if not on report): Wilson



STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPLIANCE EVALUATION INSPECTION

FACILITY INFORMATION:

Facility Name: **RITE AID #11425**

EPA ID Number: **NCR000157750**

Type of Facility: Notified as large quantity generator, operating as conditionally exempt small quantity generator.

Facility Location: 2650 Ward Boulevard, Wilson NC 27893-1619
Wilson County

Telephone Number: 252-243-3131

Mailing Address: 30 Hunter Lane, Camp Hill, PA 17011

Property Owner: MK-Menlo Property Owner LLC
Property Owner Address: 580 White Plains Road, Tarrytown NY 10591

Operator: Eckerd Corporation
30 Hunter Lane Camp Hill, PA 17011

FACILITY CONTACTS:

Stephanie A. Caiati, Director, EH&S (Corporate)
Telephone: 717-730-8225
E-mail: sscaaiti@riteaid.com

Store Manager: Ken Finney
Telephone Number: 252-243-3131
E-mail: kfinney@riteaid.com

DATE OF SITE VISIT: **November 20, 2014** onsite: 1430 hrs. offsite: 1540 hrs.

PARTICIPANTS:

Representing Rite Aid #11425: Kristy Millard, Shift Supervisor
Representing NCDENR: William Hunneke, Environmental Senior Specialist (Inspector)

PURPOSE OF SITE VISIT:

Compliance Evaluation Inspection to determine compliance with regulations described at 40 CFR 261, 262, 265, 268 and 273. There is no record that this facility has been previously inspected.

FACILITY DESCRIPTION:

Rite Aid #11425 operates as a retail pharmacy also selling groceries and a variety of household items. It is part of a national chain and is provided guidance for compliance with the hazardous waste management regulations by the by the RITE AID corporate office and by their contracted waste management

companies. They use a bar code system as a guide in waste determination and handling of hazardous wastes. The system makes a determination of either “hazardous waste”, “trash” or “return to distribution warehouse”. Waste deemed as hazardous is placed into clear plastic “zip lock” bags. If the material packaging is broken and the material is leaking, absorbent is added and the material is double bagged. The bags are placed into plastic lined 15- gallon plastic containers with snap tight lids for storage.

The facility is open to the public from 8 AM until 10 PM and employs twenty individuals. Water and sewer service are provided to the facility by the City of Wilson. There are no known wells on the subject property and the distance to the nearest off site well is unknown. The distance to the nearest residence is approximately two hundred yards. The facility notified NC DWM as a Large Quantity Generator (LQG) of hazardous waste on July 8, 2012 due to the possibility of the facility generating greater than 2.2 pounds of acute hazardous waste (typically generated at the pharmacy) on-site at any time. The facility appears to currently be operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. The facility was therefore inspected as a CESQG with comments made regarding LQG rules. The Large Quantity Generator comments rendered in this report do not constitute a complete list of LQG rules and are only meant as guidance, if generator status changes due to operational changes.

WASTE STREAMS:

Hazardous waste is generated primarily from returned, defective or broken merchandise from the sales floor or from the pharmacy in the form of expired, returned or off-specification pharmaceuticals. Waste streams typically generated may include:

- | | |
|---|-----------------------------------|
| • Waste Aerosols | D001 |
| • Naphthalene, Sulfur | D001/U165 |
| • Sodium Hydroxide, Potassium Carbonate | D002 |
| • Waste Flammable Liquids | D001 |
| • Waste Flammable Liquids (xylene, toluene) | D001/D018/D035/U022 |
| • Waste Oxidizing Liquids (hydrogen peroxide) | D001 |
| • Waste Compressed Gas | D001 |
| • Waste Flammable Solids | D001/U165 |
| • Waste Toxic Solids (Pyrethroids, Selenium) | D010 |
| • Waste Toxic Solids (M-Cresol) | D024 |
| • Waste Toxic Solids (warfarin, nicotine) | P012/P075/P188/P081/P024/P108 |
| • Waste mercury, | D009 |
| • Used batteries | Observed on manifests. |
| • Used lamps | Removed by electrical contractor. |

AREAS OF REVIEW AND EVALUATION:

Manifests and Land Disposal Restriction (LDR):

Hazardous waste manifests were reviewed from November, 2013 through the present and were observed to be in compliance and complete with Land Disposal Restriction documents. One manifest was observed with greater than 2.2 pounds of P-listed waste (Warfarin & nicotine) however a note in the comments section indicated that the weight included the P-listed constituents’ containers which were in fact RCRA empty. Based upon that information, it is unlikely that the residual P-listed waste in the containers amounted to anywhere close to 2.2 pounds.

HW Transporters:

Companies that transport hazardous waste from the subject site include:

- EQ Industrial Services EPA id#: MI0000263871
- AR Paquett & Company, Inc. EPA id#: FLD982105884

HW TSD's:

Companies that treat, store or dispose of hazardous waste from the subject site include:

- EQ Detroit EPA id#: MID980991566

Emergency Preparedness/Arrangements with Local Authorities:

The facility has a fire suppression system, spill clean-up supplies, fire extinguishers, public announcement (PA) system, audible fire alarms and emergency information posted by most phones. *The facility could not produce documentation or describe the arrangements made with emergency authorities (not required for CESQG). If the facility operates as a LQG, the facility must comply with 40 CFR 265.37 and ensure arrangements have been made with the fire and police department that include the properties of hazardous waste handled at the facility and the associated hazards, the places where facility personnel normally work, the entrances to roads inside the facility, and possible evacuation routes. Arrangements with the hospital must include the properties of hazardous waste handled and the injuries or illnesses that could occur as a result of fire, spill or explosion. Examples of these arrangement letters will be provided with this report.*

Contingency Plan:

The facility has a contingency plan entitled "Emergency Action, Fire Prevention, and Hazardous Waste Contingency Plan" (The Plan) that describes the actions personnel must take to respond to emergency incidents such as fire, explosion and any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil or surface water. Last revised in September 2014, The Plan did not include a list of emergency coordinators with their work and cell phone numbers the individual's home addresses or home telephone numbers. The Plan did not provide a description of any arrangements made with the local emergency authorities. Rather, a paragraph under the heading "Off-Site Emergency Responders" reads:

Hazardous Waste Incidents: Pursuant to 40 CFR § 265.37 (as incorporated by applicable State regulations), prior coordination with local emergency response authorities is required "as appropriate for the type of waste handled at [the] facility and the potential need for the services of these organizations." Due to the amounts and nature of hazardous waste generated and managed at this facility, Rite Aid has determined that such coordination is not indicated and has instead elected to contract with the Hazardous Waste Emergency Responder at 1-800-839-3975 for spill response services.

The Plan lists a description of the signal used to begin evacuation of the facility; a physical description of the emergency equipment used at the hazardous waste storage area in the event of an emergency with the location of the equipment and a brief description of the capabilities of the equipment and a description of the evacuation routes from the less than 90 day storage area. The facility has not submitted the contingency plan to the local emergency authorities as required. A contingency plan is not required for a facility operating as a CESQG. *If the facility operates as a LQG, the facility must ensure compliance with the contingency plan requirements described in 40 CFR 265 Subpart*

Training Records:

Training is accomplished for personnel upon hiring and maintained online through computer based training. A log sheet indicating completion of a hazardous materials training course was observed with the names and signatures of several store employees. The training dates for the employees were in

November 2013. *A LQG must maintain training documents in accordance with 40 CFR 265.16 and make them available during an inspection. LQG hazardous waste training must take place on an annual (365 days or less) schedule.*

Inspection Records (storage):

The facility was not able to produce weekly inspection logs for the facility's hazardous waste storage area at the time of the inspection. *A LQG is required to inspect and document the hazardous waste storage area at least weekly (every 7 days) and maintain the inspection logs for three years.*

Hazardous Waste Areas:

The store has two areas where hazardous waste is accumulated or stored: the back stockroom and the pharmacy. The stockroom and pharmacy each are equipped with 15-gallon plastic bins with snap on lids for the storage of hazardous waste.

Pharmacy:

On the day of the inspection, one hazardous waste container was observed located in the pharmacy. The container was lined with a plastic bag with each of its contents in separate small zip lock baggies. The bin was observed to be closed, labeled and dated.

The Stockroom:

On the day of the inspection, one hazardous waste container was observed located in the stockroom, lined with a plastic bag and with each of its contents in separate small zip lock baggies. The bin was observed to be closed, labeled and dated. The area was observed to be equipped with a spill kit, fire extinguisher, eye wash station, and telephone.

Universal Waste:

Used Batteries are generated predominantly from customer returns. Batteries were observed to be listed on hazardous waste manifests. No used lamps were observed on the day of the inspection. The facility must ensure compliance with the universal waste rules found at 40 CFR 273. Even if a third party manages the universal waste (e.g. an electrical contractor), the originating facility generating the waste may still be held liable for any mismanagement.

Biennial Report: The biennial report is not required for facilities operating as CESQGs. *A LQG is required to maintain a copy of the biennial report on site for three years.*

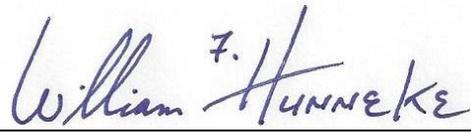
Waste Minimization: The facility's waste minimization plan was not reviewed.

SITE DEFICIENCIES:

The facility was inspected for compliance with the rules applicable for conditionally exempt small quantity generators. As such, no site deficiencies were noted or observed. If the facility actually operates as a LQG, the facility must comply with all applicable LQG requirements. Currently the facility is not in compliance with all of the requirements applicable to LQGs of hazardous waste.

COMMENTS:

The importance of remaining vigilant about the volume of P-Listed hazardous waste was discussed the Shift Supervisor, Ms. Millard. It is recommended that when shipping hazardous waste, someone review the manifest with the transporter to ensure that the quantity of P-listed waste is counted correctly. Only the residual contents of P-listed containers should be part of the facility's P-Listed weight calculation. It is beneficial if the facility can continue to demonstrate its operational status as CESQG.



Name
Environmental Senior Specialist, NCDENR

December 8, 2014

Date

Copy of report delivered to facility contact

Guidance Documents included with report:
Arrangements with Emergency Authorities example letters
LQG Inspection Checklist