



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

**RCRA COMPLIANCE ASSISTANCE VISIT (CAV) REPORT**

**1. FACILITY INFORMATION:**

Facility Name: CVS Pharmacy # 2306  
EPA ID Number: NCR 000 154 088  
Type of Facility: Large Quantity Generator (LQG) of hazardous waste  
Facility Location: 2797 NC Hwy 55, Cary, NC 27519  
Mailing Address: CVS Corporation, One CVS Drive, Woonsocket, RI 02895  
County: Wake

**2. FACILITY CONTACT:** Wendy L. Brant, Environmental Manager – CVS Corporation  
Office telephone: 401-770-7457; [wendy.brant@cvscaremark.com](mailto:wendy.brant@cvscaremark.com)

On-site contact: Mr. William Foxworth, Store Manager – CVS Pharmacy # 2306  
919-362-0381 – store telephone

**3. DATE OF SITE VISIT:** July 8, 2015

**4. EVALUATION PARTICIPANTS:**

Mr. William Foxworth, Store Manager – CVS Pharmacy # 2306  
Jenne S. Walker, Environmental Senior Specialist, Division of Waste  
Management, Hazardous Waste Section, NC DENR

**5. PURPOSE OF SITE VISIT:** An unannounced site visit was conducted to provide compliance assistance regarding the hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Chapter 40 of the Code of Federal Regulations (40 CFR), Parts 260-270, 273 and 279, and Title 15 Chapter 13A of the North Carolina Administrative Code (NCAC). The subject facility has not previously been inspected.

**6. FACILITY DESCRIPTION:**

CVS Pharmacy # 2306 (Hwy 55, Cary) operates as a retail drug store and pharmacy specializing in prescription and non-prescription medications. The store also sells a variety of household items including cosmetics and some groceries. CVS Pharmacy # 2306 notified NC DWM as a Large Quantity Generator (LQG) of hazardous waste on 4/6/2015 due to the possibility of generating or storing greater than 2.2 pounds of acute hazardous waste on-site at any time.

Acute hazardous waste (P-listed waste) and non-acute hazardous waste may be generated due to returned, damaged or defective merchandise. The facility utilizes digital photography and does not generate hazardous waste at the photo lab area.

CVS Pharmacy # 2306 (Hwy 55, Cary, NC)

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**General Information:**

- a. **Operator of facility:** North Carolina CVS Pharmacy LLC  
One CVS Drive, Woonsocket, RI 02895
- b. Property Owner: 55High House Rd Associates, LLC, 5306-101 Six Forks Rd, Raleigh NC 27609
- c. **Operating Shifts:** 8am -10pm/ open 7days per week
- d. **Number of Employees:** ~ 15
- e. **Water Supply & Sanitary Sewer:** Town of Cary
- f. **Groundwater Monitoring wells on-site:** none
- g. **Distance to closest residence:** > ½ mile

**7. WASTE STREAMS:**

Hazardous waste may be generated from returned defective or damaged merchandise (hazardous materials). Acute hazardous waste may be generated in the Pharmacy as waste pharmaceuticals (often as warfarin/Coumadin) or in the form of returned merchandise (waste nicotine). Items are sent for disposal as hazardous waste if they cannot be returned for credit or used as intended as a product (such as through donation programs). The following waste streams may be generated on-site:

**Hazardous Waste**

- D001 – compressed gas – flammable (lighters/LPG)
- D001, D004, D005, D007, D009, D010, D011, D016 Toxic liquids & solids (labpack)
- D001/D018 – Waste flammable liquids
- D001/D035 – Waste aerosols
- D002 – Corrosive liquids, basic
- D009 – mercury containing waste (broken fluorescent lamps)
- P001, P012, P046, P075, P081 - Waste pharmaceuticals (acute hazardous waste - toxic solids)  
(including but not limited to warfarin, nicotine)

**8. AREAS OF REVIEW:**

At the time of the site visit, CVS Pharmacy # 2306 appeared to be operating as a Large Quantity Generator (CESQG) of hazardous waste. The inspection focused on the Pharmacy and Storage Room hazardous waste storage areas and a LQG records review was conducted.

**PHYSICAL INSPECTION/FACILITY WALK-THROUGH**

When returned merchandise is received at the Customer Service area in the front of the store, it is immediately taken to the Stock Room for processing. The facility's main Hazardous Waste Storage Area and waste processing areas are located in the back of the facility in the Stock Room.

A computerized "TELZON" bar code system is used as a guide in waste determination and overall waste management. The system makes a determination of either "hazardous waste", "trash" or "return to distribution warehouse". Each waste item that is deemed hazardous is placed into a "strong pack" clear plastic zip locking/sealable bag. If the item's original container or packaging has been damaged and/or the material is leaking, then it is double bagged. Each item in its own bag is then placed into a 10-gallon cardboard box that is lined with a thick plastic bag. The facility uses plastic lined 10-gallon cardboard boxes as hazardous waste storage containers.

### **Hazardous Waste Satellite Accumulation Area**

**Pharmacy** – One open container ('Strongpack' boxes are used as containers) of hazardous waste was observed in the Pharmacy. The individual waste items were in sealed bags inside the box. The container was observed to be properly labeled and marked with an accumulation start date (6/11/15).

### **Hazardous Waste Storage Area**

**Stock Room (Main hazardous waste Storage Area)** – Three boxes of hazardous waste (HW) were observed in storage on a shelf in the Stock room. Each container (box) was marked with the words hazardous waste and an accumulation start date (6/13/15, 7/1/15, and 7/5/15). Adequate aisle space was maintained and the area appeared to be extremely neat and clean and well organized. *Ensure that each container (box) of hazardous waste in storage is kept closed unless waste is being added or removed from the container.*

**Universal Waste (Used Lamps, Used batteries)** – No Universal Waste was in storage at the time of the inspection. Used lamps containing mercury (LCMs) are managed by a third party (Sylvania) and are not stored on-site.

**Emergency Preparedness** - Spill clean-up supplies and fire extinguishers were available in the Pharmacy and Stock Room hazardous waste storage area as listed in the facility's contingency plan. The facility is equipped with a PA system (intercom) and audible/pull fire alarms. A landline telephone is located in the Pharmacy and Stock Room.

## **RECORDS & DOCUMENT REVIEW**

**Weekly Inspection logs** – Inspections of the facility's hazardous waste storage areas (Pharmacy and Storage Room) are conducted on a weekly basis. However, inspection records appeared to be incomplete. *Ensure that inspections are conducted and documented at least every 7 days.*

**Contingency Plan** – The facility's LQG Contingency Plan was reviewed (last updated in 6/2013). The facility's contingency plan was last revised in March 2015. *Ensure that a copy of the most recently updated contingency plan is maintained onsite and that the plan contains the required site specific information.*

It was noted that the emergency information required for compliance with Small Quantity Generator regulation requirements was posted on-site at the front of the store near a telephone and in the Stock Room near the facility's main hazardous waste storage area.

**Manifests and Land Disposal Restriction (LDR) forms** – Hazardous waste is picked up approximately once every 10 – 12 weeks. The facility's manifests & LDR records were reviewed for 2013 – June 2015. All records appeared to be complete and were extremely well organized. CVS Pharmacy # 2306 utilized the following hazardous waste management vendors during the specified time frame (for transportation and Treatment/storage/disposal of hazardous waste):

**HW Transporters:** Stericycle Inc. – INR 000 110 197  
Allworth, LLC – ALD 094 476 793

**HW TSD facilities:** Stericycle Specialty Waste Solutions, Inc. – MNS 000 110 924  
Republic Env Sys (Trans Group) LLC – PAD 982 661 381

**Arrangements with Local Authorities** – Copies of letters to document arrangements the facility has made with local emergency authorities (hospital, fire and police departments) could not be located at the time of the site visit but were referenced in the facility's contingency plan. **Ensure that documentation is maintained on-site to demonstrate the facility's compliance with this requirement.**

**Personnel Training Records** – The facility's personnel training records are maintained in an on-line database (electronic records). On-line RCRA training is provided initially upon hire and thereafter approximately every six months. Employee RCRA Training modules were available for review at the time of the inspection.

**Job Descriptions** – Job descriptions are maintained on-line and were available for review for staff with hazardous waste management related job duties. Records appeared to contain the required elements.

**Biennial Report** –*The facility's next Biennial Report is due to DWM on or before 3/1/16 (for calendar year 2015 data).*

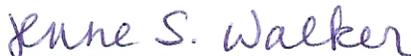
## 9. COMMENTS & RECOMMENDATIONS:

CVS Pharmacy # 2306 appeared to operate as a Large Quantity Generator (LQG) of hazardous waste in June 2015 based on a review of the facility's manifests.

**The following action items must be addressed in order to comply with the Large Quantity Generator regulation requirements:**

- 1. Inspections of hazardous waste containers in storage are required to be conducted and documented weekly (at least every 7 days). All records should be available for unannounced review during a follow up inspection.**
- 2. A copy of the facility's most recently updated contingency plan must be maintained onsite and the plan must contain the required site specific information.**
- 3. Copies of letters to document arrangements the facility has made with local emergency authorities (hospital, fire and police departments) could not be located at the time of the site visit but were referenced in the facility's contingency plan. **Ensure that documentation is maintained on-site to demonstrate the facility's compliance with this requirement.****

The cooperation and assistance of Mr. William Foxworth (Store Manager) was greatly appreciated during the RCRA compliance inspection. If you have any questions about this report or maintaining compliance with the (RCRA) hazardous waste management regulations, please contact me at [jenne.walker@ncdenr.gov](mailto:jenne.walker@ncdenr.gov) or by telephone at 919-707-8224.



Jenne S. Walker  
Senior Environmental Specialist, NCDENR

signed 8/4/2015