

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

Your Name: Jenne Walker
Facility ID Number: NCR000155036
Facility Name: CVS Pharmacy #5384
Document Group: Inspection/Investigation (I)
Document Type: I - Compliance Evaluation Inspection (CEI)
Description for File: LQG operating as CESQG with no violations
Date of Document: 08/26/2015
Author(s) of Document: Jenne S Walker

Inspector ID #: NC028 **Suborganization:** Eastern Region

Comments for RCRA Info: LQG operating as CESQG with no violations

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**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

RCRA COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Facility Name: CVS Pharmacy # 5384
EPA ID Number: NCR 000 155 036
Type of Facility: Notified as a Large Quantity Generator (LQG) of hazardous waste
Operating as Conditionally Exempt Small Quantity Generator (CESQG)
Facility Location: 133 Marketplace Drive, Sanford, NC 27332
Mailing Address: CVS Corporation, One CVS Drive, Woonsocket, RI 02895
County: Lee

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

3. DATE OF SITE VISIT: August 26, 2015

4. EVALUATION PARTICIPANTS:

Mr. Nick Bilotti, Store Manager – CVS Pharmacy # 5384
Mr. William Woody, Store Manager Trainee – CVS Pharmacy # 5384
Jenne S. Walker, Environmental Senior Specialist, Division of Waste
Management, Hazardous Waste Section

5. PURPOSE OF SITE VISIT: An unannounced inspection was conducted to evaluate the facility's compliance with the hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Title 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).

6. FACILITY DESCRIPTION:

CVS Pharmacy # 5384 (Sanford) operates as a retail drug store and pharmacy specializing in prescription and non-prescription medications. The store also sells a variety of household items and some groceries. The facility opened at the subject location in November 2013. CVS Pharmacy # 5384 notified NC DWM as a Large Quantity Generator (LQG) of hazardous waste 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) may be generated in the form of waste nicotine containing products and waste pharmaceuticals. 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 in the photo lab area.

General Information:

- a. Operator of facility: North Carolina CVS Pharmacy LLC
One CVS Drive, Woonsocket, RI 02895
- b. Acreage: ~ 1
- c. Operating Shifts: 8am -10pm/ open 7days per week
- d. Number of Employees: ~ 18
- e. Water Supply & Sanitary Sewer: City of Sanford
- 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 as waste pharmaceuticals (warfarin/Coumadin) or as 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 – waste corrosive liquids, basic
- P001, P075 - waste pharmaceuticals (acute hazardous waste - toxic solids)
(warfarin, nicotine)

Other Waste Streams

Universal Waste – used batteries

8. AREAS OF REVIEW:

At the time of the inspection, CVS Pharmacy # 5384 appeared to be operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. Because the facility is listed with the Division as a Large Quantity Generator, CVS Pharmacy # 5384 was evaluated for compliance with LQG and CESQG regulation requirements. 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 container (‘Strongpack’ boxes are used as containers) of hazardous waste (HW) was observed in the Pharmacy. The container was observed to be properly labeled with the words ‘hazardous waste’ and marked with an accumulation start date of less than 90 days.

Hazardous Waste Storage Area

Stock Room (Main hazardous waste Storage Area) – Three boxes of hazardous waste (HW) was 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 of less than 90 days. Adequate aisle space was maintained and the area appeared to be neat and very well organized.

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).

Emergency Preparedness - Spill clean-up supplies and fire extinguishers were available in the Stock Room hazardous waste storage area as listed in the facility’s contingency plan. The facility is equipped with a Public Address 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 main hazardous waste storage area and Pharmacy are conducted and documented on a weekly basis. Inspection records appeared to be complete, were in excellent order and were readily available for review.

Contingency Plan – The facility’s LQG Contingency Plan was last updated in March 2015 and the plan appeared to contain the required elements. Nick Bilotti (Store Manager) is the listed as the primary on-site Emergency Coordinator. The plan was distributed to local authorities as noted in documentation maintained on-site.

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.

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 onsite at the time of the site visit but they were referenced in the facility’s contingency plan. *It is strongly recommended that copies of arrangements letters are maintained onsite in order to document the facility’s compliance with this requirement.*

Manifests and Land Disposal Restriction (LDR) forms – The facility’s manifests & LDR records were reviewed for January 2014 – June 2015. All records appeared to be complete and were well organized. CVS Pharmacy # 5384 utilized the following hazardous waste management vendors during the specified time frame (for transportation and Treatment/storage/disposal of hazardous waste):

HW Transporters: Stericycle Specialty Waste Solutions, Inc. – MNS 000 110 924
Republic Env Systems (Trans Group) – PAD 982 661 381
AR Paquette – FLD 982 105 884
Freehold Cartage – NJD 054 126 164

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

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 records were available for review at the time of the inspection and records documented that staff received annual hazardous waste management training in May 2015).

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 is required to submit a Biennial Report to DWM on or before 3/1/16 (for calendar year 2015 data).*

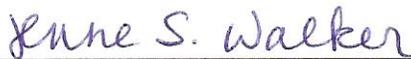
9. CONCLUSION:

CVS Pharmacy # 5384 appeared to be operating as a Conditionally Exempt Small Quantity Generator (CESQG) at the time of the inspection and no deficiencies were observed.

The following reminders is offered as part of the compliance inspection:

1. It is strongly recommended that copies of arrangements letters be maintained on-site in order to document the facility’s compliance with this requirement.
2. The subject facility’s next Biennial Report is due to DWM on or before 3/1/16 (for calendar year 2015 data).

The cooperation and assistance of Mr. Nick Bilotti (Store Manager) and facility staff 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 or by telephone at 919-707-8224.



Jenne S. Walker
Senior Environmental Specialist, NCDENR

signed 10/9/2015