

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

Your Name: Jenne Walker

Facility ID Number: NCR000139972

Facility Name: Target Store T1932

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: LQG operating as SQG, no violations

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Suborganization: Eastern Region

County (if not on report): Wake

**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: Target Store T1932 (Apex, NC)
EPA ID Number: NCR 000 139 972
Type of Facility: listed as Large Quantity Generator (LQG) of hazardous waste
operating as Small Quantity Generator
Facility Location: 1201 Beaver Creek Commons Dr, Apex, NC 27502
Telephone Number: 919-372-1405
County: Wake

2. FACILITY CONTACT: Steve Musser, Manager, Corporate Compliance – Target Corp
PO Box 111, Minneapolis, MN 55440
Telephone # 800-587-2228; corporate.compliance@target.com

On-site contact: Steven Grabko – Leader On Duty, Target # 1932

3. DATE OF SITE VISIT: March 16, 2016

4. EVALUATION PARTICIPANTS:

Steve Grabko, LOD – Target # 1932
Jenne S. Walker, Environmental Senior Specialist,
Div. of Waste Management, Hazardous Waste Section, NC DEQ

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 261-265, 268, 270, 273 and 279, and 15A NCAC 13A.

6. FACILITY DESCRIPTION:

Target Store # 1932 (Apex, NC) operates as a discount retailer for clothing, groceries and a variety of household items. Target # 1932 notified NC DWM as a Large Quantity Generator (LQG) of hazardous waste due to the possibility of the facility generating greater than 2.2 pounds of acute (P-listed) hazardous waste during any one calendar month. At the time of the inspection, the facility appeared to be operating as a Small Quantity Generator (SQG) of hazardous waste.

General Information:

- a. Legal owner of business & property: Target Corporation
- b. Operating Shifts: Sunday – Fridays 7am-11pm; Saturdays 7am -12pm
- c. Number of Employees: ~ 260
- d. Water Supply & sanitary sewer are provided by the Town of Apex
- e. Groundwater Monitoring wells on-site: none
- f. Distance to closest off-site well: unknown
- g. Distance to closest residence: ~ ¼ mile

7. WASTE STREAMS:

Hazardous waste is generated primarily from returned, defective or damaged merchandise (hazardous materials). Acute hazardous waste (P-listed) may be generated as waste nicotine containing products or in the pharmacy as waste pharmaceuticals. The following waste streams are typically 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
- D009 – mercury containing waste (broken fluorescent lamps)
- P001, P012, P046, P075, P081 - Waste pharmaceuticals (P-Listed acute hazardous waste)

Universal Waste – Used lamps and used batteries are generated on-site and are sent for recycling.

Used oil is *not* generated on-site.

8. AREAS OF REVIEW:

Target # 1932 appeared to be operating as a Small Quantity Generator of hazardous waste at the time of the inspection. However, because the facility notified as a Large Quantity Generator (LQG), the facility was reviewed for compliance with both SQG and LQG regulations.

PHYSICAL INSPECTION/FACILITY WALK-THRU

Hazardous Waste Storage Area: The facility’s Hazardous Waste Storage Area is located in the back of the facility near the loading docks. Access to this area is limited to Target staff.

A waste determination is conducted on each item upon receipt in the processing area. For items identified as hazardous waste, each item is placed in a sealed bag and the bag is then placed in the appropriate labeled plastic bin (based on hazard characteristic). Closable plastic bins/containers are used to segregate incompatible wastes.

Five containers of hazardous waste were observed in storage (two D001 Flam/aerosol; two corrosive basic; one oxidizer). Each container 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 was clean and neat and appeared to be well organized. A landline telephone, spill clean-up supplies and fire extinguisher were available. No deficiencies were observed.

Pharmacy – CVS Caremark recently purchased and began operating the Pharmacy operations located inside Target stores. One strong-pack box was observed accumulating waste pharmaceuticals. The container was marked with the words ‘hazardous waste’ and items were located in sealed plastic bags marked with the words ‘hazardous waste’.

Emergency Preparedness: Spill clean-up supplies and fire extinguishers were available near the hazardous waste storage area and at multiple locations throughout the facility. The facility is equipped with a PA system, audible fire alarms and a fire suppression (sprinkler) system. Land line telephones are located on-site throughout the facility and employees may also carry cell phones or two-way radios. The required emergency information (applicable to SQGs) was posted on-site near a telephone in the returns area, located at the back of the facility near the HW Storage Area.

RECORDS REVIEW

Manifests and Land Disposal Restriction (LDR) forms – Manifests and LDRs were reviewed and appeared satisfactory. Hazardous waste is picked up on-site approximately once every 8-10 weeks. The facility’s signed manifests & LDR records were accessible via on-line/internet access and hard copies were on-file and available for review. Target # 1932 utilized the following facilities for hazardous waste (HW) transportation and treatment, storage and disposal (TSD) in 2015:

HW TSD’s:	Clean Harbors Reidsville LLC – NCD000648451
HW Transporters:	Clean Harbors – MAD039322250
	Safety Kleen – TXR000081205

Weekly Inspection logs (for the < 90 day hazardous waste storage area) – Inspections of the facility’s hazardous waste storage area are conducted and documented on a weekly basis (at least every 7 days).

Contingency Plan – The facility’s LQG Contingency Plan was last updated in April 2014. Frank Kloeber (Store Manager) is the Primary Emergency Coordinator and Dwight Nellums is Alternate EC. The facility’s contingency plan is distributed to local authorities annually and was most recently distributed in July 2015 as documented by copies of letters sent by Certified Mail. Emergency Information was posted at the hazardous waste storage area.

Personnel Training Records – The facility’s personnel training records and job descriptions are maintained in an on-line database (electronic). The following staff received hazardous waste (aka: ESIM) training on these dates respectively: Steven Grabko – 7/9/2015; Frank Kloeber – 7/1/2015; Dwight Nellums 12/5/2015. All requirements appeared to be met.

Arrangements with Local Authorities – Arrangements with local authorities are described in the facility’s contingency plan. Copies of letters with attached contingency plan were sent via Certified Mail in July 2015 to the following agencies: Wake Med Apex Hospital, Apex Fire Department, and the Apex Police Department.

Biennial Report – Because the facility is currently listed as a LQG, *Target # 1932 is required to submit a Biennial Report to NC DWM on or before 3/1/2016 for Calendar Year 2015 data.*

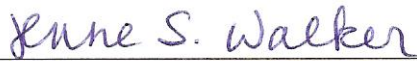
Waste Minimization Plan – The facility has a written waste minimization plan that appeared satisfactory.

9. DEFICIENCIES/VIOLATIONS: No violations cited.

10. CONCLUSION:

The cooperation and assistance of Mr. Steve Grabko was greatly appreciated during the site visit. No areas of concern were identified during the inspection.

If you have any questions about this report or maintaining compliance with the hazardous waste management (RCRA) regulations, please contact me at 919-707-8224 or jenne.walker@ncdenr.gov .



Jenne S. Walker

Environmental Senior Specialist, NCDEQ

Signed 4/4/2016