

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

Your Name: Jenne Walker

Facility ID Number: NCR000153130

Facility Name: CVS Pharmacy #7311

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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 # 7311
EPA ID Number: NCR 000 153 130
Type of Facility: Notified as a Large Quantity Generator (LQG) of hazardous waste;
Operating as Conditionally Exempt Small Quantity Generator (CESQG)
Facility Location: 1123 Kildaire Farm Rd, Cary, NC 27511
Telephone Number: 919-467-5572
Mailing Address: CVS Corporation, One CVS Drive, Woonsocket, RI 02895
County: Wake

- 2. FACILITY CONTACTS:** Christopher Martinsen – Consultant, Corporate Environmental, Health & Safety – CVS Health
Office: 401-770-7135; Christopher.Martinsen@CVSHealth.com

On-site contact: Christina Thomason, Store Manager – CVS Pharmacy #7311

- 3. DATE OF SITE VISIT:** April 18, 2016

4. EVALUATION PARTICIPANTS:

Ms. Christina Thomason – CVS Pharmacy # 7311
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 regulations) which are described at Title 40 of the Code of Federal Regulations (40 CFR), Parts 260-262, 265, 268, 270, 273 and 279, and 15A NCAC 13A.

6. FACILITY DESCRIPTION:

CVS Pharmacy # 7311 (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 and some groceries. CVS Pharmacy # 7311 notified NC DWM as a Large Quantity Generator (LQG) of hazardous waste due to the possibility of generating or storing on-site greater than 2.2 pounds of acute hazardous waste on-site at any time.

General Information:

- a. **Legal owner of business & property:** North Carolina CVS Pharmacy LLC
One CVS Drive, Woonsocket, RI 02895
- b. **Operating Shifts:** Monday – Saturdays 8am-10pm; Sundays 8am -9pm
- c. **Number of Employees:** ~ 20

- d. **Water Supply & Sanitary Sewer:** Town of Cary
- e. **Groundwater Monitoring wells on-site:** none
- f. **Distance to closest residence:** ~ ¼ mile

7. WASTE STREAMS:

Hazardous waste may be generated from returned defective or damaged merchandise. Acute hazardous waste may be generated from returned waste nicotine containing products and in the Pharmacy in the form of waste pharmaceuticals. 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 – Waste flammable liquids (acetone, alcohol)
- D001 – Waste aerosols, flammable
- D002 – waste corrosive liquids
- D007, D010 – waste toxic solids (chromium, selenium)
- D009 – mercury containing waste
- P001, P012, P046, P075, P081 – Waste toxic solids (warfarin, nicotine)

Other Waste Streams

- Universal Waste** - used batteries
- Non-hazardous and non-regulated solids and liquids
- Consumer electronics for recycling

8. AREAS OF REVIEW:

CVS Pharmacy # 7311 appeared to be operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste at the time of the inspection. However, because the facility notified NC DWM as a Large Quantity Generator (LQG), the facility was evaluated for compliance with both LQG and CESQG regulation requirements.

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 that is pre-printed with the words 'hazardous waste'. If the item's original container or packaging has been damaged and/or the material is leaking, then it is double bagged and absorbent is utilized within the bag. Each bagged waste item is laced into a 10-gallon cardboard box that is lined with a thick plastic bag.

Hazardous Waste Satellite Accumulation Area

Pharmacy – One strongpack box (container) was observed in the Pharmacy accumulating hazardous waste. Each waste item inside the container (box) was located inside a sealed and dated bag marked with the words ‘hazardous waste’. The container was also marked with the words ‘hazardous waste’ and an accumulation start date.

Hazardous Waste Storage Area

The facility’s main hazardous Waste Storage Area is located in an upstairs stock room. Two closed containers of hazardous waste (HW) were observed in storage. Each box was marked with the words ‘hazardous waste’ an accumulation start date of less than 90 days.

Universal Waste – Used batteries are occasionally generated on-site. However, no Universal Waste was in storage at the time of the inspection.

Emergency Preparedness - Spill clean-up supplies and fire extinguishers were available in the Pharmacy and in the Stock Room. The facility is equipped with a PA system, audible/pull fire alarms and a fire suppression system. A landline telephone was located in the Main Hazardous waste storage area (Stock Room) and in the Pharmacy.

RECORDS & DOCUMENT REVIEW

Weekly Inspection logs – Inspection records were reviewed and appeared to be complete.

Contingency Plan – The facility’s LQG Contingency Plan (last revised March 2015) was available for review. Christine Thomason and James Barefoot are listed as Emergency Coordinators. The Small Quantity Generator required emergency information was posted near a telephone at the front and back of the store and at various locations throughout the facility.

Arrangements with Local Authorities – Copies of letters to document arrangements the facility has made with local emergency authorities (hospital, fire and police departments) were not available for review at the time of the site visit but are referenced in the contingency plan. *Ensure that copies of arrangements letters are maintained on-file at the facility and are readily available for review during future un-announced RCRA compliance inspections.*

Manifests and Land Disposal Restriction (LDR) forms – Manifests and LDRs were reviewed for 2015 and appeared to be complete. Hazardous waste is picked up from the facility approximately once every 2 ½ months.

CVS Pharmacy #7311 utilized the following vendors for hazardous waste transportation and treatment, storage and disposal (TSD) of hazardous waste since 2014:

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

HW TSD’s: Stericycle Inc. – INR 000 110 197
Republic Env Systems PA LLC – PAD 093 690 592

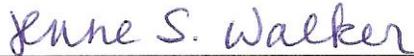
Personnel Training Records – The facility’s personnel training records are maintained in an on-line database (electronic records). Training records were reviewed for Christina Thomason and Linda Pendergraft.

Job Descriptions – Job description records are maintained onsite and appeared satisfactory.

9. CONCLUSION:

The cooperation and assistance provided by Ms. Christine Thomason was appreciated during the RCRA compliance inspection. CVS Pharmacy # 7311 appeared to be operating in compliance with the Conditionally Exempt Small Quantity Generator (CESQG) requirements at the time of the inspection.

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



Jenne S. Walker

Environmental Senior Specialist, NCDEQ

Signed 5/6/2016