

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

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**Facility ID Number:** NCR000154088

**Facility Name:** CVS Pharmacy #2306

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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 # 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 CONTACTS:** Nicole Wilkinson, Senior Manager – Corp. Environmental  
[Nicole.wilkinson@cvshealth.com](mailto:Nicole.wilkinson@cvshealth.com) telephone: 401-770-7132

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

**3. DATE OF SITE VISIT:** April 28, 2016

**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 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 260-270, 273 and 279, and 15A NCAC 13A.

**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.

**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:** municipal/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 Conditionally Exempt Small 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 marked with the words ‘hazardous waste’ and an accumulation start date of less than 90 days.

### **Hazardous Waste Storage Area**

**Stock Room (Main hazardous waste Storage Area)** – One box of hazardous waste (HW) was observed in storage on a shelf in the Stock room. The container (box) was marked with the words hazardous waste and an accumulation start date of 3/12/2016. Adequate aisle space was maintained and the area appeared to be extremely neat and clean and 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) 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 and documented on a weekly basis. Records appeared to be complete and in good order.

**Contingency Plan** – The facility’s LQG Contingency Plan was reviewed (last updated in 3/2015) and it appeared to contain the required elements. William Foxworth is listed as the Emergency Coordinator and the facility contracts with 3E to provide emergency response services.

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 – 2016. All records appeared to be complete and were well organized. CVS Pharmacy # 2306 utilized the following hazardous waste management vendors during the specified time frame:

**HW Transporters:** Stericycle Specialty Waste Solutions, Inc. – MNS 000 110 924  
Freehold Cartage – NJD 054 126 164

**HW TSD facilities:** Stericycle Inc. – INR 000 110 197  
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. Training records were reviewed for Mimie Sayegh - Clerk Cashier, JoAnn McMunn – Shift Supervisor and Sandy Garden. Each employee completed annual RCRA training on 4/28/2016.

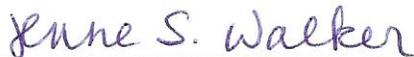
**Job Descriptions** – Job descriptions are maintained on-line and were available for review for staff with hazardous waste management related job duties. Records appeared to contain the required elements.

**Biennial Report** – The facility's last Biennial Report was submitted to DWM March 1, 2016 and was available for review.

**9. CONCLUSION:**

CVS Pharmacy # 2306 appeared to be operating as a Conditionally Exempt Small Quantity Generator (CEQG) of hazardous waste at the time of the inspection based on manifests reviewed and the quantity of hazardous waste stored onsite. At the time of the inspection, the facility appeared to be operating in compliance with the applicable regulation requirements.

The cooperation and assistance of Mr. William Foxworth (Store Manager) was greatly appreciated during the 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

Environmental Senior Specialist, NCDEQ

signed 5/13/2016