

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

**Your Name:** Phil Orozco

**Facility ID Number:** NCR000153395

**Facility Name:** CVS Pharmacy #1246

**Document Group:** Inspection/Investigation (I)

**Document Type:** I - Compliance Evaluation Inspection (CEI)

**Description for File (for CARA):** LQG operating as a CESQG at the time of inspection. No violations cited.

**Date of Document:** 1/26/2016

**Author(s) of Document:** Phil Orozco

**Inspector ID #:** NC018

**Suborganization:** Eastern Region

**Comments for RCRAInfo:** LQG operating as a CESQG at the time of inspection. No violations cited.

**County (if not on report):** GRANVILLE

**North Carolina  
Department of Environmental Quality  
Hazardous Waste Section**

**Compliance Evaluation Inspection (CEI) Report**

**FACILITY INFORMATION:**

Facility Name: **CVS Pharmacy #1246**  
EPA ID Number: **NCR000153395**  
Type of Facility: Large Quantity Generator (LQG)  
Facility Location: 612 N. Main St.  
Creedmoor, NC 27522  
Telephone Number: 919-528-4709

**FACILITY CONTACT(S):**

Christopher Martinson, Consultant, Corporate EHS, CVS Health; Office: 401-770-7135;  
Mobile: 508-612-9045 [Christopher.Martinsen@CVSHealth.com](mailto:Christopher.Martinsen@CVSHealth.com)

**DATE OF SITE VISIT:** **January 26, 2016**

**PARTICIPANTS:**

Jennifer Lewis, Shift Supervisors, CVS #1246  
Phillip Orozco, Environmental Sr. Specialist (Inspector), NCDEQ

**PURPOSE OF SITE VISIT:**

Unannounced evaluation to assist in maintaining compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279; and to provide guidance as needed with the North Carolina Hazardous Waste Management Rules. A previous CEI was conducted on 3/25/14. At that time, the store was operating as a Conditionally Exempt Small Quantity Generator CESQG.

**FACILITY DESCRIPTION:**

CVS Pharmacy Store #1246 operates as a retail pharmacy also selling groceries and a variety of household items. It is part of a national chain and is provided guidance for compliance by the corporate office and by Stericycle, its contracted waste management company. Management team members are waste handlers. They use a bar code "TELZON" system to determine handling of wastes. The system makes a determination of either "hazardous waste", "trash" or "return to distribution warehouse". Waste deemed as hazardous is placed into "strong pack" plastic bags. If the material packaging is broken and the material is leaking, it is double bagged. The bags are then placed into plastic lined 10-gallon boxes for storage.

The facility notified NC DWM as a Large Quantity Generator (LQG) of hazardous waste March 18, 2013 due to the possibility of the facility generating greater than 2.2 pounds of acute hazardous waste (typically generated at the pharmacy) during any one calendar month.

On the day of inspection, the facility appeared to be operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. One manifest indicated that 9 pounds of P-listed waste (P188, P075, P081, and P001) was transported from the store on 11/5/15. That was the only shipment of P-listed waste greater than 2.2 lbs. transported from the store in 2015.

**General Information:**

- **Legal operator of business:** North Carolina CVS Pharmacy, LLC
- **Legal owner of property:** ARC CVCRDNC001, DST
- **Operating Shifts:** The store is open 8a.m. to 9 p.m. seven days a week.
- **Number of Employees:** 14
- **Acres:** 1.36 acre site.
- **Square Footage of facility:** Unknown
- **Water Supply/Sanitary sewer:** Town of Creedmoor
- **Groundwater wells onsite:** Unknown
- **Distance to closest off-site well:** Unknown
- **Distance to closest residence:** Less than ¼ mile.

**WASTE STREAMS:**

Hazardous waste is generated primarily from returned, defective or broken merchandise from the sales floor or from the pharmacy in the form of expired, returned or off-specification pharmaceuticals. The following waste streams typically generated may include:

D001 Waste Aerosols

D001 Waste Flammable Liquids

D001 Waste Compressed Gas

Pharmaceuticals: P075/P001/P004/P012 (nicotine, warfarin, etc.); over-the counter Nicotine products, a variety of U-listed and other characteristic hazardous waste pharmaceuticals may be generated

Universal Waste - used lamps;

**UNIVERSAL WASTE:**

Used Lamps were not observed.

Batteries are being handled as hazardous waste rather than Universal Waste.

**AREAS OF REVIEW AND EVALUATION:**

**The following information pertains to rules that apply to a LQG.**

**Manifests and Land Disposal Restriction (LDR):**

Appeared to be in compliance.

**HW Transporters:**

Freehold Cartage NJD054126164

Stericycle Specialty Waste Solutions MNS000100924

**HW TSD's:**

Companies that treat, store or dispose of hazardous waste from the subject site include:

Stericycle, Inc. INR000110197

**Waste Minimization Plan:**

The facility has a written waste minimization plan on file at the site.

**Emergency Preparedness/Arrangements with Local Authorities:**

The facility has a fire suppression system, spill clean-up supplies, fire extinguishers, Public Announcement (PA) system, audible fire alarms.

**Contingency Plan:**

A contingency plan was found but emergency coordinators were not listed. 40 CFR 265.51 through 265.52 describe the regulations governing content and implementation of the contingency plan. Emergency Coordinator responsibilities are described at 40 CFR 265.55 & 265.56.

**Personnel Training Records:**

CVS provides computer based hazardous waste training modules for associates. Employees at the store had completed the appropriate training in 2015. Jennifer Lewis completed training module #500149 on 6/12/15.

**Inspection Records (storage):** Records appeared to be complete.

**Hazardous Waste Storage Area:**

The Hazardous Waste storage area is a designated area within the stock room. The facility uses the “Telzon” bar code reader and guidance from the corporate offices to determine handling of the waste. Waste identified as hazardous is placed into a “strong pack” bag. If there are free liquids, “Spill Magic” absorbent powder is added to the bag which is then placed into a second “strong pack” bag then into a 10-gallon plastic lined cardboard box for accumulation and storage. Wastes are NOT segregated by hazard class by store employees. The transporter properly segregates the waste just before transport.

The 90-day hazardous waste storage area was equipped with a fire extinguisher, spill kit. Associates who access the hazardous waste storage area typically carry cellular phones.

**Pharmacy (Satellite Accumulation Area):** OK

**CONCLUSION:**

The facility was operating as a CESQG of hazardous waste at the time of inspection. As such, the facility appeared to be in-compliance.

  
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**Phillip G. Orozco**

Environmental Senior Specialist, NCDEQ

Date: February 9, 2016