

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

**Your Name:** Jenne Walker

**Facility ID Number:** NCR000153460

**Facility Name:** Omnicare of Raleigh

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

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

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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: Omnicare of Raleigh  
EPA ID Number: NCR 000 153 460  
Type of Facility: Large Quantity Generator (LQG) of hazardous waste  
Facility Location: 1815 Garner Station Boulevard  
Raleigh, NC 27603  
Telephone Number: 919-834-1600  
County: Wake

**2. FACILITY CONTACT:**

Stephen (Steve) Moore, RPH, Pharmacy Manager – Omnicare  
office telephone: (919) 834-1600; cell- 919-215-6629  
e-mail address: [steve.moore@omnicare.com](mailto:steve.moore@omnicare.com)

**3. SITE VISIT PARTICIPANTS:**

Steve Moore, Pharmacy Manager, Omnicare of Raleigh  
Jenne Walker, Environmental Senior Specialist, Hazardous Waste  
Section, Division of Waste Management, NCDEQ

**4. DATE OF EVALUATION:** February 10, 2016

**5. PURPOSE OF SITE VISIT:**

An unannounced on-site inspection was conducted to determine the facility's compliance with the Hazardous Waste Management Rules (RCRA Regulations) described at Title 40 of the Code of Federal Regulations (40 CFR), Parts 261-262, 265, 268, 270, 273 and 279 and 15A NCAC 13A. The facility is listed with NC DWM as a Large Quantity Generator (LQG) of hazardous waste.

**6. FACILITY DESCRIPTION:**

Omicare of Raleigh provides professional pharmacy services to skilled nursing facilities and long term and/or assisted living communities. Omnicare (previously operated as Continuing Care Rx of NC) has been operating at the subject location since June 2, 2012 when regional locations were consolidated.

Omicare of Raleigh receives unused prescription drugs from multiple managed care facilities. The returned drugs are processed to determine if they can be returned (reverse-distributed) for credit. If credit cannot be given, the material will be sent out as waste (hazardous or non-hazardous medical waste). All applicable drugs destined for disposal as characteristic hazardous waste (HW) are segregated prior to disposal (P-listed hazardous waste is accumulated in one lined box; D or U-listed hazardous waste).

### **General Information:**

1. Legal owner of business: Omnicare of Raleigh
2. Legal owner of property: Raleigh Portfolio LPS, 101, LLC
3. Square Footage: ~ 25,000 sq. ft.
4. Operating shifts: M-F 8:00am – 5:30pm; Sat: 10am - 3pm
5. Number of employees: ~ 40
6. Water supply & Sanitary Sewer services are provided by the City of Raleigh.
7. Distance to closest off-site well: Unknown
8. Distance to closest private residence: < ¼ mile

### **7. WASTE STREAMS:**

The following **Hazardous Waste** streams are routinely generated on-site:

Waste Toxic Solids, Organic, n.o.s. (cytoxin, selenium) – U002, U010, U034, U035

Waste medicine, toxic, n.o.s. (warfarin, nicotine) – P001, P042, P046, P075, P188

The following **Non-Hazardous Waste Streams** are generated on-site:

Sharps and non-regulated pharmaceutical waste are generated on-site and managed in separate containers. Non-hazardous waste is by far the largest waste stream by volume that is generated on-site. Waste is picked up every two weeks.

### **8. AREAS OF REVIEW AND EVALUATION**

The RCRA Compliance inspection began with an entrance interview with Mr. Moore. He then escorted the DWM inspector through the facility and provided the facility's RCRA required records and documentation for review. The visit concluded after a brief exit interview. The following observations were made during the inspection:

#### **RECORDS REVIEW**

**Inspection Records** - Weekly inspections are conducted and documented at least every seven days of the facility's hazardous waste storage area. Steve Moore typically conducts and documents weekly inspections and inspection records reviewed and appeared to be complete and well organized.

**Manifests/LDRs** - Hazardous waste is picked up approximately every 2 weeks by Clean Harbors Environmental Services. The last hazardous waste pick up was on January 26, 2016.

The following vendors have been used for hazardous waste transport and disposal since August 2014:

HW Transporters - Clean Harbors Environmental Services – MAD 039 322 250

BGasin Environmental – OKR 000 023 085

HW Treatment, Storage & Disposal (TSD) Facility - Clean Harbors - TXD 055 141 378

**Contingency Plan** – The facility's LQG RCRA Contingency Plan was last revised on 10/7/2015. The plan was sent to local authorities in August 2012. The plan appeared to be very thorough and contained all required elements. Steve Moore is Primary Emergency Coordinator (EC) and Kristy Simpson is Alternate EC.

**Arrangements with Local Emergency Response Authorities** - Copies of arrangements letters were on-file and reviewed. The facility's revised Contingency Plan was sent out by Certified Mail to the following agencies: WakeMed Hospital; Raleigh Fire Dept (Stations 1 & 2); Raleigh Police Department; and Clean Harbors Environmental Services (environmental clean-up contractor).

**Training Records & Job Descriptions** – RCRA Training that included a review of the new facility’s contingency plan was provided to staff on March 10, 2015. Job descriptions were available for review and appeared to be satisfactory.

**Biennial Report** - The facility’s biennial report was on-file and submitted to DWM on 1/22/2014. *The next Biennial Report is due to NC DWM by March 1, 2016 for calendar year 2015 data.*

**Waste Minimization Plan** – Omnicare has a written waste minimization plan that is reviewed annually.

### **PHYSICAL INSPECTION/FACILITY WALK-THROUGH**

The following observations were made during the physical inspection of the facility:

**Hazardous Waste Satellite Accumulation Areas:** No satellite accumulation areas were observed on-site.

**Less than 90 Day Hazardous Waste Storage Area:** The facility’s hazardous waste storage area is located in a locked caged area in the receiving and returns processing room. This area is located in a separate room from the main pharmacy area. A landline telephone and fire extinguisher are located in the receiving/returns processing area (near the HW storage area). The facility utilizes 30-gallon cardboard boxes lined with thick plastic bags as waste containers. All waste is containerized in some type of packaging prior to being placed in a lined box. Each container was closed, labeled with the words ‘hazardous waste’ and marked with an accumulation start date of less than 90 days. All requirements appeared to be met.

The following waste containers were observed in storage at the time of the inspection:

- Six 30-gallon boxes of “Sharps/Medical/biohazard” Waste”;
- One 30-gallon box of P-Listed (acute) Hazardous Waste dated 2/8/16;
- One 30-gallon box of U + D Listed (non-acute) Hazardous Waste dated 2/8/16;

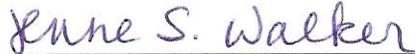
**Emergency Preparedness** – The facility is equipped with fire extinguishers , pull fire alarms, spill and first aid kits and an intercom/Public Address system to notify employees in case of an emergency (such as required evacuation). Equipment is routinely tested and maintained, as documented by on-site records.

**Used Oil Storage:** Used oil is not generated on-site.

**Universal Waste:** Three closed and labeled boxes of universal waste lamps were observed in storage in the cage. The containers were each dated 11/20/15.

**9. CONCLUSION:**

The assistance provided by Mr. Steve Moore was greatly appreciated during the RCRA Compliance inspection. No areas of concern were identified during the February 10, 2016 inspection. Please contact Jenne Walker at 919-707-8224 or [jenne.walker@ncdenr.gov](mailto:jenne.walker@ncdenr.gov) if you have questions about this report or maintaining compliance with the Hazardous Waste Management (RCRA) regulations.



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Jenne S. Walker

Environmental Senior Specialist, NCDEQ

Signed: March 2, 2016