

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

Your Name: William Hunneke
Facility ID Number: NCR000153676
Facility Name: CVS PHARMACY #7324
Document Group: Inspection/Investigation (I)
Document Type: I - Compliance Evaluation Inspection (CEI)
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Inspector ID #: NC060 **Suborganization:** Eastern Region
Comments for RCRAInfo: No violations.
County (if not on report): HERTFORD

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPLIANCE EVALUATION INSPECTION

FACILITY INFORMATION:

Facility Name: **CVS PHARMACY #7324**

EPA ID Number: **NCR000153676**

Type of Facility: Notified as Large Quantity Generator (LQG), currently operating as Conditionally Exempt Small Quantity Generator (CESQG).

Facility Location: 420 West Main Street, Murfreesboro, NC 27855
Hertford County

Telephone Number: 252-398-3585

Property Owner: North Carolina CVS Pharmacy, LLC
Property Owner Address: 1 CVS Drive, Woonsocket, RI 02895

Legal Owner of Business: North Carolina CVS Pharmacy, LLC

FACILITY CONTACTS:

Wendy L. Brant, Environmental Manager (Listed Contact)
Telephone: 401-765-1500
E-mail: wendy.brant@cvscaremark.com

Title: Adriana Morales (Ms. Brant's unofficial replacement)
Environmental Specialist, Corporate Environmental
Telephone: 401-770-8980
E-mail: adriana.morales@CVSHealth.com

Debbie Martin, Store Manager
Telephone: 252-398-3585
E-mail: debbieamartin@gmail.com

DATE OF SITE VISIT: **January 8, 2016** onsite: 1220 hrs. offsite: 1400 hrs.

PARTICIPANTS:

Representing CVS #7324: Debbie Martin
Representing NCDEQ: William Hunneke

PURPOSE OF SITE VISIT:

Compliance Evaluation Inspection to determine compliance with regulations described at 40 CFR 261, 262, 265, 268 and 273. The last compliance evaluation inspection occurred July 9, 2015.

FACILITY DESCRIPTION:

CVS Pharmacy Store #7324 operates as a retail pharmacy also selling groceries and a variety of household items. The store is part of a national chain and is provided guidance for compliance with the hazardous waste management regulations by the CVS corporate office and by Stericycle, its contracted waste

management company. Management team members who work at the facility are hazardous waste handlers. They use a bar code system as a guide in waste determination and proper management of hazardous 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" clear plastic "zip lock" bags that are preprinted with labels identifying their contents as hazardous waste. If the material packaging is broken and the material is leaking, it is double bagged. The bags are placed into plastic lined 10-gallon cardboard 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 or storing greater than 2.2 pounds of acute hazardous waste (typically generated at the pharmacy) on-site at any time. The facility appears to be operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.

GENERAL INFORMATION:

Legal operator of business:	North Carolina CVS Pharmacy, LLC
Legal owner of property:	North Carolina CVS Pharmacy, LLC
Employees:	14
Hours of Operation:	8 a.m. – 9 p.m., seven day a week.
Square Footage/Property size:	Approx. 1.5 acre site. Building is approximately 9,000 sq. feet.
Water Supply/Sanitary sewer:	Municipal
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. Waste streams typically generated include:

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|--|-------------------------------|
| • Waste Aerosols | D001 |
| • Naphthalene, Sulfur | D001/U165 |
| • Sodium Hydroxide, Potassium Carbonate | D002 |
| • Waste Flammable Liquids | D001 |
| • Waste Compressed Gas | D001 |
| • Waste Flammable Solids | D001/U165 |
| • Waste Toxic Solids (Pyrethroids, Selenium) | D010 |
| • Waste Toxic Solids (M-Cresol) | D024 |
| • Waste Toxic Solids (warfarin, nicotine) | P012/P075/P188/P081/P024/P108 |
| • Waste mercury, Silver | D009/D011 |

UNIVERSAL WASTE:

No used lamps or batteries were observed on the day of the inspection. According to store personnel, fluorescent bulbs are changed and removed by an offsite contractor.

AREAS OF REVIEW AND EVALUATION:

Manifests and Land Disposal Restriction (LDR):

Manifests were reviewed from 2015 through the present and observed to in compliance and complete with Land Disposal Restriction documents.

HW Transporters:

Companies that transport hazardous waste from the subject site include:

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|--|----------|--------------|
| • Freehold Cartage | EPA id#: | NJD054126164 |
| • Stericycle Specialty Waste Solutions | EPA id#: | MNS000100924 |
| • Republic Environmental Systems | EPA id#: | PAD982661381 |

HW TSD's:

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

- | | | |
|---|----------|--------------|
| • Stericycle, Inc. | EPA id#: | INR000110197 |
| • Republic Environmental Systems (PA) LLC | EPA id#: | PAD085690592 |
| • Allworth, LLC | EPA id#: | ALD094476793 |

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 and emergency information posted by most phones.

Contingency Plan:

The facility's contingency plan was reviewed. The content of the contingency plan must meet the requirements described in 40 CFR 265.52 and distributed to the local emergency authorities as described in 40 CFR 265.53. As a LQG, the facility must maintain a completed copy of the contingency plan on site. The plan is not required for CESQG facilities. The facility did have emergency information including emergency coordinator contact information posted by a telephone.

Training Records:

Store personnel interviewed indicated familiarity with several computer based hazardous waste training modules including course #500149; course #500146; and course #500147 (pharmacy employees). Training records for individual store associates were reviewed and observed to be in compliance.

Inspection Records (storage):

"Weekly Hazardous Waste Inspection Logs" for the facility's hazardous waste storage area were reviewed from January 2015 through the present and found to have several gaps where inspections were performed ten days apart. Weekly hazardous waste storage area inspections area required every seven days or less.

Satellite Accumulation Areas (SAA):

The store has one satellite accumulation area for hazardous waste located at the pharmacy. On the day of the inspection, one 10-gallon plastic lined cardboard box was observed in the pharmacy properly labeled as "Hazardous Waste" with its contents in individual strong pack plastic bags each properly closed and labeled as "Hazardous Waste".

Hazardous Waste Storage Area:

The Hazardous Waste storage area is a designated area within the stock room. The facility uses a 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" plastic bag. If there are free liquids, store protocol calls for "Spill Magic" absorbent powder to be 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 typically segregated by hazard class. Boxes are picked up by Stericycle and sorted on-site by Stericycle for waste determination.

On the day of the inspection, eight 10-gallon cardboard boxes with a plastic liner containing hazardous waste in strong pack plastic bags was observed in the hazardous waste storage area properly labeled, closed and dated. The hazardous waste storage area was equipped with a fire extinguisher, spill kit and telephone which could not dial external numbers but could call the front of the store. Associates who access the hazardous waste storage area typically carry mobile phones.

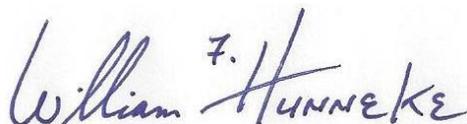
SITE DEFICIENCIES:

If the facility actually operates as a LQG, the facility must comply with all applicable LQG requirements. Currently the facility is not be in compliance with all of the requirements applicable to LQGs of hazardous waste however, because the facility was operating as a CESQG, no violations were cited.

Ms. Wendy Brant continues to be listed as the site contact and it is understood that she is no longer with the company. An 8700-12 form must be filed with the state when a facility change of contact or change of status occurs. An 8700-12 form and instruction sheet are provided with this report. Please see to it that this situation is corrected.

RECOMMENDATIONS:

The importance of remaining vigilant about the volume of P-Listed hazardous waste was discussed with the store personnel. It is recommended that when shipping hazardous waste, someone review the manifest with the transporter to ensure that the quantity of P-listed waste is counted correctly. Only the residual contents of P-listed containers should be part of the facility's P-Listed weight calculation. If the facility feels that the weight of the packaging has not been tared out of the documented calculation, a representative of the facility may utilize field number 14 to indicate that. It is beneficial if the facility can continue to demonstrate its operational status as CESQG.



William Hunneke
Environmental Senior Specialist, NCDEQ

February 2, 2016
Date

Copy of report provided to facility

8700-12 form and guidance document provided with report