

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

Your Name: Jenne Walker

Facility ID Number: NCR000154260

Facility Name: CVS Pharmacy #2714

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

Description for File (for CARA): LQG operating as CESQG – no violations

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Author(s) of Document: Jenne Walker

Inspector ID #: NC028

Suborganization: Eastern Region

Comments for RCRAInfo: no violations

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: CVS Pharmacy # 2714
EPA ID Number: NCR 000 154 260
Type of Facility: Notified as a Large Quantity Generator (LQG) of hazardous waste;
Operating as Conditionally Exempt Small Quantity Generator (CESQG)
Facility Location: 3500 Wake Forest Road, Raleigh, NC 27609
Telephone Number: 919-855-5694
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

Mr. Matthew Hill, Shift Supervisor – CVS Pharmacy # 2714
Store telephone - (919) 855-5694

3. DATE OF SITE VISIT: January 21, 2016

4. EVALUATION PARTICIPANTS:

Mr. Matthew Hill, Shift Supervisor – CVS Pharmacy # 2714
Jenne S. Walker, Environmental Senior Specialist, Div. of Waste Management, Hazardous Waste Section, NC DEQ

5. PURPOSE OF SITE VISIT: An unannounced site visit was conducted to evaluate the facility's compliance with the hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Title 40 of the Code of Federal Regulations (40 CFR), Parts 260-262, 265, 268, 270, 273 and 279, and Title 15 Chapter 13A of the North Carolina Administrative Code (NCAC).

6. FACILITY DESCRIPTION:

CVS Pharmacy # 2714 (Wake Forest Rd, Raleigh) 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 # 2714 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:** City of Raleigh
- 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 are routinely generated on-site:

Hazardous Waste

- D001 – compressed gas – flammable (lighters/LPG)
- D001 – Waste flammable liquids (acetone, alcohol)
- D001 – Waste aerosols, flammable
- D009 – mercury containing waste (broken fluorescent lamps)
- P001, P012, P046, P075, P081 – Waste toxic solids (warfarin, nicotine)

Other Waste Streams

- Universal Waste** – Used lamps containing mercury and used batteries
- Non-hazardous and non-regulated solids and liquids
- Consumer electronics for recycling

8. AREAS OF REVIEW:

CVS Pharmacy # 2714 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 box of hazardous waste 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'.

Hazardous Waste Storage Area

Stock Room (Main hazardous Waste Storage Area) - Two closed containers (10-gallon boxes) of hazardous waste (HW) were observed in storage at the time of the site visit. It was noted that each waste item inside the box had been placed in a closed and dated bag labeled 'hazardous waste'. Each box was marked with the words 'hazardous waste' an accumulation start date of less than 90 days.

Universal Waste (Used Lamps, Used batteries) – Used batteries and used lamps containing mercury 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 near the Main hazardous waste storage area. 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 (for the less than 90 day hazardous waste storage area) – Inspection records were reviewed for 2014-2015 and appeared to be complete.

Contingency Plan – The facility's LQG Contingency Plan (last revised March 2015) was available for review. Gary Naglak, Store Manager is listed as the Primary Emergency Coordinator. The Small Quantity Generator required emergency information was posted near a telephone at the front 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 2014 through December 2015 and appeared to be complete. Hazardous waste is picked up from the facility approximately once every 2 ½ months.

CVS Pharmacy # 2714 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

HW TSD's: Stericycle Inc. – INR 000 110 197
Republic Env Systems PA LLC – PAD 085 690 592

Personnel Training Records – The facility's personnel training records are maintained in an on-line database (electronic records). Applicable employees receive computer based RCRA training at least annually. Staff training records were not reviewed during the site visit.

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

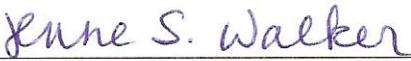
Waste Minimization – The facility maintains a written waste minimization plan.

Biennial Report – CVS Pharmacy # 2714 submitted a Biennial Report to DWM on 3/12/2014. As a LQG, a copy of the Biennial Report is required to be maintained on file at the facility for 3 years. **CVS Pharmacy # 2714 is required to submit the next Biennial Report to NC DWM by 3/1/2016 (for Calendar Year 2015 data).**

10. COMMENTS:

The cooperation and assistance of Mr. Matthew Hill was appreciated during the RCRA compliance inspection. CVS Pharmacy # 2714 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.



Jenne S. Walker
Environmental Senior Specialist, NCDEQ

Signed 2/5/2016