

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

Your Name: Jeff Menzel

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Facility Name: Omnicare

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**NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

RCRA INSPECTION REPORT

Large Quantity Generator Inspection Report Compliance Evaluation Inspection (CEI)

1. **Facility Information:** Omnicare of Hickory (Omnicare Pharmacy of NC, LLC)
1257 25th Street Place SE
Hickory, NC 28602
NCR 000 150 300, LQG
2. **Facility Contact:** Ms. Jackie Knight, Omnicare of Hickory, General Manager
828.328.1816
3. **Inspectors:** Mr. Jeff Menzel, HWS-Environmental Senior Specialist
Mr. Mark Burnette, HWS-Environmental Senior Specialist
4. **Survey Participants:** Ms. Jackie Knight, Omnicare of Hickory, General Manager
Ms. Joy Evans, Omnicare of Hickory, Pharmacy Manager
5. **Date/Time of Inspection:** January 26, 2016 Arrived-10:00am Departed-1:00pm
Date of Report: March 3, 2016 – Prepared By: Jeff Menzel
6. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279
7. **Facility Description:**

On January 26, 2016 Mr. Mark Burnette and I conducted a compliance inspection at Omnicare of Hickory located in Hickory, NC. Omnicare of Hickory operates as a regional pharmacy for dispensing medications to long term care facilities. Omnicare is a Fortune 500 company, which is comprised of several different companies that provide various long term care services, based in Cincinnati, Ohio. American Pharmaceutical Services, Inc. previously operated at this site, beginning in 1995, and was acquired by Omnicare in early 2000. Omnicare Pharmacy of NC, LLC became the current building and property owner in December 2002. This facility is comprised of one main building, which is 19,700 square feet in size and is situated on a 1.5-acre tract. Omnicare currently has between 50-60 employees and operates one primary shift, 6-days a week. The facility is located in the Commerce Business Park, adjacent to Interstate 40, and the closest residential area is greater than ½ mile away. There are no known water supply wells onsite. The facility is connected to the City of Hickory's POTW for water and sewer services.

Omnicare of Hickory primarily generates hazardous waste from medication returns to the pharmacy. The facility separates hazardous waste medications into two waste streams, one for D/U-Listed pharmaceutical wastes and one for P-Listed pharmaceutical wastes. The majority of all P-Listed waste is in the form of waste warfarin and nitroglycerin. The facility also generates used lamps. The facility also uses EXP for reverse distribution of medications.

Based on the facility's hazardous waste manifests, the facility generates more than 2.2-pounds of P-Listed hazardous waste on a monthly basis. The facility is currently listed as a LQG and was operating as a LQG at the time of the inspection.

8. Waste Type:

- P001/P042/P046/P075/ P188, waste toxic solids
- Various D/U-Listed Wastes

9. Areas of Inspection:Manifests:

Hazardous waste manifests from 2014 to present were reviewed and were in good order and documented approved transporters and TSD facilities.

Transporters: Clean Harbors Environmental Services – MAD 039 322 250
Robbie D. Wood – ALD 067 138 891

TSDs: Clean Harbors-Deer Park – TXD 055 141 378

Waste Minimization:

The facility maintains a written waste minimization plan onsite and this was reviewed during the inspection.

Weekly Inspections:

Records were reviewed from 2014 to present. The facility conducts and documents weekly inspections of hazardous waste storage containers and the inspection log was up to date. It is recommended that the facility not pre-date the inspection forms.

Emergency Preparedness:

The facility is equipped with a P/A system, fire alarm and security system monitored by an outside contractor. The facility is also equipped with fire extinguishers, spill control materials and a sprinkler system that is supplied by municipal water. Emergency arrangements are described within a section of the contingency plan, which was last submitted to local emergency response agencies on March 24, 2015, by certified mail. The facility's primary emergency coordinator is currently listed as Ms. Jackie Knight.

Training:

Omicare of Hickory currently uses computer based software, which include multiple training topic modules. Ms. Knight & Ms. Evans were able provide documentation that could demonstrate that the facility provides annual and initial RCRA training to employees through review of the facility's RCRA training outline. The training outline includes overview of hazardous waste management and handling procedures.

Biennial Report:

The facility's 2013 Biennial Report was submitted on February 26, 2014. The report was available for review at the time of the inspection and the report showed that the facility generated 3267-pounds of P/U/D Listed hazardous waste in 2013.

Contingency Plan:

The facility maintains a "Hazardous Waste Emergency Contingency Plan" on-site. The plan was last revised February, 2015. The plan lists Ms. Jackie Knight as the facility's primary RCRA emergency coordinator and Ms. Joy Evans and Ms. Dana Terrell as alternates. The plan includes the coordinator names and home addresses. The plan includes a listing of the types & properties of hazardous waste generated from the facility, spill response procedures. The plan includes a list of the type and location of emergency equipment as well as capabilities of the equipment. The plan describes that an "Emergency Management Team" has been designated and

duties of the team are listed. The plan describes the evacuation process, emergency alarm and subsequent alarm tones. The plan describes emergency arrangements with local authorities and includes facility layout diagrams. The revised plan was submitted to local emergency response agencies on March 24, 2015 by certified mail.

Accumulation Areas:

The facility does not have any satellite accumulation areas designated. Hazardous waste is generated within the Warehouse Hazardous Waste Storage Area only, which is managed as a storage area.

Hazardous Waste Storage Area:

The facility maintains the following hazardous waste storage area:

1. Warehouse Hazardous Waste Storage Room – The storage area is located within the building, near the warehouse area. The storage area is a small room, which remains locked and under the control of only a few employees. The room is used for sorting and storing medications. All medications that are returned from long term care facilities are managed as waste and sorted as either hazardous or non-hazardous waste. There were four approximately 35-gallon plastic lined cardboard boxes of hazardous waste within the room at the time of the inspection. All containers were properly labeled and dated. There are labels posted on the wall, above each container, explaining the proper hazardous waste type to be placed into each container. The area is equipped with a phone, fire extinguisher and spill control materials. Evacuation routes are also posted within the area. Additionally there were six cardboard boxes labeled as non-hazardous waste.

Used Oil and Universal Waste:

The facility generates universal waste lamps. The facility also contracted with Eco Development, based in Mason, Ohio, to change all existing fluorescent light fixtures to T8 type fluorescent lighting. Eco Development removed all used lamps generated from the fixture replacement project conducted in mid-2013.

The facility does not generate used oil.

Site Deficiencies: No violations of applicable regulations were observed during this inspection.



JEFF MENZEL, / 03/04/2016
NC HWS-COMPLIANCE BRANCH

SENT BY EMAIL
Ms. Jackie Knight

cc:
Brent Burch, Compliance Branch Head
Central Office Files