

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

**Your Name:** Ernest Lawrence

**Facility ID Number:** NCR000154989

**Facility Name:** CVS Pharmacy #3828

**Document Group:** Inspection/ Investigation (I)      **Document Type:** I – Compliance Evaluation Inspection (CEI)

**Description for File (for CARA):** -No violations

**Date of Document:** 1/21/16

**Author(s) of Document:** Ernest Lawrence

**Inspector ID #:** NC043

**Suborganization:** Western Region

**Comments for RCRAInfo:** No violations

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

**For Violations:**

**Enforcement Date:** [Click here to enter a date.](#)

**Docket Number:**

**Enforcement Type:**

**How many violations were there?**

**For IANOV or CO:** The facility is

**Outcome Measures for CSE for IANOV or CO:**

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

**Violation #1:**

**Date Determined:** [Click here to enter a date.](#)

**Scheduled Return to Compliance:** [Click here to enter a date.](#)

**Actual Return to Compliance:** [Click here to enter a date.](#)

**Regulation Description:**

**Comment:**

**For CSE, Corrections to Violations were:**

**Violation #2:**

**Date Determined:** [Click here to enter a date.](#)

**Scheduled Return to Compliance:** [Click here to enter a date.](#)

**Actual Return to Compliance:** [Click here to enter a date.](#)

**Regulation Description:**

**Comment:**



PAT MCCRORY  
*Governor*

DONALD R. VAN DER VAART  
*Secretary*

## **RCRA INSPECTION REPORT**

### **Facility Information**

CVS Pharmacy #3828  
1127 N Bridge Street  
Elkin NC 28621

**Facility Contact** – Randy Neese 336-835-1349

**EPA ID Number** – NCR000154989

**Inspector (s)** -- Ernest Lawrence

**Date of Inspection** – January 21, 2016

**Last Inspection Date** – September 3, 2014

**Status** –The facility is listed as a LQG. However, the facility has not generated 2.2 pounds of P listed waste in any month during the last several months. The facility has been operating as a CEG based on generation levels. This inspection evaluated compliance with CEG requirements. However, the facility plans to remain in compliance with LQG requirements, so this report describes steps taken by the store to meet LQG requirements.

**Inspection Type** -- CEI

### **Facility Description**

CVS is a retail drug store that also sells general merchandise. Some merchandise that is to be disposed must be disposed as hazardous waste.

The facility generates pharmaceutical waste such as empty containers, dropped tablets and pharmaceuticals returned by customers. Also, nicotine patches are disposed when they expire.

Number of employees – 13

Water and sewer – Municipal

Acreage – Small lot in business area



Nearest residence – Adjacent to property line  
Nearest off-site well – Estimated over 3 miles

### **Wastes Generated**

Wastes that are generated include:  
D001 – Hazardous waste liquid (alcohol)  
D002 – Waste corrosive liquid (sodium hydroxide) D001 – Aerosol waste  
P001 - Warfarin

### **Storage Areas**

The facility has a hazardous waste storage area in a back area of the store. Damaged items are scanned to determine if they must be disposed as hazardous waste. General merchandise that must be disposed as hazardous waste is stored in approximately 8-gallon cardboard containers. There were three cardboard container at the time of inspection

Containers on site for less than 90 days? – Yes.

Containers marked with starting accumulation date? – Yes. The earliest starting accumulation date was 12/1/2015.

Containers compatible with waste? – Yes

Managing incompatible waste? -- Yes

Aisle space adequate? – Aisle space must be increased to two feet.

Containers closed and labeled “Hazardous Waste”? - Yes

Evidence of release? – No

Type of device in area to summon outside help? – Cell phones

### **Manifests**

All manifests appeared to be filled out properly and copies maintained on site as required.

Filled Out Correctly - Yes

Signed Copies - Yes

LDR Notification Attached - Yes

**Transporters** – Stericycle – MNS000110924

Freehold Cartage – NJD05412664

Republic Env Systems – PAD085690592

**TSDFs** – Stericycle- INR000110197

Allworth, LLC – ALD094476793

### **Inspection Records**

Inspections on Storage Areas -- Yes

Inspection of Hazardous Waste Tanks --N/A

Inspection on Ancillary Equipment --N/A

## Contingency Plan

A contingency plan for the facility was prepared at the CVS corporate office. Site specific information was added by the local store.

On site? - Yes

Any changes of facility/processes or Emergency Coordinator since last review? – A 24-hour emergency coordinator office was assigned by the CVS corporate office.

Contingency plan implemented? - No

Agreement with Emergency Responders? – Yes

List of emergency equipment? – Yes

Evacuation plan included? – The map was not observed. It must be included in the plan.

Contingency plan submitted to local authorities? – Yes. The plan was submitted by the CVS corporate office.

## Training Records and Job Descriptions

Job descriptions with hazardous waste duties available? – Yes. These are available online at the store.

Training records available? - Yes. These are available online at the store.

Evidence of improper/inadequate training? - No

## Emergency Preparedness

Facility maintained and operated to prevent releases? -Yes. Facility properly handling chemicals and containers of hazardous waste.

All Personnel Handling Hazardous Waste Have Access to Alarm/Device? - Yes.

## Satellite Accumulation Areas

Two satellite accumulation containers were observed in the Pharmacy. There was one box and one bag.

Closed? – Yes.

Labeled/Contents Identified? – Yes.

Releases? – No.

Less than 55 gallons? – Yes.

**Other HW Units** - N/A

## Universal Waste

None observed

## Site Deficiencies

No violations of rules for a conditionally exempt generator were observed.

## Comments

Aisle space must be maintained in the storage area when operating as a LQG.



1/21/16

Mailed to facility

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RCRA Inspector    Date

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Facility Contact