

INSPECTION REPORT

|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|----------------|
| <b>Inspection Date(s):</b>                      | 02/16/2021 - 02/16/2021                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Announced: No               |                |
| <b>Time:</b>                                    | Entry: 10:01 AM (AKT)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Exit: 11:29 AM (AKT)        |                |
| <b>Program:</b>                                 | RCRA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                             |                |
| <b>Regulatory Program(s):</b>                   | Title 40 - ENVIRONMENTAL PROTECTION AGENCY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |                |
| <b>If Access is Denied:</b>                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
| <b>Company Name:</b>                            | TARGET CORPORATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                             |                |
| <b>Facility or Site Name:</b>                   | TARGET STORE T2371                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                             |                |
| <b>Facility/Site Physical Address:</b>          | 1200 N MULDOON RD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                             |                |
| <b>(city, state, zip code)</b>                  | ANCHORAGE, AK 99504                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                             |                |
| <b>Type of Operation:</b>                       | Retail store                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                             |                |
| <b>Size of Facility:</b>                        | 114,207 square feet                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                             |                |
| <b>Length of Facility at Location:</b>          | Since 2008                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |                |
| <b>Geographic Coordinates:</b>                  | 61.229424, -149.736518                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                             |                |
| <b>Mailing address:<br/>(Secondary Address)</b> | <p>Paul Hamilton, Sr. Environmental Program Owner (612) 304-6171<br/>         Corporate Compliance and Ethics/Legal Affairs<br/>         Mailstop: CC-3625, 33 South 6<sup>th</sup> Street<br/>         Minneapolis, MN 55402<br/> <a href="mailto:paul.hamilton@target.com">paul.hamilton@target.com</a><br/> <a href="mailto:corporate.compliance@target.com">corporate.compliance@target.com</a></p> <p>CC: Karen Giltz, T2371 Store Director <a href="mailto:karen.giltz@target.com">karen.giltz@target.com</a></p> <p>Nicole Ratigan, Senior Environmental Specialist, Corporate Environmental<br/>         1 CVS Drive, Mail Code 2340<br/>         Woonsocket, RI 02895<br/>         (401) 770-6259<br/> <a href="mailto:nicole.ratigan@cvshealth.com">nicole.ratigan@cvshealth.com</a></p> |                             |                |
| <b>(city, state, zip code)</b>                  | Minneapolis, MN 55402                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                             |                |
| <b>County:</b>                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
| <b>Facility/Site Identifier:</b>                | AKR000203000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                             |                |
| <b>Media Number:</b>                            | Unpermitted Facility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                             |                |
| <b>NAICS:</b>                                   | 452210 – Department Stores                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |                |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
| <b>Lead Inspector:</b>                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
| Jon Jones                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
|                                                 | REGION 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Jones.Jon@epa.gov           | (907) 271-6329 |
| <b>Supervisor Review:</b>                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
| Jen Sullivan                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                             |                |
|                                                 | REGION 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Sullivan.Jennifer.A@epa.gov | (206) 553-6978 |

**SECTION I – INTRODUCTION****Purpose of the Inspection/Objective**

Type of inspection: CEI - Compliance Evaluation Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279) The inspection was conducted as part of a Core Program requirement for FY 2021.

**Attendees**

| Title          | Name        | Phone          | Email                  | Present in Opening Conf. | Present in Closing Conf. |
|----------------|-------------|----------------|------------------------|--------------------------|--------------------------|
| Lead Inspector | Jon Jones   | 9072716329     | Jones.Jon@epa.gov      | Yes                      | Yes                      |
| Store Director | Karen Giltz | (907) 269-2100 | karen.giltz@target.com | Yes                      | Yes                      |

**Opening Conference**

EPA Lead Inspector Jon Jones arrived at the TARGET STORE T2371 at 10:01 AM (AKT) on 02/16/2021 for an inspection. I presented my credentials to Karen Giltz and informed her that this was an EPA RCRA inspection. The table above presents all the inspection participants.

During the inspection I looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous. I also observed the facility's universal waste. Additionally, the facility representatives told me they were not managing used oil and I did not observe any while at the facility. Specifically, I inspected the following areas of the facility:

- Store front
- Shipping and receiving area (CAA)
- Property Management Lead Office
- On-site CVS pharmacy #17435

CVS Pharmacy #17435 operates inside the Target Store T2371. There is no separate entry or exit for the pharmacy. Customers using the pharmacy must enter and exit through the Target Store.

Following the inspection, I sent Mr. Paul Hamilton (Target Corporation) a request for documents email, via "GoAnywhere", on 2/17/21. I also sent Ms. Nicole Ratigan (CVS) a request for documents. Mr. Hamilton's response was received on 2/24/21 and Ms. Ratigan's response was received on 3/4/21.

The areas of concern identified during the document review were not shared with Ms. Giltz during the closing conference since the document review was conducted after the onsite portion of inspection.

**Facility/Site Description**

Target Store T2371 is a department store located in Anchorage, AK. CVS Pharmacy #17435 operates as a separate entity inside the T2371 store. According to facility representatives, Target got out of the pharmacy business approximately five years ago when they sold their pharmacy business to CVS Health. Since Target does not operate

the pharmacy, Target representatives said they did not have any information about how CVS Pharmacy #17435 manages hazardous waste pharmaceuticals.

### Facility Info

|                                              |                                |
|----------------------------------------------|--------------------------------|
| Number of employees                          | 174                            |
| Weather Conditions                           | Clear and cold                 |
| Operating Hours                              | 8 to 10 Monday through Sunday  |
| Safety Training Provided to Inspector(s)?    | No                             |
| What type of generator facility notified?    | Small Quantity Generator (SQG) |
| What type of generator facility verified as? | SQG                            |

### Process Description

Based on information I obtained during a previous Target Store T2339 inspection I conducted on February 8, 2021, most of the waste generated by Target includes various chemicals and cleaners that are either damaged when they arrive in store, damaged in store, or returned by the customer. Wastes include, but are not limited to the following:

- Waste batteries that are managed as universal waste
- Waste fluorescent lamps that are managed as universal waste
- Cosmetics, such as nail polish
- Various cleaners

Waste streams in the facility's central accumulation area (CAA) were accumulated in transparent plastic totes and, according to the labeling, included:

- Non-RCRA Hazardous Waste WA State Toxic
- Hazardous Waste Aerosol - Toxic Ignitable
- Hazardous Waste Pharmaceuticals Over the Counter (OTC)
- Hazardous Waste Oxidizer - Ignitable
- Hazardous Waste Corrosive – Basic
- Hazardous Waste Corrosive - Acidic

### Building(s)

| Building/Area | Process Description | Area of Concern |
|---------------|---------------------|-----------------|
|---------------|---------------------|-----------------|

| Store                           |                                 | Yes |
|---------------------------------|---------------------------------|-----|
| CVS Pharmacy                    |                                 | Yes |
| Property Management Lead Office | Store maintenance               | Yes |
| Shipping and Receiving          | Central accumulation area (CAA) | Yes |

## SECTION II – OBSERVATIONS AND RECORDS REVIEW

## Observations

|                                                                                                                                                                                                                                                                                                                                                                                                                                        |                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>Building:</b> Store/CVS Pharmacy                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Contains CBI:</b> No      |
| <b>Observation #:</b> JJ1-OB-006                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Date/Time:</b> 02/16/2021 |
| <p>During the inspection, I visited the CVS Pharmacy #17435 and I spoke with Melissa Page, Pharmacist. While there I saw a hazardous waste tote that was being used to accumulate hazardous waste pharmaceuticals (HWPharms) generated by CVS. At the time of the inspection, the tote containing HWPharms was incorrectly labeled as "Pharmacy Hazardous Waste." The container was not labeled "Hazardous Waste Pharmaceuticals."</p> |                              |
| <b>Photo(s)</b><br>1. <a href="#">Observation Image-202102161123242324262994.jpg</a><br>2. <a href="#">Observation Image-202102161123322332231789.jpg</a>                                                                                                                                                                                                                                                                              |                              |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>Building:</b> Store/Property Management Lead Office                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Contains CBI:</b> No      |
| <b>Observation #:</b> JJ1-OB-003                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Date/Time:</b> 02/16/2021 |
| <p>While in the Property Management Lead Office, I saw a box that contained four-foot fluorescent lamps. Based on information I obtained during a previous Target Store T2339 inspection I conducted on February 8, 2021, Target manages their waste fluorescent lamps as universal waste. Ms. Giltz confirmed that the lamps were waste fluorescent lamps that Target was managing as universal waste. At the time of the inspection, the box containing the four-foot waste fluorescent lamps was not closed.</p> |                              |
| <b>Photo(s)</b><br>1. <a href="#">Observation Image-202102161045304530277868.jpg</a><br>2. <a href="#">Observation Image-202102161046144614320991.jpg</a>                                                                                                                                                                                                                                                                                                                                                           |                              |

|                                                                                                                                                                                         |                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>Building:</b> Store/Property Management Lead Office                                                                                                                                  | <b>Contains CBI:</b> No      |
| <b>Observation #:</b> JJ1-OB-004                                                                                                                                                        | <b>Date/Time:</b> 02/16/2021 |
| <p>The box of four-foot waste fluorescent lamps, in the Property Management Lead Office, was not labeled with the words, "Universal Waste – Lamps", "Waste Lamps", or "Used Lamps."</p> |                              |

**Photo(s)**

1. [Observation Image-202102161055115511340454.jpg](#)

|                                                                                                                                                                          |                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>Building:</b> Store/Property Management Lead Office                                                                                                                   | <b>Contains CBI:</b> No      |
| <b>Observation #:</b> JJ1-OB-005                                                                                                                                         | <b>Date/Time:</b> 02/16/2021 |
| The box of four-foot waste fluorescent lamps, in the Property management lead Office, was closed and labeled with the words “Universal Waste – Lamps” during inspection. |                              |
| <b>Photo(s)</b>                                                                                                                                                          |                              |
| <ol style="list-style-type: none"> <li>1. <a href="#">Observation Image-20210216111604164332004.jpg</a></li> </ol>                                                       |                              |

|                                                                                                                                                                                                                                                                                                                                                    |                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>Building:</b> Store/Receiving                                                                                                                                                                                                                                                                                                                   | <b>Contains CBI:</b> No      |
| <b>Observation #:</b> JJ1-OB-001                                                                                                                                                                                                                                                                                                                   | <b>Date/Time:</b> 02/16/2021 |
| While inspecting the CAA, I saw a plastic tote that was being used to accumulate OTC hazardous waste pharmaceuticals (HWPharms) generated by Target. At the time of the inspection, the tote containing HWPharms (OTC) was not closed.                                                                                                             |                              |
| The tote containing HWPharms (OTC) was closed during the inspection.                                                                                                                                                                                                                                                                               |                              |
| <b>Photo(s)</b>                                                                                                                                                                                                                                                                                                                                    |                              |
| <ol style="list-style-type: none"> <li>1. <a href="#">Observation Image-20210216103903393233203.jpg</a></li> <li>2. <a href="#">Observation Image-202102161039163916266256.jpg</a></li> <li>3. <a href="#">Observation Image-20210216102706276258205.jpg</a></li> <li>4. <a href="#">Observation Image-202102161028232823314924.jpg</a></li> </ol> |                              |

|                                                                                                                     |                              |
|---------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>Building:</b> Store/Receiving                                                                                    | <b>Contains CBI:</b> No      |
| <b>Observation #:</b> JJ1-OB-002                                                                                    | <b>Date/Time:</b> 02/16/2021 |
| View of the CAA.                                                                                                    |                              |
| <b>Photo(s)</b>                                                                                                     |                              |
| <ol style="list-style-type: none"> <li>1. <a href="#">Observation Image-202102161032513251322826.jpg</a></li> </ol> |                              |

**Records Review**

|                            |                               |                                                 |
|----------------------------|-------------------------------|-------------------------------------------------|
| <b>Record:</b> Inspections |                               | <b>AOC:</b> Yes                                 |
| <b>Ref #:</b> JJ1-RR-001   | <b>Reviewed By:</b> Jon Jones | <b>Reviewed Date:</b> 03/31/2021 08:25 AM (AKT) |

Weekly hazardous waste inspections were reviewed for the period of February 16, 2017 through February 16, 2021. During the review of weekly inspections, I saw that there were 61 weekly inspections that had not been conducted.

**Document(s)**

1. T2371 Weekly Inspections.pdf

**Record:** Ensure applicable employees are trained – SQG

**AOC:** Yes

**Ref #:** JJ1-RR-002

**Reviewed By:** Jon Jones

**Reviewed Date:** 03/31/2021 08:51 AM  
(AKT)

While reviewing the employee training records, I saw that there were two T2371 employees that were conducting weekly hazardous waste inspections of the CAA prior to receiving any training. Amelia Reed conducted the following six weekly hazardous waste inspections prior to receiving ESIM HW MGMT training: 1/10/20, 1/17/20, 1/24/20, 1/31/20, 2/7/20, and 2/14/20

Taylor Nelson conducted a weekly hazardous waste inspection on 9/11/20 and there is no record of ESIM HW MGMT training for the employee.

**Document(s)**

1. T2371 TGT\_RPT\_ESIM\_Recap\_Report.xlsx
2. T2371 Training Records.pdf

**Record:** Facility Layouts

**AOC:** No

**Ref #:** JJ1-RR-003

**Reviewed By:** Jon Jones

**Reviewed Date:** 03/31/2021 09:15 AM  
(AKT)

A copy of a facility layout drawing was obtained from the facility during the inspection.

**Document(s)**

1. T2371 Facility drawing.pdf

**Record:** Exception Reports

**AOC:** Yes

**Ref #:** JJ1-RR-004

**Reviewed By:** Jon Jones

**Reviewed Date:** 03/31/2021 10:45 AM  
(AKT)

I reviewed hazardous waste manifests following the inspection and saw that there were 17 manifests that required an exception report. During the time period in which Target T2371 was operating as a large quantity generator, the following hazardous waste manifests did not arrive at the designated TSDF within 45 days and Target was required to submit an exception report. No exception reports were included with Target's records for shipments made with the following manifests:

- #009994413 FLE
- #009994414 FLE
- #009994415 FLE
- #009994508 FLE

Inspection Date(s):

02/16/2021 - 02/16/2021

- #009994616 FLE
- #009994617 FLE
- #009994618 FLE
- #009994687 FLE
- #012598126 FLE
- #012598445 FLE
- #012698111 FLE
- #012698112 FLE
- #012698312 FLE
- #012698313 FLE
- #012698314 FLE
- #012698315 FLE
- #012698317 FLE

**Document(s)**

1. 009994413.pdf
2. 009994414.pdf
3. 009994415.pdf
4. 009994508.pdf
5. 009994616.pdf
6. 009994617.pdf
7. 009994618.pdf
8. 009994687.pdf
9. 012598126.pdf
10. 012598445.pdf
11. 012698111.pdf
12. 012698112.pdf
13. 012698312.pdf
14. 012698313.pdf
15. 012698314.pdf
16. 012698315.pdf
17. 012698317.pdf

**Record:** Exception Reports

**AOC:** Yes

**Ref #:** JJ1-RR-005

**Reviewed By:** Jon Jones

**Reviewed Date:** 03/31/2021 11:00 AM  
(AKT)

I reviewed hazardous waste manifests following the inspection and saw that there were five manifests for shipments made during the time period when Target T2371 was operating as a SQG that required an exception report. The hazardous waste shipments documented in the following hazardous waste manifests did not arrive

at the designated TSDF within 60 days requiring an exception report and the records provided by Target did not include an exception report:

- #012698431 FLE
- #012698432 FLE
- #012698439 FLE
- #012698444 FLE
- #012698445 FLE

**Document(s)**

1. 012698431.pdf
2. 012698432.pdf
3. 012698439.pdf
4. 012698444.pdf
5. 012698445.pdf

**Record:** Ensure applicable employees are trained – SQG

**AOC:** Yes

**Ref #:** JJ1-RR-006

**Reviewed By:** Jon Jones

**Reviewed Date:** 03/31/2021 11:38 AM  
(AKT)

At the time of the inspection, CVS Pharmacy #17435 was operating inside Target Store T2371. On February 19, 2021 I sent a request for documents email, via "GoAnywhere", to Ms. Nicole Ratigan, CVS. In that document request, I asked for copies of training records for CVS Pharmacy #17435 personnel working at the Target Store T2371, including a copy of the training CVS personnel received and training dates. In that email, I asked Ms. Ratigan to provide the requested documents on or before March 5, 2021. Ms. Ratigan sent the requested documents on March 4, 2021.

After reviewing the documentation received I saw that the following active CVS Pharmacy #17435 personnel received "Hazardous Waste Training for Pharmacy Colleagues" Course #500147 (May 2020) on the following dates:

- Alexander Bailey, 1/20/21
- Joshua Catalano, 6/10/20
- Gary Lose, 1/15/21
- Talon Masterson, 2/5/21
- Nana McMillan, 1/13/21
- Melissa Page, 5/18/20
- Pa Yao Yang, 1/25/21

The training records also contained the names of CVS Pharmacy #17435 personnel, no longer employed with CVS, that received Course #500147 training on the following dates:

- Angela Jaglowicz, 4/28/19 Separated 8/16/19

- Kane Olson, 9/22/18 Separated 5/10/19

I reviewed the "Hazardous Waste Training for Pharmacy Colleagues" Course #500147, dated May 2020, that was submitted with Ms. Ratigan's March 4, 2021 response and saw that it contained information that was contrary to the hazardous waste pharmaceuticals rule which was promulgated on February 22, 2019. Training course #500147, which was current as of May 2020, contained a picture of a hazardous waste pharmaceutical container with a label that was marked with the words, "Pharmacy Hazardous Waste." The same page informed the pharmacy staff to "refer to job aides and training for each specific program to determine proper handling."

I reviewed the "Hazardous Waste Job Aid Packet", also current as of May 2020, that was included with Ms. Ratigan's March 4, 2021 response and saw that it contained the same labeling information under the heading, "Hazardous Waste Tote Setup".

I brought this to Ms. Ratigan's attention, and she sent me documentation showing that the label information for CVS had been changed to "Hazardous Waste Pharmaceuticals." On March 4, 2021, Ms. Ratigan sent an email in which she stated, "Hi Mr. Jones, I should have included this in my other two emails for 17436 and 17435. I am going to reach out to both pharmacies to ensure they are using the current version of our labels and that the labels are all properly completed. I've attached a copy of the current label for reference. I just have to wait a bit because of the pesky time difference. Thank you!"

According to the training documentation, the following CVS Pharmacy #17435 personnel had not received adequate training either prior to, or since the hazardous waste pharmaceuticals rule became effective on August 21, 2019:

- Alexander Bailey
- Joshua Catalano
- Gary Lose
- Talon Masterson
- Nana McMillan
- Melissa Page
- Pa Yao Yang
- Kane Olson

**Document(s)**

1. 17435 AK Training Records.pdf
2. RX Hazardous Waste Label.pdf

|                          |                               |                                                 |
|--------------------------|-------------------------------|-------------------------------------------------|
| <b>Record:</b> Manifests |                               | <b>AOC:</b> Yes                                 |
| <b>Ref #:</b> JJ1-RR-007 | <b>Reviewed By:</b> Jon Jones | <b>Reviewed Date:</b> 03/31/2021 01:08 PM (AKT) |

At the time of the inspection, CVS Pharmacy #17435 was operating inside Target Store T2371. On February 19, 2021 I sent a request for documents email, via "GoAnywhere", to Ms. Nicole Ratigan, CVS. In that document request, I asked for copies of hazardous waste manifests and land disposal restriction notices (LDRs) for the

period February 16, 2018 through February 16, 2021. In that email, I asked Ms. Ratigan to provide the requested documents on or before March 5, 2021. Ms. Ratigan sent the requested documents on March 4, 2021.

I reviewed the documentation and saw that none of the manifests contained the EPA I.D. # AKR000203000 in block 1, that is assigned to the Target Store T2371 site. The following CVS Pharmacy #17435 hazardous waste manifests contained the acronym "CESQG" in block 1:

- #010173554 FLE
- #010752088 FLE
- #010752293 FLE
- #012962306 FLE
- #012962441 FLE
- #010174341 FLE
- #012960920 FLE
- #013107713 FLE
- #013107714 FLE

|                                                                                                                                                             |                               |                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------------------------|
| <b>Record:</b> Manifests                                                                                                                                    |                               | <b>AOC:</b> Yes                                 |
| <b>Ref #:</b> JJ1-RR-008                                                                                                                                    | <b>Reviewed By:</b> Jon Jones | <b>Reviewed Date:</b> 04/01/2021 11:17 AM (AKT) |
| During my review of the facility's hazardous waste manifests, I saw that hazardous waste manifest #012698111 FLE was not signed and dated by the generator. |                               |                                                 |
| <b>Document(s)</b>                                                                                                                                          |                               |                                                 |
| 1. 012698111.pdf                                                                                                                                            |                               |                                                 |

### SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

| Building:                                                                                                         | Area:            | Sub-area:       |
|-------------------------------------------------------------------------------------------------------------------|------------------|-----------------|
| <b>JJ1-RR-001</b>                                                                                                 |                  |                 |
| During the review of weekly inspections, I saw that there were 61 weekly inspections that had not been conducted. | <b>Citation:</b> | <b>Section:</b> |
| <b>JJ1-RR-002</b>                                                                                                 |                  |                 |
| Amelia Reed conducted the following six weekly hazardous                                                          | <b>Citation:</b> | <b>Section:</b> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                         |                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------------|
| <p>waste inspections prior to receiving ESIM HW MGMT training:</p> <p>1/10/20, 1/17/20, 1/24/20, 1/31/20, 2/7/20, and 2/14/20</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                         |                        |
| <p>Taylor Nelson conducted a weekly hazardous waste inspection on 9/11/20 and there is no record of ESIM HW MGMT training for the employee.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><b>Citation:</b></p> | <p><b>Section:</b></p> |
| <p><b>JJ1-RR-004</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                         |                        |
| <p>The hazardous waste shipments made when Target T2371 was an LQG and documented in the following hazardous waste manifests did not arrive at the designated TSDF within 45 days requiring an exception report and no report was included with the records provided by Target:</p> <ul style="list-style-type: none"> <li>• #009994413 FLE</li> <li>• #009994414 FLE</li> <li>• #009994415 FLE</li> <li>• #009994508 FLE</li> <li>• #009994616 FLE</li> <li>• #009994617 FLE</li> <li>• #009994618 FLE</li> <li>• #009994687 FLE</li> <li>• #012598126 FLE</li> <li>• #012598445 FLE</li> <li>• #012698111 FLE</li> <li>• #012698112 FLE</li> <li>• #012698312 FLE</li> <li>• #012698313 FLE</li> <li>• #012698314 FLE</li> </ul> | <p><b>Citation:</b></p> | <p><b>Section:</b></p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                  |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------|
| <ul style="list-style-type: none"> <li>• #012698315 FLE</li> <li>• #012698317 FLE</li> </ul>                                                                                                                                                                                                                                                                                                                                                                   |                  |                 |
| <b>JJ1-RR-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              |                  |                 |
| <p>The hazardous waste shipments made when Target T2371 was an SQG and documented in the following hazardous waste manifests did not arrive at the designated TSDF within 60 days requiring an exception report and no report was included with the records provided by Target:</p> <ul style="list-style-type: none"> <li>• #012698431 FLE</li> <li>• #012698432 FLE</li> <li>• #012698439 FLE</li> <li>• #012698444 FLE</li> <li>• #012698445 FLE</li> </ul> | <b>Citation:</b> | <b>Section:</b> |
| <b>JJ1-RR-006</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              |                  |                 |
| <p>CVS Pharmacy #17435 personnel did not receive adequate training either prior to, or following the hazardous waste pharmaceuticals rule which was promulgated on February 22, 2019</p>                                                                                                                                                                                                                                                                       | <b>Citation:</b> | <b>Section:</b> |
| <b>JJ1-RR-007</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              |                  |                 |
| <p>The following CVS Pharmacy #17435 hazardous waste manifests contained the acronym "CESQG" in block 1:</p> <ul style="list-style-type: none"> <li>• #010173554 FLE</li> <li>• #010752088 FLE</li> <li>• #010752293 FLE</li> <li>• #012962306 FLE</li> <li>• #012962441 FLE</li> <li>• #010174341 FLE</li> </ul>                                                                                                                                              | <b>Citation:</b> | <b>Section:</b> |

|                                                                                                                  |  |  |
|------------------------------------------------------------------------------------------------------------------|--|--|
| <ul style="list-style-type: none"> <li>#012960920 FLE</li> <li>#013107713 FLE</li> <li>#013107714 FLE</li> </ul> |  |  |
|------------------------------------------------------------------------------------------------------------------|--|--|

**JJ1-RR-008**

|                                                                                    |                  |                 |
|------------------------------------------------------------------------------------|------------------|-----------------|
| hazardous waste manifest #012698111 FLE was not signed and dated by the generator. | <b>Citation:</b> | <b>Section:</b> |
|------------------------------------------------------------------------------------|------------------|-----------------|

**Building:** Store

**Area:** CVS Pharmacy

**Sub-area:**

**JJ1-OB-006**

|                                                                                                                                                                                                                    |                  |                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------|
| At the time of the inspection, the hazardous waste tote containing HWPharms was incorrectly labeled as "Pharmacy Hazardous Waste." The container was not labeled with the words "Hazardous Waste Pharmaceuticals." | <b>Citation:</b> | <b>Section:</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------|

**Building:** Store

**Area:** Property Management Lead Office

**Sub-area:**

**JJ1-OB-003**

|                                                          |                  |                 |
|----------------------------------------------------------|------------------|-----------------|
| Box of four-foot waste fluorescent lamps was not closed. | <b>Citation:</b> | <b>Section:</b> |
|----------------------------------------------------------|------------------|-----------------|

**JJ1-OB-004**

|                                                                                                                                     |                  |                 |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------|
| Box of four-foot waste fluorescent lamps was not labeled with the words, "Universal Waste – Lamps", "Waste Lamps", or "used Lamps." | <b>Citation:</b> | <b>Section:</b> |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------|

**Building:** Store

**Area:** Receiving

**Sub-area:**

**JJ1-OB-001**

|                                                         |                  |                 |
|---------------------------------------------------------|------------------|-----------------|
| Container (Tote) in the CAA, containing hazardous waste | <b>Citation:</b> | <b>Section:</b> |
|---------------------------------------------------------|------------------|-----------------|

|                                       |  |  |
|---------------------------------------|--|--|
| pharmaceuticals (OTC) was not closed. |  |  |
|---------------------------------------|--|--|

#### SECTION IV – FOLLOW UP

I observed no follow up at the time of the inspection.

#### Closing Conference

During the closing conference with Ms. Giltz, I explained that I had a point-of-contact (Paul Hamilton) for Target Corporation that I was already working with, due to a previous inspection at another Target Store (T2339) and I asked her if she wanted to be copied with any correspondence from EPA. Ms. Giltz said she would like to be copied. I reviewed the areas of concern that were identified during the inspection and I explained to Ms. Giltz that I would contact Mr. Hamilton and to request documents.

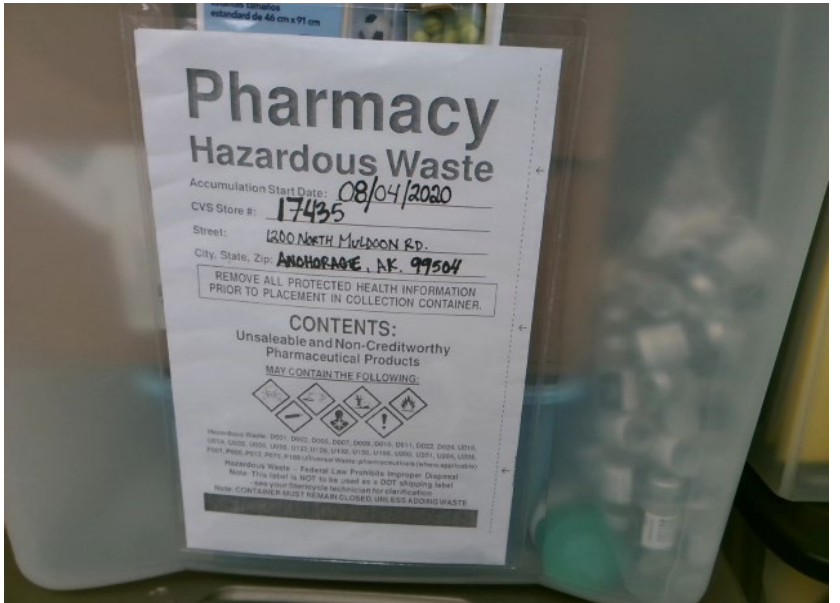
#### Communication Log

Additional information received by REGION 10 after exiting the Facility on 02/16/2021 consists of responses to requests for documentation.

#### SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

#### SECTION VI – LIST OF APPENDICES

#### Photo Log

|                                                                                                                                                                                                                      |                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| [Title]                                                                                                                                                                                                              |                                                                                     |
| Observation_Image-202102161123242324262994.jpg                                                                                                                                                                       |                                                                                     |
| 02/16/2021 11:23 AM (AKT)                                                                                                                                                                                            |                                                                                     |
| Jon Jones                                                                                                                                                                                                            |                                                                                     |
| Store/CVS Pharmacy                                                                                                                                                                                                   |                                                                                     |
| No CBI                                                                                                                                                                                                               |                                                                                     |
| No PII                                                                                                                                                                                                               |                                                                                     |
| <p>HWPharms seen here in the center, being accumulated in the top hazardous waste tote. The tote is incorrectly labeled with the words, "Pharmacy Hazardous Waste" instead of "Hazardous Waste Pharmaceuticals."</p> |   |
| [Title]                                                                                                                                                                                                              |                                                                                     |
| Observation_Image-202102161123322332231789.jpg                                                                                                                                                                       |                                                                                     |
| 02/16/2021 11:23 AM (AKT)                                                                                                                                                                                            |                                                                                     |
| Jon Jones                                                                                                                                                                                                            |                                                                                     |
| Store/CVS Pharmacy                                                                                                                                                                                                   |                                                                                     |
| No CBI                                                                                                                                                                                                               |                                                                                     |
| No PII                                                                                                                                                                                                               |                                                                                     |
| <p>Close-up view of the label showing the incorrect wording. The tote is incorrectly labeled with the words, "Pharmacy Hazardous Waste" instead of "Hazardous Waste Pharmaceuticals."</p>                            |  |

|                                                                                                                                                      |                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| [Title]                                                                                                                                              |   |
| Observation_Image-202102161045304530277868.jpg                                                                                                       |                                                                                     |
| 02/16/2021 10:45 AM (AKT)                                                                                                                            |                                                                                     |
| Jon Jones                                                                                                                                            |                                                                                     |
| Store/Property Management Lead Office                                                                                                                |                                                                                     |
| No CBI                                                                                                                                               |  |
| No PII                                                                                                                                               |                                                                                     |
| Box of four-foot waste fluorescent lamps is not closed.                                                                                              |                                                                                     |
| [Title]                                                                                                                                              |                                                                                     |
| Observation_Image-202102161046144614320991.jpg                                                                                                       |                                                                                     |
| 02/16/2021 10:46 AM (AKT)                                                                                                                            |                                                                                     |
| Jon Jones                                                                                                                                            |                                                                                     |
| Store/Property Management Lead Office                                                                                                                |                                                                                     |
| No CBI                                                                                                                                               |                                                                                     |
| No PII                                                                                                                                               |                                                                                     |
| Box of four-foot waste fluorescent lamps is not closed and is not labeled with the words, "Universal Waste – Lamps", "Waste Lamps", or "used Lamps." |                                                                                     |

[Title]

Observation\_Image-  
202102161055115511340454.jpg

02/16/2021 10:55 AM (AKT)

Jon Jones

Store/Property Management Lead Office

No CBI

No PII

Box of four-foot waste fluorescent lamps shown here after being closed.



[Title]

Observation\_Image-  
20210216111604164332004.jpg

02/16/2021 11:16 AM (AKT)

Jon Jones

Store/Property Management Lead Office

No CBI

No PII

Box of waste fluorescent lamps shown here after being labeled with the words, "Universal Waste – Lamps."



|                                                                                                                                  |                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| [Title]                                                                                                                          |   |
| Observation_Image-20210216102706276258205.jpg                                                                                    |                                                                                     |
| 02/16/2021 10:27 AM (AKT)                                                                                                        |                                                                                     |
| Jon Jones                                                                                                                        |                                                                                     |
| Store/Receiving                                                                                                                  |                                                                                     |
| No CBI                                                                                                                           |                                                                                     |
| No PII                                                                                                                           |  |
| Container (Tote) shown here in the CAA, containing hazardous waste pharmaceuticals (OTC) was not closed.                         |                                                                                     |
|                                                                                                                                  |                                                                                     |
| [Title]                                                                                                                          |                                                                                     |
| Observation_Image-202102161028232823314924.jpg                                                                                   |                                                                                     |
| 02/16/2021 10:28 AM (AKT)                                                                                                        |                                                                                     |
| Jon Jones                                                                                                                        |                                                                                     |
| Store/Receiving                                                                                                                  |                                                                                     |
| No CBI                                                                                                                           |                                                                                     |
| No PII                                                                                                                           |                                                                                     |
| Another view of the same container (Tote) shown here in the CAA, containing hazardous waste pharmaceuticals (OTC) is not closed. |                                                                                     |

|                                                                                                                                              |                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| [Title]                                                                                                                                      |   |
| Observation_Image-202102161032513251322826.jpg                                                                                               |                                                                                     |
| 02/16/2021 10:32 AM (AKT)                                                                                                                    |                                                                                     |
| Jon Jones                                                                                                                                    |                                                                                     |
| Store/Receiving                                                                                                                              |                                                                                     |
| No CBI                                                                                                                                       |                                                                                     |
| No PII                                                                                                                                       |  |
| [Title]                                                                                                                                      |                                                                                     |
| Observation_Image-20210216103903393233203.jpg                                                                                                |                                                                                     |
| 02/16/2021 10:39 AM (AKT)                                                                                                                    |                                                                                     |
| Jon Jones                                                                                                                                    |                                                                                     |
| Store/Receiving                                                                                                                              |                                                                                     |
| No CBI                                                                                                                                       |                                                                                     |
| No PII                                                                                                                                       |                                                                                     |
| <p>Another view of the same container (Tote) shown here in the CAA, containing hazardous waste pharmaceuticals (OTO) after being closed.</p> |                                                                                     |

|                                                           |                                                                                    |
|-----------------------------------------------------------|------------------------------------------------------------------------------------|
| [Title]                                                   |  |
| Observation_Image-202102161039163916266256.jpg            |                                                                                    |
| 02/16/2021 10:39 AM (AKT)                                 |                                                                                    |
| Jon Jones                                                 |                                                                                    |
| Store/Receiving                                           |                                                                                    |
| No CBI                                                    |                                                                                    |
| No PII                                                    |                                                                                    |
| Close-up view of the label on the container of HWPPharms. |                                                                                    |

## Document Log

| Document Type  | Document Name                        | Contains CBI | Contains PII | Uploaded By | Date Received |
|----------------|--------------------------------------|--------------|--------------|-------------|---------------|
| Records Review | T2371 Weekly Inspections.pdf         | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | T2371 TGT_RPT_ESIM_Recap_Report.xlsx | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | T2371 Training Records.pdf           | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | T2371 Facility drawing.pdf           | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 17435 AK Training Records.pdf        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | RX Hazardous Waste Label.pdf         | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994413.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994414.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994415.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994508.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994616.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994617.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994618.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 009994687.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 012598126.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 012598445.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 012698111.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 012698112.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |
| Records Review | 012698312.pdf                        | No           | No           | Jon Jones   | 03/31/2021    |

**TARGET STORE T2371**
**Inspection Date(s):**
**02/16/2021 - 02/16/2021**

|                    |                                           |    |    |           |            |
|--------------------|-------------------------------------------|----|----|-----------|------------|
| Records Review     | 012698313.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698314.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698315.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698317.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698431.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698432.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698439.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698444.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698445.pdf                             | No | No | Jon Jones | 03/31/2021 |
| Records Review     | 012698111.pdf                             | No | No | Jon Jones | 04/01/2021 |
| Communications     | Request for documents T2371.docx          | No | No | Jon Jones | 04/01/2021 |
| Communications     | CVS Request for documents from T2371.docx | No | No | Jon Jones | 04/01/2021 |
| Communications     | CVS 17436 Doc Submittal.docx              | No | No | Jon Jones | 04/01/2021 |
| Communications     | CVS Pharmacy 17435 Anchorage.pdf          | No | No | Jon Jones | 04/01/2021 |
| Communications     | T2371 Response to Document Request.docx   | No | No | Jon Jones | 04/01/2021 |
| Inspection Reports | Field_Notes_AKR000203000v1.0.pdf          | No | No | Jon Jones | 04/01/2021 |