

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	03/11/2024 10:12 AM (AKT)	Announced: No	
Inspection Exit Date/Time	03/11/2024 11:18 AM (AKT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Costco Wholesale Corporation		
Facility or Site Name	Costco Wholesale #63		
Facility/Site Identifier	AK0000882274		
Facility/Site Physical Address	4125 Debarr Road		
City, State, Zip Code	Anchorage, AK 99508		
County/Borough	N/A		
Generator Status	Small Quantity Generator (SQG)		
NAICS	452311		
Type of Operation	Warehouse Clubs and Supercenters		
Geographic Coordinates	61.209736, -149.809073		
Mailing Address/Secondary Address	Mr. Allen Arnold, Warehouse Manager w063mgr@costco.com N.E. Anchorage Costco #63 907 269-9501 4125 Debarr Road Anchorage, AK 99508 Cc: Mr. Tim Sitter, Assistant General Manager w063mgr3@costco.com Michael Cotton, Regional Vice President mcotton@costco.com Mario Omoss, District Vice President momoss@costco.com Jessica Stapleton, Regional Environmental Sustainability & Compliance Manager jstapleton@costco.com Traci Morgan, Director of Global Sustainability Operations tracimorgan@costco.com Gavin Pendleton, Director of Global Environmental Compliance gpendleton@costco.com Costco Environmental Compliance Team environmentalcompliance@costco.com		
City, State, Zip Code	Anchorage, AK 99508		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.05.09 10:57:11 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.08.29 16:11:35 -07'00'	
	EPA Region 10	Quarterman.matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION**Site Entry and Purpose of the Inspection**

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Costco Wholesale #63 Facility (the “Site” or “Facility”), located at 63 Debarr Road, Anchorage, AK 99508, at 10:12 AM (AKT) on 03/11/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Tim Sitter that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

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). The inspection was conducted as part of a Core Program requirement for FY 2024.

This report is based on information supplied by Costco Wholesale #63 Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
RCRA Inspector-in-training/ADEC	Vanessa Schmidt			Yes	Yes
RCRA Inspector-in-training/ADEC	Emily Vannortwick			Yes	Yes
Assistant General Manager/Costco	Tim Sitter	(907) 269-9510 Ext.231	w063mgr3@costco.com	Yes	Yes
Admin Manager/Costco	Sarah Bonholdt			Yes	Yes

Opening Conference

After arriving at Costco Wholesale #63, I spoke with a store representative at the customer service counter and asked to speak with the manager. A short time later, we were met by Mr. Tim Sitter, Assistant General Manager. I presented my inspector credentials and informed him that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

Mr. Sitter told us that he had to run something back to his RTV Clerk, in receiving, ahead of us holding an opening conference. Given that this was an area that needed to be inspected, we offered to join him. Mr. Sitter agreed, and the opening conference was conducted while walking back to the receiving area. During the opening conference, I explained that the focus of the RCRA inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents.

Only those areas in which I observed potential compliance concerns or noted other pertinent issues are

discussed in Section III of this inspection report.

Facility/Site Information

Operating Hours	Monday through Friday, from 10:00am to 8:30pm. Saturday, from 9:00am to 6:00pm, and Sunday from 10:00am to 6:00pm.
Length of Facility at Location	31 years
Number of employees	~300 total, 189 full-time
Safety Training Provided to Inspector(s)?	No
Size of Facility	168,000 square feet
What type of generator facility notified?	Small Quantity Generator (SQG)
What type of generator facility verified as?	SQG status was verified by Tim Sitter, Assistant General Manager, during the inspection.

Process Description

During the opening conference, Mr. Sitter told us the wastes generated at the facility were generated either due to product being damaged as it enters the store through receiving, damaged on the shelf at the store, or customer returns that cannot be resold. Ms. Sarah Bonholdt, Administrative Manager joined us while we were in the receiving area at the CAA.

We were accompanied during the rest of the inspection by Mr. Sitter and Ms. Bonholdt.

We looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Costco		Yes
Hearing Aid Center	Testing and fitting hearing aids Generation and collection of waste hearing aid batteries managed as universal waste.	No
Pharmacy	Generation of hazardous Waste pharmaceuticals (HWPharms).	No
Return to Vendor (RTV)	Central Accumulation Area (CAA) for the accumulation of hazardous waste and the collection of universal waste lamps and batteries and a satellite accumulation area (SAA) for waste aerosol can residue from waste aerosol can popping/puncturing.	No
Tire Shop	Tire changeovers and battery replacement, with a waste aerosol satellite accumulation area (SAA)	Yes

SECTION II – OBSERVATIONS

Building: Costco/Tire Shop			
Observation #: JJ1-OB-001	Date: 03/11/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tim Sitter		Title: Assistant General Manager	
The "Tire Shop" is an automotive shop where tire changeovers and battery replacements occur. Mr. Sitter told us that used lead acid batteries are recycled with Interstate. There is an SAA also located in the shop for the accumulation of waste aerosol cans. During the inspection of the shop, we observed two aerosol cans on a counter that was adjacent to a flammable storage cabinet. I picked up the aerosol cans and shook them to determine if they were empty or if they still held any product. Both felt as though they were empty, and I asked Mr. Sitter if they were waste aerosols. Mr. Sitter confirmed that they were empty and were waste aerosols and that this would be corrected by staff. This waste aerosol cans included a brake parts cleaner and a bathroom cleaner. At the time of the inspection, neither of the two waste aerosol cans were labeled with the words, "Hazardous Waste" or marked with a hazard indicator. Facility personnel placed the two waste aerosol cans in the waste aerosol SAA container during the inspection. On 4/5/24, I received an email from Mr. Sitter that included an attached response letter, dated 4/5/24, from Mr. Allen Arnold, Costco #63 Warehouse Manager, addressing the areas of concern that were identified during the inspection. In that letter, Mr. Arnold stated, "These were corrected at the time of inspection. In addition, all Tire Shop personnel have been retrained on the proper handling of empty aerosol cans."			
Photo(s) 1. IMG-202403111054065462361061.jpg 2. IMG-2024031110541454142024811.jpg 3. IMG-2024031110543054302211893.jpg			

SECTION III – RECORDS REVIEW

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 03/11/2024
At the time of the inspection, the facility's hazardous waste manifests were located in the RTV area of receiving, adjacent to the CAA. While there, we met Mr. Jeremy Gore, RTV Clerk. We asked Mr. Gore for the last three years of manifests, covering the period of March 11, 2021, through March 11, 2024. During the manifest review, we identified that there was no original manifest # 004899460FLE that had been signed and dated by the designated TSDF facility. Mr. Gore began looking for the signed copy and I suggested that he contact the designated TSDF, listed on the manifest, and have them email the signed copy to him. I asked him to provide a copy of the signed manifest when he received it. We departed the area and while we continued with the inspection, Mr. Gore contacted the designated facility and had a signed copy of the manifest faxed to the store. Prior to the end of our inspection, Mr. Gore received a signed copy of the manifest and brought it to us for review during the inspection. I saw that the manifested waste shipment had been signed by the TSDF and according to the date, had been received within 60 days. On 4/5/24, I received an email from Mr. Sitter that included an attached response letter, dated 4/5/24, from		

Mr. Allen Arnold, Costco #63 Warehouse Manager, addressing the areas of concern that were identified during the inspection. In that letter, Mr. Arnold stated, "We were able to correct this during the inspection. In addition, both the Costco personnel responsible for completing and retaining the manifest records and the personnel responsible for periodic inspection of the records have been retrained."

Document(s)

1. HW Manifest 004899460FLE.pdf

Photo(s)

1. [IMG-2024031110344034403310121.jpg](#)

Record: Inspections**AOC:** Yes**Ref #:** JJ1-RR-002**Reviewed By:** Jon Jones**Reviewed Date:** 03/11/2024

During the inspection, we went up to Mr. Sitter's office and I reviewed the last three years of electronic weekly hazardous waste inspections for the period of March 11, 2021, through March 11, 2024.

At the time of the inspection, I saw that no weekly inspections were conducted for the following weeks:

- October 31-November 6, 2021
- April 30-May 6, 2023

Mr. Sitter concurred that the weekly inspections had not been conducted.

On 4/5/24, I received an email from Mr. Sitter that included an attached response letter, dated 4/5/24, from Mr. Allen Arnold, Costco #63 Warehouse Manager, addressing the areas of concern that were identified during the inspection. In that letter, Mr. Arnold stated, "Having previously discovered the potential for this issue, Costco has implemented a program of electronically tracking weekly inspections. If inspections are not completed by Wednesday of each week, emails are sent to the responsible managers of each warehouse and followed up on by the Regional Environmental Sustainability and Compliance Manager. In addition, the responsibility for completing the inspections has been broadened to a larger group in order to increase consistency during periods of vacation or leave."

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Costco	Area: Tire Shop	Sub-area:
JJ1-OB-001		
Two waste aerosol cans were not labeled with the words "Hazardous Waste" or marked with a hazard indicator. Facility personnel placed the two waste aerosol cans in the waste aerosol SAA container during the inspection.	Regulation:	Sections:

Record: Manifests**JJ1-RR-001**

There was no original returned hazardous waste manifest for Manifest #004899460FLE that had been signed and dated by the designated facility (TSDF).

Mr. Gore, RTV Clerk, obtained a copy of the signed and dated manifest, from the TSDF, during the inspection.

Regulation:**Sections:****Record: Inspections****JJ1-RR-002**

At the time of the inspection, no weekly hazardous waste inspections were conducted for the following weeks:

- October 31-November 6, 2021
- April 30-May 6, 2023

Regulation:**Sections:****SECTION V – CLOSING CONFERENCE AND FOLLOW UP****Closing Conference**

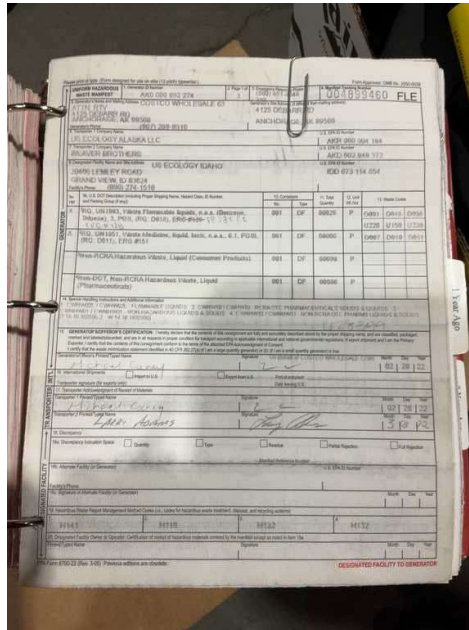
At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

Follow Up

N/A

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log





[Title]			IMG-2024031110541454142024811.jpg
03/11/2024 10:54 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Costco/Tire Shop			61.21118965, -149.80468624
Close-up view of two waste aerosol cans, seen here on a counter adjacent to a flammable storage cabinet, that were not labeled with the words "Hazardous Waste" or marked with hazard indicators.			



[Title]			IMG-2024031110543054302211893.jpg
03/11/2024 10:54 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Costco/Tire Shop			61.21121235, -149.8047242
Another close-up view of two waste aerosol cans, seen here on a counter adjacent to a flammable storage cabinet, that were not labeled with the words "Hazardous Waste" or marked with hazard indicators.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	HW Manifest 004899460FLE.pdf	No	No	Jon Jones	04/05/2024
Communications	Response letter from Costco #63	No	No	Jon Jones	04/05/2024