

INSPECTION REPORT

Inspection Entry Date/Time	11/06/2023 07:56 AM (PT)	Announced: No
Inspection Exit Date/Time	11/06/2023 09:56 AM (PT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Home Depot USA, Inc.	
Facility or Site Name	Home Depot #4726	
Facility/Site Identifier	XJW000024252 (Former Facility/Site Identifier: WAH000024252)	
Facility/Site Physical Address	9310 Quil Ceda Blvd	
City, State, Zip Code	Tulalip, WA 98271	
County/Borough	Snohomish	
Generator Status	Small Quantity Generator	
NAICS	444110	
Type of Operation	Home Centers	
Geographic Coordinates	48.097305, -122.18728	
Mailing Address/Secondary Address	Mr. Brett Amstuz, Home Depot #4726 Store Manager 9310 Quil Ceda Blvd Tulalip, WA 98271 brett_g_amstuz@homedepot.com Michelle O'Brien, Manager-Regulatory Compliance 2455 Paces Ferry Road, D-4 Atlanta, GA 30339 michelle_a_obrien@homedepot.com	
City, State, Zip Code	Tulalip, WA 98271	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2023.11.16 07:48:34 -09'00'
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.12.14 13:30:21 -08'00'
	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 Home Depot #4726 Facility (the "Site" or "Facility"), located at 9310 Quil Ceda Blvd, Tulalip, WA 98271, at 07:56 AM (PT) on 11/06/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Ms. Gale Smith, Customer Experience Manager, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). 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). The inspection was conducted as part of a Core Program requirement for FY 2024. This report is based on information supplied by Home Depot #4726 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
Store Manager/Home Depot	Brett Amstuz	(360) 657-5762 Ext. 500	brett_g_amstuz@homedepot.com	No	Yes
Receiving /Home Depot	Danyiel Vane			No	Yes
Customer Experience Manager (CXM)/Home Depot	Gale Smith	(360) 657-5762 Ext. 299	cxm_4726@homedepot.com	Yes	Yes

Opening Conference

Shortly after arriving at Home Depot #4726, I was taken to the facility breakroom where I held the opening conference. I presented my inspector credentials to and informed Ms. Gale Smith, Customer Experience Manager, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

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

Number of employees	~134
Length of Facility at Location	22 years
Operating Hours	6:00 am to 9:00 pm, Monday through Saturday. Sunday, 7:00 am to 8:00 pm.
Safety Training Provided to Inspector(s)?	No
Size of Facility	Approximately 115,000 square feet
What type of generator facility notified?	Small Quantity Generator
What type of generator facility verified as?	Verified by Ms. Smith and Ms. Vane to be a Small Quantity Generator
Weather Conditions	Rainy

Process Description

During the opening conference, Ms. Smith told me 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.

I was accompanied during the inspection by Ms. Smith. I looked at the facility's processes, 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.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Store		Yes
Receiving	Area where facility receives merchandise	Yes
CAA	180-day area where the facility accumulates hazardous and universal waste	Yes

SECTION II – OBSERVATIONS

Building: Store/Receiving/CAA			
Observation #: JJ1-OB-001	Date: 11/06/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Ms. Danyiel Vane		Title: Receiving	
While in the facility's receiving area, I inspected the central accumulation area (CAA). While in this area, I met with two facility receiving personnel, Ms. Danyiel Vane, and Mr. Miguel Ortiz. As I began inspecting the waste in the CAA, Ms. Vane provided me with a current inventory log of the waste in accumulation. This Hazmat Waste Log is included in the document log. At the time of the inspection, I saw five containers that were not closed. There were two red plastic containers. One was a five-gallon container labeled as containing "Toxic" hazardous waste and the other was a ~two-and-a-half-gallon container that was labeled as containing			

"Toxic/Reactive" hazardous waste. There was also a five-gallon container, inside of a red flammable storage cabinet, that was labeled as containing "Ignitable/Toxic" hazardous waste. There was also another ~two-and-a-half-gallon black container that was labeled "Toxic/Ignitable" hazardous waste and another black, five-gallon container that was labeled as containing "Toxic/Corrosive" hazardous waste.

The container lids on these hazardous waste containers were not completely snapped down onto the container. I explained to Ms. Vane that the lid needed to make a complete seal with the container in order for it to be considered closed. Ms. Vane closed each of the five containers during the inspection.

Document(s)

1. Hazmat Waste Log_Part1.pdf
2. Hazmat Waste Log_Part2.pdf

Photo(s)

1. [IMG-2023110608244024401866994.jpg](#)
2. [IMG-2023110608245224521727171.jpg](#)
3. [IMG-202311060825042542109414.jpg](#)
4. [IMG-2023110608252025201980867.jpg](#)
5. [IMG-2023110608305330531890571.jpg](#)
6. [IMG-202311060831033131912192.jpg](#)
7. [IMG-2023110608311431142056399.jpg](#)
8. [IMG-2023110608312131212075553.jpg](#)

SECTION III – RECORDS REVIEW

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 11/06/2023
During the records review, I inspected the facility's hazardous waste manifests covering the period of 11/06/2020 through 11/06/2023. During this manifest inspection, I saw the following 13 hazardous waste manifests for which there was no original returned copy that had been signed and dated by the designated facility:		
<u>Manifest #</u>	<u>Date of Shipment</u>	
200282182CLE	10/19/22	
200056596CLE	1/15/22	
200034266CLE	12/15/21	
000406359DAT	10/19/21	
003271887CLE	8/26/21	
003242794CLE	8/2/21	
003189650CLE	6/1/21	
000344184DAT	5/3/21	
000343467DAT	4/6/21	
003093592CLE	3/8/21	
000343071DAT	2/10/21	
003020610CLE	1/14/21	
000343982DAT	11/17/20	
During the inspection, Ms. Vane took the opportunity to log onto her personal computer and after opening her		

hazardous waste vendors website, she was able to print a copy of each manifest listed above that had the signature and date from the designated facility. Ms. Vane then filed these copies with the manifests she had onsite.

Document(s)

1. 000343071DAT 2.10.21.pdf
2. 000343467DAT 4.6.21.pdf
3. 000343982DAT 11.17.20.pdf
4. 000344184DAT 5.3.21.pdf
5. 000406359DAT 10.19.21.pdf
6. 003020610CLE 1.14.21.pdf
7. 003093592CLE 3.8.21.pdf
8. 003189650CLE 6.1.21.pdf
9. 003242794CLE 8.2.21.pdf
10. 003271887CLE 8.26.21.pdf
11. 200034266CLE 12.15.21.pdf
12. 200056596CLE 1.15.22.pdf
13. 200282182CLE 10.19.22.pdf

SECTION IV – AREA OF CONCERN

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

Building: Store	Area: Receiving	Sub-area: CAA
JJ1-OB-001		
During the inspection, I saw five hazardous waste containers that were not closed. The container lids on these hazardous waste containers were not completely snapped down onto the container making a complete seal. Ms. Vane closed each of the five containers during the inspection.	Regulation:	Sections:

Record: Manifests		
JJ1-RR-001		
During the manifest inspection, I saw 13 hazardous waste manifests for which there was no original returned copy that had been signed and dated by the designated facility. During the inspection, Ms. Vane printed a copy of each manifest that had the signature and date from the designated facility. Ms. Vane then	Regulation:	Sections:

filed these copies with the manifests she had onsite.		
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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

Communication Log

N/A

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

- 1. Photo Log
- 2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG-2023110608244024401866994.jpg
11/06/2023 08:24 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08139123, -122.18826522
View of two red plastic containers that were not closed. A five-gallon container labeled "Toxic" hazardous waste and a ~two-and-a-half-gallon container that was labeled "Toxic/Reactive" hazardous waste.			



[Title]			IMG-2023110608245224521727171.jpg
11/06/2023 08:24 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08139124, -122.18826493
View of five-gallon container, inside of a red flammable storage cabinet, that was labeled as containing "Ignitable/Toxic" hazardous waste and not closed.			



[Title]			IMG-202311060825042542109414.jpg
11/06/2023 08:25 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08138867, -122.18828571
View of another ~two-and-a-half-gallon black container that was labeled "Toxic/Ignitable" hazardous waste and not closed.			



[Title]			IMG-2023110608252025201980867.jpg
11/06/2023 08:25 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08138242, -122.18833714
View of another black, five-gallon container that was labeled as containing "Toxic/Corrosive" hazardous waste and not closed.			



[Title]			IMG-2023110608305330531890571.jpg
11/06/2023 08:30 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.0813856, -122.18832365
View of the containers, seen in IMG-2023110608244024401866994.jpg, after being closed.			



[Title]			IMG-202311060831033131912192.jpg
11/06/2023 08:31 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08138892, -122.18835414
View of the container, seen in IMG-2023110608245224521727171.jpg, after being closed.			



[Title]			IMG-2023110608311431142056399.jpg
11/06/2023 08:31 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08139434, -122.18825233
View of the container, seen in IMG-202311060825042542109414.jpg, after being closed.			



[Title]			IMG-2023110608312131212075553.jpg
11/06/2023 08:31 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Store/Receiving/CAA			48.08139555, -122.18832347
View of container, seen in IMG-2023110608252025201980867.jpg, after being closed.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Hazardous Waste Manifest	000343071DAT 2.10.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	000343467DAT 4.6.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	000343982DAT 11.17.20.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	000344184DAT 5.3.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	000406359DAT 10.19.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	003020610CLE 1.14.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	003093592CLE 3.8.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	003189650CLE 6.1.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	003242794CLE 8.2.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	003271887CLE 8.26.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	200034266CLE 12.15.21.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	200056596CLE 1.15.22.pdf	No	No	Jon Jones	11/09/2023
Hazardous Waste Manifest	200282182CLE 10.19.22.pdf	No	No	Jon Jones	11/09/2023
Other - Hazmat Waste Log	Hazmat Waste Log_Part1.pdf	No	No	Jon Jones	11/09/2023
Other - Hazmat Waste Log	Hazmat Waste Log_Part2.pdf	No	No	Jon Jones	11/09/2023