

INSPECTION REPORT

Inspection Date(s):	02/08/2021 - 02/08/2021	Announced: No	
Time:	Entry: 10:30 AM (AKT)	Exit: 02:00 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	TARGET CORPORATION		
Facility or Site Name:	TARGET STORE T2339		
Facility/Site Physical Address:	1801 E PARKS HWY		
(city, state, zip code)	WASILLA, AK 99654		
Type of Operation:	Retail store		
Size of Facility:	157000 sq. ft.		
Length of Facility at Location:	October 2008		
Geographic Coordinates:	61.577971, -149.402854		
Mailing address: (Secondary Address)	Paul Hamilton, Sr. Environmental Program Owner (612) 304-6171 Corporate Compliance and Ethics/Legal Affairs Mailstop: CC-3625, 33 South 6th Street Minneapolis, MN 55402 paul.hamilton@target.com corporate.compliance@target.com CC: Ben Munson, T2339 Store Director benjamin.munson@target.com Derek Siegrist, Executive Team Leader – Human Resources derek.siegrist@target.com Nicole Ratigan, Senior Environmental Specialist, Corporate Environmental 1 CVS Drive, Mail Code 2340 Woonsocket, RI 02895 (401) 770-6259 nicole.ratigan@cvshealth.com		
(city, state, zip code)	Minneapolis, MN 55402		
County:			
Facility/Site Identifier:	AKD983068990		
Media Number:	Unpermitted Facility		
NAICS:	452210 – Department Stores		
Lead Inspector:			
Jon Jones	JONATHAN JONES	Digitally signed by JONATHAN JONES Date: 2021.03.26 11:52:36 -08'00'	
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329

Supervisor Review:			
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	Ben Munson	(907) 631-7200	benjamin.munson@target.com	Yes	Yes
Executive Team Lead Human Resources	Derek Siegrist	(907) 631-7200	derek.siegrist@target.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Target Store T2339 at 10:30 AM (AKT) on 02/08/2021 for an inspection. I presented my credentials to Ben Munson and informed him 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 #17404

CVS Pharmacy #17404 operates inside the Target Store T2339. There is no separate entry or exit for the pharmacy. Customers using the pharmacy must enter and exit through the Target Store. During the inspection, Mr. Derek Siegrist, Executive Team Leader - Human Resources, gave me the following contact information for questions related to the CVS Pharmacy #17404:

Shannon Slavens, CVS Environmental Manager (401) 770-2836

During the inspection, I spoke with the following CVS Pharmacy #17404 Staff:

Eryn Von Edwins, Pharmacy Technician

Uriah Clarkson, Pharmacist

They told me the following items, generated at CVS Pharmacy #17404 , are sent for Reverse Distribution are sent via common carrier (UPS), to Inmar Rx Solutions, 3845 Grand Lakes Way, Suite 125 Grand Prairie, TX 75050:

- Creditable Hazardous Waste (HW) Pharmaceuticals (PHARMS)
- Non-Creditable Non-Hazardous Waste PHARMS

I asked Ms. Von Edwins if Inmar Rx Solutions ever provided any information as to what items did or did not receive any credit. Ms. Von Edwins told me that the only information they receive is how much credit they receive. She told me they are not made aware of items that don't receive credit.

Additionally,

Clean Earth, Inc., 8100 Petersburg St., Anchorage, AK 99507

- Picks up the Non-Creditable HW PHARMS from CVS Pharmacy #17404 and they are shipped to Burlington Environmental, LLC in Tacoma, WA.
- Picks up the HW PHARMS tracked by the Drug Enforcement Agency (DEA) and they are shipped to Nortru, LLC, 421 Lycaste St., Detroit, MI 48214. CVS Pharmacy #17404 manages their disposal through DEA Registrant #FA5754785.

**Clean Earth, Inc. purchased the Environmental Division of Stericycle Specialty Waste Solutions, Inc. in April 2020. Stericycle continues to manage biohazard/medical wastes.*

On the day of the inspection (2/8/21), I received an email from Brenna Hermen, Pharm. D., CVS Health Pharmacy Supervisor, Region 83, District 2. In Ms. Hermen's email, she states..."My team at CVS/Pharmacy inside Target in Wasilla, AK notified me you had stopped in for a visit! If you have any questions please feel free to reach out to my corporate partner, Shannon Slavens." Before I was able to reach out to Ms. Slavens, she also sent me an email, dated 2/9/21 in which she states..."We are happy to help with any questions you might have. Nikki Ratigan, on my team and copied, can assist also. We are happy to jump on a call, or feel free to send us questions. Also – we will be the point of contact for all follow up that might be needed (we help facilitate close out of all inspections for CVS nationwide). We are happy to help! Shannon."

Site Description

Target Store T2339 is a department store located in Wasilla, AK. CVS Pharmacy #17404 operates as a separate entity inside the T2339 store. According to Mr. Munson, Target got out of the pharmacy business approximately five years ago. According to Mr. Munson, Target sold their pharmacy business to CVS. Mr. Munson explained that since Target does not operate the pharmacy, Target does not have any information about how CVS Pharmacy #17404 manages hazardous waste pharmaceuticals.

Facility Info

Number of employees	155
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Weather Conditions	Sunny and cold
Operating Hours	8:00 am to 10:00 pm, 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 generator status was verified by Mr. Munson, T2339 Store Director

Process Description

According to Mr. Munson, 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. Mr. Munson stated that these 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 included:

- Non-RCRA Hazardous Waste 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	Areas of Concern
Target Store		No
Shipping and receiving area		No
Central accumulation area (CAA)	Location where the store personnel accumulate hazardous waste, universal waste (batteries and lamps), and HW PHARMS (OTC).	No

SECTION II – OBSERVATIONS AND RECORDS REVIEW**Observations**

Building: Target Store/Shipping and receiving area/Central accumulation area (CAA)	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 02/19/2021
I inspected the facility's CAA, located in the shipping and receiving area of the back room of the store. At the time of the inspection, I saw multiple plastic totes containing various wastes that included hazardous, universal, non-RCRA state only waste (WA), and HW PHARMS which were also labeled as "OTC" (Over-the-counter), meaning they were non-prescription. These totes were all closed, labeled, and marked with a hazard indicator. The containers were all dated and according to the dates, none of the hazardous wastes had been in accumulation for greater than 270 days and the universal waste and HW PHARMS (OTC) have been in accumulation for less than a year.	

Records Review

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 02/18/2021 01:38 PM (AKT)
At the time of the inspection, I asked Mr. Munson to email Target Store T2339 weekly hazardous waste inspections for the period covering February 8, 2017 through February 8, 2021. While reviewing weekly inspection logs, I saw that there were no weekly inspections conducted for 76 weeks.		
Document(s)		
1. ESIM Weekly Log.xlsx		

Record: Exception Reports		AOC: Yes
Ref #: JJ1-RR-004	Reviewed By: Jon Jones	Reviewed Date: 02/18/2021 02:27 PM (AKT)
Following the inspection, I reviewed the hazardous waste manifests and associated paperwork that Mr. Hamilton emailed to me on February 9, 2021. Prior to February 6, 2020, Target Store T2339 had notified (8700-12) and was operating as a Large Quantity Generator (LQG) of hazardous waste since February 2014. During my review of the manifests, I saw 13 manifests with a span between the shipping dates for the hazardous waste and the dates the waste was received by the designated facility that was greater than 45 days. There were no exception reports for the 13 manifests included in Mr. Hamilton's February 9, 2021 email. On February 12, 2021 I sent a "Request for Documents" email to Mr. Hamilton, via the "GoAnywhere" platform. In that email I requested that he send Copies of exception reports for the following hazardous waste manifests: • #008411633 FLE dated 05/30/18 • #008411635 FLE dated 05/30/18 • #008411693 FLE dated 09/25/18		

Inspection Date(s):

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- #009994507 FLE dated 11/15/18
- #009994472 FLE dated 05/02/19
- #009994607 FLE dated 10/14/19
- #009994682 FLE dated 10/14/19
- #012698108 FLE dated 03/04/19
- #012598125 FLE dated 01/11/19
- #012598444 FLE dated 06/29/19
- #012698109 FLE dated 03/04/19
- #012698305 FLE dated 12/12/19
- #012698308 FLE dated 12/12/19

In my "Request for Documents" email to Mr. Hamilton, I requested that he provide the documentation to me on or before March 1, 2021. This information was received on 2/24 and 2/25/21. I reviewed the documentation sent by Mr. Hamilton and saw that there were exception reports for the 13 manifests, but four of the exception reports were not sent to the EPA Region 10 Administrator. Four exception reports were sent to the Alaska Department of Environmental Conservation (ADEC) Commissioners Office. All the exception reports were submitted by Clean Harbors Environmental Services, Inc. on behalf of their client, Target Corporation.

No exception reports were sent to the EPA Region 10 Administrator for the following hazardous waste manifests:

- #008411633 FLE
- #008411635 FLE
- #008411693 FLE
- #012598444 FLE

Document(s)

1. #008411633FLE Exception Rpt.pdf
2. #008411635FLE Exception Rpt.pdf
3. #008411693FLE Exception Rpt.pdf
4. #012598444FLE Exception Rpt.pdf
5. #008411633FLE 5.30.18.pdf
6. #008411635FLE 5.30.18.pdf
7. #008411693FLE 9.25.18.pdf
8. #012598444FLE 6.29.19.pdf

Record: Exception Reports

AOC: Yes

Ref #: JJ1-RR-005

Reviewed By: Jon Jones

Reviewed Date: 02/18/2021 02:53 PM
(AKT)

Following the inspection, I reviewed the uniform hazardous waste manifests and associated paperwork that Mr. Hamilton emailed to me on February 9, 2021. On February 6, 2020 Target Store T2339 submitted a subsequent notification (8700-12) to EPA changing their generator status from LQG to Small Quantity Generator (SQG).

Inspection Date(s):

02/08/2021 - 02/08/2021

During my review of the manifests, I saw five manifests with a span between the shipping dates for the waste and the dates the waste was received by the designated facility that was greater than 60 days. There were no exception reports for the five manifests included in Mr. Hamilton's February 9, 2021 email. On February 12, 2021 I sent a "Request for Documents" email to Mr. Hamilton requesting that he send copies of exception reports for the following hazardous waste manifests:

- #009994732 FLE dated 10/28/20
- #012698337 FLE dated 08/11/20
- #012698338 FLE dated 08/11/20
- #012698427 FLE dated 05/29/20
- #012698428 FLE dated 05/29/20

I reviewed the documentation sent by Mr. Hamilton and saw that there were exception reports for the five manifests, but they were not sent to the EPA Region 10 Administrator. The five exception reports were sent to the ADEC Commissioners Office. Again, these exception reports were submitted by Clean Harbors Environmental Services, Inc. on behalf of their client, Target Corporation.

No exception reports were sent to the EPA Region 10 Administrator for the following hazardous waste manifests:

- #009994732 FLE
- #012698337 FLE
- #012698338 FLE
- #012698427 FLE
- #012698428 FLE

Document(s)

1. #009994732FLE Exception Rpt.pdf
2. #012698337FLE Exception Rpt.pdf
3. #012698338FLE Exception Rpt.pdf
4. #012698428FLE Exception Rpt.pdf
5. #012698427FLE Exception Rpt.pdf
6. #009994732FLE 10.28.20.pdf
7. #012698337FLE 8.11.20.pdf
8. #012698338FLE 8.11.20.pdf
9. #012698428FLE 5.29.20.pdf
10. #012698427FLE 5.29.20.pdf

Record: Ensure applicable employees are trained – SQG

AOC: Yes

Ref #: JJ1-RR-006

Reviewed By: Jon Jones

Reviewed Date: 02/18/2021 03:06 PM
(AKT)

At the time of the inspection, I asked Mr. Munson to email training records for Target Store T2339 personnel that managed hazardous waste, universal waste and non-creditable HW PHARMS, regulated by Part 266, Subpart P. Mr. Munson had Mr. Siegrist email the training records to me on February 8, 2021, the day of the inspection. While reviewing the training records, I saw that there were several Target Store personnel that had

been conducting weekly hazardous waste inspections and were not listed in the training records provided to me. In my February 12, 2021 "Request for Documents" email to Mr. Hamilton, I requested copies of training records for the following Target Store T2339 personnel that had conducted weekly hazardous waste inspections:

- Mariah Householder
- Steven Ehrhart
- Melissa Donnally
- Caitlin Self
- Ryan Landis

I reviewed the documentation sent by Mr. Hamilton and saw that the training information provided for the Target personnel listed above, indicated the following:

- Mariah Householder received Environmentally Sensitive Item Management (ESIM) Hazardous Waste Management (HW Mgmt.) training on 5/22/20, yet she conducted a total of eight weekly hazardous waste inspections prior to receiving any training. The inspections she conducted prior to her 5/22/20 training took place on the following dates: 3/2/20, 3/11/20, 3/19/20, 3/27/20, 4/2/20, 4/16/20, 4/24/20, and 5/13/20.
- Steven Ehrhart received ESIM HW Mgmt. training on 12/4/19.
- Melissa Donnally, whose last name changed several times (Roux/Butler) received the ESIM HW Mgmt. training on 2/18/15, 1/13/16, 1/3/17, and 12/8/17.
- Caitlin Self received ESIM HW Mgmt. training on 6/11/18 and again on 8/8/19, yet she conducted a weekly hazardous waste inspection at Target Store T2339 on 7/6/17, prior to receiving any training.
- Ryan Landis received ESIM HW Mgmt. training on 9/19/18, yet he conducted a weekly hazardous waste inspection at Target Store T2339 on 5/4/17, prior to receiving any training.

Record: Facility Layouts		AOC: No
Ref #: JJ1-RR-007	Reviewed By: Jon Jones	Reviewed Date: 02/19/2021 09:48 AM (AKT)
Document(s)		
1. T2339 Facility Drawing.pdf		

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-008	Reviewed By: Jon Jones	Reviewed Date: 03/17/2021 10:19 AM (AKT)
At the time of the inspection, CVS Pharmacy #17404 was operating inside Target Store T2339. On February 11, 2021 I sent a request for documents email, via "GoAnywhere", to Ms. Nicole Ratigan, CVS Health. In that document request, I asked for copies of hazardous waste manifests and land disposal restriction notices (LDRs) for the period February 8, 2018 through February 8, 2021. In that email, I asked Ms. Ratigan to provide the requested documents on or before February 26, 2021. Ms. Ratigan sent the requested documents on February 26, 2021. I reviewed the documentation and saw that none of the manifests contained the EPA I.D. # AKD983068990 in block 1, the number assigned to the Target Store T2339 site. The following CVS Pharmacy #17404 hazardous waste manifests contained the acronym "CESQG" (Conditionally exempt small quantity generator) in block 1:		

- #010173578FLE
- #010752086FLE
- #010752291FLE
- #012962304FLE
- #012962438FLE
- #010174334FLE
- #012960926FLE
- #011433799FLE
- #011433800FLE

Document(s)

1. #010173578FLE 1.11.18.pdf
2. #010752086FLE 4.23.18.pdf
3. #010752291FLE 10.8.18.pdf
4. #012962304FLE 3.29.19.pdf
5. #012962438FLE 9.9.19.pdf
6. #010174334FLE 2.25.20.pdf
7. #012960926FLE 8.10.20.pdf
8. #011433799FLE 2.2.21.pdf
9. #011433800FLE 2.2.21.pdf

Record: Manifests

AOC: Yes

Ref #: JJ1-RR-009

Reviewed By: Jon Jones

Reviewed Date: 03/17/2021 11:19 AM
(AKT)

While reviewing the hazardous waste manifests Ms. Ratigan sent on February 26, 2021, I saw that the following two manifests did not contain the acronym "PHARMS" in block 13:

- #012962304FLE
- #011433800FLE

Document(s)

1. #012962304FLE 3.29.19.pdf
2. #011433800FLE 2.2.21.pdf

Record: Ensure applicable employees are trained – SQG

AOC: Yes

Ref #: JJ1-RR-010

Reviewed By: Jon Jones

Reviewed Date: 03/17/2021 11:24 AM
(AKT)

In my February 11, 2021 request for documents email, to Ms. Ratigan, I asked for copies of training records for CVS Pharmacy #17404 personnel working at the Target Store T2339, including a copy of the training CVS personnel received and training dates.

After reviewing the documentation Ms. Ratigan sent, I saw that the following active CVS Pharmacy #17404

personnel received "Hazardous Waste Training for Pharmacy Colleagues" Course #500147 (May 2020) on the following dates:

- Jenifer Breiner 4/14/2018
- Cameron Carlson 10/13/2020
- Lindsay Causey 11/17/2018
- Uriah Clarkson 5/8/2018
- Cameron Macon 5/8/2018
- Desiree Molina 4/14/2018
- Madison Ortega 9/29/2020
- Nicole Spinner 5/8/2018
- Benjamin Stancombe 5/12/2018
- Eryn Von Edwins 5/2/2018
- Kathleen Zinnerzwink 12/29/2020

The training records also contained the names of CVS Pharmacy #17404 personnel no longer employed with CVS that received Course #500147 training on the following dates:

- Edward Danilyuk 5/12/2018 Separation Date: 7/21/2019
- Barbara Gugelman 1/2/2019 Separation Date: 4/6/2020
- Brianna Morris 4/26/2018 Separation Date: 9/7/2019
- Courtney Ponte 8/6/2019 Separation Date: 8/30/2020
- Jennifer Rochelle 4/18/2018 Separation Date: 10/31/2019
- Margaret Spilman 7/20/2019 Separation Date: 7/21/2020

I reviewed the "Hazardous Waste Training for Pharmacy Colleagues" Course #500147 (May 2020) that was submitted with Ms. Ratigan's February 26, 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 tote 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 response and saw that it contained the same labeling information under the heading, "Hazardous Waste Tote Setup".

Neither of the two training documents contained any training information related to filling out the hazardous waste manifest correctly (i.e. "PHARMS" in Block 13).

Due to the inadequate content of the submitted training materials, the following CVS Pharmacy #17404

personnel had not received adequate training either prior to, or following the hazardous waste pharmaceuticals rule, promulgated on February 22, 2019:

- Jenifer Breiner
- Cameron Carlson
- Lindsay Causey
- Uriah Clarkson
- Cameron Macon
- Desiree Molina
- Madison Ortega
- Nicole Spinner
- Benjamin Stancombe
- Eryn Von Edwins
- Kathleen Zinnerzwink
- Edward Danilyuk
- Barbara Gugelman
- Brianna Morris
- Courtney Ponte
- Jennifer Rochelle
- Margaret Spilman

Document(s)

1. 17404 AK Hazardous Waste Training Records.pdf
2. 500147_JobAid_Packet_2020.pdf
3. 2020 500147_Pharmacy Hazardous Waste Training.pdf

Record: Others		AOC: No
Ref #: JJ1-RR-011	Reviewed By: Jon Jones	Reviewed Date: 03/17/2021 01:54 PM (AKT)
In my February 12, 2021 "Request for Documents" email to Mr. Hamilton, I requested that he send a copy of any contract or documentation outlining the arrangement between Target Corporation and CVS Health. This information was received on 2/24/21 and the following language was in Mr. Hamilton's email response: "CVS CONTRACT LANGUAGE: c. Medical. Pharmaceutical, Environmental, Biohazard and Other Materials. CVS shall be responsible for the disposal of all medical, pharmaceutical, environmental, biohazard and other similar materials and similar records used or generated by CVS in any Leased Space in accordance with all applicable Laws. Target shall permit access to the Stores and Leased Space to CVS's vendors to conduct such disposal,		

subject to the provisions of the Pharmacy Operating Agreement regarding access to such Stores. All obligations of CVS pursuant to this subsection 7.c shall be performed by CVS at CVS's sole cost and expense."

Document(s)

1. T2339 Response to Document Request.docx

Record: Others		AOC: No
Ref #: JJ1-RR-012	Reviewed By: Jon Jones	Reviewed Date: 03/17/2021 02:09 PM (AKT)
In my February 11, 2021 "Request for Documents" email, to Ms. Ratigan, I asked for a copy of any contract or documentation of the arrangement between CVS Health and Target Corporation. Ms. Ratigan sent an "Execution Version" of a Master Lease Agreement between Target Corporation and CVS Pharmacy, Inc. with her February 26, 2021 response. I only conducted a cursory review of the Master Lease Agreement.		
Document(s)		
1. CVS Target Master Agreement.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:
JJ1-RR-002		
While reviewing the weekly inspection logs for the Target Store T2339, I saw that there were no weekly inspections conducted for 76 weeks during the three years prior to the February 8, 2021 RCRA CEI.	Citation:	Section:
JJ1-RR-004		
No exception reports were sent to the EPA Region 10 Administrator for the following hazardous waste manifests: • #008411633 FLE • #008411635 FLE • #008411693 FLE • #012598444 FLE	Citation:	Section:

JJ1-RR-005		
No exception reports were sent to the EPA R10 Administrator for the following hazardous waste manifests: • #009994732 FLE • #012698337 FLE • #012698338 FLE • #012698427 FLE • #012698428 FLE	Citation:	Section:
JJ1-RR-006		
The training information, for the Target Store T2339 personnel listed below, indicated the following: • Mariah Householder received Environmentally Sensitive Item Management (ESIM) Hazardous Waste Management (HW Mgmt.) training on 5/22/20, yet she conducted a total of eight weekly hazardous waste inspections prior to receiving any training. The inspections she conducted prior to her 5/22/20 training took place on the following dates: 3/2/20, 3/11/20, 3/19/20, 3/27/20, 4/2/20, 4/16/20, 4/24/20, and 5/13/20. • Caitlin Self received ESIM HW Mgmt. training on 6/11/18 and again on 8/8/19, yet she conducted a weekly hazardous waste	Citation:	Section:

inspection at Target Store T2339 on 7/6/17, prior to ever receiving any training. • Ryan Landis received ESIM HW Mgmt. training on 9/19/18, yet he conducted a weekly hazardous waste inspection at Target Store T2339 on 5/4/17, prior to ever receiving any training.		
JJ1-RR-008		
The following CVS Pharmacy #17404 hazardous waste manifests contained the acronym "CESQG" in block 1: • #010173578FLE • #010752086FLE • #010752291FLE • #012962304FLE • #012962438FLE • #010174334FLE • #012960926FLE • #011433799FLE • #011433800FLE	Citation:	Section:
JJ1-RR-009		
The following two manifests did not contain the word "PHARMS" in block 13: • #012962304FLE • #011433800FLE	Citation:	Section:
JJ1-RR-010		

Seventeen CVS Pharmacy #17404 personnel had not received adequate training either prior to or following the hazardous waste pharmaceuticals rule which was promulgated on February 22, 2019.	Citation:	Section:
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SECTION IV – FOLLOW UP

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

Closing Conference

I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern that I observed during my walk-through inspection and paperwork review while at the facility. I told Messer's. Munson and Siegrist that I had not identified any areas of concern during the walk-through portion of the inspection. At the time of the inspection, all the records for review were in electronic form and I performed a cursory review of the following records as viewed on Mr. Siegrist's desktop PC:

- Weekly hazardous inspection logs
- Hazardous waste manifests
- Land disposal restriction notices
- and Training records

I told Messer's. Munson and Siegrist that I had observed a few areas of concern while conducting the cursory paperwork review on Mr. Siegrist's pc monitor and asked if they would email the documents to me so I could conduct a more thorough review. I explained to both gentlemen that due to COVID-19 it was important, for everyone involved, to have the least amount of contact time as possible during inspections. Both gentlemen agreed and Mr. Siegrist said he would email the documents to me. I told Mr. Munson that if I identified any areas of concern while reviewing the paperwork submitted by Mr. Siegrist, I would call him and let him know. I answered any questions they had and explained the follow-up process that would take place after the inspection. Messer's. Munson and Siegrist asked to be copied, by email, with the results of the inspection.

Following the inspection, I received copies of the manifests I had requested in an email dated 2/9/21 from Mr. Paul Hamilton. Mr. Hamilton became my point-of-contact (POC) for Target Corporation and Ms. Nicole Ratigan, was the POC for CVS Health. Following the inspection, I contacted Mr. Munson to let him know that I had identified an area of concern related to weekly hazardous waste inspections that had not been performed. I also sent emails to both Mr. Hamilton and Ms. Ratigan offering a closing conference to discuss areas of concern identified during the inspection. Neither Mr. Hamilton nor Ms. Ratigan were receptive to the offer, but each requested that any follow-up documentation be sent to them.

On 2/11/21, I sent an email to Ms. Ratigan requesting documents and on 2/12/21, I sent an email to Mr. Hamilton requesting additional documents associated with the 2/8/21 RCRA CEI. The requested documentation was received from Mr. Hamilton on 2/24 and 2/25/21. The requested documentation was received from Ms. Ratigan on 2/26/21.

Communication Log

The following information was received by EPA R10 on or after exiting the Facility on 02/08/2021.

Type	Location	Point of Contact	Description	Contains PII
Email	Target Store Corporate Office	Paul Hamilton	Request for documents	No
Email	CVS Pharmacy Corporate Office	Nicole Ratigan	Request for documents	No

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log – No photographs were taken during the inspection.

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	T2339 Facility Drawing.pdf	No	No	Jon Jones	02/19/2021
Records Review	ESIM Weekly Log.xlsx	No	No	Jon Jones	02/19/2021
Inspection Reports	Field_Notes_AKD983068990v1.0.pdf	No	No	Jon Jones	02/19/2021
Personnel Training	ESIM Training.xlsx	No	No	Jon Jones	02/19/2021
Records Review	#009994732FLE Exception Rpt.pdf	No	No	Jon Jones	03/15/2021
Records Review	#012698337FLE Exception Rpt.pdf	No	No	Jon Jones	03/15/2021
Records Review	#012698338FLE Exception Rpt.pdf	No	No	Jon Jones	03/15/2021
Records Review	#012698428FLE Exception Rpt.pdf	No	No	Jon Jones	03/15/2021
Records Review	#012698427FLE Exception Rpt.pdf	No	No	Jon Jones	03/17/2021
Records Review	#009994732FLE 10.28.20.pdf	No	No	Jon Jones	03/17/2021

Inspection Date(s):

02/08/2021 - 02/08/2021

Records Review	#012698337FLE 8.11.20.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012698338FLE 8.11.20.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012698428FLE 5.29.20.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012698427FLE 5.29.20.pdf	No	No	Jon Jones	03/17/2021
Records Review	#008411633FLE Exception Rpt.pdf	No	No	Jon Jones	03/17/2021
Records Review	#008411635FLE Exception Rpt.pdf	No	No	Jon Jones	03/17/2021
Records Review	#008411693FLE Exception Rpt.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012598444FLE Exception Rpt.pdf	No	No	Jon Jones	03/17/2021
Records Review	#008411633FLE 5.30.18.pdf	No	No	Jon Jones	03/17/2021
Records Review	#008411635FLE 5.30.18.pdf	No	No	Jon Jones	03/17/2021
Records Review	#008411693FLE 9.25.18.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012598444FLE 6.29.19.pdf	No	No	Jon Jones	03/17/2021
Records Review	#010173578FLE 1.11.18.pdf	No	No	Jon Jones	03/17/2021
Records Review	#010752086FLE 4.23.18.pdf	No	No	Jon Jones	03/17/2021
Records Review	#010752291FLE 10.8.18.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012962304FLE 3.29.19.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012962438FLE 9.9.19.pdf	No	No	Jon Jones	03/17/2021
Records Review	#010174334FLE 2.25.20.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012960926FLE 8.10.20.pdf	No	No	Jon Jones	03/17/2021
Records Review	#011433799FLE 2.2.21.pdf	No	No	Jon Jones	03/17/2021
Records Review	#011433800FLE 2.2.21.pdf	No	No	Jon Jones	03/17/2021
Records Review	#012962304FLE 3.29.19.pdf	No	No	Jon Jones	03/17/2021
Records Review	#011433800FLE	No	No	Jon Jones	03/17/2021

	2.2.21.pdf				
Records Review	17404 AK Hazardous Waste Training Records.pdf	No	No	Jon Jones	03/17/2021
Records Review	500147_JobAid_Packet_2020.pdf	No	No	Jon Jones	03/17/2021
Records Review	2020 500147_Pharmacy Hazardous Waste Training.pdf	No	No	Jon Jones	03/17/2021
Records Review	T2339 Response to Document Request.docx	No	No	Jon Jones	03/17/2021
Records Review	CVS Target Master Agreement.pdf	No	No	Jon Jones	03/17/2021