

HOME DEPOT #0975 INSPECTION REPORT

Inspection Date(s):	18-19 April 2024	Inspection Announced: No
Facility or Site Name:	Home Depot Store #0975	
Facility/Site Physical Location:	421 Absecon Blvd.	
(city, state, zip code)	Absecon, NJ 08201	
Mailing address (if different from above):		
Facility/Site Contacts:	Christina Quigley Manager Christina_M_Quigley@homedepot.com (609) 484-3511 x500	
Website:	https://www.homedepot.com/l/Absecon/NJ/Absecon/08201/975	
RCRA ID Number:	NJR000048009	
Latitude, Longitude:	39.415740, -74.493461	
Facility/Site Personnel Participating in Inspection:		
Christina Quigley	Manager	
Facility/Site Personnel Unavailable During Inspection:		
Inspector(s):		
Carl F. Plössl	US EPA, Enforcement Officer/Engineer	Plossl.Carl@epa.gov (212) 637-4088
Additional Inspection Report Elements:	- HOME DEPOT #0975 (ABSECON, NJ) INSPECTION PHOTO ALBUM.pptx - Chemical-Strategy-PFAS-update-Aug-2023-FINAL	
Inspection Report Author:		
Carl F. Plössl	CARL PLOSSL Digitally signed by CARL PLOSSL Date: 2024.06.26 16:29:01 -04'00'	
Supervisor		
Leonard Grossman	LEONARD GROSSMAN Digitally signed by LEONARD GROSSMAN Date: 2024.06.26 16:44:09 -04'00'	

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SECTION I – INTRODUCTION

Purpose of the Inspection Objective

A Compliance Evaluation Inspection (CEI) was conducted to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA) requirements for hazardous waste management.

Background

The facility has been previously inspected for RCRA compliance in 2020 by the state, with a finding of no action, and has had a notification history as a small and very small quantity generator (last notification on 9 Feb 2023 as a SQG). A review of the facility's waste manifest records shows a consistent generator status as a SQG with some limited variation from VSQG to SQG (on a monthly basis). The facility is in an environmental justice area and within an extreme flood risk area.

Notification History:

Dat...	Source	Status
2/9/23	Notification	SQG
11/14/19	Notification	SQG
1/1/07	Implementer	VSQG
1/1/06	Implementer	VSQG
12/4/03	Notification	SQG

Facility Name: Home Depot Store #0975
421 Absecon Blvd, Absecon, NJ 08201
County: Atlantic
FRS: 110016736549
Inspection Required?: no
Reason Required: N/A
Gen. Status calculated by EPA: SQG
Generator Status in RCRAInfo: SQG
TSDF?: no
Most Recent RCRA Inspection: 4/18/2024
Last EPA Inspection: 4/18/2024
Last State Inspection: 12/3/2020
Last Record Review:
Federal Facility?: no
Federal Agency Name:
Is the facility a LQG, but did not submit a Biennial Report?: no
LQG not inspected in the past 5 years?: no
Most recent activity (enf action or inspection) was an informal EA?: no
Hot Spot Class:
Flood Risk: extreme
RSEI Score:
NAICS: 444110 Home Centers
In EJ area: yes
CAA Permit Types:
Last EPA formal EA?:
Last EPA informal EA :
Last state formal EA :
Last state informal EA :
Last CAA inspection:
Last CWA inspection:
Last Notification: 2/9/2023
Financial Assurance Required?: no

Opening Conference

18 April 2024. I, EPA Region 2 RCRA inspector Plössl, arrived at the main entrance to the Home Depot at ~4:40 pm for an unannounced inspection of the store. I announced and identified myself at the customer counter and was connected to an associate manager. The associate manager was unfamiliar with the nature of compliance inspections and asked if I would return the next morning. I agreed if she would conduct me on a quick inspection of their hazardous waste storage area.

We then began a walk through and inspection of the main back operations area.

19 April 2024. I arrived at the main entrance to the Home Depot at ~9 am for an announced inspection of the store. I announced and identified myself at the customer counter and was connected to the store manager Christina Quigley. Ms. Warren was somewhat familiar with the nature of compliance inspections but not those

HOME DEPOT STORE #0975

421 ABSECON BLVD - ABSECON - 08201

NJR0000480

Universes

Evaluations

Violations1

Citations

Enforcements

3007 Info Requests

Quick Reports -

Jump to Module

Evaluations

Show10entries

Search:

Act Loc	Identifier	Date	Agency	Type	Resp Person	Violations	Action
NJ	001	04/18/2024	E - EPA	CEI	R2CFP	1	
NJ	001	12/03/2020	S - State	CEI	SOCC	0	
NJ	001	05/13/2016	S - State	CEI	SOJS	0	
NJ	001	11/30/2005	S - State	CEI	SOJS	0	

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conducted pursuant to RCRA federal and state hazardous waste regulations. We discussed the facility past and current operations, waste management and disposal practices, and the nature of RCRA inspections and ran through the SQG checklist.

We then began a walk through and inspection of the main back operations area and the rental equipment management area.

Facility/Site Description

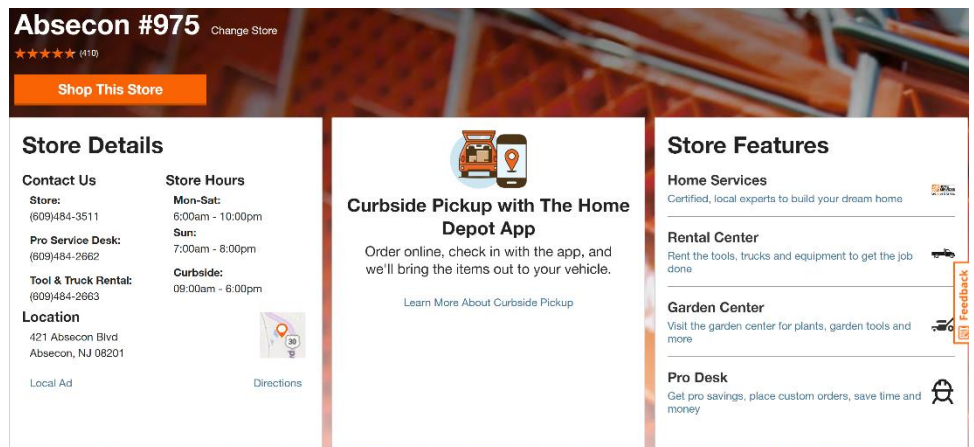
<https://www.homedepot.com/l/Absecon/NJ/Absecon/08201/975>

From Home Depot:

Recycling at The Home Depot
Did you know?

Our store diverts waste from landfills by accepting lead acid batteries, rechargeable batteries, plastic plant pots, and CFLs for recycling.

Our stores sent approximately 5.3M pounds of shredded paper for recycling in 2022. This helped the planet by preserving over 63.5K trees. It kept over 16K trash bags of solid waste out of landfills, saved over 50M gallons of water, and conserved 7.8M kilowatt hours of electricity.



Since 2010, we have decreased electricity consumption by over 52% in our U.S. stores.

The Home Depot's core values are based on doing the right thing for our associates and customers. This commitment extends beyond our stores to the environment, as well as our communities. We are your partners in environmental sustainability. Learn more about our [eco actions](#).

According to Ms. Quigley:

- General
 - Facility has been operating since 2002
 - Manager Quigley is primary emergency coordinator
 - The Fire Department conducts regular inspections and it the facility's primary emergency responder
 - ~149 employees work at this location, 24-hours per day, Monday-Friday, 5 am until midnight, Saturday and Sunday, along with 24-hour security
- Facility operates as a small quantity generator
- Small quantities of generated hazardous wastes primarily consist of aerosol cans, other ignitable wastes, and various commercial products that have been determined to be waste as spill clean-up, damaged container, out-of-date, and returns. Also, contaminated oil and fuel from the equipment rental operations:
 - Most common waste codes from manifests (in order of frequency): D001, D035, D008, D007, D005, D002, and D039:
 - D001 Ignitable Waste, D002 Corrosive Waste, D003 Reactive Waste, D005 Barium, D006 Cadmium, D007 Chromium, D008 Lead, D016 2,4-D Or 2,4-Dichlorophenoxyacetic Acid, D018 Benzene, D028 1,2-

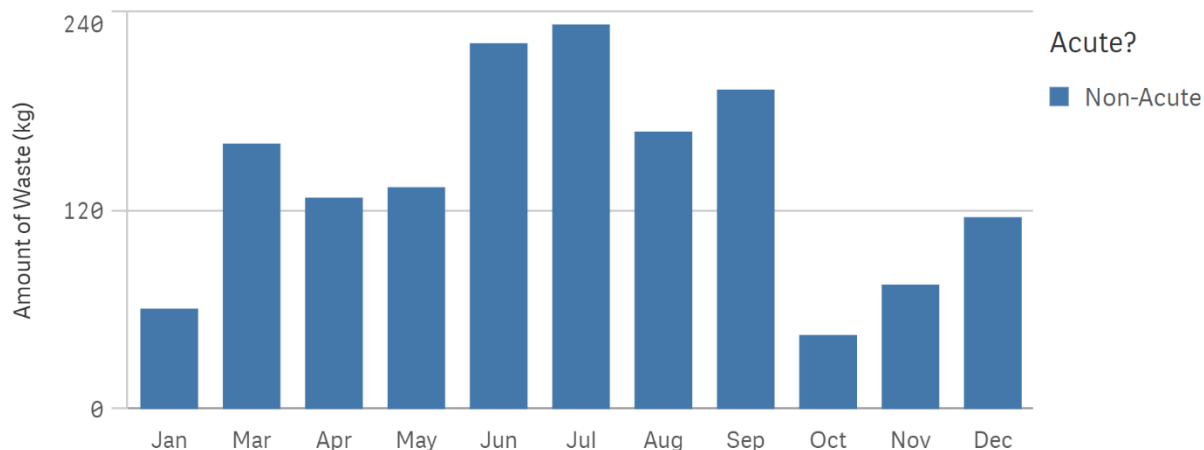
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Dichloroethane, D035 Methyl Ethyl Ketone, D039 Tetrachloroethylene, D043 Vinyl Chloride, U112 Acetic Acid, Ethyl Ester Or Ethyl Acetate, U159 2-Butanone Or Methyl Ethyl Ketone, U220 Benzene, Methyl Or Toluene, U239 Benzene, Dimethyl- Or Xylene, U240 2,4-D, Salts And Esters Or 2,4-Dichlorophenoxyacetic Acid, Salts And Esters, U279 Carbaryl

- Other specific hazardous waste generation
 - Spent fluorescent lamps (LED lamp replacement program several years ago)
 - Spent high intensity lamps
 - Old paints and spent cleaning and painting solvents
 - Spent aerosol cans
 - Spent lead acid, NiCd, and lithium batteries
 - E-wastes
- Other regulated wastes
 - Used oil
- Waste dispositions
 - Hazardous waste determinations generally via a Home Depot proprietary "HHM" smart phone application
 - Universal waste disposal records were available
 - Manifests and LDR forms were available
- Facility is operating as a small quantity generator. From 2019 to 2024, the facility averaged 296-lbs/month.
- Additional records requested during inspection:
 - None
- Additional records/information requested by phone/email after inspection:
 - None yet

Waste Shipped by NJR000048009 Home Depot Store #0975



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Home Depot #0975											
Manifest Date	Waste Qty	Units	Waste (kg)	Waste Codes	TSDF ID	MTN*	Total Waste/shipment	Units	lbs/month		
3/12/2024	29	Pounds	13	D001	PAD085690592	200739409CLE					
3/12/2024	40	Pounds	18	D001 D003 D006 D007 D035	PAD085690592	200739409CLE					
3/12/2024	125	Pounds	57	D001 D005 D007 D008 D035 D039	PAD085690592	200739409CLE					
3/12/2024	125	Pounds	57	D001 D018	PAD085690592	200739409CLE					
3/12/2024	143	Pounds	65	D001 D018 D035	PAD085690592	200739409CLE					
3/12/2024	34	Pounds	15	D002	PAD085690592	200739409CLE	496	lbs	264.9	lbs	SQG
1/15/2024	4	Pounds	2	D001 D003 D008	RID040098352	200682348CLE					
1/15/2024	112	Pounds	51	D001 D018	PAD085690592	200682347CLE					
1/15/2024	143	Pounds	65	D001 D018 D035	PAD085690592	200682347CLE					
1/15/2024	165	Pounds	75	D002	PAD085690592	200682347CLE					
1/15/2024	32	Pounds	15	D008	PAD085690592	200682347CLE	456	lbs	289.2	lbs	SQG
12/18/2023	132	Pounds	60	D001 D018	PAD085690592	200658927CLE					
12/18/2023	124	Pounds	56	D001 D018 D035	PAD085690592	200658927CLE	256	lbs	389.6	lbs	SQG
11/28/2023	89	Pounds	40	D001 D005 D007 D008 D035 D039	PAD085690592	200506619CLE					
11/28/2023	77	Pounds	35	D001 D018 D035	PAD085690592	200506619CLE	166	lbs	140.4	lbs	VSQG
10/23/2023	20	Pounds	9	D001 D018	PAD085690592	200608442CLE					
10/23/2023	39	Pounds	18	D001 D035 U112 U159 U220 U239	PAD085690592	200608442CLE					
10/23/2023	40	Pounds	18	D018 D028 D043	PAD085690592	200608442CLE	99	lbs	111.6	lbs	VSQG
9/26/2023	91	Pounds	41	D001 D005 D007 D008 D035 D039	PAD085690592	200583929CLE					
9/26/2023	112	Pounds	51	D001 D018 D035	PAD085690592	200583929CLE					
9/26/2023	125	Pounds	57	D001 D035 U112 U159 U220 U239	PAD085690592	200583929CLE					
9/26/2023	98	Pounds	44	D002	PAD085690592	200583929CLE	426	lbs	447.1	lbs	SQG
8/28/2023	55	Pounds	25	D001 D005 D007 D008 D035 D039	PAD085690592	200558025CLE					
8/28/2023	197	Pounds	89	D001 D018	PAD085690592	200558025CLE					
8/28/2023	50	Pounds	23	D016	PAD085690592	200558025CLE					
8/28/2023	68	Pounds	31	D016 U240	PAD085690592	200558025CLE	370	lbs	402.2	lbs	SQG
7/31/2023	100	Pounds	45	D001 D018 D035	PAD085690592	200530694CLE					
7/31/2023	15	Pounds	7	D008	PAD085690592	200530694CLE					
7/31/2023	75	Pounds	34	D016 U240	PAD085690592	200530694CLE	190	lbs	206.5	lbs	VSQG
7/3/2023	45	Pounds	20	D001 D003 D006 D007 D035	PAD085690592	200506126CLE					
7/3/2023	107	Pounds	49	D001 D005 D007 D008 D035 D039	PAD085690592	200506126CLE					
7/3/2023	69	Pounds	31	D001 D018 D035	PAD085690592	200506126CLE					
7/3/2023	26	Pounds	12	D002	PAD085690592	200506126CLE					
7/3/2023	76	Pounds	34	D016	PAD085690592	200506126CLE	323	lbs	351.1	lbs	SQG
6/5/2023	120	Pounds	54	D001 D005 D007 D008 D035 D039	PAD085690592	200480148CLE					
6/5/2023	132	Pounds	60	D001 D018	PAD085690592	200480148CLE					
6/5/2023	99	Pounds	45	D001 D018 D035	PAD085690592	200480148CLE					
6/5/2023	110	Pounds	50	D016	PAD085690592	200480148CLE					
6/5/2023	27	Pounds	12	D018 D028 D043	PAD085690592	200480148CLE	488	lbs	530.5	lbs	SQG
5/8/2023	35	Pounds	16	D001	PAD085690592	200455394CLE					
5/8/2023	13	Pounds	6	D001 D005 D007 D008 D035 D039	PAD085690592	200455394CLE					
5/8/2023	127	Pounds	58	D001 D018	PAD085690592	200455394CLE					
5/8/2023	68	Pounds	31	D001 D035 U112 U159 U220 U239	PAD085690592	200455394CLE					
5/8/2023	23	Pounds	10	D016	PAD085690592	200455394CLE					
5/8/2023	30	Pounds	14	D018	PAD085690592	200455394CLE	296	lbs	375.4	lbs	SQG
4/14/2023	98	Pounds	44	D001 D005 D007 D008 D035 D039	PAD085690592	200435055CLE					
4/14/2023	12	Pounds	5	D001 D018 D035	PAD085690592	200435055CLE					
4/14/2023	96	Pounds	44	D016	PAD085690592	200435055CLE					
4/14/2023	76	Pounds	34	D016 U240 U279	PAD085690592	200435055CLE	282	lbs	268.2	lbs	SQG
3/13/2023	47	Pounds	21	D001 D005 D007 D008 D035 D039	PAD085690592	200405024CLE					
3/13/2023	80	Pounds	36	D001 D018 D035	PAD085690592	200405024CLE					
3/13/2023	16	Pounds	7	D002	PAD085690592	200405024CLE					
3/13/2023	211	Pounds	96	D016	PAD085690592	200405024CLE					
1/16/2023	67	Pounds	30	D001 D018	PAD085690592	200352650CLE					
1/16/2023	67	Pounds	30	D001 D018 D035	PAD085690592	200352650CLE					

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SECTION II – OBSERVATIONS

The accompanying HOME DEPOT #0975 (ABSECON, NJ) INSPECTION PHOTO ALBUM.pptx document is the complete set of inspection observations made during the facility walkthrough with both the associate and primary store managers.

SECTION III – AREAS OF CONCERN

Concerns

- Container Accumulation Area issues:
 - SQG posting requirements:
 - Did not post emergency coordinator's name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near the phone
 - Hazardous waste containers:
 - All labels were not both visible and affixed to containers
 - Labels lacked accumulation start dates
 - Weekly inspections lacked sufficiency as noted herein
- Universal Waste issues:
 - All containers were not closed (to protect from potential breakage)
 - A container was not labeled as "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"
 - A container was not labeled as "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"
 - must inform all employees who handle or have responsibility for managing universal waste were apparently not sufficiently informed on the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility
- Equipment Rental and Maintenance Area:
 - No labeled distinction between hazardous waste, *i.e.*, contaminated gasoline/oil, and still usable product, *i.e.*, uncontaminated gasoline, and used oil
 - Ignitable, D001/D018, containers not labeled as hazardous waste or with accumulation start dates
 - Used oil containers not labeled as "used oil"
 - Area needs to be included in weekly inspections
 - Did not post emergency coordinator's name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near the phone

Closing Conference

Ms. Quigley and I reviewed my findings and we discussed any follow up. We agreed that we would correspond by email regarding any additional records that I needed to complete the evaluation.

INSPECTION PHOTOGRAPHS: See HOME DEPOT #0975 (ABSECON, NJ) INSPECTION PHOTO ALBUM.pptx

UNIVERSAL WASTE REGULATIONS: See Appendix 1

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FOLLOW UP EMAILS: None yet

PROVIDED RECORDS: None yet

Appendix 1: Certain, Applicable Universal Waste Regulations

Title 40 Chapter I Subchapter I Part 273

Small quantity handler of universal means a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

A small quantity handler of universal waste is:

- (a) Prohibited from disposing of universal waste; and
- (b) Prohibited from diluting or treating universal waste, except by responding to releases as provided in 40 CFR 273.17; or by managing specific wastes as provided in 40 CFR 273.13.

Lamps. A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:

- (1) A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
- (2) A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified below:

- (a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste—Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"
- (e) Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".

A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph (b) of this section are met.

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A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

- (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
- (2) Marking or labeling each individual item of universal waste (*e.g.*, each battery or thermostat) with the date it became a waste or was received;
- (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;
- (4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;
- (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or
- (6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

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Appendix 2: Follow Up Email Chain

Appendix 3: Additional Records Provided Post Inspection

Appendix 4: Post Inspection Facility Reports