

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	04/13/2021 - 04/13/2021	Announced: No	
Time:	Entry: 10:36 AM (AKT)	Exit: 02:39 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Costco Wholesale Corporation		
Facility or Site Name:	COSTCO WHOLESALE #107		
Facility/Site Physical Address:	5225 COMMERCIAL BOULEVARD		
(city, state, zip code)	JUNEAU, AK 99801		
Type of Operation:	Warehouse Club and Supercenter		
Size of Facility:	80,871 sq. Ft.		
Length of Facility at Location:	Since 1993		
Geographic Coordinates:	58.359013, -134.482656		
Mailing address: (Secondary Address)	Costco Wholesale Corporation Attn: Ms. Jessica Stapleton, Environmental Compliance Manager 999 Lake Drive jstapleton@costco.com CC: Mr. Gene Waters, General Manager w107mgr@costco.com Mr. Mark Pincikowski, Assistant General Manager w107mgr3@costco.com		
(city, state, zip code)	Issaquah, WA 98027		
County:	King		
Facility/Site Identifier:	AKR000003764		
Media Number:	Unpermitted Facility		
NAICS:	452311 – Warehouse Clubs and Supercenters		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2021.06.29 08:23:05 -08'00'	
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
Supervisor Review:			
Jen Sullivan	Jennifer A Sullivan	Digitally signed by Jennifer A Sullivan Date: 2021.06.30 12:25:14 -07'00'	
	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	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Merchandise Manager	Brent Mattson	(907) 780-6740	w107mer@costco.com	Yes	No
General Manager	Gene Waters	(907) 780-6740	w107mgr@costco.com	Yes	Yes
Assistant General Manager	Mark Pincikowski		w107mgr3@costco.com	No	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Costco Wholesale #107 at 10:36 AM (AKT) on 04/13/2021 for an inspection. I presented my credentials to Brent Mattson, Merchandise Manager and informed him that I was here to conduct an EPA RCRA inspection. Mr. Mattson had me follow him to the administrative offices, on the second floor, where he introduced me to Mr. Gene Waters, General Manager. I explained the purpose of the RCRA inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents. The table above presents all the opening and closing conference participants.

Facility/Site Description

Costco Wholesale #107 (hereafter referred to as Costco, store or facility) is located in a business area in northwestern Juneau, Alaska. The facility is a Warehouse Club and Supercenter. The facility has been at it's current location since 1993. The 80,871 square foot facility has approximately 112 employees and is open Monday through Friday from 10:00 am to 8:30 pm. Saturday from 9:30 am to 6:00 pm and Sunday from 10:00 am to 6:00 pm. The store also has an onsite pharmacy operated by Costco personnel.

Facility Info

Number of employees	Approximately 112
Weather Conditions	Cool and rainy
Operating Hours	10 am to 8:30 pm, Monday through Friday. 9:30 am to 6 pm, Saturday and Sunday
Safety Training	No

Inspection Date(s):

04/13/2021 - 04/13/2021

Provided to Inspector(s)?	
What type of generator facility notified?	SQG
What type of generator facility verified as?	SQG verified by Mr. Waters

Process Description

The following information was obtained from Messrs. Gene Waters, General Manager and Brent Mattson, Merchandise Manager, during the inspection.

Wastes generated at the facility include waste aerosol cans, used batteries and fluorescent light tubes that are managed as universal waste, and pharmaceutical waste that is managed through a reverse distributor. Automotive batteries and small lead weights, used for tire balancing, in the automotive department are also recycled.

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.

Only those areas in which I observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Building(s)

Building/Area	Process Description	Area of Concern
Store Floor		Yes
Pharmacy		Yes
Return to Vendor (RTV)		Yes
Central Accumulation Area (CAA)		Yes
Tire Center		No

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

Building: Store Floor/Pharmacy	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 04/13/2021
While inspecting the pharmacy, I observed a container used to accumulate hazardous waste pharmaceuticals (HWPharms). At the time of the inspection, the container was closed and labeled with the words "Hazardous Waste Pharmaceuticals."	

Inspection Date(s):

04/13/2021 - 04/13/2021

While there, I was introduced to Mr. Robert Baars, Pharmacist. Mr. Baar told me that Costco uses Inmar as their reverse distributor for the return of waste pharmaceuticals for which they expect to receive credit. I asked Mr. Baar for documentation of the last three shipments to Inmar. I explained that I was wanted to get documentation of what pharmaceuticals Costco was returning to Inmar for credit as well as pharmaceuticals for which they did not receive credit. Mr. Baar said that it would take him a while to gather the documentation and I asked him if two weeks would be enough time. It was determined, during the inspection, that Mr. Baar would get the requested paperwork to Mr. Waters and Mr. Waters would then forward the paperwork on to me within two weeks.

Mr. Baar stated that they usually receive credit for everything they send to Inmar; however, he said that most of the time they don't receive credit back on pet medications. Mr. Baar stated that even though they don't receive credit back on pet medications, they keep sending them to Inmar.

Mr. Waters sent copies of the last three shipments to Inmar in four separate emails dated 04/15/2021.

Photo(s)

1. [Observation Image-20210413110745745304995.jpg](#)
2. [Observation Image-2021041311080686210992.jpg](#)
3. [Observation Image-20210413110828828258229.jpg](#)

Building: Store Floor/RTV/Central Accumulation Area (CAA)

Contains CBI: No

Observation #: JJ1-OB-002

Date/Time: 04/13/2021

While inspecting the Central Accumulation Area (CAA), in the Return to Vendor (RTV) area, I saw a black, five-gallon container that contained waste Sporax. The container was dated "3/4/21." The container was labeled with the word "Corrosive" as the hazard indicator. According to Ben Roguska, RTV Clerk, the Sporax waste is generated in the hearing center and is managed as hazardous waste.

At the time of the inspection, the container was not labeled with the words "Hazardous Waste." Mr. Roguska, labeled the container with the words "Hazardous Waste" during the inspection.

While inspecting the facility's weekly hazardous waste storage checklists at the facility, I saw that this unlabeled container of hazardous waste was not caught during the weekly inspection that was conducted and documented on 04/06/2021. The first item listed on the checklist, under the heading "RTV Area - HW Storage Management" states, "For each bucket the "Hazardous Waste" label is visible and filled out correctly for your state?" The 04/06/2021 checklist is marked "Yes" while the bucket was found to be not labeled "Hazardous Waste" during the 04/13/2021 RCRA CEI.

During my review of the data following the inspection, while writing the report, I noticed that I had not obtained a copy of the weekly inspection while at the facility. I sent Mr. Waters an email on 06/24/2021 requesting a copy of the weekly inspection which was provided to me on the same day.

Document(s)

1. Re_ Copy of weekly inspection.pdf
2. 04-06-2021 weekly inspection.docx

Photo(s)

1. [Observation Image-202104131138453845350216.jpg](#)
2. [Observation Image-202104131138543854246409.jpg](#)
3. [Observation Image-202104131139113911293971.jpg](#)

Inspection Date(s):

04/13/2021 - 04/13/2021

4. [Observation Image-202104131140344034275378.jpg](#)
5. [Observation Image-202104131140414041261346.jpg](#)

Building: Store Floor/Tire Center	Contains CBI: No
Observation #: JJ1-OB-003	Date/Time: 04/13/2021
While inspecting the Costco Tire Center I met Mason Morris, Tire Center Manager. According to Mr. Morris, Tire Center shop personnel use aerosol cans of Brakleen® on automotive wheels. He said they puncture the aerosol cans, when empty, and recycle the empty aerosol cans. I observed a 15-gallon container with drum top can popper. At the time of the inspection the container was closed and labeled with the words "Hazardous Waste" and marked with a hazard indicator. Mr. Mason said lead-acid batteries and lead wheel weights get shipped down to Sumner, WA. where they are recycled. Mr. Mason said the batteries go to Interstate Battery. He said he wasn't sure about the wheel weights, but thought they were recycled through a company called Wegman.	

Records Review

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 04/13/2021
I reviewed the facility's hazardous waste manifests for the period, April 2018 through April 2021. During this review, I saw that manifest #000384258 JJK was used to ship HWPharms; however, block 13 of the manifest did not contain "PHARMS." Block 13 contained "PHRM."		
Document(s) 1. 000384258 JJK.pdf		

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 04/13/2021
While reviewing CAA weekly inspection documentation, I saw that documentation for the following four weekly CAA inspections was missing: August 12 - 18, 2018 September 15 - 21, 2019 November 10 - 16, 2019 July 26 - August 1, 2020		

Record: Shipping Documents		AOC: No
Ref #: JJ1-RR-003	Reviewed By: Jon Jones	Reviewed Date: 06/24/2021
On 4/15/2021, I received four emails from Mr. Gene Waters that included scanned copies of the paperwork		

Inspection Date(s):

04/13/2021 - 04/13/2021

documenting the return of waste pharmaceuticals from the pharmacy to Inmar, Costco's reverse distributor.

During the inspection, Robert Baars, Costco Pharmacist, said that most of the time they don't receive credit back on pet medications, although he did say they keep sending them to Inmar.

Document(s)

1. Scan2021-04-15-163304.pdf
2. Scan2021-04-15-163805.pdf
3. Scan2021-04-15-163919 part 1.pdf
4. Scan2021-04-15-163919 part 2.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-001		
I reviewed the facility's hazardous waste manifests for the period, April 2018 through April 2021. During this review, I saw that manifest #000384258 JJK was used to ship HWPharms; however, block 13 of the manifest did not contain "PHARMS." Block 13 contained "PHRM."	Citation:	Section:
JJ1-RR-002		
While reviewing documentation of the CAA Weekly Inspections, I saw that there were four weekly inspections with no documentation . Those week are: August 12 -18, 2018 September 15 - 21, 2019 November 10 - 16, 2019 July 26 - August 1, 2020	Citation:	Section:
Building: Store Floor Area: Pharmacy Sub-area:		
JJ1-OB-001		
Costco uses Inmar as their reverse distributor. Pharmacist	Citation:	Section:

Inspection Date(s):

04/13/2021 - 04/13/2021

Robert Baar said that most of the time they don't receive credit back on pet medications, but said they keep sending them to Inmar.		
---	--	--

Building: Store Floor**Area:** RTV**Sub-area:** Central accumulation area (CAA)**JJ1-OB-002**

While inspecting the CAA, in the RTV, I saw a black, five-gallon container of waste Sporax that was not labeled with the words "Hazardous Waste." The RTV clerk labeled the container with the words "Hazardous Waste" during the inspection.	Citation:	Section:
---	------------------	-----------------

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 answered any questions they had and explained the follow-up process that would take place after the inspection.

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

Inspection Date(s):

04/13/2021 - 04/13/2021

SECTION VI – LIST OF APPENDICES

Photo Log

[Title] Observation_Image- 202104131138453845350216.jpg 04/13/2021 11:38 AM (AKT) Jon Jones RTV/Central Accumulation Area (CAA) No CBI No PII Black, 5-gallon container of waste Sporax, seen here on the floor is not labeled with the words, "Hazardous Waste."	
[Title] Observation_Image- 202104131138543854246409.jpg 04/13/2021 11:38 AM (AKT) Jon Jones RTV/Central Accumulation Area (CAA) No CBI No PII Close-up view of the black, 5-gallon container of waste Sporax showing that it is not labeled with the words, "Hazardous Waste." It also shows the container is marked with an Accumulation Start Date (ASD) of 3/4/21.	

Inspection Date(s):

04/13/2021 - 04/13/2021

*[Title]*Observation_Image-
2021041311139113911293971.jpg

04/13/2021 11:39 AM (AKT)

Jon Jones

RTV/Central Accumulation Area (CAA)

No CBI

No PII

Close-up view of the black, 5-gallon container of waste Sporax showing that it is not labeled with the words, "Hazardous Waste." It also shows the container is marked with a hazard indicator "corrosive."

*[Title]*Observation_Image-
2021041311140344034275378.jpg

04/13/2021 11:40 AM (AKT)

Jon Jones

RTV/Central Accumulation Area (CAA)

No CBI

No PII

The RTV clerk labeled the container during the inspection.



Inspection Date(s):

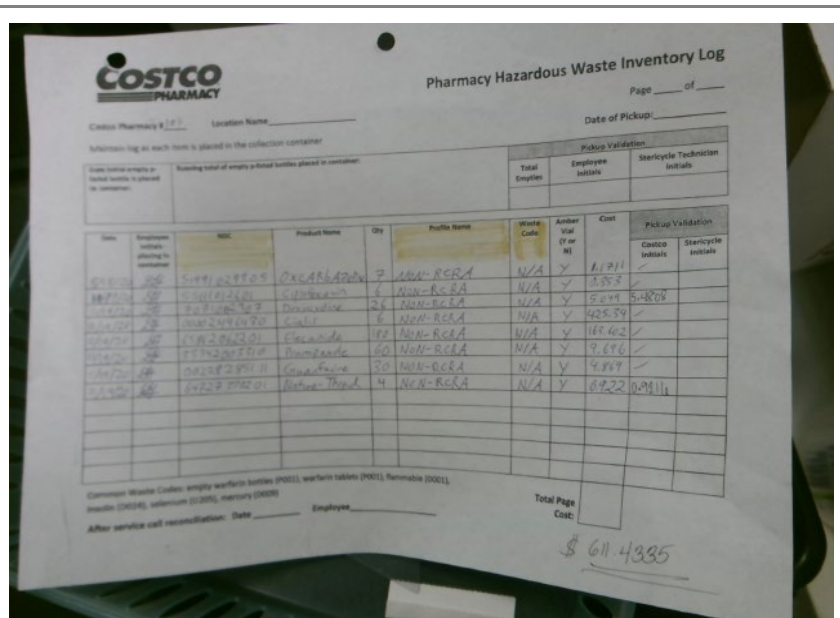
04/13/2021 - 04/13/2021

[Title] Observation_Image-202104131140414041261346.jpg 04/13/2021 11:40 AM (AKT) Jon Jones RTV/Central Accumulation Area (CAA) No CBI No PII Close-up view showing that the container was labeled with the words "Hazardous Waste" during the inspection.	
[Title] Observation_Image-20210413110745745304995.jpg 04/13/2021 11:07 AM (AKT) Jon Jones Store Floor/Pharmacy No CBI No PII I observed a container being used to accumulate HWPharms. The container was closed and properly labeled "Hazardous Waste Pharmaceuticals."	

Inspection Date(s):

04/13/2021 - 04/13/2021

[Title]
Observation_Image-2021041311080686210992.jpg
04/13/2021 11:08 AM (AKT)
Jon Jones
Store Floor/Pharmacy
No CBI
No PII
This is a view of the pharmacy hazardous waste inventory log that was on top of the container of HWPharms.



[Title]
Observation_Image-20210413110828828258229.jpg
04/13/2021 11:08 AM (AKT)
Jon Jones
Store Floor/Pharmacy
No CBI
No PII
I observed a container being used to accumulate HWPharms. The container was closed and properly labeled "Hazardous Waste Pharmaceuticals."



Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	000384258 JJK.pdf	No	No	Jon Jones	06/24/2021
Facility Map	107 Juneau Site Map 4.13.21 - Apr 13 2021 - 12-17 PM.pdf	No	No	Jon Jones	06/24/2021
Records Review	Scan2021-04-15-163304.pdf	No	No	Jon Jones	06/24/2021
Records Review	Scan2021-04-15-163805.pdf	No	No	Jon Jones	06/24/2021
Records Review	Scan2021-04-15-163919 part 1.pdf	No	No	Jon Jones	06/24/2021
Records Review	Scan2021-04-15-163919 part 2.pdf	No	No	Jon Jones	06/24/2021

Inspection Date(s):

04/13/2021 - 04/13/2021

Communications	Re_ Copy of weekly inspection.pdf	No	No	Jon Jones	06/24/2021
Weekly Inspections	04-06-2021 weekly inspection.docx	No	No	Jon Jones	06/24/2021
Inspection Reports	Field_Notes_AKR000003764v1.0.pdf	No	No	Jon Jones	06/24/2021