

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	02/22/2021 - 02/22/2021	Announced: No	
Time:	Entry: 09:30 AM (AKT)	Exit: 10:31 AM (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 T2372		
Facility/Site Physical Address:	150 W 100TH AVE		
(city, state, zip code)	ANCHORAGE, AK 99515		
Type of Operation:	Retail store		
Size of Facility:	114,121 square feet		
Length of Facility at Location:	12 years		
Geographic Coordinates:	61.129371, -149.882419		
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: Ian Momany, T2372 Store Director ian.momany@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:	AKR000203471		
Media Number:	Unpermitted Facility		
NAICS:	452210 – Department Stores		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			

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	Ian Momany	(503) 806-1235	ian.momany@target.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Target Store T2372 at 09:30 AM (AKT) on 02/22/2021 for an inspection. I presented my credentials to Mr. Ian Momany, Store Director, 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 #17436

CVS Pharmacy #17436 operates inside the Target Store T2372. There is no separate entry or exit for the pharmacy. Customers using the pharmacy must enter and exit through the Target Store.

Following the inspection, I sent Mr. Paul Hamilton (Target Corporation) a request for documents email, via "GoAnywhere", on 2/22/21. I also sent Ms. Nicole Ratigan (CVS) a request for documents. Mr. Hamilton's response was received on 2/26/21 and Ms. Ratigan's response was received on 3/4/21.

The areas of concern identified during the document review were not shared with Mr. Momany during the closing conference since the document review was conducted after the onsite portion of inspection.

Facility/Site Description

Target Store T2372 is a department store located in Anchorage, AK. CVS Pharmacy #17436 operates as a separate entity inside the T2372 store. According to facility representatives, Target got out of the pharmacy business approximately five years ago when they sold their pharmacy business to CVS Health. Since Target does not operate the pharmacy, Target representatives said they did not have any information about how CVS Pharmacy #17436 manages hazardous waste pharmaceuticals.

Facility Info

Number of employees	160
Weather Conditions	Sunny and cold
Operating Hours	8 to 10 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 verified by Mr. Momany

Process Description

Based on information I obtained during a previous Target Store T2339 inspection I conducted on February 8, 2021, 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. 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, according to the labeling, included:

- Non-RCRA Hazardous Waste WA 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	Area of Concern
Target Store	Store front	Yes
CVS Pharmacy #17436	On-site pharmacy	Yes
Property Management Lead Office (PMLO)	Store maintenance	Yes
Shelf outside PMLO	Used to store lamps.	Yes
Shipping and Receiving		No
Central Accumulation Area (CAA)		No

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

Building: Target Store/CVS Pharmacy #17436	Contains CBI: No
Observation #: JJ1-OB-004	Date/Time: 02/22/2021
I inspected the CVS Pharmacy #17436 while at Target Store T2372. While there I met with the pharmacist, Jennifer Veloudas. I asked Ms. Veloudas if she could show me where the pharmacy was accumulating their hazardous waste pharmaceuticals (HWPharms). She led me to where the waste was being accumulated in a hazardous waste tote. At the time of the inspection, the container of HWPharms was incorrectly labeled as "Pharmacy Hazardous Waste." The container was not labeled "Hazardous Waste Pharmaceuticals."	

Building: Target Store/Property Management Lead Office/Shelf outside PMLO	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 02/22/2021
At the time of the inspection, I saw a box that contained four-foot fluorescent lamps that had been placed on a shelf, just outside of the Property Management Lead office. The lamps were inside of a box that was labeled with the vendor name, Clean Earth. According to Mr. Momany, and based on information obtained from two prior Target Store inspections, the Clean Earth boxes are used to accumulate waste fluorescent lamps. I asked if the lamps were waste lamps and Mr. Momany said that they were waste lamps. Target stores manage waste fluorescent lamps as universal waste. At the time of the inspection, the box of waste fluorescent lamps was not closed.	

Building: Target Store/Property Management Lead Office/Shelf outside PMLO	Contains CBI: No
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Observation #: JJ1-OB-003	Date/Time: 02/22/2021
At the time of the inspection, the same box, containing four-foot waste fluorescent lamps, was not labeled with the words, "Universal Waste - Lamps", "Waste Lamps", or "Used lamps." Target personnel labeled the box with the words "Universal Waste - Lamps" during the inspection.	

Building: Target Store/Shipping and Receiving/Central Accumulation Area (CAA)	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 02/22/2021
I inspected the facility's central accumulation area (CAA), located in the Shipping and Receiving Area in the back room of the store. At the time of the inspection, I saw that there were multiple plastic totes containing various wastes that included hazardous, universal, non-RCRA state only waste (WA), and hazardous waste pharmaceuticals (HWPharms) 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 HWPharms (OTC) have been in accumulation for less than a year.	

Records Review

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 04/07/2021 10:17 AM (AKT)
At the time of the inspection, I asked Mr. Momany for a copy of the Target Store T2372 weekly hazardous waste inspections for the period covering February 22, 2018 through February 22, 2021. This information was reviewed after the closing conference. While reviewing the weekly inspection logs for the Target Store I saw that there were no weekly inspections conducted for 44 weeks during the three-year period.		
Document(s)		
1. T2372 weekly HW inspections.pdf		

Record: Ensure applicable employees are trained – SQG		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 04/07/2021 10:31 AM (AKT)
During the inspection, I asked Mr. Momany for a copy of training records for Target Store T2372 personnel that manage hazardous waste, universal waste and non-creditable hazardous waste pharmaceuticals, regulated by Part 266, Subpart P. Mr. Momany had Target Store personnel provide a copy of the training records on the day of the inspection. Following the inspection, I reviewed the training records and observed that there were several Target Store personnel that had been conducting weekly hazardous waste inspections that were not listed in the training records provided to me. On February 22, 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 training records for the following Target Store personnel that had conducted weekly hazardous waste inspections:		

- Trevor Bonk
- Misty Monroe
- Cayton Cox
- Devon Haskell
- William Brown
- Erik Mata

In my "Request for Documents" email to Mr. Hamilton, I requested that he provide the documentation to me on or before March 8, 2021. This information was received on 2/26/21.

After reviewing the training records that Mr. Hamilton sent to me, I saw that the following Target Store T2372 personnel were conducting weekly hazardous waste inspections at the CAA without ever receiving Environmentally Sensitive Item Management (ESIM) Hazardous Waste Management (HW Mgmt.) training:

- Trevor Bonk
- Misty Monroe
- Cayton Cox
- Devon Haskell
- William Brown
- Erik Mata

Document(s)

1. T2372 employee training.pdf
2. T2372 TGT_RPT_ESIM_Recap_Report.xlsx

Record: Ensure applicable employees are trained – SQG

AOC: Yes

Ref #: JJ1-RR-003

Reviewed By: Jon Jones

Reviewed Date: 04/07/2021 11:07 AM
(AKT)

At the time of the inspection, CVS Pharmacy #17436 was operating inside Target Store T2372. Following the inspection, on February 22, 2021 I sent a request for documents email, via "GoAnywhere", to Ms. Nicole Ratigan, CVS. In that document request, I asked for copies of training records for CVS Pharmacy #17436 personnel working at the Target Store T2372. In that email, I asked Ms. Ratigan to provide the requested documents on or before March 8, 2021. Ms. Ratigan sent the requested documents on March 4, 2021.

After reviewing the documentation received, I saw that CVS Pharmacy #17436 personnel received "Hazardous Waste Training for Pharmacy Colleagues" Course #500147.

I reviewed the "Hazardous Waste Training for Pharmacy Colleagues" Course #500147 that was submitted with Ms. Ratigan's March 4, 2021 response and saw that it contained information that was contrary to the hazardous waste pharmaceuticals rule which was effective as of August 21, 2019. Training course #500147 which was current as of May 2020 contained a picture of a hazardous waste pharmaceutical container with a label that was

Inspection Date(s):

02/22/2021 - 02/22/2021

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 March 4, 2021 response and saw that it contained the same labeling information under the heading, "Hazardous Waste Tote Setup".

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

According to the training documentation, CVS Pharmacy #17436 personnel had not received adequate training either prior to or following the hazardous waste pharmaceuticals rule, which became effective on August 21, 2019.

Document(s)

1. 17436 Haz Waste Training Records.pdf
2. 2020 500147_Pharmacy Hazardous Waste Training.pdf
3. 500147_JobAid_Packet_2020.pdf

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-004	Reviewed By: Jon Jones	Reviewed Date: 04/07/2021 11:23 AM (AKT)
While reviewing the hazardous waste manifests that Ms. Ratigan sent on March 4, 2021, I saw that the following manifest did not contain the word "PHARMS" in block 13: #013107717FLE		
Document(s) 1. #013107717 FLE.pdf		

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-005	Reviewed By: Jon Jones	Reviewed Date: 04/07/2021 11:32 AM (AKT)
At the time of the inspection, CVS Pharmacy #17436 was operating inside Target Store T2372. On February 22, 2021, following the inspection, I sent a request for documents email, via "GoAnywhere", to Ms. Nicole Ratigan, CVS. In that document request, I asked for copies of hazardous waste manifests and land disposal restriction notices (LDRs) for the period February 22, 2018 through February 22, 2021. Ms. Ratigan sent the requested documents on March 4, 2021. I reviewed all the documentation and saw that none of the manifests contained the EPA I.D. # AKR000203471 in block 1, that is assigned to the Target Store T2372 site. The following CVS Pharmacy #17436 hazardous waste manifests contained the acronym "CESQG" in block 1: • #010173556 FLE • #010752090 FLE • #010752296 FLE		

Inspection Date(s):

02/22/2021 - 02/22/2021

- #012962308 FLE
- #012962448 FLE
- #010174348 FLE
- #012960921 FLE
- #013107716 FLE
- #013107717 FLE

Document(s)

1. #010173556 FLE.pdf
2. #010174348 FLE.pdf
3. #010752090 FLE.pdf
4. #010752296 FLE.pdf
5. #012960921 FLE.pdf
6. #012962308 FLE.pdf
7. #012962448 FLE.pdf
8. #013107716 FLE.pdf
9. #013107717 FLE.pdf

Record: Exception Reports

AOC: Yes

Ref #: JJ1-RR-006

Reviewed By: Jon Jones

Reviewed Date: 04/08/2021 03:02 PM
(AKT)

I reviewed hazardous waste manifests following the inspection and saw that there were 18 manifests that required an exception report. During the time period in which Target T2372 was operating as a large quantity generator, the following hazardous waste manifests did not arrive at the designated TSDF within 45 days and Target was required to submit an exception report. No exception reports were included with Target's records for shipments made with the following manifests:

- #008411630 FLE
- #008411632 FLE
- #008411807 FLE
- #009994406 FLE
- #009994408 FLE
- #009994409 FLE
- #009994410 FLE
- #009994512 FLE
- #012598127 FLE
- #012598447 FLE

Inspection Date(s):

02/22/2021 - 02/22/2021

- #012698114 FLE
- #012698124 FLE
- #012698182 FLE
- #012698183 FLE
- #012698184 FLE
- #012698320 FLE
- #012698321 FLE
- #012698322 FLE

Document(s)

1. #008411630 FLE.pdf
2. #008411632 FLE.pdf
3. #008411807 FLE.pdf
4. #009994406 FLE.pdf
5. #009994408 FLE.pdf
6. #009994409 FLE.pdf
7. #009994410 FLE.pdf
8. #009994512 FLE.pdf
9. #012598127 FLE.pdf
10. #012598447 FLE.pdf
11. #012698114 FLE.pdf
12. #012698124 FLE.pdf
13. #012698182 FLE.pdf
14. #012698183 FLE.pdf
15. #012698184 FLE.pdf
16. #012698320 FLE.pdf
17. #012698321 FLE.pdf
18. #012698322 FLE.pdf

Record: Exception Reports

AOC: Yes

Ref #: JJ1-RR-007

Reviewed By: Jon Jones

Reviewed Date: 04/08/2021 03:07 PM
(AKT)

I reviewed hazardous waste manifests following the inspection and saw that there were two manifests for shipments made during the time period when Target T2372 was operating as a SQG that required an exception report. The hazardous waste shipments documented in the following hazardous waste manifests did not arrive at the designated TSDF within 60 days requiring an exception report and the records provided by Target did not include an exception report:

- #012698435 FLE
- #012698436 FLE

Document(s)

1. #012698435 FLE.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		
While reviewing the weekly inspection logs for the Target Store I saw that there were no weekly inspections conducted for 44 weeks during the three-year period.	Citation:	Section:
JJ1-RR-002		
After reviewing the training records that Mr. Hamilton sent to me, I saw that the following Target Store T2372 personnel were conducting weekly hazardous waste inspections at the CAA without ever receiving Environmentally Sensitive Item Management (ESIM) Hazardous Waste Management (HW Mgmt.) training: • Trevor Bonk • Misty Monroe • Cayton Cox • Devon Haskell • William Brown • Erik Mata	Citation:	Section:
JJ1-RR-003		
According to the training documentation, CVS Pharmacy	Citation:	Section:

#17436 personnel had not received adequate training either prior to, or following the hazardous waste pharmaceuticals rule, which became effective on August 21, 2019.		
JJ1-RR-004		
While reviewing the hazardous waste manifests that Ms. Ratigan sent on March 4, 2021, I saw that the following manifest did not contain the word "PHARMS" in block 13: • #013107717FLE	Citation:	Section:
JJ1-RR-005		
I reviewed all the documentation and saw that none of the manifests contained the EPA I.D. # AKR000203471 in block 1, that was being used by Target Store T2372. The following CVS Pharmacy #17436 hazardous waste manifests contained the acronym "CESQG" in block 1: • #010173556 FLE • #010752090 FLE • #010752296 FLE • #012962308 FLE • #012962448 FLE • #010174348 FLE • #012960921 FLE • #013107716 FLE • #013107717 FLE	Citation:	Section:
JJ1-RR-006		
The hazardous waste shipments made when Target T2372 was an LQG and documented in the	Citation:	Section:

following hazardous waste manifests did not arrive at the designated TSDF within 45 days requiring an exception report and no report was included with the records provided by Target:

- #008411630 FLE
- #008411632 FLE
- #008411807 FLE
- #009994406 FLE
- #009994408 FLE
- #009994409 FLE
- #009994410 FLE
- #009994512 FLE
- #012598127 FLE
- #012598447 FLE
- #012698114 FLE
- #012698124 FLE
- #012698182 FLE
- #012698183 FLE
- #012698184 FLE
- #012698320 FLE
- #012698321 FLE
- #012698322 FLE

JJ1-RR-007

The hazardous waste shipments made when Target T2372 was an SQG and documented in the following hazardous waste manifests did not arrive at the designated TSDF within 60 days requiring an exception report and no report was included with the records provided by Target:

- #012698435 FLE
- #012698436 FLE

Citation:

Section:

Building: Target Store Area: CVS Pharmacy #17436 Sub-area:		
JJ1-OB-004		
At the time of the inspection, the container of HWPharms was incorrectly labeled as "Pharmacy Hazardous Waste." The container was not labeled "Hazardous Waste Pharmaceuticals."	Citation:	Section:
Building: Target Store Area: Property Management Lead Office Sub-area: Shelf outside PMLO		
JJ1-OB-002		
At the time of the inspection, the box of waste fluorescent lamps was not closed.	Citation:	Section:
JJ1-OB-003		
A box, containing four-foot waste fluorescent lamps, was not labeled with the words, "Universal Waste - Lamps", "Waste Lamps", or "Used lamps."	Citation:	Section:

SECTION IV – FOLLOW UP

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

Closing Conference

During the closing conference with Mr. Momany, I explained that I had a point-of-contact (Paul Hamilton) for Target Corporation that I was working with, due to a previous inspection at another Target Store (T2339) and I asked him if he wanted to be copied with any correspondence from EPA. Mr. Momany said he would like to be copied.

Following the inspection, I sent Mr. Paul Hamilton (Target Corporation) a request for documents email, via "GoAnywhere", on 2/22/21. I also sent Ms. Nicole Ratigan (CVS) a request for documents too. Mr. Hamilton's response was received on 2/26/21 and Ms. Ratigan's response was received on 3/4/21.

Communication Log

Additional information received by REGION 10 after exiting the Facility on 02/22/2021 includes hazardous waste management documentation that was requested following the inspection. This documentation is included in the inspection document log.

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

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Other - T2372 Photo Log	T2372 Photo log.pdf	No	No	Jon Jones	04/06/2021
Records Review	17436 Haz Waste Training Records.pdf	No	No	Jon Jones	04/07/2021
Records Review	T2372 weekly HW inspections.pdf	No	No	Jon Jones	04/08/2021
Records Review	T2372 employee training.pdf	No	No	Jon Jones	04/08/2021
Records Review	T2372 TGT_RPT_ESIM_Recap_Report.xlsx	No	No	Jon Jones	04/08/2021
Records Review	2020 500147_Pharmacy Hazardous Waste Training.pdf	No	No	Jon Jones	04/08/2021
Records Review	500147_JobAid_Packet_2020.pdf	No	No	Jon Jones	04/08/2021
Records Review	#010173556 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#010174348 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#010752090 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#010752296 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012960921 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012962308 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012962448 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#013107716 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#013107717 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#013107717 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#008411630 FLE.pdf	No	No	Jon Jones	04/08/2021

Inspection Date(s):

02/22/2021 - 02/22/2021

Records Review	#008411632 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#008411807 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#009994406 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#009994408 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#009994409 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#009994410 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#009994512 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012598127 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012598447 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698114 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698124 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698182 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698183 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698184 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698320 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698321 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698322 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698435 FLE.pdf	No	No	Jon Jones	04/08/2021
Records Review	#012698436 FLE.pdf	No	No	Jon Jones	04/08/2021
Inspection Reports	Field_Notes_AKR000203471v1.0.pdf	No	No	Jon Jones	04/09/2021

PHOTO LOG

Target Store T2372

AKR000203471

2021 RCRA Inspection Report

PHOTO LOG

Unless otherwise noted, all photographs were taken by Jon Jones on the date of the inspection, using a Sony Cyber-shot DSC-H400 digital camera and appear in the Photo Log that accompanies this report. None of the photographs have been manipulated in any way.

1. DSC09978 – Box of four-foot waste fluorescent lamps, seen in center of photo, is not closed.
2. DSC09979 – Another view of box of four-foot waste fluorescent lamps, seen in center of photo, is not closed.
3. DSC09980 – Box of four-foot waste fluorescent lamps is not labeled as either “Universal Waste – Lamps”, “Waste Lamps”, or “Used Lamps.”
4. DSC09981 – Another view, showing box of four-foot waste fluorescent lamps is not labeled as either “Universal Waste – Lamps”, “Waste Lamps”, or “Used Lamps.”
5. DSC09982 – Box of four-foot waste fluorescent lamps was labeled during the inspection.
6. DSC09983 – Hazardous waste tote in CVS pharmacy is labeled incorrectly, as “Pharmacy Hazardous Waste.”
7. DSC09984 – Another view of the same mislabeled tote.



DSC09978.JPG



DSC09979.JPG



DSC09980.JPG



DSC09981.JPG



DSC09982.JPG



DSC09983.JPG



DSC09984.JPG