



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

March 23, 2000

David Landavazo
Store Manager
Walgreen's #2900
1096 St. Francis Drive
Santa Fe, New Mexico 87501

Dear Mr. Landavazo:

Thank you for participating in the Hazardous Waste Technical Assistance Program September 13, 1999. Please take a moment and complete the enclosed Customer Service Survey and return it in the self-addressed stamped envelope provided. This information is valuable for us to improve our service.

The Compliance and Technical Assistance Program recognizes your efforts of pollution prevention and waste minimization that have been implemented. The generator fees, non-compliance violation, has been resolved by Qualex, Inc. in writing on March 13, 2000. If you ever have any questions, please call me at (505) 827-1835.

Sincerely,

A handwritten signature in cursive script that reads "Chris Serazio".

Chris Serazio
Environmental Specialist

Enclosure



October 6, 1999

Mr. Chris Serazio
New Mexico Environmental Department
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, NM 87502

RE: Hazardous Waste Consultation Report for Walgreens #2900 [NMR000002147]

Dear Mr. Serazio:

This letter is in response to the Hazardous Waste Consultation Report completed for the Walgreens #2900 located at 1096 St. Francis Drive, Santa Fe, New Mexico, based upon the inspection conducted on September 13, 1999. Based upon the inspection, several conditions of non-compliance were identified in the pharmacy and One-Hour Photo Lab that requires corrective action. Please note that this response addresses the concerns identified in the One-Hour Photo Lab as indicated below:

1. Facility has failed to maintain manifests on site for 3 years.

Spent photographic solutions are containerized and transported off-site for silver reclamation. Hazardous waste manifests are used to track material from generator to receiving facility. Store personnel have been instructed to attach the signed copy of the manifest from the receiving facility to the original manifest to document proper management of the waste. Copies of the manifests will be maintained in a central file and available for review for state inspectors.

2. Facility must pay Large Quantity Generator (LQG) fees for 1998 and 1999. Facility should also verify generator fees submitted in 1997.

Qualex Inc. offers environmental and technical support to the One-Hour Photo Lab operating in the Walgreens store. Qualex contacted Ms. Cindy Abeyta of the New Mexico Hazardous & Radioactive Materials Bureau on September 22, 1999 to review fees previously submitted by Walgreen Company. Ms. Abeyta will provide generator status information to Qualex for the years in question.

The completed Annual Hazardous Waste Fee Report is attached for your files. Qualex Inc. will notify the Hazardous & Radioactive Materials Bureau once Walgreen Company submits the appropriate payment to the State of New Mexico.

If there are any questions concerning this response, please contact me at 919-484-3647.

Sincerely,

Kenneth J. McKeveny
HSE Permitting & Regulatory Compliance Manager

Qualex Inc.
4020 Stirrup Creek Dr., Suite 211
Durham, NC 27703
Attachment

919-484-3500



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Hazardous Waste Consultation Report

I have read the explanation of the on-site technical assistance program and agree to participate in the program. I also agree to correct any and all violations of the Hazardous Waste Regulations (20NMAC 4.1) identified by the Hazardous and Radioactive Materials Bureau (HRMB), within the time period(s) agreed for each violation. I also certify that I am a responsible party (owner or manager) to the facility listed below.

[Signature]
 Signature

MGR
 Title

9/13/99
 Date

Facility

Facility Name: WALGREEN'S #2902 EPA #: _____
 Facility Contact(s): DAVID LANZAVAZO NMR 000002147
 Title(s) STORE MANAGER, DAVID LANZAVAZO
 Phone: 982-4642 Phone: _____
 Address: 1096 ST FRANCIS DR.
 Mailing Address: _____
 City: SANTA FE Co.: SANTA FE Zip: 87501
 Notification Status (circle) CESQG SOQ LOG TSD -1997
 Transporter Recycler Other _____

NMED/HRMB

Lead Contact: CHRIS SERAZIO
 Other Representatives: N/A
 Time On Site: 1:45 AM/PM Time Off Site: 2:45 AM/PM

Facility History & Nature

History & Nature of Business: EMPLOYEE'S
CHG 1994 25 Full/PART TIME
RETAIL STORE w/ PHOTO LAB & PHARMACY

Facility **WAL GREENS #2900**

EPA# **NMR 000 00 2147**

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
Parts Washing	N/A	<input type="checkbox"/> Solvent units, <input type="checkbox"/> Lids Closed, Collected by _____ <input type="checkbox"/> Solvent filtering, filter disposed by _____		
Used Oil		<input type="checkbox"/> UST(registered), Used oil Barrels labeled <input type="checkbox"/> & closed _____ Collected by _____ Oil Filters Drained <input type="checkbox"/> Crushed <input type="checkbox"/>		
Antifreeze		<input type="checkbox"/> recycled, <input type="checkbox"/> disposed by who _____ <input type="checkbox"/> Tested for TCLP, results _____		
Refrigerant		<input type="checkbox"/> licensed to manage refrigerant <input type="checkbox"/> recycling R12, <input type="checkbox"/> recycling R-134		
Batteries		<input type="checkbox"/> Recycled, <input type="checkbox"/> stored properly (not stacked, no leaks)		
Paint & Lacquer Thinner		<input type="checkbox"/> waste paint stored & labeled, waste paint collected by _____, solvent bearing rags managed as haz waste _____		
Brakes		<input type="checkbox"/> Dry fully encapsulated or <input type="checkbox"/> Wet method <input type="checkbox"/> Solvent is caught in drip pan and managed properly		
Radiators		<input type="checkbox"/> Lead /zinc solder waste managed properly, <input type="checkbox"/> Sludge from tanks managed properly (dewatered first)		
Aerosol Cans & Carburetor Cleaner		Aerosol and/or carburetor cleaner with more than 10% by weight of any of the following: <input type="checkbox"/> Carbon Tetrachloride <input type="checkbox"/> Chlorobenzene <input type="checkbox"/> Methyl ethyl ketone <input type="checkbox"/> Trichloroethylene <input type="checkbox"/> zylene <input type="checkbox"/> CFC's <input type="checkbox"/> methylene chloride <input type="checkbox"/> Tetrachloroethylene (perc) <input type="checkbox"/> toluene <input type="checkbox"/> 1,1,1-trichloroethane - Managed as hazardous waste _____		
Wastewater, Sludge & Waste Fuel	<input type="checkbox"/> Hot soap washer <input type="checkbox"/> Sand Trap(s), cleaned by _____ <input type="checkbox"/> Oil water separator, cleaned by _____			
Tires & Scrap Parts	✓	<input type="checkbox"/> over 500 waste tires stored on site (need to follow tire regs) <input type="checkbox"/> scrap metal sold, <input type="checkbox"/> aluminum cans recycled, <input type="checkbox"/> paper recycled, other: _____		

Facility WALGREENS #2900 EPA# NMR 000002147

Process Information

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
PHOTO FIXER	SILVER	PHOTO LAB SW. CORNER OF STORE, LABELED, CLOSED, 2 UNITS, PLU WKLY SAFE KLEEN ON TRESTMANS	D011	97 UNK. NO RECORDS 98 DEC. 2510 LBS 99 Avg 2,744 LBS
PHARMACY WASTE		OUT DATED PHARMICHTICAL DRUGS	UNK. POSSIBLY	UNK. GENERATOR
		SEND OUT TO WINDSOR, WIS E, R.D.S	DELISTED HAZ. WASTE	ASSUMED EXEMPT
		HOW OFTEN: BI - ANNUAL		

Facility WALGREENS #2900

EPA# NMR00002147

Conditions Not in Compliance

Condition	Location	Recommended Corrective Action	Due Date
1. FAILURE TO MAKE AN ADEQUATE HAZ.	PHARMACY	ADEQUATELY DETERMINE IF EXPLODED MEDICAL DRUGS ARE HAZ. WASTE,	10/14/99
2. WASTE DETERMINATION & SHIP AS HAZ. WASTE ACCORD PHARMACY DRUGS.		MANIFEST & SEND TO AN APPROPRIATE TSD.	
3.		RECORDS SHOULD BE IN ORDER FOR 3 YRS	
4. FAC. HAS FAILED TO MAINTAIN MANIFESTS FOR.	ARM. OFFICE BYRSON SITE	COMPLETE ATTACHED WORK SHEET	10/14/99
5. FACILITY MUST PAY LQG FEES FOR 1998/1999	ARM OFFICE.		10/14/99

OK
CMS

VERIFY 1997 ~~MANIFESTS~~

& PAY LQG FEES, LATE FEES

Pollution Prevention & Waste Minimization Suggestions, Technical Assistance Referrals

STORAGE DOLL SPENT SILVER FIXER ADEQUATE SEALED/Labeled. FREE-NOTIFY AS LQG.

2 units into 2 - single drums w/ EXTRA DRUM W/HDN FULL.

SAFETY KLEEN PICK'S UP ON TUES/THUR WKLY.

1-hr PHOTO DEVELOPMENT HAS BEEN IN PLACE (OPERATIONAL) SINCE 9/97

Questions, Concerns, Comments

RECOMMEND SETTING UP MANIFEST LOG-BOOK FOR 1-YR PERIOD & SEGRAGATE BY MONTHS ALL MANIFESTS W/ LDR ATTACHMENTS

OK UNABLE TO DO H.W. VOLUME FOR 1997 NO MANIFESTS CMS

Facility WALGREENS #2900

EPA# NM R 000 00 2147

Corrective Actions Notification

Corrective action or a plan of corrective action must be submitted within thirty (30) days from the date of this on-site visit. Please describe the actions taken to correct the conditions identified. Sign and return the original, include all documentation and photos necessary to support correction within the delineated times noted.

From the initial site visit date, the participant will receive amnesty from regularly scheduled compliance inspections for the period of six months. This amnesty does not include complaint investigation, on-going enforcement action, immediate or imminent threat to human health or the environment, or failure to take corrective action on the conditions by the agreed deadline.

Condition Number	Corrective Action Taken By Facility	Date Completed
#3	TRAINING AND CORRESPONDENCE TO STORE MANAGER	10/5/99
#4	CONTACTED STATE OF ^{NEW} MEXICO TO DETERMINE APPROPRIATE FEES	01/6/00
	ABOVE ISSUES VERIFIED/CONDUCTED BY KELLY J. McKEEVER QUALEX HSE MANAGER	
	<i>Kent J. Murphy</i> 10/6/99	

Signature

File:forms\consultf.orm

Title

Date