

August 25, 2020

Fairfield County EMA
240 Baldwin Drive
Lancaster, Ohio 43130

To Whom It May Concern:

Re: CVS Pharmacy # 6188 : 111 South Memorial Drive Lancaster, OH 43130

This letter serves as notification regarding a CVS Pharmacy in your jurisdiction located at the address above that uses/stores hazardous materials, and generated hazardous waste. Furthermore, CVS Pharmacy would like to take this opportunity to request support from your agency in the unlikely event of a fire, explosion, or uncontrolled release of a hazardous waste pursuant to 40 CFR 262.256 and 40 CFR 262.262.

CVS Pharmacy uses & stores hazardous materials and generates hazardous waste. The hazardous materials at this facility are stored throughout the retail sales floor area, in the receiving/stockroom area, and in the pharmacy. The nature of the hazardous materials on site includes: flammable and combustible liquids; compressed, flammable gases; aerosol products; corrosive liquids; unstable and water-reactive liquids; solid oxidizers; irritants; and chemicals classified as causing "Other Health Hazards." Hazardous waste is generated primarily resulting from severely damaged, pre-packaged consumer products, or unsaleable pharmaceuticals, or from small, incidental spills or releases of chemicals. Facility personnel at CVS Pharmacy work throughout the entire facility.

Due to the possibility that this store has or will be registered as a Large Quantity Generator of RCRA hazardous waste primarily resulting from low volumes of acutely hazardous pharmaceutical or nicotine-containing wastes, the CVS Pharmacy Retail Store Hazardous Waste Contingency Plan is enclosed for your review, pursuant to 40 CFR 262.262. For more specific information on what materials this facility uses and stores, or emergency preparedness measures in effect, please contact Verisk 3E Regulatory Compliance Support Services at (800) 451-8346 ext. 8400.

Additionally, Verisk 3E provides CVS Pharmacy stores with the following support services:

- SDS on Demand®
- 24-Hour Spill Response Guidance (Stores can dial 888-464-2960 - 24-7-365)
- Poison Control Assistance
- DOT Hazardous Materials Shipping Guidance
- Regulatory Compliance Reporting Services

Please take a moment to review this information. If you have any questions, or concerns, please do not hesitate to contact Verisk 3E Regulatory Compliance Support Services at (760) 602-8700 ext. 8400. If your agency would like to make alternate aid arrangements or declines to provide support to this facility, please fill out the enclosed aid declination form and send it to Verisk 3E at the referenced mailing address.

Thank you, in advance, for your cooperation and support.

Verisk 3E, Regulatory Compliance Support Services



Verisk 3E Corporate Headquarters
3207 Grey Hawk Court
Carlsbad, CA 92010 USA

P: +1.760.602.8700
W: Verisk3E.com

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Lancaster, Ohio 43130

To Whom It May Concern:

Re: CVS Pharmacy # 6188 : 111 South Memorial Drive Lancaster, OH 43130

In accordance with 40 CFR 262.256, and 40 CFR 262.253, the above CVS Pharmacy location is attempting to make emergency response arrangements with your agency in the unlikely event of a fire, explosion, or uncontrolled release of hazardous waste. Details about the hazardous materials and hazardous waste at this CVS pharmacy location are identified in the Aid Notification Letter included with this document.

Title 40 of the United States Code of Federal Regulations §262.256, subpart (b) requires that CVS Pharmacy record any decline of this request for support and possible response in the unlikely event of a fire, explosion, or uncontrolled release of hazardous waste.

If your agency wishes to formally decline support and/or emergency response in the unlikely event of a fire, explosion, or uncontrolled release of hazardous waste at the above referenced CVS Pharmacy location, please state your reasoning as to why you are declining support, and sign, date, and mail this letter to Verisk 3E at the following address:

*Verisk 3E, Regulatory Compliance Support Services – CVS Pharmacy # 6188
Attn: Aid Notification Arrangements Declined
3207 Grey Hawk Court, Suite 200
Carlsbad, CA 92010-6664*

PLEASE NOTE: THIS LETTER NEEDS TO BE SIGNED & RETURNED ONLY IF YOUR AGENCY IS DECLINING TO PROVIDE SUPPORT OR INFORM US OF INACCURATE JURISDICTIONAL ASSIGNMENT

Reason(s) for declining to support and/or respond:

(Print Name and Title)

(Signature)

(Date)



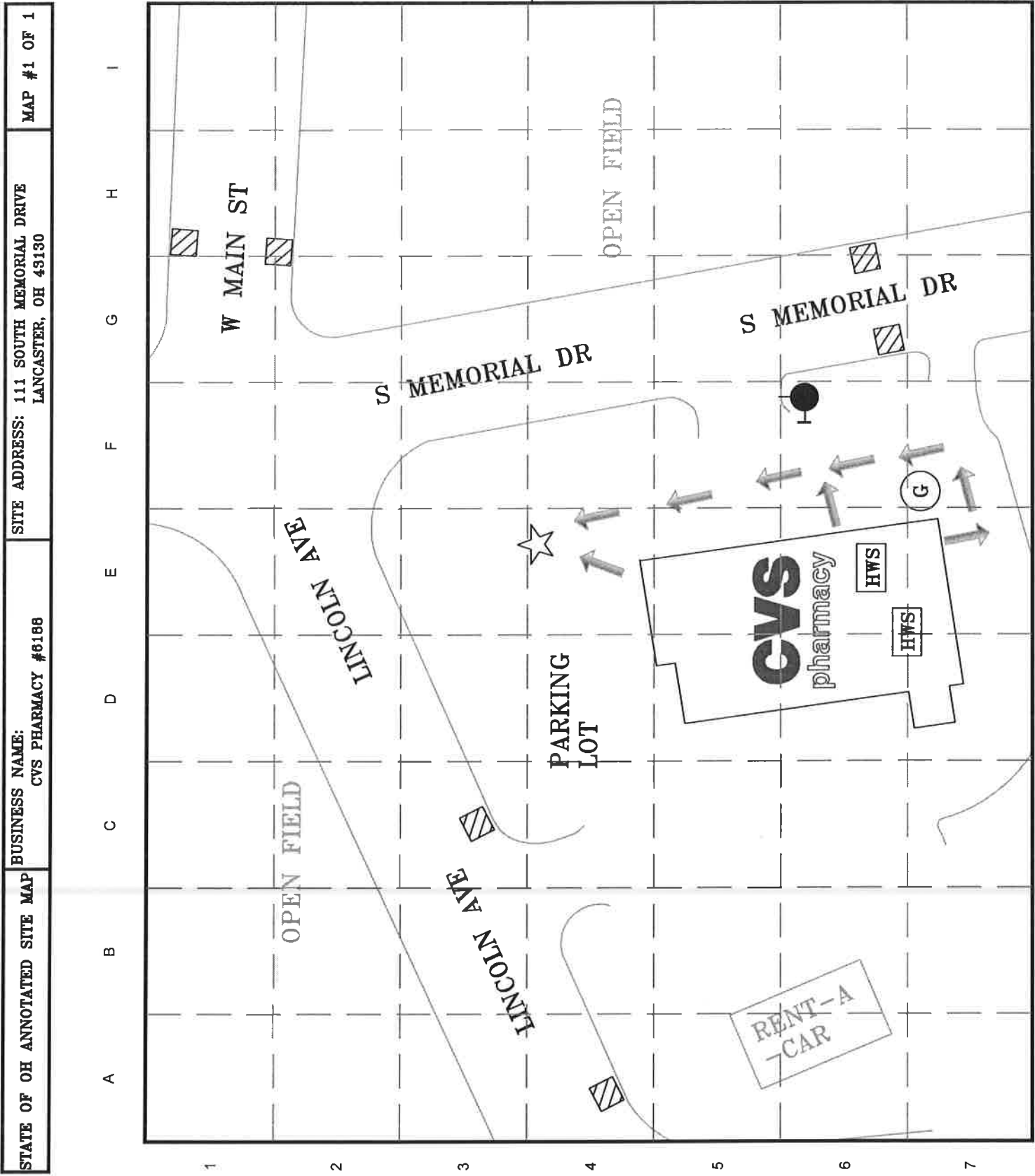
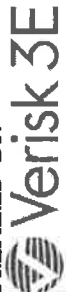
SCALE: NOT TO SCALE
DATE: 06/19/2020

LEGEND

- SAFE REFUGE AREA
- STORM DRAIN
- FIRE HYDRANT
- HAZARDOUS WASTE STORAGE
- EVACUATION ROUTE
- GAS MAIN
- WATER MAIN
- LOCATION UNKNOWN

CVS PHARMACY #6188 IS LOCATED ON THE CORNER OF SOUTH MEMORIAL DRIVE AND LINCOLN AVENUE. THE PHARMACY CAN BE ACCESSED ON PARKING LOT ENTRANCE; SOUTH MEMORIAL DRIVE AND LINCOLN AVENUE.

PREPARED BY:



STATE OF OH ANNOTATED SITE MAP

BUSINESS NAME:
CVS PHARMACY #6188

SITE ADDRESS: 111 SOUTH MEMORIAL DRIVE
LANCASTER, OH 43130

MAP #1 OF 1



RETAIL STORE

HAZARDOUS WASTE CONTINGENCY PLAN

Revision Date: May 2016



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APPENDICES

Appendix A – Contingency Plan Implementation Record

1.0 OVERVIEW

A CVS/pharmacy Retail Pharmacy Store (Store) typically generates a relatively small amount of hazardous waste during normal store operations. This Contingency Plan has been developed for Stores in keeping with applicable federal and state hazardous waste regulations. This Contingency Plan provides emergency response procedures to minimize health and environmental hazards resulting from fire, explosion, or other releases to air, soil, or surface water related to the storage of hazardous waste consumer products which may occur at a CVS Store. This Contingency Plan establishes a system of procedures to be used at the Store in response to an incident involving hazardous waste consumer products.

This Contingency Plan is not a stand-alone document. It is designed to operate in concert with other emergency preparedness plans and procedures in effect at the Store, specifically including the Store's Emergency Procedures Plan and Emergency Procedures Plan Summary. The purpose of the Emergency Procedures Plan is to educate store managers and colleagues and allow for coordinated actions during a workplace emergency. The Manager-on-Duty is responsible for the implementation and enforcement of the Emergency Procedures Plan. All store-specific information must be completed on the Emergency Procedures Plan Summary for each store and the Summary must be posted in the break room, at out-dialing phones including near the hazardous waste storage areas and in MinuteClinic locations. Store colleagues are trained to the Emergency Procedures Plan and Contingency Plan.

CVS has developed this Contingency Plan for stores that have attained Large Quantity Generator (LQG) status, Small Quantity Generator (SQG) status as required by some states, as well as other stores at which CVS has elected to implement the Plan. It is intended to provide additional emergency preparedness and response information that is correlative to the risk posed by hazardous waste located on-site.

IMPORTANT NOTE: Classification as a large quantity generator (LQG) at the store level is almost exclusively due to the generation or accumulation of small amounts of consumer products or pharmaceuticals that are regulated as “acutely hazardous waste” when discarded. Additional information on potential acutely hazardous wastes is provided in a later section.

2.0 GENERAL STORE INFORMATION

In keeping with a typical Store profile, this Store generates relatively small amounts of hazardous waste through normal Store operations. Typical Stores have a secure pharmacy area in which all pharmaceuticals must be stored, the front store floor area where all customer activity occurs, and a backroom area in which the hazardous waste storage area is located as well as additional storage for consumer products and other program support resources. A manager's office and employee break area complete the store footprint.

Select Stores have a wet photo lab, usually near the customer entrance to the front store floor area.

Store colleagues are normally present within most areas of the Store during normal working hours. Store colleague work schedules vary between full and part time colleagues. Some colleagues may have occasion to handle waste products during their work days. It is very unlikely an occasion will arise where there will be only one colleague at the premises.

Telephones capable of summoning external emergency assistance are available for colleague use.

Specifically, the primary waste products known to have the *potential* to result in the generation or accumulation of greater than 2.2 lbs of acute hazardous waste are (1) nicotine from waste nicotine replacement therapy products and (2) warfarin-family pharmaceutical waste generated in the pharmacy. Except in very rare cases, CVS Stores do not otherwise reach LQG status, because they do not generate large amounts (greater than 2200 lbs.) of other hazardous waste.

4.0 EMERGENCY COORDINATOR DUTIES

This Contingency Plan will be implemented whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, or surface water that could threaten human health or the environment. Due to the nature of the retail setting, the Emergency Coordinator role has been divided between a local contact and 3E Company, a third party service provider which ensures expertise is available 24/7. The local contact and 3E Company must work together on any emergency requiring the implementation of this plan. All store management colleagues are authorized to act as the local contact, and a member of store management is always present during store operation.

3E Company (3207 Greyhawk Court, Carlsbad, CA) has been retained by CVS's Environmental Department and authorized to act as the designated Emergency Coordinator at all CVS Store locations. 3E Company has the expertise and authority to decide when the procedures outlined in this Contingency Plan should be executed. If an emergency situation develops at the Store, such as a fire, the first Store colleague(s) on the scene will immediately call 911 and then notify the Store Manager and 3E Company. Contact information for 3E Company and the Store Manager is provided on the Emergency Procedures Plan Summary Posters located next to out-dialing telephones at the Store. Please note that due to confidentiality concerns, additional personal information such as home addresses and phone numbers for the Store Managers or other store management colleagues is not included in this document. CVS has taken every effort to design this Contingency Plan such that personal information is not necessary for successful implementation.

3E Company has been delegated the authority to commit company resources necessary to implement this Contingency Plan. Where needed, 3E Company will assist CVS with making

arrangements with CVS's approved emergency response contractor, and shall have authority to perform the following:

- Engage CVS's approved emergency response contractor for response to a Store emergency,
- Deputize/enlist other properly trained Store colleagues to assist him/her in the event of an emergency, and
- Enlist Store colleagues or other emergency response personnel to direct or divert traffic in the event of an emergency.

The Manager-on-Duty, is required to assist 3E Company with emergency response at the Store level, where possible, and is responsible for contacting CVS's Corporate Environmental Representative in the unlikely event that 3E Company is inaccessible to Store colleagues.

5.0 EMERGENCY RESPONSE PROCEDURES

The decision to implement this Contingency Plan is the responsibility of the Emergency Coordinator, and depends upon whether an imminent or actual incident involving a fire, explosion, or release of hazardous waste or constituents could threaten human health or the environment. The Emergency Coordinator should use judgment based upon his/her experience with the processes involved in making this decision and confer with CVS's Corporate Environmental Representative, as appropriate. Not all incidents require the implementation of this Contingency Plan. In fact, minor incidents will not generally require implementation of the Contingency Plan.

The following universal notification and coordination actions will be followed when a fire, explosion, or hazardous waste spill that requires the implementation of this Contingency Plan occurs.

1. The first Store colleague(s) on the scene of an emergency situation will immediately notify the Manager-on-Duty or call 911, if there is concern of an immediate threat to human health or the environment.
2. The Manager-on-Duty will determine whether he or she has the training and capability to address the situation (e.g., a spill of a known chemical that can be contained).
3. If the emergency involves a large spill that cannot be readily contained, may result in exposure to Store colleagues or the general public, or may result in a release to the environment (e.g., outside the building or down the drain), the Manager-on-Duty must contact 3E Company via the 24-Hour CVS Health Safety Hotline at 888-464-2960. 3E Company will then be responsible for contacting a CVS Health approved Emergency Response Contractor, and all appropriate state or local authorities with designated response roles as warranted by the nature and scope of the emergency. 3E Company will also be responsible for notifying the National Response Center if needed.

4. Contact information for the state environmental agency, local fire and police departments, as well as other local emergency services, will be on file with 3E Company and the Emergency Response Contractor and immediately accessible in an emergency.
5. To the extent possible, the Emergency Response Contractor will identify the character, source, approximate amount, and aerial extent of the release (if applicable). The Emergency Response Contractor will make additional notifications as required by applicable regulations.
6. These include notifications to the National Response Center (phone number on file with the Emergency Response Contractor and immediately accessible in an emergency), the State Emergency Response Commission (phone number on file with the Emergency Response Contractor and immediately accessible in an emergency), and the Local Emergency Planning Committee (phone number on file with the Emergency Response Contractor and immediately accessible in an emergency).
7. The Emergency Response Contractor will take all reasonable measures necessary to minimize the potential for the impacts to human health and the environment.
8. Until emergency responders arrive, the Manager-on-Duty should monitor building conditions and be prepared to provide information to emergency response personnel.

Where required, local fire, police, hospitals, and the state emergency agency have been provided a copy of this Contingency Plan along with aid notification letters. Copies of the correspondence with these agencies and emergency response providers are available through the CVS Corporate Environmental Representative.

6.0 EMERGENCY EQUIPMENT

Emergency response equipment is maintained and inspected, as appropriate, and spill kit supplies are replenished as they are used. Due to the space-constrained retail setting, no equipment with extra capabilities above and beyond standard are required.

In addition to the information located on the store's Emergency Procedures Plan Summary posted by telephones related to emergency response equipment, a list of emergency response equipment available on-site is below. This information also includes equipment capabilities and general equipment locations:

Emergency Equipment	Physical Description	Capabilities	Location(s)
Fire alarm (where applicable)	Varies by type	Provides an audible alarm capable of being heard throughout the building	Varies by location
Fire extinguishers	A, B, and C fire extinguishers, 10 lbs	Extinguishing A, B, and C fires NOTE: Colleagues should not attempt to fight fires or use fire extinguishers to put out fires unless they have been trained to do so and the training has been documented and is available for review at the Store.	Throughout store
Automatic sprinkler system (where applicable)	Ceiling mounted sprinkler system	Spraying water from the ceiling	Throughout store

Emergency Equipment	Physical Description	Capabilities	Location(s)
Spill Cleanup Materials	Collection of spill response equipment	For use in cleaning up spills	Hazardous waste storage areas (backroom)
- Nitrile gloves	Disposable gloves made of nitrile	Provides protection to hands during spill clean-up	Hazardous Waste storage areas (backroom)
- Vinyl apron	Standard adult size apron made of vinyl	Provides protection to front of body during spill clean-up	
- Safety goggles	Standard adult size acrylic goggles	Provides protection to eyes during spill clean-up	
- Absorbent materials	Spill Magic (3 lb container) or clay cat litter	Used to absorb free liquids	
- Broom	Standard broom with handle	Used to sweep up debris or other spilled material	
- Dustpan	Non-sparking, plastic dustpan (i.e., plastic)	Used to collect and transport debris or other spilled material to disposal receptacle	
- Paper towels	Two rolls of standard paper towels	Used to absorb free liquids and/or wipe surfaces	
Eyewash station (in stores operating a wet photo lab)	Eyewash apparatus is connected to sink. When activated, the eyewash station is designed to cleanse both eyes simultaneously.	Used to provide mechanism for continuous flushing of eye(s)	Wet photo lab (if present)
Telephones	Standard telephone connected to a land line	For use in two-way communication	Various locations in store – front store, pharmacy, back room, and photo lab (if present)

7.0 EVACUATION PLAN

In the event of a major emergency, it may be necessary to evacuate the premises. Store colleagues will follow the CVS Emergency Procedures Plan, available on-site.

Details on the outdoor designated rally point are outlined on the Emergency Procedures Plan Summary poster.

Colleagues are instructed to remain calm, walk to the nearest exit and leave the building immediately. Exit doors are indicated by signs in the Store and exit routes are clearly marked.

There are no Store processes that require continued operation during an emergency.

Colleagues should not attempt to fight fires or use fire extinguishers to put out fires unless they have been trained to do so and the training has been documented and is available for review at the Store.

All colleagues, customers, patients and vendors are expected to leave the Store immediately when an evacuation alarm is sounded or an evacuation order is announced. Each colleague needs to be aware of at least two exits in the Store in the event one is compromised. After leaving the Store, colleagues should proceed to the designated outdoor rally point.

8.0 REPORTING

After identifying the character, source, approximate amount, and areal extent of the release (if applicable), 3E Company, the Emergency Response Contractor or the CVS Corporate Environmental Representative will make additional notifications as required by applicable regulations. These include notifications to the National Response Center (800-424-8802), the State Emergency Response Commission (phone number on file with 3E Company and immediately accessible in an emergency), and the Local Emergency Planning Committee (phone number on file with 3E Company and immediately accessible in an emergency).

Following an emergency, 3E Company, with the assistance of CVS's Corporate Environmental Representative and Emergency Response Contractor(s), will perform the following duties:

- Provide for the collection, treatment, and disposal, if necessary, of hazardous waste or hazardous waste constituents released during the incident, and ensure that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed,
- Ensure that all emergency equipment for the area is restored to full operational status or is replaced if necessary prior to resuming normal operations,
- Place an entry in the Contingency Plan Implementation Log (**Appendix A**) indicating the date, time, and details of the incident,
- Investigate the cause of the incident and take appropriate action to prevent a recurrence,
- As required by applicable regulations, before resuming operations, notify the appropriate state and local authorities or agencies, and
- As required by applicable regulations, prepare a written report for submission to the state environmental agency and/or Regional Administrator, as applicable. This report should be submitted within 15-days after the incident. The report should include the following:
 - Name, address, and telephone number of the owner or operator;

- Name, address, and telephone number of the Store;
- Date, time, type (e.g., fire, explosion, spill), and brief description of the incident;
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

9.0 PLAN AMENDMENTS

A copy of this Contingency Plan will be accessible for review by all affected colleagues. This Contingency Plan may be revised as necessary.

The Contingency Plan must be reviewed, and amended, if necessary, on an annual basis and whenever:

- Applicable regulations are revised;
- The plan fails in an emergency;
- The Store changes-in its design, construction, operation, maintenance, or other circumstances-in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of emergency coordinators changes; or
- The list of emergency equipment changes.

10.0 REVISION LOG

- June 2013: Contingency Plan Implemented
- August 2014: Substantive Revisions to Contingency Plan include the following:
 - Section 4.0 Emergency Coordinator Duties: Added note that due to confidentiality concerns, personal information such as home addresses and phone numbers for store management is not included in the Contingency plan.
 - Section 6.0 Emergency Equipment: Deleted prior list of emergency equipment; added table detailing emergency equipment, physical description of equipment, equipment capabilities, and equipment location.
- March 2015: Substantive Revisions to Contingency Plan include the following:
 - Section 8.0: Added note that when required by applicable regulations, before resuming operation, the appropriate state and local authorities or agencies must be notified.
- May 2016: NH SOP added as attachment

