

US EPA ARCHIVE DOCUMENT

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS				
SECTION D. PROCESS INFORMATION - DRIP PADS				
Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
D-11 Drip Pads	270.26; 264.570 - .575			
D-11a Drip Pad Description	270.26(c); 264.573(a)			
D-11a(1) Construction	270.26(c); 264.573(a)(1) - (4); 264.573(b)(1) - (3)	Provide a description of the unit including dimensions and materials of construction. Drip pads must: be constructed of nonearthen materials; be sloped to free-drain treated wood drippage, rain and other waters or wastes to the associated collection system; and, have a curb or berm around the perimeter.		
D-11a(1)(a) Existing Drip Pads	270.26(c); 264.572(a); 264.573(a)(4)	Existing drip pads must have a hydraulic conductivity of less than or equal to 1×10^{-7} centimeters per second. Provide a copy of the most recent written assessment of the drip pad. This assessment must be reviewed and certified by an independent, qualified registered professional engineer (PE). The assessment must be reviewed, updated and recertified annually.		
D-11a(1)(b) New Drip Pads	270.26(c); 264.572(b); 264.573(b)	New drip pads must have a synthetic liner installed below the pad. The liner must be constructed of materials that will prevent waste from being absorbed into the liner. A leakage detection system and a leakage collection system are also required.		
D-11b(1) Preventive Maintenance	270.26(c);	Drip pads must be maintained to remain		

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	264.573(c)	free of cracks, gaps, corrosion, etc., that could cause a release of hazardous waste.		
D-11b(2) Prevent Runon and Runoff	270.26(c); 264.573(d), (e), (L)	The drip pad and associated collection system must be operated to prevent runoff. Unless protected by a structure, the runon and runoff control systems must have the capacity to prevent flow onto the drip pad from a 24-hour, 25-year storm. All collection systems must be emptied as soon as possible after storms to maintain design capacity.		
D-11b(3) Certification	270.26(c); 264.573(g)	Provide certification from a qualified, registered PE stating the drip pad meets the requirements of section 264.573.		
D-11b(4) Maintaining Collection System	270.26(c); 264.573(h)	Provide plan for removal of drippage and accumulated precipitation from collection system as necessary to prevent overflow.		
D-11b(5) Cleaning Drip Pad Surface	270.26(c); 264.573(i),(j)	Drip pad surface must be cleaned appropriately to allow weekly inspection of the entire surface and to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad.		
D-11b(6) Recordkeeping	270.26(c); 264.573(k)	Maintain records sufficient to document that all treated wood is held on the pad following treatment in accordance with the requirements of this section.		

RCRA I.D. No.: _____

Facility Name: _____

Notes:

- a Considerations in addition to the requirements presented in the regulations.
- b For each requirement, this column must indicate one of the following: NA for not applicable, IM for information missing, or the exact location of the information in the application.
- c If application is deficient in an area, prepare a comment describing the deficiency, attach it to the checklist, and reference the comment in this column.