

US EPA ARCHIVE DOCUMENT

RCRA REVISION CHECKLIST 82

Wood Preserving Listings
 55 FR 50450-50490
 December 6, 1990
 (RCRA Cluster I, HSWA and Non-HSWA Provisions)

- 1) This Revision Checklist adds three broad categories of wastes from wood preserving processes that use chlorophenolic, creosote, and/or inorganic (arsenical and chromium) preservatives to the list of wastes from non-specific sources. These wastes, F032, F034 and F035, include wastewaters, process residuals, preservative drippage and spent formulations. The listing of F032 and the permitting and interim status standards applicable to drip pads handling this waste are promulgated pursuant to HSWA. The listings of F034 and F035, the permitting and interim standards for drip pads that handle F034 and F035 wastes, and the addition of a test method to Appendix III of Part 261 are non-HSWA provisions. EPA will implement the addition of F032 to the list of hazardous wastes from non-specific sources in authorized States until the States modify their programs and such modifications are approved by EPA. The non-HSWA requirements are applicable only in those States that do not have interim or final authorization. In authorized States, the non-HSWA requirements will not be applicable until the States revise their programs to adopt equivalent requirements under State law, unless the wastes are designated as hazardous due to the Toxicity Characteristic, which would allow an owner or operator to comply with the drip pad standards administered under Federal law.
- 2) Note that on June 13, 1991 (56 FR 27332), an administrative stay was published affecting this final rule. Because the Federal code was changed, a checklist was developed, Revision Checklist 91. The changes addressed by that checklist are all optional.
- 3) Technical corrections were made to this rule on July 1, 1991 (56 FR 30192; Revision Checklist 92). States are strongly encouraged to adopt those technical corrections at the same time that Revision Checklist 82 provisions are adopted.

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

PART 260 - HAZARDOUS WASTE MANAGEMENT SYSTEM: GENERAL

SUBPART B - DEFINITIONS

DEFINITIONS

add "drip pad" in alphabetical order	260.10
---	--------

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

PART 261 - IDENTIFICATION AND LISTING OF HAZARDOUS WASTE

SUBPART A - GENERAL

EXCLUSIONS

† add new paragraph which excludes as a solid waste spent wood preserving solutions that have been used and are reclaimed and reused for their original intended purpose	261.4(a)(9)
--	-------------

SUBPART D - LISTS OF HAZARDOUS WASTES

HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES

add the waste codes "F032", "F034" and "F035" in alpha- numeric order to list as shown below	261.31(a)
--	-----------

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

		STATE ANALOG IS:			
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
Industry and EPA hazardous waste No.	Hazardous waste				Hazard code
*	*	*	*	*	*
F032 . . .	Wastewaters, process residuals, preservative drippage, and spent formula- tions from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations (except potentially cross- contaminated wastes that have had the F032 waste code deleted in accordance with §261.35 of this chapter and where the generator does not resume or initiate use of chlorophenolic formulations). This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol.				(T)
F034 . . .	Wastewaters, process residuals, preservative drippage, and spent formula- tions from wood preserving processes generated at plants that use creosote formulations. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol.				(T)
F035 . . .	Wastewaters, process residuals, preservative drippage, and spent formula- tions from wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol.				(T)
*	*	*	*	*	*

DELETION OF CERTAIN HAZARDOUS WASTE CODES FOLLOWING EQUIPMENT CLEANING AND REPLACEMENT

wastes from wood
preserving processes
at plants that do not
resume or initiate
use of chlorophenolic
preservatives will not
meet the listing
definition of F032
once the 261.35(b)
and (c) requirements
are met; wastes may
continue to meet
another hazardous
waste listing descrip-
tion or exhibit one or
more characteristics 261.35(a)
generators must
either clean or

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
replace all specified process equipment that may have come into contact with chlorophenolic formulations or constituents; generators must either:	261.35(b)				
prepare and sign a written equipment cleaning or replace- ment plan and con- duct cleaning and/or replacement of equip- ment in accordance with plan; manage discarded equipment as F032 waste	261.35(b)(1)				
removal of all visible residues from process equipment and rinsing process equipment with appropriate solvent to meet specified criteria when tested in accordance with SW-846 Method 8290; management of all residues as F032 waste	261.35(b)(2)				
document that previous equipment cleaning or replace- ment was performed in accordance with 261.35 requirements and occurred after a change in preservative	261.35(b)(3)				
documentation that must be maintained as part of the facility's operating record	261.35(c)				
name and address of the facility	261.35(c)(1)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
formulations previously used and the date on which their use ceased in each process at the plant	261.35(c)(2)				
formulations currently used in each process at the plant	261.35(c)(3)				
equipment cleaning or replacement plan	261.35(c)(4)				
name and address of any persons who conducted the cleaning and replacement	261.35(c)(5)				
dates on which cleaning and replacement were accomplished	261.35(c)(6)				
dates of sampling and testing	261.35(c)(7)				
description of sample handling and prep- aration techniques	261.35(c)(8)				
description of the tests performed, the date, and the results of the tests	261.35(c)(9)				
name and model numbers of the instrument(s) used in performing the tests	261.35(c)(10)				
QA/QC documentation	261.35(c)(11)				
signed certification statement	261.35(c)(12)				

APPENDIX III TO PART 261

CHEMICAL ANALYSIS TEST METHODS

add the compound,
"Benzo(k)
fluoranthene", in
alphabetical order,
to Table 1

Table 1, Appendix III

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

TABLE 1. --ANALYSIS METHODS FOR
ORGANIC CHEMICALS CONTAINED IN SW-846

Compound	Method Nos.
* * * * *	
Benzo(k) fluoranthene	8100,8250, 8270,8310
* * * * *	

APPENDIX VII TO PART 261

BASIS FOR LISTING HAZARDOUS WASTE

add "F032", "F034",
and "F035" to list
in alphanumeric order
as shown below:

Appendix VII

EPA hazardous waste No.	Hazardous constituents for which listed
* * * * *	
F032.....	Benz(a)anthracene, benzo(a)pyrene, dibenz(a,h)-anthracene, indeno(1,2,3-cd)pyrene, pentachloro- phenol, arsenic, chromium, tetra-, penta-, hexa-, heptachlorodibenzo- p-dioxins, tetra-, penta-, hexa-, heptachlorodibenzofurans.
F034.....	Benz(a)anthracene, benzo(k)fluoranthene, benzo(a)pyrene, dibenz(a,h)anthracene, indeno(1,2,3-cd)pyrene, naphtha- lene, arsenic, chromium.
F035.....	Arsenic, chromium, lead.

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
*	*	*	*	*	*

APPENDIX VIII TO PART 261

HAZARDOUS CONSTITUENTS

add the specified
hazardous
constituents in
alphabetical order
as shown below:

Appendix VIII

Common name	Chemical abstracts name	Chemical abstracts No.	Hazardous waste No.
* * * * *			
Benzo(k)fluoranthene	Same	207-08-9	
* * * * *			
Heptachlorodibenzofurans
Heptachlorodibenzo-p-dioxins
* * * * *			

PART 262 - STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

SUBPART C - PRE-TRANSPORT REQUIREMENTS

ACCUMULATION TIME

- † redesignate paragraph
(a)(2) as (a)(3);
add new paragraph
requiring placement
of waste on drip pads,
generator compliance

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
with Subpart W of Part 265 and maintenance of the following records at the facility:	262.34(a)(2)				
† description of procedures to ensure wastes are removed from drip pad and associated collection system at least once every 90 days	262.34(a)(2)(i)				
† documentation of each waste removal, including quantity, date and time of removal; generator exemption from Sub- parts G and H of Part 265 require- ments, except for 265.111 and 265.114	262.34(a)(2)(ii)				
redesignate "262.34(a)(2)" as "262.34(a)(3)"	262.34(a)(3)				
redesignate "262.34(a)(3)" as "262.34(a)(4)"	262.34(a)(4)				
redesignate "262.34(a)(4)" as "262.34(a)(5)"	262.34(a)(5)				

PART 264 - STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE
TREATMENT, STORAGE AND DISPOSAL FACILITIES

SUBPART J - TANK SYSTEMS

APPLICABILITY

add reference to
paragraph (c)

264.190

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
add new paragraph subjecting tanks, sumps and other collection devices used in conjunction with Subpart W- regulated drip pads to Part 264, Subpart J requirements		264.190(c)			

SUBPART W - DRIP PADS

APPLICABILITY

Subpart W applies to owners and operators of facilities that use new or existing drip pads to convey treated wood drippage to an associated collection system; existing drip pads defined	264.570(a)
owner or operator of certain drip pads inside or under a structure not subject to 264.572(e) or 264.572(f) regulations, as appropriate	264.570(b)

ASSESSMENT OF EXISTING DRIP PAD INTEGRITY

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
evaluation of existing drip pads; by June 6, 1991, written assessment obtained and kept on file; annual review, update and recertification required until 264.572 standards are met, except 264.572(b) standards for liners and leak detection systems; documentation of drip pad age	264.571(a)				
development of written plan for up-grading, repairing and modifying drip pad to meet 264.572(b) requirements; submittal of plan to Regional Administrator no later than 2 years before completion of modifications; written plan documentation, review and certification requirements; conditions for completion of upgrades, repairs and modifications	264.571(b)				
for existing drip pads of known and documentable age, upgrades, repairs and modifications completed within two years of June 6, 1991, or when the drip pad has reached 15 years of age, whichever comes later	264.571(b)(1)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
for existing drip pads with no documentable age, upgrades, repairs and modifications must be completed within 8 years of June 6, 1991; if facility is over 7 years old, completion by the time facility reaches 15 years or by two years after June 6, 1991, which- ever comes later	264.571(b)(2)				
conditions under which owner or operator may petition Regional Adminis- trator for extension of deadline; petition granted if drip pad meets all 264.572 requirements, except those for liners and leak detection systems specified in 264.572(b)	264.571(b)(3)				
submittal of required drawings and certification to Regional Adminis- trator or State Director upon completion of all repairs and modifications	264.571(c)				
if drip pad found to be leaking or unfit for use, compliance with 264.572(m) provi- sions or close drip pad in accordance with 264.574	264.571(d)				
DESIGN AND OPERATING REQUIREMENTS					
drip pads must: be constructed of	264.572(a)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
non-earthen materials, excluding wood and non- structurally supported asphalt	264.572(a)(1)				
be sloped for free- drainage to the associated collection system	264.572(a)(2)				
have a curb or berm around the perimeter	264.572(a)(3)				
be impermeable as specified	264.572(a)(4)				
be of sufficient structural strength and thickness to meet specified conditions	264.572(a)(5)				
a drip pad must have:	264.572(b)				
a synthetic liner that meets certain design, construction and instal- lation specifications	264.572(b)(1)				
specific requirements for liner construction materials	264.572(b)(1)(i)				
foundation or base requirements	264.572(b)(1)(ii)				
liner must cover all surrounding earth that could come into contact with the waste or leakage	264.572(b)(1)(iii)				
leakage detection system immediately above the liner; detection system must be:	264.572(b)(2)				
constructed of materials that are:	264.572(b)(2)(i)				
chemically resistant to relevant waste and leakage	264.572(b)(2)(i)(A)				
of sufficient strength and thickness to prevent collapse	264.572(b)(2)(i)(B)				
designed and operated					

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
to function without clogging through the scheduled closure of the drip pad	264.572(b)(2)(ii)				
designed to detect drip pad failure or the release of hazardous waste or accumulated liquid at the earliest practicable time	264.572(b)(2)(iii)				
maintenance of drip pads; note regarding remedial action	264.572(c)				
convey, drain, and collect liquid resulting from drippage or precipitation in order to prevent run-off	264.572(d)				
run-on control system requirements, unless control system is protected by a structure, as described in 264.570(b)	264.572(e)				
run-off management system requirements, unless system is protected by a structure, as described in 264.570(b)	264.572(f)				
evaluation of drip pad for compliance with 264.572(a) - (f) requirements; design certification required	264.572(g)				
removal of drippage and accumulated precipitation from associated collection system as necessary to prevent overflow onto the drip pad	264.572(h)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
thorough cleaning of drip pad surface at least once every seven days to meet specified conditions; documentation of date, time and cleaning procedure in facility's operating log	264.572(i)				
minimize tracking of hazardous waste or constituents off the drip pad	264.572(j)				
after removal from treatment vessel, treated wood from pressure and non- pressure processes must be held on pad until drippage has ceased; documen- tation required	264.572(k)				
collection and holding units for run-on and run-off control systems emptied or otherwise managed as soon as possible after storms to maintain design capacity	264.572(l)				
throughout the active life of the drip pad and as specified in the permit, repair of detected condition that could lead to or has caused a release of hazardous waste within a reasonable period of time, in accordance with the following procedures:	264.572(m)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
upon detection of a condition that has led or could lead to a release of hazardous waste, the owner must:	264.572(m)(1)				
enter discovery in the facility operating log	264.572(m)(1)(i)				
immediately remove from service affected portion of drip pad	264.572(m)(1)(ii)				
determine steps to repair drip pad and clean up any leakage; establish schedule for repairs	264.572(m)(1)(iii)				
notify Regional Administrator within 24 hours after discovery; provide written notice as specified within 10 working days	264.572(m)(1)(iv)				
review, determination and notification by Regional Administrator	264.572(m)(2)				
1 written notification to Regional Administrator and certification of compliance with 264.572(m)(1)(iv) after repairs and clean up	264.572(m)(3)				
should a permit be necessary, Regional Administrator will specify in the permit all design and operating practices necessary to ensure that 264.572 requirements are met	264.572(n)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
documentation in operating log, as specified, of past operating and waste handling practices	264.572(o)				
INSPECTIONS					
inspection of liners and cover systems for uniformity, damage and imperfections during construction or installation; inspection and certification of liners to meet 264.572 requirements; maintenance of certification as part of the facility operating record; inspection of liners and covers after installation	264.573(a)				
drip pad must be inspected weekly and after storms to detect evidence of any of the following:	264.573(b)				
deterioration, malfunctions or improper operation of run-on and run-off control systems	264.573(b)(1)				
presence of leakage in and proper functioning of leak detection system	264.573(b)(2)				
deterioration or cracking of drip pad surface; note regarding remedial action	264.573(b)(3)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

		STATE ANALOG IS:			
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
CLOSURE					
at closure, removal and decontamination requirements; management as hazardous waste	264.574(a)				
conditions under which owner or operator must close facility and perform post-closure care in accordance with 264.310 requirements; for permitted units, permit requirement continues throughout post-closure period; drip pad is considered a landfill and must meet Subparts G and H requirements of Part 264	264.574(b)				
owner or operator of an existing drip pad that does not comply with the 264.572(b)(1) liner requirements must:	264.574(c)(1)				
include in closure plans for drip pad under 264.112, a plan for 264.574(a) compliance and a contingent plan for 264.574(b) compliance	264.574(c)(1)(i)				
prepare a contingent post-closure plan under 264.118 for complying with 264.574(b) in case not all contaminated subsoils can be practicably removed at closure	264.574(c)(1)(ii)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
cost estimates calculated under 264.112 and 264.144 for closure and post- closure care of drip pad subject to 264.574 must include the cost of complying with the contingent closure plan and the contingent post- closure plan; cost of expected closure under 264.574(a) need not be included		264.574(c)(2)			
DESIGN AND INSTALLATION OF NEW DRIP PADS					
owners and operators of drip pads must ensure that the pads are designed, installed and operated in accordance with all applicable 264.572, 264.573 and 264.574 requirements		264.575			
PART 265 - INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES					
SUBPART J - TANK SYSTEMS					
APPLICABILITY					
add reference to paragraph (c)		265.190			
add new paragraph subjecting tanks, sumps and other collection devices used in conjunction with Subpart W- regulated drip pads to Part 265, Subpart J requirements		265.190(c)			

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

SUBPART W - DRIP PADS

APPLICABILITY

Subpart W applies
to owners and
operators of facilities
that use new or
existing drip pads
to convey treated
wood drippage to an
associated collection
system; existing drip
pads defined

265.440(a)

owner or operator
of certain drip pads
inside or under
a structure
not subject to
265.443(e) or
265.443(f)
regulations, as
appropriate

265.440(b)

ASSESSMENT OF EXISTING DRIP PAD INTEGRITY

evaluation of existing
drip pads; by June 6,
1991, written
assessment obtained
and kept on file;
annual review, update
and recertification
required until 265.443
standards are met,
except for 265.443(b)
standards for liners
and leak detection
systems;
documentation
of drip pad age

265.441(a)

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
development of written plan for up- grading, repairing and modifying drip pad to meet 265.443(b) requirements; submittal of plan to Regional Adminis- trator no later than 2 years before completion of modi- fications; written plan docu- mentation, review and certification require- ments; conditions for completion of upgrades, repairs and modifications	265.441(b)				
for existing drip pads of known and documentable age, upgrades, repairs and modifications com- pleted within two years of June 6, 1991; or when the drip pad has reached 15 years of age, whichever comes later	265.441(b)(1)				
for existing drip pads with no documentable age, upgrades, repairs and modifications must be completed within 8 years of June June 6, 1991; if facility is over 7 years old, completion by the time facility reaches 15 years or by two years after June 6, 1991, whichever comes later	265.441(b)(2)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
conditions under which owner or operator may petition Regional Administrator for extension of deadline; petition granted if drip pad meets all 265.443 requirements, except those for liners and leak detection systems specified in 265.443(b)	265.441(b)(3)				
submittal of required drawings and certification to Regional Administrator or State Director upon completion of all repairs and modifications	265.441(c)				
if drip pad found to be leaking or unfit for use, comply with 265.443(m) provisions or close drip pad in accordance with 265.445	265.441(d)				
DESIGN AND INSTALLATION OF NEW DRIP PADS					
owners and operators of new drip pads must ensure that the pads are designed, installed and operated in accordance with all applicable 265.443, 265.444 and 265.445 requirements	265.442				
DESIGN AND OPERATING REQUIREMENTS					
drip pads must:	265.443(a)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
be constructed of non-earthen materials, excluding wood and non- structurally supported asphalt	265.443(a)(1)				
be sloped to free- drain wastes to the associated collection system	265.443(a)(2)				
have a curb or berm around the perimeter	265.443(a)(3)				
be impermeable as specified	265.443(a)(4)				
be of sufficient structural strength and thickness to meet specified condi- tions; note regarding structural integrity standards	265.443(a)(5)				
a new drip pad or an existing drip pad, after the 265.441(b) deadline, must have:	265.443(b)				
a synthetic liner that meets certain specifications	265.443(b)(1)				
specific requirements for liner construction materials	265.443(b)(1)(i)				
foundation or base requirements	265.443(b)(1)(ii)				
liner must cover all surrounding earth that could come into contact with the waste or leakage	265.443(b)(1)(iii)				
leakage detection system immediately above the liner; detection system must be:	265.443(b)(2)				
constructed of materials that are:	265.443(b)(2)(i)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
chemically resistant to relevant waste and leakage	265.443(b)(2)(i)(A)				
of sufficient strength and thickness to prevent collapse	265.443(b)(2)(i)(B)				
designed to detect the failure of the drip pad or the presence of hazardous waste release or accumulated liquid at the earliest practicable time	265.443(b)(2)(ii)				
maintenance of drip pads; note regarding remedial action	265.443(c)				
convey, drain, and collect liquid resulting from drippage or precipitation in order to prevent run-off	265.443(d)				
run-on control system requirements, unless drip pad is protected by a structure, as described in 265.440(b)	265.443(e)				
run-off management system requirements, unless drip pad is protected by a structure, as described in 265.440(b)	265.443(f)				
evaluation of drip pad for compliance with 265.443(a) - (f) requirements; design certification required	265.443(g)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
removal of drippage and accumulated precipitation from associated collection system as necessary to prevent overflow onto the drip pad	265.443(h)				
thorough cleaning of drip pad surface at least once every seven days to meet specified conditions; documentation of date, time and cleaning procedure in facility's operating log	265.443(i)				
minimize tracking of hazardous waste or constituents off the drip pad	265.443(j)				
after removal from treatment vessel, treated wood from pressure and non-pressure processes must be held on pad until drippage has ceased; documentation required	265.443(k)				
collection and holding units for run-on and run-off control systems emptied or otherwise managed as soon as possible after storms to maintain design capacity	265.443(l)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
throughout the active life of the drip pad and as specified in the permit, repair of detected condition that could lead to or has caused a release of hazardous waste within a reasonable period of time, in accordance with the following procedures:	265.443(m)				
upon detection of a condition that has led or could lead to a release of hazardous waste, the owner must:	265.443(m)(1)				
entry of discovery in the facility operating log	265.443(m)(1)(i)				
immediate removal from service of affected portion of drip pad	265.443(m)(1)(ii)				
determination of steps to repair drip pad, remove any leakage, and establish schedule for clean up and repairs	265.443(m)(1)(iii)				
notify Regional Administrator within 24 hours after discovery; provide written notice as specified within 10 working days	265.443(m)(1)(iv)				
review, determination and notification by Regional Administrator	265.443(m)(2)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
2 written notification to Regional Adminis- trator and certification of compliance with 265.443(m)(1)(iv) after repairs and clean up	265.443(m)(3)				
documentation in operating log, as specified, of past operating and waste handling practices	265.443(n)				
INSPECTIONS					
inspection of liners and cover systems for uniformity, damage and imperfections during construction or installation; inspection and certification of liners to meet 265.443 requirements; maintenance of certification as part of the facility operating record; inspection of liners and covers after installation	265.444(a)				
drip pad must be inspected weekly and after storms to detect evidence of any of the following:	265.444(b)				
deterioration, malfunctions or improper operation of run-on and run-off control systems	265.444(b)(1)				
presence of leakage in and proper functioning of leak detection system	265.444(b)(2)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
deterioration or cracking of drip pad surface; note regar- ding remedial action	265.444(b)(3)				
CLOSURE					
at closure, removal and decontamination requirements; manage- ment as hazardous waste	265.445(a)				
closure and post- closure care of drip pad as a landfill under 265.310, if some contaminated subsoils cannot be removed or decontaminated; for permitted units, permit require- ment continues throughout post- closure period	265.445(b)				
owner or operator of an existing drip pad not in compliance with the 265.443(b)(1) liner requirements must:	265.445(c)(1)				
include in the closure plan for the drip pad under 265.112, a plan for 265.445(a) com- pliance and a contin- gent plan for 265.445(b) compliance	265.445(c)(1)(i)				
prepare contingent post-closure plan under 265.118 for complying with 265.445(b) in case not all contaminated subsoils can be practicably removed at closure	265.445(c)(1)(ii)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
cost estimates calculated under 265.112 and 265.144 for closure and post-closure care of drip pad subject to 265.445(c) must include cost of complying with contingent closure plan and contingent post-closure plan; cost of expected closure under 265.445(a) need not be included	265.445(c)(2)				

PART 270 - EPA ADMINISTERED PERMIT PROGRAMS:
THE HAZARDOUS WASTE PERMIT PROGRAM

SUBPART B - PERMIT APPLICATION

3 SPECIAL PART B INFORMATION REQUIREMENTS FOR DRIP PADS

additional information to be provided by owners and operators of hazardous waste treatment, storage, or disposal facilities that collect, store, or treat hazardous waste on drip pads, except as otherwise provided by 264.1	270.22
list of hazardous wastes placed or to be placed on each drip pad	270.22(a)
detailed plans and an engineering report describing how 264.90(b)(2) will be met, if an exemption is sought to Subpart F of Part 264	270.22(b)

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
detailed plans and an engineering report describing the design, construction, opera- tion and maintenance of drip pad to meet 264.572 require- ments; submission must address 264.571 items	270.22(c)				
design characteristics of the drip pad	270.22(c)(1)				
liner system	270.22(c)(2)				
leakage detection system	270.22(c)(3)				
practices designed to maintain drip pads	270.22(c)(4)				
associated collection system	270.22(c)(5)				
control of run-on to the drip pad	270.22(c)(6)				
control of run-off from the drip pad	270.22(c)(7)				
removal intervals and demonstration of sufficiency to prevent overflow	270.22(c)(8)				
procedures for cleaning drip pad at least once every seven days; provisions for documentation of date, time and cleaning procedure	270.22(c)(9)				
operating practices and procedures to minimize tracking of hazardous waste or waste constituents off the drip pad	270.22(c)(10)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
procedures for ensuring that treated wood from pressure and non-pressure processes is held on the drip pad until drippage has ceased; recordkeeping practices	270.22(c)(11)				
provisions for ensuring that collection and holding units for run-on and run-off control systems are emptied or managed as soon as possible after storms to maintain design capacity	270.22(c)(12)				
if treatment is carried out on the drip pad, details of process equipment used, and the nature and quality of residuals	270.22(c)(13)				
description of drip pad inspections to meet 264.572 requirements; include in 270.14(b)(5) inspection plan	270.22(c)(14)				
certification that drip pad design meets 264.571(a) - (f) requirements	270.22(c)(15)				

RCRA REVISION CHECKLIST 82: Wood Preserving Listings (Cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
description of removal procedures at closure under 264.573(a); for waste not removed at closure, submittal of detailed plan and engineering report to describe compliance with 264.310(a) and (b); information should be included in closure plan and, where applicable, 270.14(b)(13) post-closure plan		270.22(c)(16)			
<p>¹ Note that paragraph 264.572(m)(3) in the <u>Federal Register</u> (55 <u>FR</u> 50486, December 6, 1990), has an incorrect reference. The reference to "paragraph (m)(3) of this section" should be to "paragraph (m)(1)(iv) of this section." This error is addressed by the July 1, 1991 technical corrections to the rule (56 <u>FR</u> 30192).</p> <p>² Note that paragraph 265.443(m)(3) in the <u>Federal Register</u> (55 <u>FR</u> 50488, December 6, 1990), has an incorrect reference. The reference to "paragraph (m)(3) of this section" should be to "paragraph (m)(1)(iv) of this section." This error is addressed by the July 1, 1991 technical corrections to the rule (56 <u>FR</u> 30192).</p> <p>³ Note that the Boilers and Industrial Furnaces Rule (56 <u>FR</u> 7134; February 21, 1991; Revision Checklist 85) inadvertently removed these requirements from the code. The July 1, 1991 (56 <u>FR</u> 30192; Revision Checklist 92) Wood Preserving technical corrections notice rectified this problem by redesignating this section as 270.26.</p>					