

DRIP PADS PERMIT APPLICATION REVIEW CHECKLIST

PAGE 1 OF 5

FACILITY _____
 EPA ID NUMBER _____ PATS NUMBER _____
 TYPE OF APPLICATION _____

SUBMITTAL DATE _____ REVIEWER _____
 1. _____
 2. _____
 3. _____

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
	U. Requirements for Drip Pad.			
	1. List of Hazardous and Non-Hazardous Wastes.	264.573		
	<ul style="list-style-type: none"> • List of hazardous wastes, including waste codes and waste constituents, to be placed or treated on each drip pad. • List of non-hazardous wastes, including waste constituents, to be placed or treated on each drip pad. 			
	2. A detailed plan and an engineering report demonstrating compliance with 40 CFR 264.90(b)(2), if claiming an exemption from the requirements of 40 CFR 264 Subpart F.			
	3. For All Drip Pads: Detailed plans and an engineering report demonstrating compliance with the requirements of 264.573, except 264.573(b) to include:			
	<ul style="list-style-type: none"> • Design characteristics to include: <ul style="list-style-type: none"> - construction material - slope - curb details - sealant information - permeability data. • A written assessment of the drip pad and structural integrity data, reviewed and certified by an independent registered professional engineer. • Practices designed to maintain drip pads so that they remain free of cracks, gaps, corrosion or other deterioration. • Design and operational procedures of the associated collection system. • Control of run-on to the drip pad. 			

DRIP PADS PERMIT APPLICATION REVIEW CHECKLIST

PAGE 2 OF 5

FACILITY _____
 EPA ID NUMBER _____ PATS NUMBER _____

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- Control of the run-off from the drip pad.
- The interval at which the applicant will remove drippage and other materials from the associated collection system and a statement demonstrating that the interval is sufficient to prevent overflow onto the drip pad.
- Procedures for cleaning the drip pad at least once every seven days to ensure the removal of any accumulated residues of waste or other materials. (Procedures should include but not be limited to rinsing, washing with detergents or other appropriate solvents, or steam cleaning.)
- Provision for documenting the date, time, and cleaning procedure used each time the pad is cleaned.
- Operating practices and procedures that personnel will follow to ensure that they minimize the tracking of hazardous waste or waste constituents off the drip pad due to their or the equipment activities.
- Procedures (including recordkeeping practices) for ensuring that, after removal from the treatment vessel, personnel hold treated wood from pressure and non-pressure processes on the drip pad until drippage has ceased.
- Provisions for ensuring that personnel empty or otherwise manage collection and holding units associated with the run-on and run-off control systems as soon as possible after storms to maintain design capacity of the system.
- Details of the process equipment used and the nature and quality of the residuals, if the hazardous waste is treated on the pad.
- A certification signed by an independent professional engineer certifying that the drip pad design meets the requirements of 264.573(a) through (f).
- A plan outlining repairs and certification required pursuant to 264.573(m) in case of a release of hazardous waste.
- An operating log to document past operating and waste handling procedures, identification of preservative formulations, a description of drippage management practices, and a description of treated wood storage and handling practices.

DRIP PADS PERMIT APPLICATION REVIEW CHECKLIST

PAGE 3 OF 5

FACILITY _____

EPA ID NUMBER _____

PATS NUMBER _____

TYPE OF APPLICATION _____

PAGE / P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
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4. For Each New Drip Pad:

Detailed plans and an engineering report demonstrating compliance with the requirements of 264.573(b) to include:

- The leakage detection system, including the leak detection system and how it is designed to detect the failure of the drip pad or the presence of any releases of hazardous waste or accumulated liquid at the earliest practicable time.
- Detailed design specifications and installation information of the liner system.
- A plan for the maintenance and operation of a leak detection system.
- A detailed design of leakage collection system and a plan for maintenance and operation of it.
- An inspection plan to inspect the liner and cover system during installation for uniformity, damage, and imperfections.
- A certification from a professional engineer, upon completion of installation, certifying that the liner and cover meet the requirements of 264.573 and do not contain tears, punctures or blisters, and all seams and joints are tight.

5. For Each Existing Drip Pad:

5(a). Date of construction and documentation to show that it qualifies for an existing drip pad, as defined in 264.570(a).

5(b). Submit a detailed written plan including a schedule for upgrading, repairing, or modifying the drip pad to meet the requirements of 264.573(b) and provide details of:

- The leakage detection system, including the leak detection system and how it is designed to detect the failure of the drip pad or the presence of any releases of hazardous waste or accumulated liquid at the earliest practicable time.
- Design specifications and installation information of the liner system.
- A plan for the maintenance and operation of a leak detection system.
- Design of leakage collection system and a plan for maintenance and operation of it.
- An inspection plan to inspect the liner and cover system during installation for uniformity, damage, and imperfections.

DRIP PADS PERMIT APPLICATION REVIEW CHECKLIST

PAGE 4 OF 5

FACILITY _____

EPA ID NUMBER _____

PATS NUMBER _____

TYPE OF APPLICATION _____

PAGE / P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
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	5(c). A schedule to submit as-built drawings and certification by an independent professional engineer certifying completion of all upgrades, repairs, and modifications to the drip pads to meet the requirements of 264.571(c). The certification shall include a statement that liners and covers meet the requirements of 264.573 and do not contain tears, punctures or blisters, and all seams and joints are tight (264.574(a)).			
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	5(d). A written plan, including schedule, to comply with requirements of 264.573(m) to repair the unit or close it in accordance with 264.575, if the drip pad is found to be leaking or unfit for use.			
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6. Inspection Schedule.

6(a). General Inspection Requirement.

A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment:

- monitoring equipment
- emergency and safety equipment
- safety devices
- operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.

6(b). Types of Problems.

The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, reading out of specified range, missing items of materials, inoperative equipment, etc).

6(c). Frequency of Inspection.

A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills,

DRIP PADS PERMIT APPLICATION REVIEW CHECKLIST

PAGE 5 OF 5

FACILITY _____

EPA ID NUMBER _____

PATS NUMBER _____

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PAGE / P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
-------------------	-------------	-----------	-------------------------	----------

such as loading and unloading areas, must be inspected daily when in use. All emergency feed cut-off valves must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily. Feed cut-off system, by-pass system, drainage system, and pressure relief system must be inspected at least once each operating day.

6(d). Remedial Action.

Procedures for taking remedial actions when inspections reveal problems. (These may alternate by described in the contingency plan.)

6(e). Specific Process Inspection Requirements.

Inspection of drip pads weekly and after storms to detect evidence of deterioration, malfunction or improper operation of run-on and run-off control systems; presence of leakage in and functioning of leak detection system; deterioration or cracking of the drip pad surface. A plan to meet the requirements of 264.573(m), if deterioration or leakage is detected during inspection.

6(f). Inspection Log.

A description of the inspection log or summary including the following:

- Dates and times of inspections.
- Name(s) of inspector(s).
- Observations made.
- Date and nature of repairs or remedial action.

7. A closure or post-closure plan and cost estimate as required by Part II.K.