

**Oklahoma Department of Environmental Quality**  
**Supplemental Checklist for Drip Pads**

FACILITY \_\_\_\_\_

EPA ID# \_\_\_\_\_

DATE \_\_\_\_\_

*(Note: Drip pads at LQG facilities are subject to all requirements. Drip pads at TSD facilities are subject to Sections B through G)*

Regulatory Requirements	Area of Non-compliance	Remarks
<b>A. Requirements for LQGs Only</b>		
A.1. Does the o/o have a description of procedures to ensure all wastes are removed from the drip pad and associated collection systems at least every 90 days? [40 CFR 262.34(a)(1)(iii)(A)]		
A.2. Does the o/o maintain documentation of each waste removal, to include quantity removed and the date and time of removal? [40 CFR 262.34(a)(1)(iii)(B)]		
<b>B. Construction Requirements (Note: Applies to all drip pads)</b>		
B.1. Are the drip pads constructed of non-earthen material (excluding wood and non-structurally supported asphalt)? [40 CFR 264.573(a)(1)/265.443(a)(1)]		
B.2. Are the drip pads sloped to free-drain liquids to the associated collection system? [40 CFR 264.573(a)(2)/265.443(a)(2)]		
B.3. Are the drip pads equipped with a curb or berm around the perimeter? [40 CFR 264.573(a)(3)/265.443(a)(3)]		
B.4. Are the drip pads of sufficient structural strength to prevent failure due to physical contact, weather, daily operations, etc? [40 CFR 264.573(a)(5)/265.443(a)(5)]		
<b>C. Construction Requirements (additional standards)</b> <i>(Note: Drip pad construction must also comply with all requirements of Item C.1. OR Item C.2.)</i>		
C.1. Is the drip pad constructed and maintained in accordance with EACH of the following: <i>(Identify which standards are met)</i> ___ Is the drip pad constructed with a surface material that has a hydraulic conductivity of at least $1 \times 10^{-7}$ cm/sec? [40 CFR 264.573(a)(4)(i)/265.443(a)(4)(i)] ___ Does the o/o ensure the surface material is maintained free of cracks and gaps that could adversely affect its hydraulic conductivity? [40 CFR 264.573(a)(4)(i)/265.443(a)(4)(i)] ___ Does the o/o ensure the surface material is compatible with the preservatives that contact it? [40 CFR 264.573(a)(4)(i)/265.443(a)(4)(i)] ___ Does the o/o maintain a written assessment of the drip pad describing how it meets the design and operating standards? [40 CFR 264.573(a)(4)(ii)/265.443(a)(4)(ii)] ___ Is the written assessment reviewed and certified by a qualified professional engineer? [40 CFR 264.573(a)(4)(ii)/265.443(a)(4)(ii)] ___ Does the o/o ensure the assessment is reviewed, updated, and recertified annually? [40 CFR 264.573(a)(4)(ii)/265.443(a)(4)(ii)]		

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<p>C.2. Is the drip pad constructed and maintained in accordance with EACH of the following: <i>(Identify which standards are met)</i></p> <p>___ Is the drip pad constructed with a synthetic liner below the pad? [40 CFR 264.573(b)(1)/265.443(b)(1)]</p> <p>___ Is the liner designed, constructed, and installed to prevent leakage from the drip pad into soils, groundwater, or surface water? [40 CFR 264.573(b)(1)/265.443(b)(1)]</p> <p>___ Is the liner constructed of materials that will prevent waste from being absorbed into the liner? [40 CFR 264.573(b)(1)/265.443(b)(1)]</p> <p>___ Is the liner constructed of materials with appropriate chemical properties and strength to prevent failure due to pressure gradients, physical contact, climatic conditions, etc? [40 CFR 264.573(b)(1)(i)/265.443(b)(1)(i)]</p> <p>___ Is the liner placed on a foundation or base capable of providing support to the liner and resistance to pressure gradients? [40 CFR 264.573(b)(1)(ii)/265.443(b)(1)(ii)]</p> <p>___ Is the liner installed to cover all surrounding earth that could come into contact with waste? [40 CFR 264.573(b)(1)(iii)/265.443(b)(1)(iii)]</p> <p>___ Is the liner equipped with a leak detection system immediately above the liner? [40 CFR 264.573(b)(2)/265.443(b)(2)]</p> <p>___ Is the leak detection system constructed of materials that are chemically resistant to the waste managed on the drip pad? [40 CFR 264.573(b)(2)(i)(A)/265.443(b)(2)(i)(A)]</p> <p>___ Is the leak detection system sufficiently strong to prevent collapse under pressure from materials or equipment used at the pad? [40 CFR 264.573(b)(2)(i)(B)/265.443(b)(2)(i)(B)]</p> <p>___ Is the leak detection system designed and operated to function without clogging? [40 CFR 264.573(b)(2)(ii)/265.443(b)(2)(ii)]</p> <p>___ Is the leak detection system designed to detect failure of the drip pad or the presence of a release? [40 CFR 264.573(b)(2)(iii)/265.443(b)(2)(iii)]</p> <p>___ Is the leak collection system designed and constructed so that leakage can be removed from below the drip pad? [40 CFR 264.573(b)(3)/265.443(b)(3)]</p> <p>___ Does the o/o document the date, time, and quantity of leakage detected and removed from the leak collection system? [40 CFR 264.573(b)(3)/265.443(b)(3)]</p>		
<p><b>D. Operational Requirements</b></p>		
<p>D.1. Does the o/o maintain the drip pads so they are free of cracks, gaps, corrosion, or other deterioration that could cause HW to be released? [40 CFR 264.573(c)/265.443(c)]</p>		
<p>D.2. Does the o/o maintain and operate the drip pads in order to prevent run-off from the drip pads? [40 CFR 264.573(d)/265.443(d)]</p>		
<p>D.3. Is the drip pad constructed with EITHER: (1) a structure or cover that prevents run-on; OR (2) excess capacity to contain the run-on from a 24-hour/25-year storm event? [40 CFR 264.573(e)/265.443(e)]</p>		
<p>D.4. Is the drip pad constructed with EITHER: (1) a run-off control system capable of collecting and controlling the run-off from a 24-hour, 25-year storm event; OR (2) a structure or cover that prevents run-off? [40 CFR 264.573(f)/265.443(f)]</p>		
<p>D.5. Has the o/o obtained a certification from a qualified professional engineer that the drip pad meets all construction and operational requirements identified in items B.1. through D.4.? [40 CFR 264.573(g)/265.443(g)]</p>		
<p>D.6. Does the o/o ensure drippage and liquids are removed from the collection system as necessary to prevent overflow onto the drip pad? [40 CFR 264.573(h)/265.443(h)]</p>		
<p>D.7. Does the o/o ensure the drip pad is cleaned sufficiently to allow weekly inspections of the entire drip pad surface? [40 CFR 264.573(i)/265.443(i)]</p>		
<p>D.8. Does the o/o document the date and time of each drip pad cleaning and the procedure used for cleaning? [40 CFR 264.573(i)/265.443(i)]</p>		

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D.9. Does the o/o ensure drip pads are operated and maintained to minimize tracking of HW or HW constituents off the drip pad by personnel or equipment? [40 CFR 264.573(j)/265.443(j)]		
D.10. Does the o/o ensure that treated wood removed from the treatment vessel is held on the drip pad until drippage has ceased? [40 CFR 264.573(k)/265.443(k)]		
D.11. Does the o/o maintain records to demonstrate that treated wood is held on the drip pad until drippage has ceased? [40 CFR 264.573(k)/265.443(k)]		
D.12. Does the o/o ensure the run-on/run-off collection systems (if used) are emptied as soon as possible after rainfall events to maintain the design capacity of the system? [40 CFR 264.573(l)/265.443(l)]		
D.13. Does the o/o maintain documentation of past operating and waste handling practices to include EACH of the following: (1) identification of preservative formulations used in the past; (2) a description of drippage management practices; AND (3) a description of treated wood storage and handling practices. [40 CFR 264.573(o)/265.443(n)]		
<b>E. Detection of releases</b> (Note: The following procedures are required if there is a condition that caused, or may cause, a release of HW from the drip pad. If none, skip to Section F.)		
E.1. Identify the date(s), nature, and quantity of the release(s)		
E.2. Did the o/o enter a record of the discovery in the facility operating record? [40 CFR 264.573(m)(1)(i)/265.443(m)(1)(i)]		
E.3. Did the o/o immediately remove from service, the portion of the drip pad affected by the condition? [40 CFR 264.573(m)(1)(ii)/265.443(m)(1)(ii)]		
E.4. Did the o/o determine necessary steps to repair the pad, clean up leakage, and establish a repair schedule? [40 CFR 264.573(m)(1)(iii)/265.443(m)(1)(iii)]		
E.5. Did the o/o provide notification to the DEQ within 24 hours of discovery? [40 CFR 264.573(m)(1)(iv)/265.443(m)(1)(iv)]		
E.6. Did the o/o provide written notification to the DEQ within 10 days of the steps that will be taken to repair the pad, clean up any leaks, and a timeline for completing the work? [40 CFR 264.573(m)(1)(iv)/265.443(m)(1)(iv)]		
E.7. Did the o/o provide the DEQ with a certification when repairs were completed? [40 CFR 264.573(m)(3)/265.443(m)(3)]		
E.8. Did the o/o ensure the certification was signed by an independent, qualified registered PE? [40 CFR 264.573(m)(3)/265.443(m)(3)]		
<b>F. Inspection of liners &amp; cover systems</b>		
F.1. Did the o/o ensure the liner or cover system was inspected for uniformity, damage, imperfections, thin spots, or foreign materials during installation or construction? [40 CFR 264.574(a)/265.444(a)]		
F.2. Did the o/o ensure liners and covers were inspected for tight seams and joints, and the absence of tears, punctures, or blisters after installation? [40 CFR 264.574(a)/265.444(a)]		
F.3. Did the o/o ensure liners were inspected and certified by a qualified professional engineer immediately after construction? [40 CFR 264.574(a)/265.444(a)]		
F.4. Does the o/o maintain a copy of the certification in the operating record? [40 CFR 264.574(a)/265.444(a)]		
<b>G. Inspections (routine)</b>		
G.1. Does the o/o ensure the drip pad is inspected weekly and after storms to determine problems with the run-on/run-off control systems, to look for leaks and proper function of the leak detection system, and to look for deterioration of the drip pad surface? [40 CFR 264.574(b)/265.444(b)]		