

2. Drip Pad Leakage Collection System Requirements

Title 40 CFR Parts 264 and 265, Subpart W, contain requirements for owners and operators of wood preserving plants which accumulate hazardous waste on drip pads. A drip pad is defined as an engineered structure consisting of a curbed, free-draining base, constructed of non-earthen materials, and designed to convey preservative drippage or "kick-back" to an associated collection system (Section 260.10). To prevent the drip pad from leaking kick-back to surrounding soils, owners and operators of new or existing drip pads have two design and installation options: applying surface coatings to the drip pad; or providing an associated liner and leak detection system (Sections 264.572 and 265.442). If an owner and operator of a new or existing drip pad chooses to install a liner and leak detection system, must the pad design also include a leakage collection system?

The regulations applicable to drip pads appear at 40 CFR Parts 264 and 265, Subpart W, and address both existing and new drip pads. Existing drip pads are those constructed before December 6, 1990, and those for which a design and a binding financial or other agreement for construction were entered into prior to December 6, 1990. All other drip pads are considered new.

If the owner and operator chooses to install a liner and leak detection system, rather than applying an impermeable surface coating, a leakage collection system is required for most new drip pads. Only the following drip pads do not require a leakage collection system:

- Existing drip pads
- New drip pads constructed before December 24, 1992
- New drip pads for which the owner and operator had a design, and had entered into a binding financial or other agreement for construction prior to December 24, 1992 (Sections 264.570(a) and 265.440(a)).