

QUESTION: A Part B applicant has an “existing” storage surface impoundment with a liner. According to 270.2(b) (1) and 264.221(a), “existing” surface impoundments are not required to install liners but are required to conform with all other design and operating requirements in 264.221, as well as the ground water protection requirements. Must the applicant describe the liner in the Part B application?

ANSWER: The applicant is not required to describe the liner in the application. EPA, however, recommends that the applicant include such information in their Part B.

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