



WOOD PRESERVING FACILITIES - DRIP PADS

Revision: 01/08/2024
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 1: Existing Drip Pads

A. Indicate in the comments section the approximate date the drip pad was constructed. If the drip pad was constructed after June 1, 1995, go to Section 2. (NR 665.0440(1)). Note: Drip pads constructed after June 1, 1995 are new drip pads.	665.443(9)
B. A PE certified written assessment of the drip pads is kept at the facility and documents the extent to which the drip pads meet all of the design and operating standards of NR 665.0443, excluding liner and leak detection requirements of NR 665.0443(2). (NR 665.0441(1)). Note: See Section 2 of this inspection form for NR 665.0443 requirements.	665.0443
C. The written assessment is reviewed, updated and re-certified annually until the drip pad complies with NR 665.0443 standards. (NR 665.0441(1))	665.0441(1)
D. If the owner or operator is upgrading the drip pad to meet the liner and leak detection requirements of NR 665.0443(2), a PE certified written plan describing the changes has been submitted to the DNR no later than 2 years before the changes were completed. (NR 665.0441(2))	665.0443(2)
E. As-built drawings certified by a PE were submitted to the DNR upon completion of all upgrades. (NR 665.0441(3))	665.0441(3)

Section 2: Design and Operating Requirements

A. Drip pads are constructed of non-earthen materials, except wood and non-structurally supported asphalt. (NR 665.0443(1)(a))	665.0443(1)(a)
B. Drip pads are properly sloped to free-drain all wastes and water towards the collection system. (NR 665.0443(1)(b))	665.0443(1)(b)
C. A curb or berm is constructed around the entire perimeter of the drip pad. (NR 665.0443(1)(c))	665.0443(1)(c)
D. Drip pads are of sufficient structural strength and thickness to prevent failure. (NR 665.0443(1)(e))	665.0443(1)(e)
E. Drip pads are free of cracks, gaps or other deterioration that could cause releases. (NR 665.0443(3))	665.0443(3)
F. Drip pads and collection system convey, drain and collect drippage and precipitation to prevent run-off. (NR 665.0443(4))	665.0443(4)
G. The drip pad is inside or under a structure that provides protection from precipitation so that run-off or run-on is not generated. (NR 665.0440(2)) If YES, go to Question J.	665.0440(2)
H. A run-on control system is capable of preventing flow onto the drip pad during peak discharge from a 24-hour, 25-year storm unless the system has sufficient excess capacity to contain the run-on. (NR 665.0443(5))	665.0433(5)
I. A run-off management system is designed to collect and control the water volume from a 24 hour, 25-year storm. (NR 665.0443(6))	665.0443(6)
J. Drippage and precipitation is removed from the collection system to prevent overflow onto the drip pad. (NR 665.0443(8))	665.0443(8)



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Section 2: Design and Operating Requirements

K. The drip pad surface is cleaned thoroughly in a manner and frequency to remove accumulated residues to allow weekly inspections of the entire drip pad surface. (NR 665.0443(9))		665.0443(9)
L. The date and time of each cleaning and the procedure used is recorded in the operating log. (NR 665.0443(9))		665.0443(9)
M. Drip pads are operated and maintained to minimize tracking of hazardous waste off the drip pad. (NR 665.0443(10))		665.0443(10)
N. Records at the facility document treated wood from pressure and non-pressure processes are held on the drip pad until drippage has ceased. (NR 665.0443(11))		665.0443(11)
O. Collection and holding units associated with run-on and run-off control systems are emptied or otherwise managed as soon as possible after storms to maintain the design capacity of the system. (NR 665.0443(12))		665.0443(12)
P. If the owner or operator detects a condition that may cause a release of hazardous waste, all of the following procedures are followed. (NR 665.0443(13)) 1. Repairs are made in a reasonable amount of time after discovery. 2. A record of discovery is entered in the operating log. 3. The portion of the drip pad affected by the condition is immediately removed from service. 4. Steps to be taken to repair the drip pad and remove any leakage from below the drip pad are determined. 5. A schedule for accomplishing clean up and repairs is established. 6. DNR is notified of the condition immediately after discovery. 7. Within 10 working days, DNR is given written notice, including a description of the steps to be taken to repair the drip pad and clean up leakage and the schedule for accomplishing this work. 8. Upon completing all repairs and clean up, the owner or operator provides written notification and PE certification to DNR that repairs and cleanup were completed according to their written plan.		665.0443(13)
Q. Documentation of past operating and waste handling practices are maintained in the operating record, including all of the following. (NR 665.0443(14)) 1. Identification of preservative formulations used in the past. 2. Description of drippage management practices. 3. Description of treated wood storage and handling practices.		665.0443(14)
R. The drip pads are designed and operated with one of the following. (NR 665.0442) 1. A sealed surface. 2. A liner and leak detection system.		665.0442
S. If the drip pad has a sealed surface, all of the following are met. (NR 665.0443(1)(d)1 & 2.) 1. The entire surface of the drip pad has been sealed, coated or covered with a surface material having a hydraulic conductivity $\leq 1 \times 10^{-7}$ cm/sec. 2. The surface where drippage occurs or may run across will contain the drippage, precipitation or other wastes while being routed to a collection system. 3. The surface material is free of cracks and gaps that could adversely affect its hydraulic conductivity. 4. The surface material is chemically compatible with the preservatives in contact with the drip pad. 5. The owner or operator has a PE certified assessment that states the drip pad meets all of the drip pad design and operating requirements in NR 665.0443. 6. The assessment is reviewed, updated and re-certified annually.		665.0443(1)(d)1&2



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Section 2: Design and Operating Requirements

<p>T. If a synthetic liner is installed below the drip pad, the liner meets all of the following. (NR 665.0443(2)(a))</p> <ol style="list-style-type: none"> 1. Designed, constructed and installed to prevent leakage from the drip pad into subsurface soil or groundwater during the active life of the drip pad. 2. Constructed of materials with appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients, contact with the waste, climatic conditions and stress of daily operation. 3. Placed on a foundation or base that provides support and prevents failure due to settlement, compression or uplift. 4. Covers all surrounding earth that could come in contact with the waste or leakage. 	<table border="1"> <tr><td>665.0443(2)(a)</td></tr> <tr><td> </td></tr> </table>	665.0443(2)(a)	
665.0443(2)(a)			
<p>U. If a synthetic liner is installed, a leak detection system that meets all of the following was installed immediately above the liner. (NR 665.0443(2)(b) & (c))</p> <ol style="list-style-type: none"> 1. Constructed of materials that are chemically resistant to the waste managed on the drip pad. 2. Constructed of materials with sufficient strength and thickness to prevent collapse under pressures exerted by overlaying materials and equipment used on the drip pad. 3. Functions without clogging. 4. Detects failure of the drip pad or the presence of a release at the earliest practical time. 5. Collects leakage that can be removed from below the drip pad. 6. The date, time and quantity of leakage removed from the system are documented in the operating log. 	<table border="1"> <tr><td>665.0443(2)(b)&(c)</td></tr> <tr><td> </td></tr> </table>	665.0443(2)(b)&(c)	
665.0443(2)(b)&(c)			
<p>V. If a synthetic liner is installed, the owner or operator has a PE certified statement that the drip pad meets all of the design and operating requirements in NR 665.0443. (NR 665.0443(7))</p>	<table border="1"> <tr><td>665.0443(7)</td></tr> <tr><td> </td></tr> </table>	665.0443(7)	
665.0443(7)			
<p>W. The associated collection system meets the tank standards in NR 665 subch. J. (NR 665.0190(3))</p>	<table border="1"> <tr><td>665.0190(3)</td></tr> <tr><td> </td></tr> </table>	665.0190(3)	
665.0190(3)			
<p>X. Written procedures are kept at the facility to ensure all waste is removed from the drip pad and associated collection system every 90 days.</p>	<table border="1"> <tr><td>662.016(2)(d)2.</td></tr> <tr><td> </td></tr> </table>	662.016(2)(d)2.	
662.016(2)(d)2.			
<p>Y. For each waste removal event, records kept at the facility document the quantity of waste removed from the drip pad and the sump or collection system, and the date and time of removal.</p>	<table border="1"> <tr><td>662.016(2)(d)2.</td></tr> <tr><td> </td></tr> </table>	662.016(2)(d)2.	
662.016(2)(d)2.			

Section 3: Inspections

<p>A. The drip pad is inspected weekly and after storms to detect evidence of the following. (NR 665.0444(2))</p> <ol style="list-style-type: none"> 1. Deterioration, malfunctions or improper operation of run-on and run-off control systems. 2. The presence of leakage in and proper functioning of the leakage detection system. 3. Deterioration or cracking of the drip pad surface. 	<table border="1"> <tr><td>665.0444(2)</td></tr> <tr><td> </td></tr> </table>	665.0444(2)	
665.0444(2)			

Section 4: Closure Requirements

<p>A. Previously used drip pads are present at the facility. If NO, go to Section 5.</p>	<table border="1"> <tr><td>NA1</td></tr> <tr><td> </td></tr> </table>	NA1	
NA1			
<p>B. If the previously used drip pads are closed, all containment system components (i.e., pads and liners), contaminated subsoils, structures, and equipment have been decontaminated or all waste residues and leakage were removed. (NR 665.0445(1))</p>	<table border="1"> <tr><td>665.0445(1)</td></tr> <tr><td> </td></tr> </table>	665.0445(1)	
665.0445(1)			



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Section 4: Closure Requirements

<p>C. If the previously used drip pads are in the process of being closed, the facility is voluntarily complying with applicable NR 700 requirements. Note: If the facility is not voluntarily complying with NR 700 standards, the closure and long term care requirements of NR 665.0445(2) & (3) apply.</p>		665.0445(2)&(3)
<p>D. All waste residues and decontamination materials from closure have been managed as hazardous waste. (NR 665.0445(1))</p>		665.0445(1)

Section 5: Contingency Plan

<p>A. The contingency plan includes all of the following to describe how the owner/operator will respond immediately to infrequent and incidental drippage in storage yards. (NR 665.0440(3))</p> <ol style="list-style-type: none"> 1. Clean up the drippage. 2. Document the cleanup of the drippage. 3. Retain documents regarding cleanup for 3 years. 4. Manage contaminated media in a manner consistent with state rules. <p>Note: For information on the proper waste classification of contaminated media, see EPA's Wood Preserving RCRA Compliance Guide at http://www.epa.gov/compliance/resources/publications/assistance/sectors/woodrcraguide.pdf</p>		665.0440(3)
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