

Deregulating Former CCA Treating Plant Drip Pads

The US EPA has issued the following options for former CCA Treating Plants:

Complete Closure. This option allows facilities to be completely deregulated from Subpart W; meaning no handling of hazardous waste, no annual certification by Professional Engineers and no limited access of forklifts. This is the most labor intensive option and requires extensive cleaning of the drip pad and soil, water and surface sampling.

Continued Operation. This option requires facilities to do nothing; however, the facility must continue to meet all the requirements applicable to Subpart W drip pads.

Phased (Partial) Closure. This option allows facilities to be partially deregulated from Subpart W. Certain requirements such as the annual certification by a Professional Engineer will still be applicable. This option requires cleaning and limited surface sampling. Also, a complete closure will still be required in the future.



Not all State Agencies accept each of the EPA options or have the same requirements to pursue closure.

Ultimately, the State Agencies determine what criteria a facility must meet to obtain complete or partial closure of a Drip Pad.

It is important to establish open communication with the State Agencies to negotiate favorable terms and obtainable goals during the closure process.

Different states favor different cleaning and sampling methods, and it is important to understand the advantages and disadvantages of these methods.

A Consultant experienced in dealing with various states and utilizing different sampling techniques can help you avoid costly pitfalls many facilities face while navigating the closure maze.





Conversion Technology Inc.

ENVIRONMENTAL CONSULTING ENGINEERS

Conversion Technology Inc. (CTI) will work with you in preparation of a Drip Pad closure plan.

Conversion Technology Inc. (CTI) has successfully completed the cost effective closure of Drip Pads at multiple CCA Treating Plants. CTI's experience can work for you to address the unique challenges that can present themselves with each CCA Drip Pad Closure. We strive to complete each closure in a cost effective manner to the full satisfaction of our clients and regulatory authority. We are experienced in multiple states with varying state requirements and negotiating favorable clean-up criteria for our clients.

CTI's experienced engineers are available to work for you to successfully close the Drip Pad at your facility, regardless of location. Please feel free to call Brian Edwards at 770-263-6330, or email to bedwards@conversiontechnology.com to discuss your needs. We welcome any opportunity to work with you.

