

4.5.2 Effectiveness and Reliability of Containing, Confining, and Collecting Systems and Structures in Preventing Migration

This part of the permit application should discuss the engineering and operational controls in place to minimize the potential for release from Subpart X units. Permit applications for OB units should provide a description of containment devices; such devices may include burn boxes or pans that contain the wastes and any refractory material (for example, soil) inside the box or pad to protect the containment from heat generated during OB. Permit writers should require containment for OB units, especially for those that treat liquid wastes and wastes that contain free liquids. Permit applicants also may propose the use of cages around the unit to minimize the spread of debris generated during OB.

It is unlikely that OD units will be provided with engineering controls; however, discussion of operations in the application should provide for a survey of the area after the detonation and for the removal of any obvious waste explosive as a method of minimizing any potential contamination of soil or runoff to surface water or wetlands. OD units may have extensive surface-water runoff controls. If such controls are in place, the application should include a discussion of how they minimize runoff and how they will be maintained.

Some problems a permit writer might encounter include:

- An insufficiently detailed wastewater management plan for managing runoff wastewater
- Lack of discussion of operational controls that minimize the amount of waste remaining on the ground
- Lack of adequate engineering drawings that indicate placement and design or materials of construction of controls