

### 3.2.4 Subpart L - Waste Piles

Subpart L establishes requirements for waste piles. OB/OD units may resemble waste piles, especially if residual waste is left to accumulate on the ground surface or during temporary storage of the waste before it is treated by OB/OD. Standards for waste piles that may be applicable to the circumstances at an OB/OD unit described above include requirements for installing leachate collection systems and liners. The leachate collection and removal system must be chemically resistant to the waste managed in the pile and the leachate expected to be generated (40 CFR §264.251(a)(2)(i)(A)). The liner must be constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, and the stresses of installation and daily operation (40 CFR §264.251(a)(1)(i)). Clay liners should be considered in particular for OB units that do not have containment devices; synthetic liners may not withstand the extreme temperatures generated in the OB unit. Further, detonation activities

conducted in OD units will destroy any kind of synthetic liner conventionally installed beneath the unit. Therefore, synthetic liners are not generally recommended for OD units.

Other requirements for waste piles that may be applicable and appropriate for OB/OD units include requirements for controlling run-on and run-off, and conducting ground-water monitoring if the environmental assessment indicates that there is potential for contamination of the ground water. The run-on control system should be capable of preventing flow onto the active portion of the waste pile during peak discharge from a 25-year storm (40 CFR §264.251(g)). The runoff management system should be capable of collecting and controlling the water volume resulting from a 24-hour, 25-year storm (40 CFR §264.251(h)). The pile should be managed to control any particulate matter subject to wind dispersal (40 CFR §264.251(j)). The waste pile should be inspected weekly and after storms (40 CFR §264.254(b)).