

Brief Summary
New EPA regulations for Wood Preserving Operations
August 2008
40 CFR Part 63 Subpart QQQQQQ

EPA has new requirements to reduce air pollution of dioxins, methylene chloride and metals such as chrome and arsenic compounds from wood preserving (also called wood treatment) operations. These pollutants pose health risks to anyone who breathes the air that contains these materials. Many wood preservatives contain these materials and EPA's new regulations require the wood preservative industry to do several things to prevent these materials from getting into the air during treatment processes and treated wood product storage.

This is a short summary of things a wood treatment facility must do now to comply with the new rule requirements. For more details and assistance, please talk to your wood preserving association, or your EPA regional office contact. These web links to government contacts are a good place to start:

- http://www.epa.gov/ttn/atw/area/regional_contacts.pdf
<http://www.smallbiz-enviroweb.org/contacts.aspx>

1) Equipment Requirements

- If you use a pressure treatment process with any wood preservative containing chromium, arsenic, dioxins, or methylene chloride, the preservative must be applied to the wood product inside a retort or similarly enclosed vessel.
- If you use a thermal treatment process with any wood preservative containing chromium, arsenic, dioxins, or methylene chloride, the preservative must be applied using process treatment tanks equipped with an air scavenging system to control emissions.
- Prepare a management practice plan and operate your treatment process according to that plan to minimize air emissions.

The management practice plan must include the following activities:

1. Minimize preservative usage;
2. Maintain records on the type of treatment process and types and amounts of wood preservatives used at the facility;
3. For the pressure treatment process, maintain charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessel);
4. For the thermal treatment process, maintain records that the air scavenging system is in place and operated properly during the treatment process;
5. Store treated wood product on drip pads or in a primary containment area to convey preservative drippage to a collection system until drippage has ceased;

6. For the pressure treatment process, fully drain the retort to the extent practicable, prior to opening the retort door;
7. Promptly collect any spills; and
8. Perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations.

If you use a wood preservative containing chromium, arsenic, dioxins or methylene chloride, you must do the following:

Reporting:

- All wood treatment facilities must send a notification to EPA with some general information by October 2007 (existing sources) or upon startup (new sources):
 - Location of facility
 - Types of treatment processes and wood preservatives used
- Facilities must report any deviation from the requirements of the rule within 30 days of the deviation.
- No ongoing compliance reports are required beyond Title V Requirements.

Please contact your EPA regional office for the specific address to send your notifications to: http://www.epa.gov/ttn/atw/area/regional_contacts.pdf

Recordkeeping:

- Records to include copies of notifications submitted to EPA and records of any corrective or preventive measures.
- Records have to be maintained and be readily available for review.

Monitoring:

- There are no monitoring requirements for this rule.

The rule can be found on page 38915, at this link:

<http://www.epa.gov/ttn/atw/area/fr16jy07.pdf>