



Environmental Fact Sheet

WOOD SURFACE PROTECTION WASTES PROPOSED AS HAZARDOUS

The Environmental Protection Agency (EPA) has proposed to list as "hazardous" certain wastes from wood surface protection operations that use protectant containing a concentration of pentachlorophenolate greater than 0.1 parts per million (ppm). EPA is requesting public comment on the proposal.

Background

Freshly cut lumber is often treated with a surface protectant in order to temporarily prevent sapstain. Some protectant formulations used in the lumber industry contain chlorophenolic chemicals. These particular formulations and the wastes generated by their use in the surface protection of lumber contain dioxin and furan impurities. In the past, chlorophenolic formulations were used quite extensively to protect lumber. In January 1992, production of chlorophenolics ceased and current use is diminishing.

The 1984 Hazardous and Solid Waste Amendments require EPA to determine whether to designate, or "list," these and other wastes as hazardous, thereby subjecting them to the waste management regulations under the Resource Conservation and Recovery Act (RCRA).

Action

EPA has issued a Notice of Proposed Rulemaking to list as hazardous those wastes from wood surface protection operations whose protectant formulations have a concentration of pentachlorophenolate greater than 0.1 ppm. This proposed listing includes wastes from plants that presently use non-chlorophenolic formulations, but whose formulations have been contaminated by previous chlorophenolic use.

The proposed listing includes the following wastestreams: 1) any wastewaters generated which contact protectant, 2) process residuals, 3) protectant drippage, and 4) spent formulations.

For plants using formulations containing more than 0.1 ppm pentachlorophenate. EPA has proposed recordkeeping requirements, a requirement to hold treated wood in the process area to allow excess drippage of surface protectant to cease, and standards for the storage of treated lumber in uncovered storage areas during precipitation events

The notice also proposes testing, analysis, and recordkeeping requirements for operators using a protectant containing less than or equal to 0.1 ppm pentachlorophenate. Related to the testing requirement, EPA has proposed to amend document SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, to include a method for detecting pentachlorophenate.

EPA is requesting public comment on this proposed rule, including the option not to list these wastes as hazardous. The "no-list" option is being considered because future generation of these wastes is expected to rapidly diminish and risk analyses have shown that risk from certain exposure pathways is relatively low, assuming the use of chlorophenolics does not resume.

Public Comment

Comments should be submitted to EPA within 60 days of the *Federal Register* notice publication date. No extensions will be granted. For instructions on submitting written comments, please see the *Federal Register* notice. It is available at no charge by calling the RCRA Hotline or by visiting EPA's RCRA Information Center in Washington, D.C.

Contact

For further information, or to order a copy of the *Federal Register* notice, please call the RCRA Hotline Monday through Friday, 8:30 a.m. to 7:30 p.m., EST. The national toll-free number is (800) 424-9346; for the hearing impaired, it is (TDD) (800) 553-7672. In Washington, D.C., the number is (703) 412-9810 or TDD (703) 412-3323. Or write to: RCRA Information Center, Office of Solid Waste (OS-305), U.S. EPA, 401 M Street, SW, Washington, D.C. 20460.