Wood Preserving (WP), What ya need to know

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Wood Preservation

- Wood preservation – penetration of preservative solutions into wood to preserve the structural integrity and improve resistance to weathering, water and ground contact.

- Preservative alternatives (don't create hazardous waste)
  - ACQ, MCQ…….

- Preservatives – create hazardous waste under RCRA
  - CCA - Chromated Copper Arsonate
  - Penta – Pentachlorophenal
  - Creosote

Drip Pad Definition (40 CFR 260.10)

- *An engineered structure consisting of a curbed, free-draining base, constructed of non-earthen materials and designed to convey preservative kick-back or drippage from treated wood, precipitation, and surface water run-on to an associated collection system at wood preserving plants.*

Are All WP LQG's ?

- WP use a drip pad (depends on drippage/HW/Non-HW)
- Use of a drip pad is only listed in 262.34(a)(1)(iii)(A)&(B)
- McCoy reference 6.3.4.3 ***"SQG's may not accumulate wastes on drip pads."***
- So WP that use drip pad must meet LQG requirements as well!
- Lead OGC Council (Augusta Posner) reviewed regulations and came to this conclusion.

Wood Preservation (Pressurized)Process

- A charge (bundle) of wood is loaded onto a rail system
- Charge is placed into a large pressurized cylinder (retort).
- Cylinder is flooded with chemical mixtures @ particular conc
- Pressure applied – time dependent

Wood Preservation (Pressurized)Process

- Remaining mixture is drained – reused
- Vacuum placed on retort to remove excess liquid from wood
- Charge is pulled onto the drip pad
- Charge allowed to dry (time????)

Overview of Drip Pad

Additional components at WP

- Several large tanks for holding preservatives, water and mixtures
- Sump that drains back to treatment tanks

Waste Codes

- D004 & D007
- F032 – chlorophenolic formulations
- F034 – creosote
- F035 – inorganic preservatives containing arsenic and chromium
- K001 – Pentachlorophenol bottom sediment/sludge from wastewater treatment

262.34(a)(1)

- (iii)(A) – must maintain a record on how the facility will clean pad & collection system every 90 days
- (iii)(B) – document each waste removal w quantity, date & time
  - Drip pad
  - Sump
  - Collection system

Because the drip pad is your collection device, SAA's are not applicable, 90-day time clock has already started

Subpart W

- Requirements for new & existing drip pads
  - EXISTING must be certified yearly (documented)
  - NEW must have Leak Detection System (LDS)
- Pad constructed of non earthen material
- Slope to free drain to a collection system
- HAVE CURB OR BERM

Subpart W

- LDS has own list of requirements
- Maintain pad free CRACKS, GAPS, CORROSION
- Pad must be cleaned WEEKLY & DOCUMENTED (date/time/cleaning procedure used)
- Treated wood must remain on pad until drippage has ceased – must document

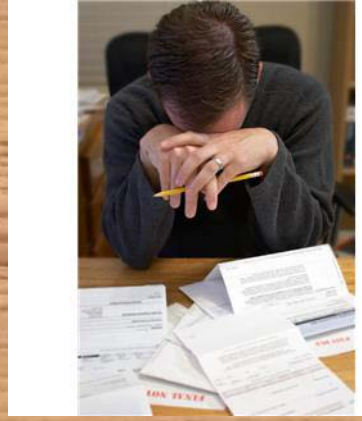
Subpart W

- Operating log – all past/present practices and chemicals used
- Contingency Plan must address drippage in storage yard
- Weekly inspection of pad:
  - Deterioration/malfunctions / run on/off
  - Presence of leakage from LDS
  - Cracks in pad

Inspection

- Walk the drip pad
- Lots of debris (weekly cleaning)
- Look at sump area (clean/dirty)
- Look at equipment (stay on pad or have to be moved off)
- Walk the yard -incidental drippage
  - **Use caution, piles can be unstable**
- Take a peek at the LDS ports

Records



- Operating log
- Charge sheet (on/off) cease drippage doc
- Weekly Pad Cleaning log (date/time/amount/how)
- Drip Pad Repair log
- Leak Detection Repair Log
- Drip Pad weekly inspection log
- Leak detection collection log (date/time/amount)
- Triple rinse log
- All other remaining LQG stuff

TIPS

- Utilize the checklist in SWIFT or the version found on our checklist page
- **http://www.dep.state.fl.us/waste/categories/hwRegulation/pages/InspectionandEnforcement.htm**
- Sub part W is only 3 pages, but it is flooded with requirements (old vs new, LDS)
- Don’t forget all other LQG requirements apply to the facility

Tips

- Don’t forget the maintenance/mechanic shop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NWD WP

- Total of 3 in NWD
- All were registered as CESQG or SQG
- phone calls 2008
- Conducted CASV's as LQG's
- Follow up w/ each 4-6 months later
- Yearly LQG inspections

Most common problems found

- Paperwork (details – date/time/amount)
- Keeping drip pad clean & documenting
- Weekly waste checklist
- Unable to meet 90 day waste removal limit
- Training