

Utility Solid Waste Activities Group

**GUIDELINES
FOR THE USE AND MANAGEMENT OF
TREATED WOOD PRODUCTS**

July 2002

Background of Guidelines Document

Wood treated with preservatives is used in a wide variety of applications by utilities, railroads, and telecommunication and construction companies. Treated wood provides a long lasting alternative to untreated wood. It has been estimated that treated wood extends the service life of wood by three to ten times. One of the benefits of using treated wood is that it ensures fewer trees are harvested for replacement products, thereby conserving our natural resources. The reuse of treated wood in the secondary market also conserves natural resources and is consistent with EPA's preferred policy of resource conservation and reuse. See EPA publication, "Waste Reduction Activities of Selected WasteWi\$e Partners, Electric Power Industry" (EPA, August 1997).

Treated wood is used by electricity service providers as one of the primary, cost-effective, and reliable means for supporting the equipment and wires necessary for transmitting and distributing electrical power to the millions of residential, commercial, industrial, and governmental consumers of electricity throughout the United States. Other industries, including railroads, cable television, and the telecommunication and construction industries, also use treated wood as a means for providing services to millions of customers.

This document is comprised of a series of guidelines identified by the Utility Solid Waste Activities Group ("USWAG") regarding the use and management of treated wood by electric utilities.¹ USWAG recognizes, however, that whether and how the identified

¹ USWAG, an informal consortium of approximately 80 individual power companies, the Edison Electric Institute ("EEI"), the National Rural Electric Cooperative Association ("NRECA"), and the American Public Power Association ("APPA"), represents the United States' electric utility industry on solid waste regulatory matters. EEI is the national association of investor-owned electric utility companies and acts as spokesman for those firms on subjects of national interest. Its members provide approximately 85 percent of the total electric generation capacity in the United States and service more than 95 percent of the nation's consumers of electricity. NRECA is the national association of rural electric cooperatives, with a membership in excess of 1,000, serving 25 million people in 46 states. APPA is the national association of publicly-owned electric utilities.

guidelines are embraced by a particular company depends on many unique operating factors, including, for example, the size of the company and its service territory, as well as the practical availability of differing management options.

Treated Wood Management Guidelines

- **Establish purchasing policies that reflect appropriate treatment standards.**

Companies should endeavor to have purchasing documents, specifications, or procedures requiring that new treated wood products meet the American Wood Preservers Association standards or specific utility company requirements.

- **Continue to ensure that secondary users are appropriately informed with regard to the proper handling, use, and disposal of treated wood products.**

A high percentage of treated wood removed from service by the electric utility industry retains enough of its original structural and preservation characteristics to make it usable in other treated wood applications. Such “continued life” applications have dual environmental advantages of conserving timber resources and reducing demand on increasingly scarce landfill space. The vast majority of electric utilities provide information to secondary users of treated wood to inform these users of the appropriate handling, use, and ultimate disposal of treated wood products. It is important that this information be provided in a consistent, reliable, and effective manner. While the information provided varies from company to company, a useful guide for providing this information is set forth in the EPA approved voluntary consumer information or safety information sheets (“CIS”/CSIS”) for treated wood products (attached as Appendices). Companies may additionally consider placing tags/labels on treated wood sold/donated to the public, as suggested in EPA’s voluntary CIS/CSIS program, and consider including the following points on the tags/labels:

- **Caution:** This wood has been treated with an EPA registered wood preservative and may contain chromated copper arsenate, pentachlorophenol, creosote, or other registered wood preservatives;

- Never burn treated wood;
 - Wear a dust mask and goggles when cutting or sanding treated wood;
 - Wear gloves when working with treated wood;
 - Ask for the consumer safety information sheet or other safety information that may be available.
 - Do not use treated wood in circumstances where there may be direct contact with domestic animals or livestock which may crib (bite) or lick the wood.
 - Do not use treated wood in circumstances where the wood may become a component of food or animal feed, such as structures or containers for storing silage or food.
 - Ensure that the treated wood is properly disposed of after its intended use. Removal and disposal by ordinary trash collection is generally acceptable, though it may be advisable to check with local officials regarding proper disposal options.
- **Continue to explore and utilize alternative management options.**

The sale or donation of treated wood products to the public for reuse is a beneficial and important option for treated wood products removed from service and is consistent with EPA's preferred policy of resource conservation and reuse. USWAG also remains committed, however, to exploring and expanding the number of alternative reuse/recycling and disposal options that are equally practicable and beneficial (e.g., working with key stakeholders to develop additional fuel recovery options). Individual companies are encouraged to actively explore, and where appropriate utilize, alternative reuse/recycling and disposal options for treated wood products. Examples of some current and potential reuse and disposal options for treated wood are presented in an Electric Power Research Institute report entitled "Options for Disposal or Reuse of Four Types of Treated-Wood Utility Poles," August 3, 2001 (EPRI Report number 1005168).

- **Arrange for proper disposal of treated wood that is not reused.**

Utilities should ensure that treated wood they designate for disposal rather than reuse is managed in accordance with all applicable federal and state laws governing solid waste disposal.

- **Reuse treated wood products within the utility system.**

Electric utilities may elect to reuse treated wood products, as appropriate, within their systems. Consistent with this principle, utilities may evaluate techniques for prolonging the life of treated wood already in use (e.g., groundline treatment of in-service poles), thus reducing the amount of treated wood removed from service and reducing the quantity of treated wood purchased.

- **Evaluate, where applicable, treated wood alternatives.**

The use of treated wood remains the most preferred method for supporting electric utility transmission and distribution lines and associated equipment because it offers one of the most cost-effective and reliable means of providing electricity to millions of customers throughout the United States. The preservatives used to treat the wood are specifically approved and registered for such use by U.S. EPA, and the disposal of treated wood is regulated by U.S. EPA, state, and local governments. In certain instances, depending on site location and function, alternatives to treated wood may better suit the needs of particular transmission or distribution operations. Therefore, in undertaking future transmission and distribution operations, companies are likely to continue to evaluate potential alternatives to treated wood products, taking into account company-specific factors, customer needs, structural support requirements, and economic impacts, among other considerations. USWAG will assist in these efforts by continuing to evaluate the feasibility of alternatives to treated wood and bringing these alternatives to the attention of its members.

- **Ensure program awareness.**

To the extent practicable, companies should have a system in place to ensure that applicable personnel are aware of and understand the guidelines presented in this document. The information contained herein should be communicated to appropriate company personnel to ensure the guidelines are understood and supported at all relevant levels of the company.

- **Continue to coordinate with other industry groups**

USWAG will continue to reach out to other industry groups that use treated wood products – e.g., the telecommunications and railroad industries – to: (1) encourage these groups to embrace the treated wood management guidelines set forth in this document, and (2) better ensure the proper management of treated wood products by all groups that use these important products.

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If you have questions regarding USWAG's Treated Wood Guidelines document, please contact USWAG's Executive Director, Jim Roewer, at jimroewer@USWAG.org or 202/508-5645.

APPENDICES

- USEPA Consumer Information Sheet for Pentachlorophenol Pressure-Treated Wood
- USEPA Consumer Information Sheet for Creosote Pressure-Treated Wood
- USEPA Consumer Safety Information Sheet for Inorganic Arsenical Pressure-Treated Wood