

*This guidance document supersedes PM97-1:
“Water Quality and Wood Preservatives Policy Memoranda”*

Guidance for the Use of Wood Preservatives and Preserved Wood Products In or Around Aquatic Environments

Idaho Department of Environmental Quality



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Statement of Purpose

Chemicals used to preserve wood products have the potential to cause and/or contribute to adverse biological and human health effects. The Idaho Department of Environmental Quality (DEQ) created this guidance for DEQ staff and the regulated community in their efforts to minimize the potential for negative water quality impacts and violations of Idaho Water Quality Standards (available at <http://adm.idaho.gov/adminrules/rules/idapa58/0102.pdf>) associated with the use of preserved wood products. The contents of this guidance are not intended to, nor do they, constitute a rulemaking by DEQ. Furthermore, the contents of this document do not create any rights or benefits, substantive or procedural, enforceable at law or in equity by any person. Nothing in this document shall be construed to constitute a valid defense by regulated parties in violation of any state or federal environmental statute, regulation, or permit.

In order to protect surface water quality, including beneficial uses, the production and use of chemically treated wood products in or around waters of the State should be in accordance with the best management practices (BMPs) and guidelines outlined below and any other applicable guidance and BMPs DEQ may recognize. While this guidance primarily addresses the use of treated wood products in or around waters of the State, the placement of untreated wood products and other natural, native, or non-wood materials is generally recognized as an acceptable alternative.

Pressure-Treated Wood

1. The following preservative chemicals are registered by the U.S. Environmental Protection Agency (EPA) and may be used to pressure-treat wood products that will be used in or around waters of the State: alkaline copper quarternary (ACQ), ammoniacal copper zinc arsenate (ACZA), copper azole (CA-B), chromated copper arsenate (CCA), creosote, copper naphthenate, and pentachlorophenol (Penta).
2. Treated wood materials should be produced in compliance with the *Best Management Practices (BMPs) for the Use of Treated Wood in Aquatic and Other Sensitive Environments* (“BMP Manual”) published by the “Supporting Organizations”¹ (August 2006). DEQ understands that the Supporting Organizations may modify the BMP Manual from time to time. If a modified BMP is to be used, DEQ requests copies of the revised BMP manual in a form to facilitate comparison so that the modification(s) may be reviewed.
3. Prior to placement of treated wood products, assurance of compliance with the BMP Manual should be demonstrated by an independent third-party inspection agency via a BMP Mark or a certificate of compliance.
4. The treated wood material to be used in or around waters of the State is to be appropriate for the intended use, performance, and environmental conditions. Information on properly selecting and specifying pressure-treated wood can be obtained from *Treated Wood in*

¹ “Supporting Organizations” include the Western Wood Preservers Institute (WWPI), Wood Preservation Canada (WPC), the Southern Pressure Treaters’ Association (SPTA), and the Timber Piling Council (TPC).

Aquatic Environments — A Specification and Environmental Guide to Selecting, Installing and Managing Wood Preservation Systems in Aquatic and Wetland Environments (“Specification Guide”) (Western Wood Preservers Institute, 2002). This document can be downloaded from the following URL: <http://www.wwpinstitute.org/>. More detailed information can be found in the American Wood Protection Association (AWPA)² Book of Standards (www.awpa.com).

5. The applicant and contractors working on the project should be familiar with and follow the appropriate handling, installation, and maintenance guidelines for treated wood as outlined in the BMP Manual (see #2 above) and the Specification Guide (see #4 above) .
6. A site-specific risk assessment may be required where DEQ determines that a proposal calls for placement of a significant volume of treated wood in, over, or around a small body of water with low flow velocity. If, based on the review, DEQ determines that there is an unacceptably high risk to water quality or the aquatic environment, use of the product as proposed may be prohibited. An alternative proposal may be allowed should the applicant demonstrate that such a proposal will not impair water quality or beneficial uses and will otherwise comply with Idaho Water Quality Standards.

Non-Pressure-Treated (“Field-Treated”) Wood

Field treating with preservatives or other chemicals (such as paints, sealers, stains, and finishes) over waters of Idaho should be minimized. Only chemicals labeled safe for use in and around aquatic environments may be used. Where field application of such chemicals is necessary, the following actions should be taken:

1. Treat wood materials at least 75 feet above the high water mark to prevent spills, drips, and leaks from contaminating surface water. Collect any spills, drips, and leaks of preservatives to protect surface and ground water. Dispose of all excess and spilled preservatives in accordance with applicable laws.
2. Where treating wood materials over the water or below the high water mark is necessary, take appropriate precautions for collecting drips or spills to assure that wood preserving chemicals are not discharged or released into waters of the State. The quantity of product placed over the water should be limited to minimize potential spill size.
3. Preservatives or antifouling chemicals should not be applied underwater. Refer to the local DEQ regional office for further guidance.
4. All chemicals are to be used as directed on product labeling. Preservatives are to be applied and cured at specified temperature conditions, and wood products are to be properly cured in accordance with label directions before coming into contact with water.
5. All field treatment personnel are to be properly trained and/or licensed to apply preservatives

² Formerly the American Wood-Preservers’ Association.

in accordance with product labeling.

General Guidelines

1. If field cutting, drilling, sanding, or fabrication of chemically-treated wood products is necessary, it should be performed at least 75 feet above the high water mark. Collect and dispose of all waste, including sawdust, in accordance with applicable laws.
2. If field cutting, drilling, sanding, or fabrication of chemically-treated wood products must be done over water or a dry lake or river bed, all waste is to be contained, removed from these locations, and disposed of in accordance with applicable laws.
3. The removal of existing treated wood products in waters of the State should be done in a manner that minimizes the potential for treated debris to enter the environment. Collect and dispose of all waste, including sawdust, in accordance with applicable laws.

Use Restrictions

Treated wood should not be used where it comes into direct or indirect contact with water used for human consumption without consultation with DEQ, except for uses involving incidental contact such as docks and bridges.

For further information, please contact your local DEQ regional office.

Implementation

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