

Creosote and Creosote Treated Wood

Canadian Wood Preservation Association

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Creosote pressure treated wood will continue to be used as a result of the Environmental Protection Agency re-registration process in the United States and the Pest Management Regulatory Agency Reevaluation here in Canada.

EPA determined after a comprehensive review that creosote is eligible for FIFRA (Federal Insecticide, Fungicide and Rodenticide Act) re-registration provided that wood treatment plant risk mitigation measures are adopted and preservative labels are amended accordingly. The Registration Eligibility Decision (RED) was completed in the fall of 2009.

The results mean that the use pattern for creosote treated wood remains unchanged. There are no restrictions on the aquatic uses of creosote treated wood. Creosote is allowed for exterior/outdoor uses only including all major uses included in the American Wood Protection Association (AWPA) use category standards.

In the United States, the revised/updated pesticide labels for creosote were approved by EPA on May 5, 2010. Creosote manufacturers began distribution of the new labels on August 5, 2010. Creosote pressure treatment plants must comply with the revised/updated labeling by November 5, 2010 unless otherwise indicated on the labels.

New wording on the EPA labels includes the following:

“For terrestrial and aquatic non-food wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.”

In addition:

Creosote (P1/P13) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPA Book of Standards.”

- UC 4A, 4B and 4C: Crossties and Switch Ties, produced from all wood species recognized by AWWPA for this commodity. Manufactured to meet AWWPA specifications.
- UC 5A, 5B and 5C: Bulkhead sheathing. Lumber/timbers use, including timbers, cross bracing, and highway construction. Piles for marine applications. Plywood for bridge and marine construction.
- UC 4A, 4B and 4C: Utility poles (including laminated). Poles for highway and agricultural construction, lighting, building structural use.

In Canada, the Pest Management Regulatory Agency, Health Canada posted its Provisional Re-evaluation Decision Document (PRVD) and the accompanying Re-evaluation Note on August 20, 2010. The PMRA has suggested the development of a Risk Management Plan focused on the requirement for treatment plants using creosote to meet the requirements of the Environment Canada Technical Recommendations Documents for the Design and Operation of Wood Preservation Facilities (TRD). PMRA will also compare the risk mitigation measures of the EPA review with requirements of the TRD to ensure that all areas of concern are addressed. Another proposal of PMRA will be to include target retentions on the preservative label. This is similar to the EPA requirement for AWWPA standards except that PMRA does not reference outside organizations like the Canadian Standards Association on pesticide labels. The Creosote Council and Wood Preservation Canada have submitted comments. Closing date for submissions is October 20, 2010.

In support of creosote pressure treated wood products the Creosote Council Product Stewardship activities include:

- Revised Consumer Information Sheet (CIS) for Safe Handling & Use of Creosote-Treated Wood Products
- Creosote Treatment Worker Educational Video explaining new labeling requirements

Another area of activity of the Creosote Council that has implications on the use of creosote treated wood is with the National Oceanic and Atmospheric Administration (NOAA), a U.S. federal agency focused on the condition of the oceans and atmosphere.

- Guidelines for West Coast NOAA fisheries staff concerning ESA and essential fish habitat consultations Alaska, Northwest and Southwest Regions
- Field Guidelines are being developed by the treated wood industry and were submitted to NOAA in September for review

Research continues in a number of projects involving creosote:

- Vines Study – protocol deficient
- New Study to Evaluate Effect of Creosote Treated Wood on Herring Eggs
- Cooperative Efforts with Industry, Oregon State, and University of Alaska

In conclusion the following is a quick summary about creosote:

Creosote is an antimicrobial wood preservative applied via pressure treatment at federally, state or provincially regulated wood treatment plants. In Canada, plants meet the requirements of Environment Canada's TRD to address environmental and human safety.

Creosote has provided decades of satisfactory and safe use when used as directed and in the proper applications.

Creosote extends the useful life of industrial wood products (often in use for 75 years, but typically 30 to 40 years).

Creosote is used to treat the following wood products: railroad crossties, utility poles, marine and foundation piling, lumber and timber products used in the transportation industry.

Creosote is regulated primarily by US EPA under FIFRA, the Federal Pesticide Statute and in Canada the Pest Management Regulatory Agency, Health Canada under the Pest Control Products Act.

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