

AN UPDATE ON THE DEVELOPMENT OF
TECHNICAL RECOMMENDATIONS DOCUMENTS FOR
THE CANADIAN WOOD PRESERVATION INDUSTRY
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With the completion of the final draft of the Technical Recommendations (TR) documents for the wood preservation industry, there are naturally questions as to what is expected from these documents and how Environment Canada and provincial regulatory agencies may interact with the wood preservation industry. As you know, the development work for the Technical Recommendations documents was initiated in 1983. Phase I of the project was the assessment of all available information on fifteen wood preservation plants in British Columbia and four plants in Eastern Canada. The reports prepared by Envirochem Services of Burnaby, B.C. provided a detailed description of the unit operations and processes employed at wood preservation plants, including transportation and off-loading of chemicals, chemical mixing and handling, preservative operations, waste treatment systems and treated wood storage. In addition, the reports include sections on the assessment of chemical control measures, potential environmental impacts and measures for worker protection. These background reports are available from Environment Canada.

In 1984 a Wood Preservation Industry Technical Steering Committee (TSC) was formed. The members of the committee included representatives of federal and provincial governments, industry and labour unions. Envirochem Services were retained to assist the TSC and to author the TR documents. The overall responsibility of the TSC was to direct the consultants in the preparation of TR documents. Five separate TR documents were developed for the five major types of preservatives used in Canada: Pentachlorophenol, Creosote, Ammonical-Copper-Arsenate, Chromated-Copper-Arsenate and Pentachlorophenol-Thermal.

In general, Environment Canada expects that the Canadian wood preservation industry will meet the objectives of the TR documents, which are:

- (a) to reduce or eliminate the release of wood preservative chemicals into the environment, and
- (b) to eliminate exposure of workers to wood preservative chemicals.

The TR documents are a means of accomplishing these objectives. The documents explain the rationale for the environmental and workplace concerns and provide information required to achieve controls on the use of wood preservative chemicals.

The TR documents provide consistent guidelines for the design and operation of wood preservation facilities. The following topics are discussed in the documents:

- the need for wood preservation
- overview of wood preservation facilities
- description of wood preservatives (production and use, physical and chemical properties and environmental and human health effects)
- suggested approach for design and operation of wood preservation facilities
- process emissions
- transportation of preservatives
- waste, spill and fire contingency planning.

Final Technical Recommendations are expected to be edited and printed soon. It is the intention of Environment Canada that these documents be periodically revised and reissued.

The finalization of the TR documents is the result of a comprehensive development and review process with input from industry, labor and government. The proper implementation of the recommendations will allow the continued beneficial use of wood preservatives and will protect both the environment and the worker from potential harmful effects.

Undoubtedly, implementation of these recommendations will require the cooperation of government, labor and industry. We have cooperated in the development of these documents. We must cooperate now in using them. It is industry that is accountable for the use of these chemicals and it is the responsibility of Environment Canada and the provincial agencies to encourage, motivate and provide incentive to the industry to accept that responsibility.

The TR documents are not part of any one specific piece of environmental legislation. They do, however, reflect the intent of several federal and provincial Acts and regulations. We realize that the plant modifications to comply with these recommendations will take time to put in place and accordingly, a compliance deadline can not be set at this time. It is expected that the industry will endeavour to act immediately on the recommendations pertinent to their operations, with particular emphasis on the safety aspects of handling the treatment chemicals. However, new wood preservation facilities should be designed to be in full compliance with the Technical Recommendations.

Environment Canada, in cooperation with provincial agencies, plans to conduct surveys at various wood preservation plants to establish the existing "state of the art". Should future government surveys show that a satisfactory level of compliance is not being achieved, Environment Canada and/or the provincial agencies may consider more direct regulatory activities, such as development of Code of Good Practices, guidelines and/or regulations.

It is expected that the initiatives by both industry and government will achieve the objectives of environmental and worker protection, which is the intent of the TR documents.

Perhaps you are aware that an information seminar, jointly sponsored by the Canadian Institute of Treated Wood and Environment Canada was held in Vancouver last month. The purpose of this seminar was to introduce TR documents covering the five major chemical applications used by the wood preservation industry, and to discuss their safe use.

Industry representatives outlined their initial plans and programs to comply with the objectives of the TR documents. Provincial authorities (B.C., Ontario and Quebec) explained how their individual jurisdictions intend to use these recommendations and Environment Canada discussed its role.

As companions to the TR documents, Environment Canada, in cooperation with the Canadian Institute of Treated Wood, is preparing two training information packages (for oil and waterborne preservatives) with written and video tape content. The purpose of these packages is to heighten the awareness for procedures to safeguard air, water and soil quality.

In conclusion, I would like to say that generally wood preservative chemicals are toxic and can alter the environment in a deleterious manner. A greatly accelerated research effort must therefore be made by both industry and government to clearly define the effect that these chemicals have on the environment and to search for more environmentally acceptable alternative chemicals. In the meantime, wood preservation facilities should continue their efforts to reduce or eliminate the releases of wood preservative chemicals into the environment and eliminate exposure of workers to these chemicals.