

THE STRATEGIC OPTIONS PROCESS IS FINISHED NOW LETS GET STARTED!

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Last year, at the CWPA 19th Annual General Meeting, I presented a paper entitled *Strategic Options Process (SOP). Past, Present, Future.* Well the future is now. The purpose of this presentation is to inform you of the great deal of activity that is now underway resulting from the completion of this very significant regulatory process initiated by Environment Canada and Health Canada.

First started in December 1994, the Strategic Options Process for the Wood Preservation Sector was finally completed with the publication on July 1, 1999 of the report "Strategic Options for the Management of Toxic Substances – Wood Preservation Sector. This document is now referred to as the SOR.

The SOR contains a series of recommendations in four main categories: A) general recommendations including references to the Pest Management Regulatory Agency and provincial regulators; B) wood treatment/preservative manufacturing; C) consumer treated wood products; and D) in-service use and post use of industrial treated wood products.

The implementation of these recommendations has been delegated to two steering committees. The Treater/Manufacturer Steering Committee will oversee the implementation of recommendations "B" and "C" while the Industrial Treated Wood User Steering Committee will implement recommendations D.

Recommendations for the treating industry focus on two main components: the mandatory reporting of toxic substance releases to the National Pollutant Release Inventory (NPRI) and the implementation of the Recommendations for the Design and Operation of Wood Preservation Facilities (TRD).

All treating plants will be required to report their year 2000 releases to NPRI in the year 2001. The current thresholds for reporting will be changed. These currently include: an equivalent of 10 full-time employees (20,000 person hours), the manufacture, processing or otherwise use of 10 tonnes or more an NPRI substance and manufacture, processing or otherwise use at a concentration of greater than 1 percent by weight.

The new reporting criteria for wood preservation plants will include: no minimum number of employees, the current 10 tonne requirement will remain except for dioxin, furan and hexachlorobenzene, which will have no minimum and PAH's which will have a 50 kg minimum and the greater than 1 percent concentration will remain.

The following substances will be required to be reported: for waterborne preservatives including CCA and ACZA – hexavalent chromium and arsenic and its compounds; for creosote – PAH's including anthracene and naphthalene; for pentachlorophenol – polychlorinated dibenzodioxins as TEQ, polychlorinated dibenzofurans as TEQ and hexachlorobenzene.

For determination of releases, a wood treating facility must gather all pertinent information on process releases, waste shipments, shipments for recycling, and discharges to the environment. No monitoring data or emissions measurements need to be collected specifically for NPRI reporting. In the absence of data, reasonable estimates must be made using published emission factors, material balance calculations, or engineering calculations.

Information requirements can be grouped into the following categories:

- Process (air and water)
- Storm water
- Remedial action (soil and water)
- Catastrophic events (spills)
- Non hazardous solid waste
- Hazardous waste

A Working Group of the Treater/Manufacturer Steering Committee is currently developing reporting guidelines for calculating releases for each preservative type. These should be available in the fall of 2000.

The most significant outcome of the SOP for individual wood treatment plants is the implementation of the Recommendations Documents for the Design and Operation of Wood Preservation Facilities. Environment Canada has given the wood preservation industry the opportunity to attain compliance with the TRD through a voluntary program thereby avoiding additional regulatory requirements. This is significant in that some of the other SOPs resulted in new regulations being imposed by the federal government on those particular industries.

The implementation of the TRD will be conducted over a 5-year time span which will begin in 2000 with a cross Canada plant assessment program. This assessment will provide the Treater/Manufacturer Steering Committee with a benchmark on which to measure progress in implementation by the industry.

The national assessment will be conducted by an independent third party assessor, between the months of April and October 2000. A national protocol for the assessment has been developed for use at all plants. The individual plant assessment data will be kept confidential and provided to plant officials only. The aggregate data will be presented in a final report by the assessment team in December 2000. Costs for the assessment will be equalized so that plants with similar configurations across Canada (eg. two CCA cylinders) will incur identical costs.

Plant owners and operators will be able to use the assessment as a tool in setting priorities for plant improvements, in negotiations with finance and insurance companies, and in discussion with local environmental authorities. Participation in the assessment program will assist with due diligence issues and is a positive sign to treated wood customers of the environmental commitment by the wood preservation plant.

After the initial plant assessments are conducted, the implementation program continues with the submission of implementation plans by the individual treating plants. Each plant will submit to the Treater/Manufacturer Steering Committee an implementation plan describing how they plan to address deficiencies identified by the assessment and to attain compliance with the TRD.

On an annual basis each plant will then provide a progress report in June of each year describing items that have been carried out and any changes to the implementation plan. Both the implementation plan and the annual reports will be subject to verification by the steering committee.

After 5 years, the steering committee will conduct a second assessment program to determine the new level of TRD compliance by the individual plants and the industry as a whole. Any further action by the regulatory authorities will depend upon the outcome. A positive move by the industry may simply result in a continuance through some type of monitoring program whereas a negative move will likely result in regulatory action.

Treating plants that opt not to participate in this voluntary program will go through a mandatory program administered by Environment Canada through the Canadian Environmental Protection Act (CEPA). These treating plants will be identified in the Canada Gazette and regulatory action will be taken through CEPA. These plants will be required to conduct an assessment (the same as in the voluntary program) followed by the development of a pollution prevention program (much more detailed than the implementation plan and requires monitoring) within six months. Compliance with the TRD will be required within two years. The expense to the treater by going this route is greater and the time frame is shorter.

The Treater/Manufacturer Steering Committee is also responsible to address the consumer treated wood products portion of the Strategic Options Report. In order to provide the general public with more information on the safe use and handling of pressure treated wood products a formal public education program will be developed. An increased distribution of the consumer information sheets as currently provided by the CCA suppliers is also part of the recommendations.

The Industrial Treated Wood Users Steering Committee is charged with an ambitious series of recommendations focusing on best management practices. The Canadian Electricity Association (CEA), representing the utilities across Canada, has already developed a program which is being modified to include treated wood products. The CEA program is being used by the Steering Committee as a model for adaptation and use by all industrial treated wood users.

The development of a national treated wood waste management strategy is an important outcome of the SOP for the industrial users. Work will begin in 2000 on finding a way for the users to deal with treated wood products coming out of service.

The users will also be examining life cycle methodologies for treated wood and alternatives. Actual life cycle analysis will not be conducted by the steering committee but a means by which life cycle impacts can be determined will be developed.

So the SOP is done, but as you can see this is only just the beginning. A process which took 4 years to complete has set the stage for another process which will take 5 years to complete, perhaps longer depending upon the outcome of the many programs and projects to be undertaken.