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November 2, 2023

Amanda Heye
Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503
(Sent via email to ahey461@ECY.WA.GOV)

Re: Draft Stormwater Management Manuals for Western and Eastern Washington

Dear Ms. Heye:

The Western Wood Preservers Institute (WWPI) is a non-profit trade association founded in 1947 and based in Vancouver, WA to serve as a resource for and support the preserved wood industry in western North America. Currently, WWPI represents nine (9) wood preserving manufacturing facilities in Washington. WWPI works with federal, state, and local agencies, as well as designers, contractors, and users over the entire preserved wood life cycle, ensuring that preserved wood is used in a safe, responsible, and environmentally friendly manner.

The Treated Wood Council (TWC) is an international trade association, serving the treated wood industry with more than 560 member organizations, including those with twenty-six (26) facilities or operations in Washington [Aberdeen, Arlington, Bellingham (3), Centralia, Clarkston, Federal Way, Kettle Falls, Longview, Mt. Vernon, Olympia (2), Port Angeles, Raymond, Rochester, Seattle, Spokane, Sumas, Sumner, Tacoma (2), Vancouver (2) and Washougal (2)] and numerous others in neighboring states.

We appreciate the opportunity to comment on the draft [S432 BMPs for Wood Treatment Areas](#). Listed below you will find the changes that we are requesting to the *BMPs for Wood Treatment Areas* (Best Management Practices).

Description of Pollutant Sources

The second sentence in this section lists a few wood preservatives. We believe this is an old, out-of-date listing. We have never heard of some that are on the list, and there are still others in current use that were not listed. To include current and future wood preservatives, we suggest changing the paragraph to the following:

Description of Pollutant Sources: Wood treatment includes both anti-staining and wood preserving using pressure processes or by dipping or spraying. Wood preservatives *are registered with the U.S. EPA and* include *oil-borne and water-borne preservatives. creosote, creosote/coal tar, pentachlorophenol, copper naphthenate, arsenic trioxide, malathion, or inorganic arsenicals such as chromated copper arsenate, acid copper chromate, chromate zinc chloride, and fluor-chrome arsenate phenol. Anti-staining chemical additives include iodo-propenyl butyl carbamate, dimethyl sulfoxide, didecyl dimethyl ammonium chloride, sodium azide, 8-quinolinol; copper (II) chelate, sodium ortho-phenylphenate, 2-(thiocyanomethylthio)-benzothiazole (TCMTB) and methylene bis-(thiocyanate), and zinc naphthenate.*

Pollutant Control Approach

The first sentence in this section should be revised by adding “when feasible” to the beginning and eliminating “and contain all” and “all leaching of and”. Drip pads are not required to be covered. If a drip pad does not have a cover, the drip pad is required to be capable of managing drippage and precipitation from a 24-hour, 25-year storm (CFR 270.26(c) and 264.573 (d), (e), and (L)). We suggest changing the paragraph to the following:

Pollutant Control Approach: *When feasible*, cover ~~and contain all~~ wood treating *drip pads facilities* and prevent ~~all leaching of and~~ stormwater contamination *by from* wood treating chemicals.

Applicable Operational BMPs

The second bullet point in this section includes two sentences that contradict each other. Eliminating non-process traffic on the drip pad would prohibit scrubbing down non-dedicated lift trucks on the drip pad. We suggest replacing the word “eliminate” with “minimize” in the first sentence. In the second sentence, we suggest replacing “scrub down” with “clean”.

The fourth bullet point in this section should be reworded as incidental drippage is specifically regulated by hazardous waste regulations under RCRA and the WACs. The bullet points under the “Applicable Operational BMPs” section should be revised in the following way:

- Use dedicated equipment for treatment activities to prevent the tracking of treatment chemicals to other areas on the site.
- ~~Eliminate~~ *Minimize* non-process traffic on the drip pad. ~~Scrub down~~ *Clean* non-dedicated lift trucks on the drip pad.

- Immediately remove, contain, and properly dispose of soils with visible surface contamination (green soil) to prevent the spread of chemicals to groundwater and/or surface water via stormwater runoff.
- ~~If incidental drippage is discovered in the storage yard, relocate the wood to a concrete chemical containment structure until it is drip free.~~ *If wood is discovered to be actively dripping in the storage yard, relocate the wood to the drip pad until it ceases dripping.*

Applicable Structural Source Control BMPs

The first sentence of the second bullet point in this section should be modified to include “when feasible” at the beginning. Drip pads are not required to be covered. If a drip pad does not have a cover, the drip pad is required to be capable of managing drippage and precipitation from a 24-hour, 25-year storm (CFR 270.26(c) and 264.573 (d), (e), and (L)). Furthermore, freshly treated wood is not a technical term and should be defined. We suggest a definition with the addition of a new bullet point. When WWPI proposed comments to the stormwater management manuals in 2018, we requested including freshly treated wood, however this term has caused many issues due to it not being defined. Additionally, the second and third sentence should be removed from this bullet point as waterborne wood preservers do not generate process water or wastewater. Oil-borne wood preservers do not use process water.

An overwhelming number of wood preserving sites are not paved. The third bullet point should be removed if the department would like to incentivize paving a site. We suggest the bullet points under “Applicable Structural Source Control BMPs” be revised in the following way:

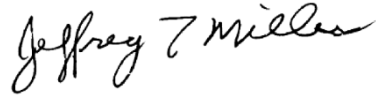
- Cover and/or enclose, and contain with impervious surfaces, all wood treatment equipment and drip pads. Slope and drain areas around dip tanks, spray booths, retorts, and any other process equipment in a manner that allows return of treatment chemicals to the wood treatment process.
- *Freshly treated wood is defined as wood that has not been removed from the drip pad immediately following treatment.*
- *When feasible, cover drip pads storage areas for freshly treated-wood that has not ceased dripping to prevent contact of treated wood products with stormwater. Segregate clean stormwater from process water. Convey all process water to an approved treatment system.*
- ~~Seal any holes or cracks in the asphalt areas that are subject to wood treatment chemical contamination.~~
- Elevate stored and/or treated wood products to ~~prevent~~ *minimize* contact with stormwater run-on and runoff.
- Place dipped lumber over the dip tank, or on an inclined ramp for a minimum of 30 minutes to allow excess chemical to drip back to the dip tank.
- Freshly treated lumber from dip tanks or retorts must be placed on a containment area until drippage has ceased prior to placement in outside storage areas.

Should you have any questions on our suggestions or comments, please contact Ryan Pessah, Director of Government Relations for Western Wood Preservers Institute, at (619) 889-1666 or Ryan@wwpi.org.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jeff Keller".

Jeff Keller
Executive Director
Western Wood Preservers Institute

A handwritten signature in black ink, appearing to read "Jeffrey T. Miller".

Jeffrey T. Miller
President & Executive Director
Treated Wood Council