



# Wood Preservation Canada Préservation du bois Canada

## ENVIRONMENTAL COMMITTEE

May 2<sup>nd</sup>, 2011  
Banff, AB

Daryl Anderson	Roger Fox	Peter Mason
Brian Balkwill	Craig Frohlich	Larry McTaggart
Nigel Banks	Stephane Gauvin	Jeff Miller
Wayne Bergman	Danny Goodine	Jim Mogan
Brad Burmeister	Dave Haley	Dave Phipps
Linus Clark	David Harris	Lawrence Prendiville
Corey Clark	Peter Hattin	Maureen Prendiville
Mary-Anne Dalkowski	Andrew Hobbs	Jason Quantz
Paul Dandy	Ian Jones	Dave Rollins
Brian Delbrueck	Rick Knechtel	Grant Sali
Herb Estreicher	Ted Ladoux	Kevin Schmunk
Elizabeth Everitt	James Laundry	Craig Wilson
Tom Fitzgerald	Ian Macdonald	Joe Zador
Paul Foster		

### Staff:

Henry Walthert  
Michael Srogosz-Bolduc

### Committee Members:

Mr. Dave Haley (Chairperson)  
Mr. Nigel Banks  
Mr. Linus Clark  
Mr. Craig Frohlich  
Mr. Rick Knechtel  
Mr. Jim Mogan  
Mr. John Wilkinson  
Mr. Craig Wilson

## 1. **Call to Order**

Chair D. Haley called the meeting to order.

## 2. Adoption of the Agenda

The Chairman announced two additions to the agenda.

Item #8 Quebec Regulations – M. Srogosz-Bolduc

Item #9 Hazardous Waste – H. Estraicher

Motion by H. Pruden to adopt the agenda.

Seconded by C. Frohlich.

CARRIED

## 3. Minutes of the Previous Meeting

Motion by C. Frohlich to adopt the minutes of the previous meeting held October 18<sup>th</sup>, 2010.

Seconded by D. Goodine.

CARRIED

## 4. CWPCA Update

I. Macdonald, WESA reported on the 2010 activities of the CWPCA.

Currently, 51 facilities are accredited with a CWPCA Certification. This year, WESA conducted:

- Internal audits on **35 facilities** (58 plants)
- External audits on **17 facilities** (24 plants)
- 2 auditor training sessions, accrediting **35 auditors**

Internal audits completed in 2010 had improved agreement between internal scores and review scores, including 3 facilities whose review scores were higher than the internal audit score. Completion reminders were sent out by WESA in October as facilities must respond by mid-November to meet the end of year deadline set by the CWPCA.

WESA also provided a “Top Ten” list of items that most often result in “not compliant” during an audit. They include:

1. Continued lack of documentation for status reports or internal audits.
2. Additional attention to detail in the worksheet guidelines.
3. Analysis for minimum parameters in ground/surface water monitoring.
4. Showers are not mandatory.
5. Tanks must be inspected every 5years by the contractor, every year by the plant operator.
6. A complete spill enactment drill performed yearly.
7. Sumps must have a tertiary lining.

8. An industrial hygienist should be used to establish an air testing program and policy.
9. Alarms, which should be installed on sumps and tanks, are inadequately tested and recorded.
10. Proper venting in the plant to avoid discharge.

I. Macdonald also reminded members of the CWPCA programs mandatory requirements for certification, which can be found in the programs' Regulations (contact WPC for an electronic version of the CWPCA Regulations).

In 2011, the external audit schedule will be established by WESA and distributed for the next 3 year cycle. Updated audit worksheets are also ready to be sent to certified facilities.

Members were reminded that the CWPCA logo is available for use by certified plants. Many have already applied the logo to stationary, lumber wrap and clothing.

*Action: WESA to send updated CWPCA audit worksheets to be sent to all certified facilities.*

## 5. CWPCA Regulations

H. Pruden presented, on behalf of the CWPCA Steering Committee, the revised regulations and ACQ/CA worksheets.

Revisions to the regulations include:

- Annual CWPCA dues increased to 1080\$

Revisions to the non-CEPA worksheets include:

- Qualifying audits of a facility are comprehensive and all 217 audit questions are evaluated.
- Maintenance audits will primarily examine practices that are ongoing such as training workers, bio monitoring, testing requirements for tanks, alarms, floor coatings, etc...
- The maintenance audit will cover 172 questions. A reduction of 20% in auditing time and 1000\$ in auditing cost is estimated in savings.
- The scoring benchmark has been reduced to 90% to maintain CWPCA certification.
- "Must Have" items were added to the worksheets for easier reference.
- Reduction in requirements for alarm testing.
- Alarm testing (circuitry and probe function) will be done and documented every six (6) months.
- Daily Inspection requirements have been reduced to daily checks (not requiring documentation, but a plant SOP).

- First Aiders trained in ethanolamine emergencies must be notified of chemical delivery has been removed from the worksheets.
- Annual tank inspection and cleaning has been eliminated.
- Plants will establish an SOP for the frequency and document inspection/cleaning of tanks that suit their facility issues.
- Seasoning of wood prior to treatment requirement has been removed.
- The requirement for a Risk Evaluation Study in conjunction with Environmental Monitoring has been removed.
- Removed the need to address skin exposure at every safety meeting.
- Showering after every shift is no longer required although hot showers must be available to employees.
- Tanks must be certified for the intended use although the specific requirement to test the tank bottom has been removed.

To conclude, H. Pruden reiterated the need to document and inform the programs' Inspection Firm of any changes to the plant, piping, coatings, containment, etc...

The CWPCA Steering Committee is currently seeking a representative from a certified facility in Quebec to be included in the committee. Interested representatives can contact M. Srogosz-Bolduc at Wood Preservation Canada.

## 6. **PMRA Update**

H. Walthert informed the members that the reevaluation of heavy duty wood preservatives is nearing completion. The Proposed Re-evaluation Decision Document for the HDWP's was posted by PMRA on August 20<sup>th</sup>, 2010.

The most significant changes for the treating industry is a requirement for TRD compliance and the inclusion of target retentions on the pesticide label.

The final Decision Document is expected to be published during the summer of 2011.

## 7. **Ontario Toxic Reduction Regulations**

The Ontario government now requires manufacturers in Ontario to produce a Toxic Reduction Plan. As the deadline for TRD plan submission is approaching, WPC has made it clear that Ontario treaters have prepared and implemented their plan through the TRD and CWPCA programs.

*Action: WPC to meet with Ontario Toxic Reduction Regulations representatives from the Ontario Ministry of Environment to showcase the CWPCA program.*

## 8. Quebec Regulations

M. Srogosz-Bolduc updated members on the impact of the document « Lignes Directrices Relatives à la Gestion du Bois Traité » to Quebec treaters. Wood Preservation Canada has contacted and discussed the document with industry and government representatives from various agencies including Ministry of Transport and Environment.

The focus of the document is on ground contamination and water quality, and is enforced by regional inspectors of the Ministry.

The document:

<http://www.mddep.gouv.qc.ca/matieres/valorisation/lignesdirectrices/bois-traite.pdf>

Attempts at establishing contact with the documents' author were unsuccessful, and thus, WPC has adjusted its strategy, and is drafting a position letter on behalf of the treated wood industry to be sent to the head of the Ministère du Développement durable, Environnement et Parcs. This communiqué would explain our position regarding the document, explain our concern and suggest a meeting to update the document to reflect the current treated wood practices.

*Action: M. Srogosz-Bolduc to keep coordinating and cooperating with various Quebec treaters and concerned government agencies to submit a letter on behalf of Wood Preservation Canada.*

## 9. Federal Hazardous Waste Regulations

H. Estreicher updated members on the developments with the Federal Hazardous Waste Regulation.

Following the implementation of the Transborder regulation for hazardous waste, Wood Preservation Canada submitted a notice of objection for the proposed intra-provincial hazardous waste regulation. WPC met with government representatives on 2 occasions to discuss issues and concerns surrounding treated wood waste.

Environment Canada seems willing to work with the treated wood industry and its partners (Canadian Electrical Association, Railway Association of Canada) to ensure that concerns are addressed.

## 10. Comments from Members

N/A

**11. Adjournment**

Motion by A. Hobbs to adjourn the meeting.  
Seconded by P. Hattin.

CARRIED