

KOPPERS CREOSOTE SOLUTION (cont.)

APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic remotely operated devices must be used to open, close, lock, and unlock cylinder doors.
- Mechanical methods must be used to place/remove bridge rails
- General Instructions for Creosote Pressure Treatment:
 - Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
 - Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
 - In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide or residue is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Supplemental Labeling for Creosote (P2) EPA Reg. No. 61469-3

Creosote (P2) 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.

AWPA Commodity Specification: Posts	
AWPA Use Category	Commodity Examples
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

AWPA Commodity Specification: Poles	
AWPA Use Category	Commodity Examples
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue- or mechanically-laminated

AWPA Commodity Specification: Piling	
AWPA Use Category	Commodity Examples
UC4C	Foundation and Land & Fresh Water Piles

AWPA Commodity Specification: Wood Composites	
AWPA Use Category	Commodity Examples
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminated members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened
Note: PSL = parallel strand lumber, LVL = laminated veneer lumber

AWPA Commodity Specification: Cross ties and Switch Ties	
AWPA Use Category	Commodity Examples
UC 4A, 4B, and 4C	Cross ties and Switch Ties, produced from all wood species recognized by AWPA for this commodity. Manufactured to meet AWPA specifications

AWPA Commodity Specification Marine (Salt Water/Brackish Water) Applications	
AWPA Use Category	Commodity Examples
UC 5A, 5B, and 5C	Ballast chocking Lumber/limbers use, including timbers, cross bracing, and highway construction Piles for marine applications Plywood for bridge and marine construction

AWPA Commodity Specification: Sawn Products	
AWPA Use Category	Commodity Examples
UC 1, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/limber for highway construction, including for golf course bridges meeting highway construction standards Crossarms Fence rail (farm/agricultural only, round, 1/4 round, 1/2 round)
UC4B	Highway bridge decking (above ground structural subject to critical/severe decay) Road salt/brine storage Highway construction materials, including lighting Piles (structural support in residential or business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, space blocks, important building structural use Poles for structural balling use Lumber/limbers (5 inches or greater) structural use, highway construction and cribbing, retaining walls for highway uses, building support structures Lumber/limbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone)
UC4C	Piles for structural support