North Carolina Guidelines for Converting a Wood Treatment Facility from Use of CCA to a Non-CCA Process Which Does Not Produce Hazardous Waste

1. Remove all waste residues from the tanks, treatment cylinder, leak detection and collection system and ancillary equipment, including bottom sludge from the tanks.
2. Rinse the above items and flush the piping. The tanks may need to be scrubbed to remove any scaling prior to rinsing.
3. Collect samples from the final rinse of the equipment, pad, etc. and additional samples from the final flush of the piping and analyze for total chromium, copper and arsenic. If the analytical results of the rinsate indicate that hazardous constituents are present above the regulatory standard, the facility must repeat item #2 until the rinsate meets the current 15A NCAC 2L (2L) standard * for those constituents.
4. Decontamination of drip pad: The drip pad should be pressure washed. The facility must analyze the rinsate from the drip pad for chromium, copper and arsenic. Once the concentration of chromium, copper and arsenic in rinsate is below the 2L standards, the drip pad will be considered clean. Bead blasting of surfaces may be required if rinsate continues to be above the 2L standard.
5. The facility must collect, characterize, manage and dispose of all rinsate and residues in accordance with hazardous waste regulations if determined to be hazardous waste. Non-hazardous rinsate must be managed and disposed of in accordance with state and local requirements.
6. Evidence of hazardous waste releases (cracks, discolored soil, etc.) must be assessed in accordance with the Generator Closure Guidance**. An assessment plan, along with a schedule for completion, must be submitted.
7. Required remediation in accordance with the Generator Closure Guidance and 40 CFR 265.445, will be completed within a time period agreed upon by the facility and the Division of Waste Management or when the drip pad ceases to be used for wood treatment purposes.
8. If remediation is delayed, compliance with 40 CFR Subpart W must be maintained.
9. If the facility intends to use groundwater from the site as makeup water for the treatment process, the groundwater must not contain any hazardous constituents above 2L standards.
10. When the facility ceases to use a drip pad for wood treatment purposes, the drip pad must be closed in accordance with the requirements of 40 CFR 265.445.
11. Compliance with these guidelines by a wood treating facility shall not affect remedial action requirements or obligations at any facility where environmental contamination is currently known or subsequently discovered, and shall not preclude the Department from commencing or continuing enforcement action based on environmental contamination or regulatory violations.

12. Continued use of the facility after conversion to a non-CCA process, especially use of a drip pad, must be in accordance with applicable environmental requirements, including, but not limited to, the Department's industrial wastewater discharge and disposal regulations.

* Current 2L – Groundwater Classification and Standards can be found in the Classification and Water Quality Standards Applicable to the Groundwater of North Carolina.
** The Generator Closure Guidelines can be accessed on the Division's Web site.

For more information you can contact:
Doug Roberts at (919) 508-8563 or douglas.roberts@ncmail.net
Harvi Cooper at (919) 467-1979 or harvi.cooper@ncmail.net
Robin Proctor at (828) 625-0171 or roberta.proctor@ncmail.net
Mike Williford at (919) 508-8572 or mike.williford@ncmail.net