



RISK MANAGEMENT ALERT

Sure Schools

SCHOOL RISK MANAGEMENT ADVISORY
Utica National Insurance Loss Control Department Bulletin

TOPIC: Chromated Copper Arsenate (CCA) Treated Wooden Playgrounds

SCOPE: This Risk Management Alert addresses a current issue of public interest with regard to pressure treated wood and the hazards alleged to be associated with exposure to CCA. Many public and private schools as well as churches and daycare centers across the country have playgrounds or play sets made out of lumber that has been treated with CCA.

BACKGROUND: Information supplied by the U.S. Environmental Protection Agency (EPA) and the U.S. Consumer Product Safety Commission (CPSC) was used in developing this Risk Management Alert.

According to the EPA, CCA is a chemical mixture consisting of three pesticidal compounds (arsenic, chromium and copper) registered for wood preservative uses. The chemical mixture is injected into wood by a process that uses high pressure to saturate wood products with the chemical. CCA has been widely used to protect wood from dry rot, fungi, molds, termites and other pests that may threaten the integrity of wood products. The CPSC has in the past indicated that CCA is acceptable for use as a treatment of playground equipment wood, if the dislodgeable arsenic on the surface of the wood is minimized.

Current scientific research suggests that over time, arsenic may begin to slowly leach from CCA treated wood. Local factors such as climate, acidity of rain and soil, age of the wood product and how much CCA was applied influence how much and at what rate arsenic leaches. Of particular concern is that some chemicals may be dislodged from wood surfaces upon contact with the skin. According to the EPA, arsenic is a known human carcinogen and is acutely toxic. As a result concern has been raised regarding children's exposure to arsenic associated with their use of CCA-treated playground structures such as those found on school campuses, in daycare settings, churches and other public locations.

**** It is important to note that the EPA has NOT concluded that CCA-treated wood poses an unreasonable risk to the public or environment.** Nor is the EPA recommending that consumers replace or remove existing structures made with CCA-treated wood or the soil surrounding those structures. However, the EPA has concluded that any reduction in the levels of potential exposure to arsenic is desirable.

On February 12, 2002, the EPA announced a voluntary decision by the wood industry to move consumer use of treated lumber products away from CCA pressure-treated wood by December 31, 2003, in favor of new alternative wood preservatives. The U.S. Federal Register lists the applications or products where CCA treated wood will be acceptable as of January 1, 2004. Public playground structures are not listed in the register. In addition, some states may already have begun to prohibit any new construction of public playgrounds using CCA-treated lumber. For example, the Governor of New York State recently signed a law prohibiting the construction of new playgrounds using CCA-treated lumber effective March 15, 2003.

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Specific Concerns and Guidance: Despite the voluntary decision by the wood products industry to move away from CCA-treated lumber production, there remain CCA-treated products in circulation that were manufactured prior to 2/12/02. In addition, there is a good chance that more CCA-treated wood will continue to be manufactured perhaps only on a limited scale prior to 12/31/03. This wood may be available to schools, daycare centers and churches at an attractive price as suppliers attempt to empty their existing stocks before the cutoff date. The possibility remains then for schools, daycare and churches in states that don't prohibit new construction of CCA-treated wood playgrounds in the time between 2/12/02 and 12/31/03 to opt for less expensive wooden playgrounds that may be constructed from existing stocks of CCA-treated lumber.

**** In the absence of any state regulation prohibiting new construction of CCA-treated wooden playgrounds, we discourage the purchase/use of any lumber products treated with CCA or any other inorganic arsenical.** Guidance to schools, churches and daycare centers regarding the need to properly maintain their existing wooden playground structures in the safest possible manner is available from the EPA and CPSC.

Recommendation: The following is a standard recommendation for locations (church, daycare, schools) where playgrounds are constructed of lumber treated with CCA:

Existing playgrounds constructed from lumber treated with Chromated Copper Arsenate (CCA) should be maintained in such a manner as to minimize CCA from leaching from the structure. According to the U.S. Environmental Protection Agency (EPA), applying certain penetrating coatings (e.g., oil-based, semi-transparent stains) on a regular basis (e.g., once per year or every other year depending on wear and weathering) may reduce the migration of wood preservative chemicals from CCA-treated wood.

For further guidance on safe handling and maintenance of CCA treated wood/playgrounds please refer to the following information sources:

- **National Pesticide Information Center: 1-800-858-7378**
- **U.S. Federal Register 2/22/02 www.epa.gov/pesticides/citizens/1file.htm**
- **U.S. EPA Questions and Answers, Consumer Safety Information Sheet and worker protection:**
 - www.epa.gov/pesticides/citizens/cca_qa.htm
 - www.epa.gov/pesticides/citizens/cca_transition.htm
 - www.epa.gov/pesticides/citizens/cca_consumer_safety.htm
- **U.S. Consumer Product Safety Commission: www.cpsc.gov**
- **CPSC Handbook for Public Playground Safety**