

CCA-Treated Wood: Child Care Visit Procedures

The guidelines below pertain to completing the "CCA Pressure-Treated Wood Form." The form may be completed by either the Environmental Health Specialist (EHS) or the child care operator.

STEP 1

During a child care visit, the EHS shall identify any non-painted wood, which appears to be accessible to children (see accessibility). Since CCA-treated wood is not always identifiable by color (green wood), all wood is assumed to be treated including:

Playground Equipment	Building Components (decks, siding, trim, etc.)
Landscaping Wood	Fences
Tables	Benches

The EHS shall also document if accessible bare soil exists under the treated wood. It shall also be documented if there are any markings on the wood which indicate that the wood was treated with CCA.

STEP 2

EHS shall ask the operator when the treated wood was installed. If the operator is unsure, the EHS shall document the installation date as UNKNOWN. If operator indicates that installation occurred before January 2005, it shall be documented as PRE-1/1/05. The EHS shall ask the operator if the wood was sealed in the past two years with one of the three acceptable sealants. The EHS shall request a specific date or range and document the response (e.g., EST-JULY 2006). Operators who indicate sealing within the past two years shall be instructed to complete the CCA Pressure-Treated Wood Form detailing the sealant information. They shall also be instructed to keep this documentation on file for future inspections. If the operator is unsure or indicates that the wood is not sealed, it shall be documented as NO.

STEP 3

If exterior wood has not been sealed in the past two years (or the operator is unsure), the operator shall be directed to seal the wood within 30 days of the visit and submit (or place on file) the CCA Pressure-Treated Wood Form detailing:

WHAT WAS SEALED (e.g., landscape, siding, playground equipment)
WHEN IT WAS SEALED
WHAT THE SEALANT WAS (i.e., manufacturer, type of sealant)

STEP 4

If the wood has already been sealed, the operator shall be asked if any accessible bare soil is present and how it was addressed. If bare soil has not been addressed, the operator needs to indicate how it shall be addressed. The operator shall be instructed that bare soil underneath CCA-treated wood shall be treated by one of the following three methods:

REMOVED & REPLACED WITH AT LEAST 4 INCHES OF SOIL
COVERED WITH AT LEAST 4 INCHES OF SOD, SAND, OR SIMILAR MATERIAL
OTHERWISE MADE INACCESSIBLE TO CHILDREN

The operator shall be directed to have the soil treated within 30 days of the visit and documented on the CCA Pressure-Treated Wood Form. The following information is needed:

WHERE AND WHEN SOIL WAS ADDRESSED
WHAT METHOD WAS USED

COMPLIANCE DETERMINATION

CCA-pressure treated wood installed after September 1, 2006 shall be addressed as indicated above unless the operator has the original CCA label, in which case the label shall be compared to the EPA Supplemental Guidance on Interpretation of Revised CCA-Wood Preservative Label to determine compliance.