

Comparison of Treated Wood to Resinated Wood

Resinated Wood	Treated Wood
Resinated wood is a sought-after fuel by many manufacturing and electricity-generating operations and is an integral part of the wood manufacturing process.	✓
Resinated wood is managed as a desirable fuel for its higher Btu levels (due to low moisture content and the extra heat of added chemicals)	✓
Resinated wood is “clearly considered and managed as a valuable commodity”	✓
Contaminant levels “may not always meet the contaminant legitimacy criterion in every situation”	✓
Wood product plants were “designed to specifically use these residuals” and “would not be able to operate as designed without this material”	✓
(Implicitly) Disrupting this established, valuable commercial relationship would cause adverse economic consequences	✓
“EPA recognizes that some specific types of non-hazardous secondary materials, such as resinated wood residuals, are more like valuable commodities than solid wastes. Resinated wood is a secondary material that, upon examination, is not discarded when used on-site or transferred off-site to a different company.” 76 Fed. Reg. at 15,499-500.	✓

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