

## Appendix 1

### Best Management Practices (BMPs) Associated with the Use of Pentachlorophenol-treated Utility Poles in Vermont

#### Procurement, Delivery & Storage

1. Require Traceable ID brand with plant location and year produced, which can be traced to the batch of treated poles.
2. Require all poles used in VT to be treated to AWWA specifications for deterioration zone 2.
3. Require all poles used in VT to be double vacuum treated or extend vacuum cycle to twice the standard length prior to delivery to VT. In some cases, utilities may require immediate delivery of poles for emergency restoration activities, and that such poles may deviate from normal specifications. However, in all cases, reasonable efforts will be made to install poles in accordance with these BMPs.
4. Inspect poles on delivery – Retain the right to reject any pole that exhibits excessive sweating of preservative solution. This is more readily accomplished during the warmer months.

#### Permanent Pole Storage Areas *Use for design of new construction or substantial reconstruction of existing pole storage areas*

1. Locate 100 feet from drinking water sources and as far away as possible from residences.
  - a. Design considerations should include:
    - i. A low permeability surface material (compacted soil or asphalt) with absorbent/organic material; or
    - ii. Other containment/migration prevention measures
2. Poles should be elevated off ground surface
3. Ground surface should consist of a low erosion potential substance
4. Maintain a yard slope of less than 10% throughout the pole storage area
5. Pole storage areas should be sited to limit odor impact to the public
6. Pole storage areas should be visually inspected when work is being done at a pole yard for excessively sweating poles, unusual staining, or other evidence of unusual releases of pentachlorophenol.

#### Pole Siting & Construction

1. Onsite utility personnel and contractors should inspect all poles prior to installation to ensure no excessive release of preservative solution is occurring
2. Before installing any new pole, determine if there are any shallow drinking water sources within 50 feet of the pole location. Wherever feasible poles should be located at least 50 feet away from shallow drinking water sources; if this is not feasible utilities should, in the following order;
  - a. Use an alternative type of treated pole
  - b. Use a containment structure or barrier (e.g., pole sleeve)
  - c. Work with landowner(s) to develop a proactive plan to prevent contamination to the drinking water supply. Also provide landowner ANR fact sheet, *What to Do If You Suspect Drinking Water Contamination from Utility Poles*

#### Decommissioning, Retirement, and Disposal of Pentachlorophenol-treated Poles

1. Removal of poles (based on specific site characteristics)
  - a. Cut pole and leave butt in ground: appropriate in remote locations and sensitive areas (e.g., wetlands) where access by construction vehicles is difficult or unsafe, or poses significant environmental risk, including soil erosion
  - b. Pull pole butt and replace with clean fill, where appropriate: appropriate in locations accessible by construction equipment or where the utility or landowner determines that cutting the pole would pose an unacceptable risk of injury after the pole butt decays
  - c. If excavation is required to remove the pole, limit soil disturbance to the extent possible and implement soil management, and erosion and sediment control measures. Excavation should be delayed when

there are extreme weather conditions which may lead to erosion (high sustained wind, heavy precipitation) and are within 50 feet of a drinking water well.

- d. For work within 50 feet of a shallow drinking water source, excavated soil should be removed and disposed of in accordance with Vermont solid waste regulations.
  - e. Grossly contaminated soil should be removed and disposed of in accordance with Vermont solid waste regulations.
2. Reuse pentachlorophenol-treated wood poles consistently with the restrictions placed on the original product.
    - a. Provide ANR fact sheet "Managing Treated Wood Waste" to all private parties that accept decommissioned poles for reuse.
    - b. If reuse is not feasible, dispose of treated poles in accordance with all applicable ANR regulations

### Training/Education

1. In order to ensure compliance with these BMPs train appropriate personnel to:
  - a. Locate and identify shallow drinking water sources
  - b. Identify environmentally-sensitive areas
  - c. Identify poles that are excessively sweating preservative solution
  - d. Ensure familiarity with proper handling and safety precautions
  - e. Identify and report potential contaminant releases from utility poles