

Waste Wood

Quick guide 43_17

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What's this document about?

This document provides a comprehensive guide on waste wood; what waste wood is, how it is classified and categorised, how it is regulated and issues arising from its regulation.

It replaces two previous notes; Briefing on the regulation of waste wood (version 2, November 2014) and our position on The environmental regulation of wood (version 2.0, June 2010).

Who does this apply to?

This guide has been produced to help our permitting and compliance officers identify the key issues relevant to the regulation of waste wood in order to support their site permitting and compliance work.

This is an internal guide. However, it may be shared externally where appropriate in order to help deliver a consistent regulatory approach.

Contact for queries and feedback

- E&B non-hazardous waste storage and treatment team
- E&B hazardous waste regime team.
- For anonymous [feedback](#) for this document.

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Introduction

Overview

For waste regulation purposes, we start with the decision as to whether or not wood is waste.

If wood is waste; how that waste wood is classified (hazardous or non-hazardous) then graded dictates how it is regulated and the end uses which are available.

Non-waste wood may still be subject to other environmental regulation (e.g. wood-burning combustion units of 20MW thermal input or more), but that is not considered here.

When is wood waste?

What is not waste wood?

Virgin timber is not waste. We will not apply waste controls to virgin timber residues if the residues are certain to be used for the same purpose to which you would use virgin timber. This includes:

- woodchip, left in situ, used in gardens or on pathways;
- a raw material for composting;
- animal bedding or equestrian exercise surfaces;
- fuel in an appliance such as a biomass boiler or wood burning stove (but not burning in the open for disposal);
- raw material for the production of furniture, utensils or other wood-based products or in paper production;
- its use to create or maintain a habitat.

Virgin timber includes:

- trees and branches, shavings and sawdust, removed during forestry, woodland or river bank management;
 - trees and branches, shavings and sawdust removed from watercourses following flooding;
 - virgin timber shavings and off-cuts produced by sawmills, wood-working or timber product manufacture before the virgin timber is subject to treatment or use.
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What is waste wood?

Wood, which is not virgin timber (that is, wood that has been used for any purpose) and associated residues such as off-cuts, shavings, chippings and sawdust, either treated or not treated, is waste. They remain waste and subject to waste regulatory control until completely recovered.

Clippings or trimmings that consist mainly of foliage - the leaves of a tree or leaves on the stems or branches on which they are growing; is waste - 'green-waste'.

Where virgin wood is mixed with waste wood such as fence posts, pallets, construction boarding or other waste, the mixed load is waste.

Treated waste wood is wood that has been treated by being injected, impregnated, sprayed, infused (soaked) or surface coated with any organic or inorganic substances for the purposes of preserving or

protecting it or for changing its appearance. Some of these treatments may not be obvious and visible. Surface coating includes varnishes and paints, glues and non-natural veneers.

End of waste

We recognise there is a wide variation in the specifications used in waste wood markets. As the market for waste wood products develops, it will remain an option for companies to consider whether the waste wood has been fully recovered such that [end of waste is achieved](#).

Tree surgery

Arboriculture

Tree surgeons working in the arboriculture sector typically produce green-waste. As such;

- tree surgeons should register as a lower-tier waste carrier;
 - a T6 waste exemption should be registered for the chipping, shredding, cutting or pulverising of the green waste;
 - an S2 waste exemption should be registered for the storage of green waste away from the site of production.
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Wood treatments

What treatments are applied to wood?

Non visible wood treatments such as sap-stains, fungicides and preservatives and visible treatments such as creosote, paint, varnish, resins, glues and oils, may be applied to wood before and during its use.

Chemical preservative treatments are of concern (e.g. copper, chromium, arsenic) and these tend to be visible treatments.

For visibly clean waste wood which is not marked as kiln-dried or cannot be traced back to the saw mill or aboriculture sector, only sampling and analysis can determine if invisible treatments have been used.

Why are we concerned about treatments applied to wood?

Treated waste wood has been used in applications where it can cause risk to the environment and human health - for example, in composting, used as animal bedding or burnt as a fuel in inappropriate combustion plant.

Waste wood from different sources should be assessed, classified and segregated in order to ensure appropriate handling and processing for recovery or disposal and specific end uses. Quality management systems can help to ensure effective segregation and management of waste wood arisings.

Segregating waste wood

There are two stages to the segregation of waste wood

- separating out hazardous waste wood, and
 - separating non-hazardous fractions into appropriate grades.
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Why do you need to identify and segregate hazardous waste wood?

Waste wood is a 'mirror entry' waste in the [List of Wastes](#). This means that its composition and any hazardous properties have to be determined before a list of waste code can be assigned. Waste wood may may be hazardous or non-hazardous until assessed.

There are legal obligations to assess and classify waste wood produced by a business before it is sent for recycling or disposal.

Waste wood producers are legally required to:

- check if the waste wood is hazardous waste;
- identify the segregation needed. Unless producers of waste wood have a permit to allow mixing, the law prohibits the mixing of any item of wood that is hazardous waste with any -
 - items of non-hazardous waste (including other wood);
 - other types of hazardous waste; and
 - other non-waste materials.
- complete the paperwork for waste contractors so they can manage the waste - this is part of waste '[duty of care](#)'
- determine if the destination site is authorised to accept the waste.

This means that those producing waste wood must have reliable and robust procedures to identify and segregate items of waste wood that are hazardous waste.

If, for any reason, an item of waste wood that is hazardous waste is placed in a container with other wood that is waste

- that item remains classified and controlled as hazardous waste wood and
- all parties involved have a legal duty to separate out the hazardous waste wood when it is in their possession.

Loads containing hazardous waste wood should be rejected at a site authorised to just handle non-hazardous waste wood. In such cases, the operator is obliged to notify us.

Operators will need to meet [additional requirements](#) if they want to dispose of waste wood that is hazardous.

How do you assess, classify and describe waste wood?

To assess and classify whether waste wood is hazardous, producers or processors need to identify

- the Lists of Wastes code or codes that may apply to the waste. This is normally two codes (a mirror entry) where assessment of hazardous properties is legally required to determine which applies.

This assessment will have to consider:

- what hazardous substances are present (for example in timber treated with preservatives, coatings, paints or varnishes or is contaminated from use)
- their concentration and chemical classification, to compare to hazardous waste thresholds.

Such an assessment will always be required if any item of treated wood is present. The presence of treated waste wood is therefore a key piece of information that should be set out in the waste description for Duty of Care purposes on waste documentation.

If the item of wood is reliably known not to be treated or contaminated, then that would be sufficient to conclude that there would be insufficient hazardous substances present.

To avoid any confusion, a non-hazardous mirror entry code cannot legally be assigned to an item of treated wood (or any mixed wood waste that contains it) unless an appropriate assessment has been performed (in accordance with [technical guidance WM3](#)).

The type of treatment, and its concentration, cannot be determined by visual observation of waste wood. Although railway sleepers, creosote coated timber, telegraph poles and demolition waste wood, primarily from old buildings, are particularly likely to be hazardous waste, this does not exclude any other items of treated waste wood from also being hazardous waste. All items of treated waste wood should be regarded as potentially hazardous waste.

Officers regulating waste wood (and waste operators conducting waste acceptance and duty of care checks) should ask the producer of any item of treated waste wood for their assessment of hazardous properties. If the assessment is not in accordance with WM3, the classification will be unreliable.

Practical application of waste wood assessment

In practice, industry's assessment of waste wood tends to be based on the source of that waste wood and grade - the PAS 111 system [discussed in the next section]. The PAS grading system does not address whether the incoming waste wood is hazardous but whether it is treated or untreated. This does not meet our assessment requirements as set out in WM3.

We are working with the key trade bodies to assist them in understanding and discharging their obligations with respect to the assessment, classification, description and segregation of hazardous waste wood. We don't know if hazardous waste wood volumes are significant or minor. We have particular concerns with mixed waste wood sources such as that arising at civic amenity sites, construction and demolition wood and from skip operators.

The waste wood sector has presented some information on waste wood type. For example, particle board is unlikely to be hazardous waste, but we are waiting for additional information and evidence to support.

Until this work is complete and we can provide specific advice for the waste wood sector, we should ensure that:

- railway sleepers, creosote coated timber, telegraph poles and demolition waste wood, particularly from old buildings, are handled as hazardous waste or properly assessed. This is not an exhaustive list.
- treated waste wood is not misdescribed as clean untreated waste wood, especially where mixing of clean and treated waste wood is carried out.
- The waste wood ends up being used correctly

In the near future we anticipate that any item of treated waste wood, that has not been assessed appropriately, should be classified as hazardous waste. We expect forthcoming European guidance to make this clear within 12 months. We therefore expect the wood sector to make very rapid progress to address any deficiencies in forthcoming months to avoid this outcome.

Grading of waste wood and suitable uses

Why is non-hazardous waste wood grading and segregation important?

Waste wood is graded from A to D (see Annex A, [PAS: 111 \(2012\)](#)).

Items of waste wood which are hazardous must be segregated as grade D, before further subdivision of the non-hazardous waste into grades A to C occurs. Assessment, classification and segregation procedures for hazardous waste should be in place and followed.

Wood must be effectively segregated into these grades before subsequent processing for use so that correct controls can be applied.

Regulatory controls and suitable end uses depend on the effectiveness of such segregation. In order to have regulatory certainty for proposed end uses, we need to have evidence of the effectiveness of segregation into these grades and robust management controls.

Grade D waste wood

Grade D waste wood can include any item of waste wood which has been treated, coated, painted or otherwise contaminated with any hazardous substance. This may include for example heavy metals and in particular, copper, chrome or arsenic (CCA), creosote, halogenated compound or metal pigment containing treatments, paints, coatings and preservatives.

Grade D wood must be disposed of at a permitted hazardous waste disposal facility - usually an authorised incinerator.

Where procedures at all stages of the waste chain reliably identify, separate and exclude items of hazardous waste wood, the remaining non-hazardous wood fraction can be separated into grades A to C for subsequent processing for use.

Grade A waste wood

Grade A waste wood must be visibly 'clean' non-hazardous waste wood from the arboriculture sector, packaging waste, scrap pallets, packing cases, cable drums and off-cuts from the manufacture of untreated wood products.

We should not accept as grade A, wood sorted from a mixed waste load delivered to, for example, a skip yard unless we are completely confident on how the wood is assessed and classified.

Single-use packaging and pallets manufactured within the UK are unlikely to have been subject to any form of non-visible treatment other than being kiln dried. However, pallets arising from outside of Europe may have been treated with methyl bromide for biosecurity purposes. In line with international convention, such pallets will be stamped with an M and is therefore treated wood.

Only grade A [untreated, clean] waste wood can be used for animal bedding, as a mulch, in composting, as a fuel in wood burning stoves or other sensitive uses. To ensure that the waste wood destined for these uses is only grade A waste wood, segregation at the point of waste production and tracking is important.

Rejected grade A waste wood becomes either grade B or grade C waste wood.

Grade B waste wood

Grade B waste wood consists of non-hazardous waste wood from the production of wood-based panels; for example, chipboard and medium density fibreboard.

Particle board manufacturing in the UK is subject to a gate-house protocol ([PAS 104](#)). In addition to visual inspection of incoming waste wood, sampling for heavy metals and halogenated compounds is carried out.

Such wood is usually sourced from recycling centres and civic amenity sites, manufacturers of furniture and other wood products. Rejected grade B waste wood becomes grade C waste wood.

Grade C waste wood

Grade C consist of non-hazardous waste wood sourced mainly from construction and demolition activities, recycling centres and civic amenity sites.

Grade C wood is used as a fuel in permitted co-incinerators but is not suitable for clean waste wood combustion plant.

Due to the tight specifications and checks carried out by the board-manufacturing sector, visibly clean grade C waste wood may also go to wood-based panel manufacture.

Duty of care

Some wood recyclers have robust management systems in place to achieve high quality output. However, we do not yet have sufficient confidence that general procedures for the segregation of waste wood are sufficiently robust for some end uses. This applies to all waste wood originating from construction and demolition or municipal sources.

Treatment or use of such waste wood should therefore be in accordance with a relevant exemption, permit or Environment Agency position statement.

All producers, carriers and operators of sites managing waste wood must:

- comply with their duty of care and describe their waste correctly.
 - be aware of the need to accurately code and describe the wood and to draw to the attention of subsequent holders any contamination, especially chemical or organic treatments applied.
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Regulating waste wood activities

Environmental Permitting Regulations

The handling and treatment of waste wood is either a waste recovery or disposal operation, as defined under Article 3 (15) for recovery and Article 3 (19) for disposal of the Waste Framework Directive¹. Examples of recovery and disposal operations are provided in Annex I and II.

These operations are permitted under the Environmental Permitting Regulations (EPR)² either as an installation activity (where required by the Industrial Emissions Directive) or a waste operation, depending on the type of activity and throughput. Waste exemptions are available for certain non-hazardous waste wood recovery activities which allow a defined waste activity to be carried out without the need for a permit as long as all the requirements of the exemption are met.

The burning of waste wood is subject to regulatory control by either the Environment Agency or Local Authority. Waste exemptions for burning waste wood are also available but only for untreated waste wood.

A waste installation

Section 5.4, Schedule 1 of EPR includes pre-treatment of waste for incineration or co-incineration above 50 or 75 tonnes per day treatment capacity depending on whether pre-treatment is for disposal or recovery. Pre-treatment could therefore include the preparation of waste wood for use as a fuel.

Note 5.4.5 and 5.4.6 in [Regulatory Guidance Note 2](#) sets out our interpretation of pre-treatment and includes examples for waste wood.

A waste operation

Most waste wood storage and processing activities will be permitted as a waste operation either under a standard rules permit (SRP) or a bespoke permit. Waste exemptions are available for small scale recovery operations.

SRPs, following external consultation, are subject to change. The 2015 SRP consultation resulted in a significant reduction in the annual throughput of waste wood allowed under the [waste wood SRP](#) - from 75,000 tonnes to 5,000 tonnes. Where an operator can no longer rely on SRPs, a bespoke permit is required.

Waste exemptions

There are several waste exemptions which if registered and all requirements are complied with in full, allow operators to carry out non-hazardous waste recovery activities without the need for a permit.

¹ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

² The Environmental Permitting (England and Wales) (as amended) Regulations 2010

The exemptions are set out in Schedule 3 of the EPR. However, it is also worth looking at the exemption guidance on the [Gov.uk web pages](#).

The list of waste codes used in the exemptions, specifies the source of the waste wood and type allowed. However, for the exemptions set out below, the corresponding waste wood grade is identified.

Exemptions for recovering or using waste wood:

- U1 – Grade A waste wood for use in construction.
- U4 – Grade A waste wood used as a fuel in a small appliance such as a wood burning stove for heating.
- U8 – Grade A waste wood for use in equestrian exercise surfaces or for animal bedding. Grades A, B and grade D telegraph poles and railway sleepers for use in construction, fencing and other barriers etc.
- U9 – Grade A and B waste wood to manufacture finished goods.
- U12 – Grade A waste wood for use as a mulch.

Exemptions for treating specific sources of waste wood for the purpose of recovery:

- T5 – Screening and blending grade A waste wood to produce an aggregate or soil
- T6 Treatment of Grade A to C waste wood by chipping, shredding, cutting etc.
- T12 – Sorting, dismantling, repairing wood, telegraph poles, wooden pallets - grades A to D.

Exemptions for disposal only at the place where the waste is produced:

- D6 - Disposal by incineration of grades A to C. Grade D wood is specifically excluded.
- D7 – Burning untreated waste wood in the open for disposal.
- D8 - Burning waste at a port under a Plant Health Notice ("Dunnage").

Exemptions for storage pending recovery of the waste:

- S2 – Storage of wood including telegraph poles and railway sleepers - all grades of waste wood subject to EWC codes.

Following a Direction from the Secretary of State, storage of wood as part of a Part B permit is regulated by the Local Authorities as a directly associated activity.

We know that some operators register exemptions and do not comply with all the limits and / or conditions set out in that exemption. These waste activities are illegal and where found, appropriate action should be taken in accordance with our [enforcement and sanctions statement](#) and statement.

Households are not businesses or undertakings. Households need to comply with an exemption if carrying out a waste activity such as burning waste wood, composting etc. but they are not required to register the exemptions.

We anticipate Government consulting on changes to the exemption regime in March 2017. We do not anticipate any changes to the legislation until April 2018 at the earliest.

Waste Wood conversions

It may be necessary to estimate the amount of waste wood stored on a site to check compliance with tonnage limits prescribed in an exemption or permit.

You may need to pace out or measure the storage area and stack height in order to estimate the volume stored, or use more accurate techniques, for example, theodolites, GPS instruments.

Typical conversion factors from volume to tonnage for waste wood are as follows:

Unprocessed feedstock	1 m ³ = 0.16 tonnes
Pre-crushed feedstock	1 m ³ = 0.20 tonnes
Screened chip	1 m ³ = 0.25 tonnes
Unscreened chip	1 m ³ = 0.28 tonnes
Fines	1 m ³ = 0.38 tonnes

Burning waste wood

What about burning waste wood?

Burning waste wood is subject to Environment Agency or Local Authority control depending on the waste throughput. Treated waste wood can only be burnt in a Local Authority SWIP (Small Waste Incineration Plant) or IED Chapter IV compliant incinerator.

- Below 50 kilograms per hour – [U4](#), [D6](#) or [D7](#) waste exemptions are available and only applies for the burning of grade A waste wood. D6 and D7 can only be used at the place where the waste is produced. If the waste wood code or waste type to be burnt is not specified in the exemption, a SWIP is required under Schedule 13 of EPR.
- From 50 kilograms per hour up to 3 tonnes per hour– a Local Authority Section 5.1 Part B (a) (v) permit is required. This is available for grade A wood. Grade B waste wood can also be used but only if there are adequate quality controls in the supply chain to ensure there is no grade C wood is included. Burning grade C wood at this throughput can only be done under a SWIP.
- 3 tonnes per hour or more – Section 5.1(b) of Schedule 1 EPR permit required which is subject to Best Available Techniques.
- 10 tonnes per day or more - Section 5.1(a) of schedule 1 EPR available for grade D waste wood. And, BAT applies.

Where grade D waste wood is burnt - normally under Section 5.1 Part A(1)(a) (technically it could also be done as a SWIP), it is subject to the requirements set out in Chapter IV of the IED (formerly the Waste Incineration Directive), with a minimum combustion temperature of 850°C or 1100°C for 2 seconds - depending on whether the halogenated organic content is less or more than 1%.

Burning grade C wood in a SWIP or as a 5.1A(1)(b) activity is also subject to the requirements of Chapter IV of the IED - minimum temperature of 850°C for 2 seconds. Chapter IV will also apply to burning grade B wood unless there are adequate quality controls in the supply chain to ensure no grade C material is included.

Chapter IV requires continuous emissions monitoring, sophisticated abatement equipment and heat recovery (normally to generate electricity). As such, burning grade C wood in a SWIP is not usually economically viable and so most plants will fall under 5.1 Part A(1)(b).

What about burning virgin timber off-cuts?

Virgin timber shavings and off-cuts produced by sawmills, wood-working or timber product manufacture before the virgin timber is subject to treatment or use is not waste. Burning these off-cuts and shavings in a wood burner is not subject to waste management controls.

Kitchen, furniture or other wood product manufacturers, burning for example, off-cuts from particle board, plywood or melamine facing board etc. is subject to waste management controls and must be done either under a registered exemption or an appropriate permit.

What about Smoke Control Areas?

In [Smoke Control Areas](#), smoke cannot be emitted from a chimney. However, appliance exemptions are available for specified appliances and fuels. This is separate to the EPR.

Where burning of waste wood takes place within a Smoke Control Area in accordance with an appliance exemption, EPR permitting requirements or waste exemptions still apply.

What about the Biomass Suppliers List and the Renewable Heat Incentive?

The [Biomass Suppliers List \(BSL\)](#) is a list of woodfuel which is eligible for the [Renewable Heat Incentive \(RHI\)](#) scheme administered by Ofgem.

EPR permitting requirements or waste exemptions still apply if waste derived woodfuel or a blend of virgin and waste woodfuel is produced or used.

Heating open spaces or empty sheds is not eligible for RHI payments. Ofgem has a [Counter Fraud Team](#) that manages allegations of fraudulent behaviour and would welcome any reports.

What about burning wood off-cuts from furniture or kitchen production?

Furniture and kitchen manufacturers routinely burn their wood off-cuts in small industrial stoves in order to provide space heating for their industrial units. Wood off-cuts include particle board with melamine facing (a decorative plastic laminate).

We have provided a low risk position statement - [LRW 551](#) to allow such off-cuts to be burnt as a fuel for heating at the same place where it is produced. Other than the waste type, the limits and conditions of the U4 waste exemption applies. Use as a fuel means that the waste wood is not being burnt for the purpose of disposal.

The board-manufacturing sector work to tight specifications involving sampling and testing of the incoming waste wood. We are therefore confident that Grade D waste wood and visibly treated grade C waste wood is excluded from particle board manufacture.

Wood facings such as melamine do not contain heavy metals or halogenated compounds. On balance, we consider that the burning of such facings as part of the particle board is low risk, as set out in our low risk position statement.

What about biochar production?

Two [low risk position statements](#) have been published which deal with the manufacture of biochar from untreated waste wood (LRW 547) and the spreading of biochar on land to confer benefit (LRW 548).

Biochar production by pyrolysis is incineration and if LRW 547 does not apply, a permit is required - see the section 'what about burning waste wood'.

What about dunnage?

"Dunnage" is waste plant tissue or wood of any kind – including packaging material, spacers and pallets – used to wedge or support a ship's cargo.

Dunnage needs to be burnt on arrival at a dockside to avoid non-native species, e.g. types of beetle, being introduced from abroad. The burning of dunnage at the dockside where the cargo is unloaded is exempt from environmental permitting - [D8](#).

For practical or logistical reasons, it is not always possible to burn all the waste plant tissue or wood at the dockside. Instead the waste is burnt at the place where the goods are delivered to and unpacked.

We have provided a [regulatory position statement](#) to allow the burning of dunnage at the place where the goods are delivered to without the need for an EPR permit.

Exporting waste wood

Exporting waste wood

Trans-frontier shipment documentation for the export of waste wood is required and should identify the location from where the shipment commences. This is at the point of waste production or an exempt or permitted waste facility; it cannot commence from a port where the waste is stored for a short period of time.

Non-treated waste wood (grade A) can be exported under [Article 18 controls](#) (green list controls). You do not have to notify us of these exports.

Treated waste wood is notifiable waste (grades B to D) and Operators can submit a [notification](#) using our international waste shipments [on-line tool](#). Waste wood is exported for panel board manufacturing and for use as a fuel (seasonal).

Storage of waste wood at ports pending export

Storage of wastes, unless a waste exemption applies, requires a permit. There are circumstances at ports where waste is stored for short periods of time as set out below.

Dealing with shipping containers

Ports run very rigid systems when dealing with shipping containers for export. All shipping containers are booked onto a ship and must arrive at the dock within a specific time period. If the shipping container arrives at a dock too early or too late so that it misses its loading window, then there are daily financial penalties. Typically, ports run a 7 day window in which shipping containers must arrive at port and be loaded onto a ship. We consider that storage within this type of operation is incidental to transport and does not require a permit.

Ports which import shipping containers of waste may run similar rigid systems in which there is a short window between unloading, storage and onward transport. This window takes into account custom checks and other logistical constraints of moving the waste. Again penalties may be applied if this window is exceeded.

We consider that storage within this type of operation is incidental to transport and does not require a permit.

Dealing with ferry services

Docks operate three types of services:

Lorries, which are loaded onto ferries (comprising tractor unit and trailer);

Trailers which are delivered by lorry to a dock (the tractor unit departs the port and the trailer is loaded onto the ferry for a tractor unit at the destination to collect); and,

Containers which are delivered by lorry to dock and off-loaded at the port, which are then transferred onto a trailer and loaded onto the ferry (this is then removed from the trailer at the destination port and then loaded onto a trailer when collected).

For such operations, the storage and loading operation of the lorries and trailers occurs over a short time period. We consider that storage within this type of operation is incidental to transport and does not require a permit.

Dealing with bulk services

Ports try to avoid double handling when dealing with bulk services. A storage area is assigned in which waste is brought to that area in curtain-sided lorries or open top lorries, trains or other modes of transport. Once enough waste is, or is anticipated to be, accumulated at that storage area, a bulk-carrier ship is chartered. Waste can be stored in that area anywhere between several days and several months depending on the pace of deliveries and size of the ship. Generally, this is a permanent facility where bulking up occurs regularly, although several areas on the port may be utilised if the port requires flexibility.

We consider that storage within this type of operation requires a permit.

Other issues

Risk of fire and dealing with fines.

We are currently expecting [fire prevention plans](#) for sites storing waste wood where they are for:

- New permit applications.
- Variations to existing permits where there would be an increased risk of fire.
- Transfers where there are concerns about the compliance history of the new operators.
- High risk fire sites.
- Sites that have had a fire.

The requirement for an FPP will be extended to existing sites but this has not yet been finalised. When agreed it will be done on a risk-based approach. In the meantime, we should only be asking for FPP in the above circumstances only.

The FPP guidance is best practice for waste wood activities including sites operating under a waste exemption or Part B permit.

The justification on stack sizes, the science behind self-combustion and justifications for other fire prevention requirements for waste wood is set out in our [consultation response document](#) which accompanies our FPP guidance.

During processing of waste wood, fine materials are produced. This often contains materials such as glass, metals, plastics or wood grades B and C, which cannot be readily recycled. Such fine materials should be kept separated and either be landfilled or incinerated.

Fine materials should not end up in composting facilities or spread to agricultural land. Where this happens then we shall take enforcement action in accordance with our [enforcement and sanctions statement](#).

We will support the sector and review sustainable proposals for alternatives to incineration or landfill of waste wood fines and update this note accordingly.

Appropriate measures for waste wood acceptance

Measures The appropriate measures include:

Item	Measure
1	<p>Operators should check each movement of waste wood brought to site and ensure that the details on the accompanying waste transfer note (non-hazardous waste) or consignment note (hazardous waste) are correct.</p> <p>To check the classification the operator will need to identify the original process that produced the waste (e.g. construction and demolition) and ensure that the composition of each item has been assessed and classified. This requirement should be set out in the acceptance procedure.</p> <p>The classification of the waste wood cannot reliably be checked by visual observation of the load on receipt.</p>
2	<p>Operators should check that the waste wood has been sourced correctly and is of the right type in accordance with the restrictions set out in any exemption the process is relying on or permit conditions.</p> <p>Misdescribed waste or waste which is not allowed under the exemption or permit should be rejected and either returned to the supplier or sent to an appropriate regulated facility.</p> <p>Adequate provision should be made for storing rejected waste wood in a quarantine area pending timely off-site removal.</p>
3	<p>Waste wood should only be accepted if adequate storage and treatment capacity is available on site.</p>

Appropriate measures for waste wood storage, handling & treatment

Measures The appropriate measures include:

Item	Measure
1	<p>The total maximum storage capacity of the site and storage areas should be clearly stated in writing and effective stock management should ensure that the maximum storage capacities of the site and storage areas are not exceeded.</p>
2	<p>All waste wood storage and handling areas should be on an impermeable surface and sealed drainage and located away from watercourses and sensitive receptors.</p> <p>Surface water should be released via oil interceptors and particulate traps.</p>
3	<p>Rejected waste wood should be stored separately and should not be mixed with accepted waste.</p>

Item	Measure
4	Waste wood should be stored in accordance with an approved fire prevention plan . When FPPs are formally required is set out in the section 'Other Issues'.
5	An appropriate dust and noise management plan should be implemented in order to prevent or minimise any impact on site neighbours.
6	Drop heights should be minimised and material transfer points and storage should be sheltered from the wind.
7	<p>Storage areas should be designed to minimise material handling and measures should be taken to prevent dust from material handling activities (e.g. tipping and loading) and vehicle movements.</p> <p>Examples of appropriate measures include regular cleaning and dampening of roadways and yard areas subject to vehicle movements, the use of dedicated tipping and loading areas provided with dust suppression systems, placing storage facilities close to processing areas and using closed or sheeted vehicles.</p>
8	<p>Waste wood processing and storage may need to take place within a building where dust may impact on nearby sensitive receptors.</p> <p>Buildings in which storage and / or waste wood processing is undertaken, should be subject to building air extraction to appropriate abatement equipment (e.g. fabric filters, cyclones or wet scrubbers) to minimise dust emissions.</p>
9	The drainage infrastructure of the storage area(s) should be able to contain all possible contaminated run-off, including rainfall (if storage is outdoors) and fire water.
10	<p>Procedures should be in place for the regular inspection and maintenance of storage areas and associated infrastructure, including site surfacing, drainage systems and containment measures.</p> <p>Inspections should pay particular attention to signs of damage, deterioration and leakage. Records should be kept detailing action taken. Faults must be repaired as soon as practicable.</p>

Related documents

Reference documents

Integrated Pollution Prevention and Control, [Reference document on best available techniques for waste treatment industries](#), European Commission, August 2006. [Due to be replaced in 2017/8

[Risk assessments for your environmental permit](#)

[S5.06 IPPC Sector Guidance Note](#), Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste, Environment Agency.

[Environmental permitting guidance: waste incineration](#)

[Regulatory Guidance Note 2](#). Understanding the meaning of regulated facility. Appendix 1 - Interpretation of Schedule 1 to the Regulations. Environment Agency. May 2015.

[PAS 104](#) Wood recycling in the panelboard manufacturing industry. Specification for quality and guidance for good practice for the supply of post consumer wood for consumption in the manufacturer of panelboard products, ISBN 0-580-43531-8 WRAP and BSI, 2004.

[PAS 111](#) Specification for the requirements and test methods for processing waste wood, ISBN 978 0 580 69643 5 WRAP and BSI, 2012

Technical Guidance [WM3](#) Waste Classification - Guidance on the classification and assessment of waste
