

wra



Wood
Recyclers'
Association

Serving the Waste Wood Sector for 21 Years

2001-2022

WRA Waste Wood Classification (WWC) Update

**Vicki Hughes - WRA Board Technical Lead and
McPhee Associates Limited**

Enva Acceptable Materials Guide – Valid until 31st Aug 2023.

Acceptable Materials Guide



Manchester | Version 01

Grade A+	Grade A
Soft White Wood including: Pallets, Off Cuts, Cable Drums, Scaffold Boards, Floor Boards, Skids.	All Grade A+ type material plus: Plywood, OSB, Hardwood, Solid Timber and Plain Chipboard.
<small>All above materials must be made from soft white wood and be free from paint, dirt and cannot be charred or rotten.</small>	<small>Wood must not include window frames or doors.</small>

Grade B	Grade C
All Grade A+ and A type material plus: Window Frames and Doors, MFC (Melamine Faced Chipboard), Melamine and Untreated Decking and Fence Panels.	All Grade A+, A and B type material plus: Hardboard, Civic Amenity Wood Waste and MDF.
<small>Loads will be graded according to the lowest grade of wood contained in the mix as determined by Enva Wood Recycling.</small>	

All types of metals will be accepted within all grades except plastic coated wire

Unacceptable Materials

We do not accept: Paper, plastic, cardboard, felt, glass, black bags, foam, fabric, plastic coated wire, hazardous wood waste including any creosote and cca treated railway sleepers, telegraph poles, treated fence panels, treated decking, hardcore, formica, greenwaste, soil, burnt or charred material or bricks.

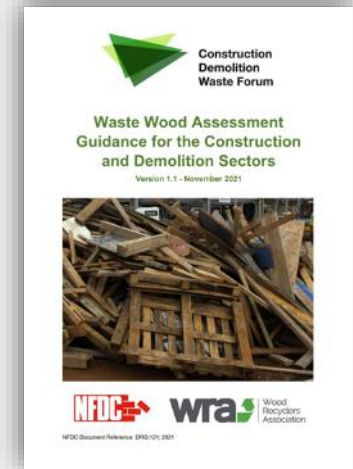
Excessive contamination of loads with unacceptable materials will result in the loads being rejected or excess charges being applied.

For further information call your Account Manager on **0161 370 2360**



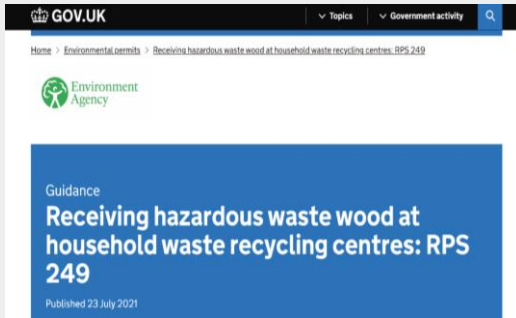
WWC Results Sampling/Testing completed in April 2020

- **Results to date:**
- **HWRC** - small amounts of haz content in fence posts and decking from household stream – **0.06% (600 tonnes)**
- Diminishing and won't exist from 2023 onwards
- **C&D stream** - all construction and most demolition waste wood non haz
- **Not enough evidence** either way on haz content of structural timbers, external joinery and tiling battens from pre-2007 buildings
- EA issued **RPS 249 and RPS250** & SEPA and NRW have confirmed positions
- **Industry guidance** developed to ensure waste wood is correctly identified and segregated.



Waste Wood Classification – Household (HWRC)

HWRC RPS 249 expires April 2024 and allows business as normal for now



- **On-going sampling & testing** of fence posts and decking from circa 40 WRA members sites
- To prove that hazardous **content reducing** and will no longer be there in the future
- **Specific sampling process** being followed with verified testing houses and test criteria
- Industry **sharing results** to further knowledge

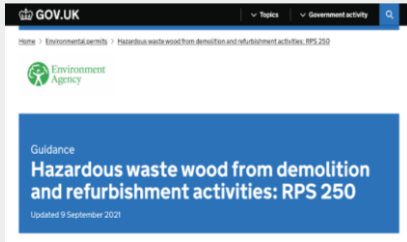
Waste Wood Classification - Demolition

HWRC RPS 250 expires Sept 2023 and allows business as normal for now

- Following 5 years evidence gathering, C&D stream only has **10 potentially hazardous items (Amber)**
- These are items **from pre 2007 buildings only**
- These represent **tiny proportion** of demolition stream – estimated at **0.08% (4 k tonnes)**
- **Ongoing testing required** to remove more items from the Hazardous list






Barge Boards
External Fascia
Soffit boards
External Joinery
External Door
Roof Timber
Tiling Cladding
Tiling Battens
Timber Frames
Timber Joists



What do you need to do now?

- **Regulatory Duty of Care – Must Assess in line with RPS250**
 - **Review waste wood onsite** inline with industry Acceptable Material Guidance
 - Potentially haz or unknown wood items should be **externally tested** via recognised test houses
 - Use **WRA01 (HWRC) or WRA02 (C&D) test suites** to ensure data is captured and shared
 - If confirmed as hazardous, **consign** using Hazardous Consignment Note
 - **Up to 31st Aug 2023**
 - **Segregate**, if possible, from non haz wood
 - If not possible - blend with non-haz wood and **estimate % of hazardous**
CRUCIAL POINT to ensure overall volumes reported are not over stated
 - Move under **dual EWC codes** to Reprocessor

The Risk of not continuing to test

Potential Haz (Amber) Item	Producer - C & D Company		Transfer Station / MRF		Wood Reprocessor		Biomass Plant or End-Use Storage Site
	KG's		T's		000'TS		000,000'Ts
3kgs	Small Quantity (KG's) potentially haz material in 5 tonne skip = 5 tonnes consigned Haz		Processed through or tipped in wood bay = 20 tonne consigned Haz.		Each and every day all raw material mixed so despatched as Haz Annual output = 50KT		Will record / receive *3MT Haz Material
Volume permit variations			In the thousands?		In the hundreds?		~100 (Plant plus 1 storage site. (Markinch has 4)
*Assume 400kt demolition wood and 1% haz = 4Kt. UK total wood arising 4.5Mt therefore 0.08% in reality.							

Ongoing Position

- RPS250 will be **withdrawn** on 1st Sept 2023
- All **Amber** items **will** become **hazardous** at that point unless tested
- All wood processors will be **updating Acceptable Material Schedules** to exclude the Amber items, unless testing proof is supplied.
- Hazardous items need to be sent for **specialist disposal - £200 + per tonne**
- Panel Board and Biomass Operators will **NOT** take hazardous wood
- Risk is that if not separated then larger volumes of waste wood could be **classified and charged as hazardous for no reason**
- **Only 1 or 2 operators** who can currently process hazardous waste wood
- Huge **impact on recycling targets** for local authorities

Why is sampling so important?

- To **confirm IF** items are hazardous or not – small volume will impact on ongoing C & D wood usage
- Demonstrate **environmental credentials to customers & regulators** by providing evidence to support better use of a resource in line with **Environmental Sustainability Reporting**.
- Provide **credible data** to EA and other regulators
- **Reduce paperwork, delays and costs** on sites
- Use **existing mature** wood supply chain outlets
- Ensure no waste wood gets wasted or goes to the wrong destination – **loss of recycling and recovery** options

WRA Quick Guide

See [WRA-Demolition-Wood-Quick-Guide.pdf \(woodrecyclers.org\)](http://www.woodrecyclers.org/WRA-Demolition-Wood-Quick-Guide.pdf)

Quick Guide on Potential Hazardous Wood Items under RPS 250 – August 2022

IDENTIFY . TEST . ASSIGN OR CONSIGN?

1. Fence Posts
(Not Fence Panels) ▾



2. Decking ▾



The items BELOW are only relevant if FROM pre-2007 buildings

3. Barge Boards, Fascias and Soffits ▾



4. External Joinery (wooden windows and conservatories) ▾



5. External doors ▾



6. Roof Timbers ▾



7. Tiling and Cladding Batters ▾



8. Timber Frames / Joists ▾



These items must be assessed as per RPS 250, using the available guidance documents, then externally tested as detailed below, and if deemed Hazardous consigned using a Hazardous consignment note, which needs to be completed fully including the actual weight of the specific items not just the full load weight. These items should be segregated and only when segregation is not practical can they be blended within a non-hazardous wood load.

They can then be moved under Dual EWC codes 17 02 04* and 17 02 01, or 19 12 06* and 19 12 07 or 20 01 37* and 20 01 38 to a reprocessor that will comply with the RPS250 approved end destinations for this material. Demolition waste wood passing through a transfer station should retain its 17 code. It will become a 19 code if mechanical treatment such as chipping is carried out.

INSTRUCTIONS FOR WASTE WOOD CLASSIFICATION TESTING & SAMPLE COLLECTION

- Please ensure that the samples taken are from whole pieces of the items identified over leaf. Then take a cross section from the middle no smaller than 150mm long – which should be sent to the lab.
- Safety equipment worn to collect the samples must be clean and free from any sources of hydrocarbon or metal contamination and where suspected cross-contamination has been handled, new gloves should be worn for subsequent samples. Cross contamination of samples must be avoided.
- Any sample preparation equipment must also be cleaned between each item.
- The samples will need to be securely wrapped in airtight packaging (e.g. rubble sacks secured with cable ties or shrink wrapped) for posting and must have this form with the completed information inside the packaging.

Please complete the information below and put this sheet in with the sample.

Company Name: _____

Site Name: _____

Location: _____

Contact name: _____

Telephone: _____

Sample Type (Use new form for each different wood type):

Wood Type	Approx. Age of building	Enclosed Sample (Tick as appropriate)	Sample Source – HWRC, Household Transfer Station, Construction Site or Other (Please specify)	EWC Code (Tick as appropriate)		
				17 02 04*	19 12 06*	20 01 37*
Fence Post (NOT fence panels)	N/A					
Decking N/A	N/A					
The items below are only relevant if from pre 2007 buildings						
Barge Boards						
External Fascia						
Soffit boards						
External Joinery						
External Door						
Roof Timber						
Tiling Cladding						
Tiling Batters						
Timber Frames						
Timber Joists						

Test Required: WRA01 – HWRC or Householder Sourced (_____) or WRA02 – C & D or Householder Sourced (_____)

Sample Unique Reference Number (To be provided by person sending sample to chosen laboratory and same unique reference number to be used on required Chain of Custody Form for that laboratory).

Completing this request form means you give permission for your results to be shared with the WRA either directly by your lab or via the Hazardous Waste Online platform. The only information shared will be the test result, the wood type and the geographic location to allow WRA to satisfy the EA's testing criteria. No specific company information will be identifiable. Please sign below to confirm this:

Name: _____ Signature: _____

This will ensure we can complete the assessment on behalf of the industry. We appreciate your input.

Any results obtained using WRA01 or WRA02 are specifically for this piece of work and cannot be relied upon for any other purpose. If you have any queries at all, please do not hesitate to contact 0330 325 0490 or julia.turner@woodrecyclers.org

Other Examples



Other Examples



Use Quick Guide to Detail Samples

See [WRA-Demolition-Wood-Quick-Guide.pdf](#)
(woodrecyclers.org) for full version

INSTRUCTIONS FOR WASTE WOOD CLASSIFICATION TESTING & SAMPLE COLLECTION

1. Please ensure that the samples taken are from whole pieces of the items identified over leaf. Then take a cross section from the middle no smaller than 150mm long – which should be sent to the lab.
2. Safety equipment worn to collect the samples must be clean and free from any sources of hydrocarbon or metal contamination and where suspected creosote posts have been handled, new gloves should be worn for subsequent samples. Cross contamination of samples must be avoided.
3. Any sample preparation equipment must also be cleaned between each item.
4. The samples will need to be securely wrapped in airtight packaging (e.g. rubble sacks secured with cable ties or shrink wrapped) for posting and must have this form with the completed information inside the packaging.

Please complete the information below and put this sheet in with the sample.

Company Name: _____
 Site Name: _____
 Location: _____
 Contact name: _____
 Telephone: _____

Sample Type (Use new form for each different wood type):

Wood Type	Approx. Age of building	Enclosed Sample (Tick as appropriate)	Sample Source – HWRC, Household, Transfer Station, Construction Site or Other (Please specify)	EWC Code (Tick as appropriate)		
				17 02 04*	19 12 06*	20 01 37*
Fence Post (NOT fence panels)	N/A					
Decking	N/A					
The items below are only relevant if from pre 2007 buildings						
Barge Boards						
External Fascia						
Soffit boards						
External Joinery						
External Door						
Roof Timber						
Tiling Cladding						
Tiling Battens						
Timber Frames						
Timber Joists						

Test Required: WRA01 – HWRC or Householder Sourced () or WRA02 – C & D or Householder Sourced ()

Sample Unique Reference Number (To be provided by person sending sample to chosen laboratory and same unique reference number to be used on required Chain of Custody Form for that laboratory).

Completing this request form means you give permission for your results to be shared with the WRA either directly by your lab or via the Hazardous Waste Online platform. The only information shared will be the test result, the wood type and the geographic location to allow WRA to satisfy the EA's testing criteria. No specific company information will be identifiable. Please sign below to confirm this:

Name: _____ Signature: _____

This will ensure we can complete the assessment on behalf of the industry. We appreciate your input.

Any results obtained using WRA01 or WRA02 are specifically for this piece of work and cannot be relied upon for any other purpose. If you have any queries at all, please do not hesitate to contact 0330 325 0490 or julia.turner@woodrecyclers.org

INSTRUCTIONS FOR WASTE WOOD CLASSIFICATION TESTING & SAMPLE COLLECTION

1. Please ensure that the samples taken are from whole pieces of the items identified over leaf. Then take a cross section from the middle no smaller than 150mm long – which should be sent to the lab.
2. Safety equipment worn to collect the samples must be clean and free from any sources of hydrocarbon or metal contamination and where suspected creosote posts have been handled, new gloves should be worn for subsequent samples. Cross contamination of samples must be avoided.
3. Any sample preparation equipment must also be cleaned between each item.
4. The samples will need to be securely wrapped in airtight packaging (e.g. rubble sacks secured with cable ties or shrink wrapped) for posting and must have this form with the completed information inside the packaging.

KEY POINT:

Items are from Pre-2007 Buildings only

Demolition Site Sample Collection and Testing

- Ensure that the samples taken are from **whole piece** of waste wood
- Cross section **no smaller than 150 mm long** – in **airtight packaging**
- **DO NOT** send in multiple samples from the same piece
- DO NOT sample obviously creosoted **wood that would be rejected** at a wood site. Always use Acceptable Material Guidance to assess first.
- Give each sample a **unique reference code** using the first three letters of your company followed by the first three letters of your site location, then add in **DEM (Demo)** and then sequential numbering
- **WRA will help provide clarity** with all the above if requested

WRA 01 & WRA02 Testing Suites

WRA01 & WRA02 Testing Suites – August 2022

		WRA01 HWRC	WRA02 C & D
Arsenic	As	x	x
Barium	Ba	x	x
Cadmium	Cd	x	x
Chromium	Cr	x	x
Copper	Cu	x	x
Lead	Pb	x	x
Mercury	Hg	x	x
Nickel	Ni	x	x
Selenium	Se	x	x
Zinc	Zn	x	x
PAH - Speciated (EPA 16)			x
Antimony	Sb		x
Dieldrin			x
Lindane			x
Permethrin			x
Pentachlorophenol (PCP)			x
Moisture Content		x	x
Tin	Sn		x
Where Tin >25mg/kg			
Tributyltin			x
Sample Prep			
Acid Peroxide Extraction		x	x
No smaller than 150 mm long		x	x

Process & Analysis of Results

Classification of sample: Picking Line Sample 1

✔ **Non Hazardous Waste**
Classified as 19 12 07
in the List of Waste

Sample details

Sample name: Picking Line Sample 1
Moisture content: 0.1% (no correction)
LoW Code: 19: Wastes from Waste Management Facilities, Off-site Waste Water Treatment Plants and the Preparation of Water Intended for Human Consumption and Water for Industrial Use
Chapter: 19 12 07 (wood other than that mentioned in 19 12 06)
Entry:

Hazard properties

None identified

Determinands

Moisture content: 0.1% No Moisture Correction applied (MC)

#	Determinand			CLP Hazard	User entered data	Conv. Factor	Compound conc.	Classification value	MC Applied	Conc. Not Used
	EU CLP index number	EC Number	CAS Number							
1	arsenic (arsenic acid and its salts with the exception of those specified elsewhere in this Annex)				36 mg/kg	1.895	68.203 mg/kg	0.00682 %		
2	cadmium (cadmium sulfate)				<0.2 mg/kg	1.855	<0.371 mg/kg	<0.0000371 %		<LOO
3	chromium in chromium(III) compounds (* chromium(III) oxide (worst case))				75 mg/kg	1.462	109.617 mg/kg	0.011 %		
4	copper (copper sulphate pentahydrate)				40 mg/kg	3.929	157.162 mg/kg	0.0157 %		
5	lead (lead chromate)				53 mg/kg	1.56	82.67 mg/kg	0.0053 %		
6	tin (tributyltin compounds, with the exception of those specified elsewhere in this annex)				2.2 mg/kg		2.2 mg/kg	0.00022 %		
7	zinc (zinc chromate)				2.2 mg/kg	2.774	6.103 mg/kg	0.00061 %		
8	pentachlorophenol				<0.1 mg/kg		<0.1 mg/kg	<0.00001 %		<LOO
9	dieldrin (ISO)				<10 mg/kg		<10 mg/kg	<0.001 %		<LOO
10	hexachlorocyclohexanes, including lindane				<10 mg/kg		<10 mg/kg	<0.001 %		<LOO
11	permethrin (ISO) m-phenoxybenzyl 3-(2,2-dichlorovinyl)-2,2-dimethylpropane-carboxylate				<10 mg/kg		<10 mg/kg	<0.001 %		<LOO
								Total	0.0427 %	

- All results will be processed through the **WRA profile on HazWasteOnline** to provide a report to UK Regulators and / or yourselves if required
- Laboratory will upload raw results to HazWasteonline to **provide impartiality and confidentiality** of data sources.
- We ideally need **300 + individual samples** to prove items Haz or Non Haz
- Ensure you agree to **share your data** with WRA to effect change!

WRA Member Laboratories

ALFRED H KNIGHT (Prescot)

Kings Business Park
Kings Drive
Prescot
L34 1PJ

Ken Hepburn

0151 481 5850

[www.ahkgroup.com/markets/solid-fuels/
solidfuels@ahkgroup.com](http://www.ahkgroup.com/markets/solid-fuels/solidfuels@ahkgroup.com)

MARCHWOOD, PART OF CAWOOD

Unit 1A.2A Marchwood Industrial Park
Marchwood
Southampton
Hampshire
SO40 4BL

Ben Rowe

02380 786979

[cawood.co.uk/marchwood/
Ben.rowe@marchwood-scientific.co.uk](http://cawood.co.uk/marchwood/Ben.rowe@marchwood-scientific.co.uk)

SOCOTEC UK Ltd

Renewable Energy
Unit 3
Canal Street
Burton on Trent
DE15 0YZ

Anna Lloyd

anna.lloyd@socotec.com
07803 262 082
socotec.co.uk

Always send your samples with:

1. A Quick Guide **form for each Sample** - fully completed and test identified.
2. A **Chain of Custody form** for each batch of samples
3. Other Laboratories can be used but **always use WRA01 and / or WRA02 approved testing suites** and forms to allow the right data to be captured.
4. If sites don't **share data**, then we won't get to required numbers to confirm haz wood types – so please give permission to share data with WRA.

Conclusions

- Collect as many **samples of Amber** Items before 31st Aug
- Send for **WRA02 testing** to recognised labs using correct paperwork
- Check reprocessor **Acceptable Material Schedules** asap
- Speak to clients to **update understanding** and cost implications
- Update site layouts and **container requirements** – Haz and Non Haz wood containers will be needed
- Ensure that the on-site **procedures are updated** before 1st Sept
- Expect **more regulator visits** to site to check compliance

- **GIVE PERMISSION TO SHARE DATA TO WRA**

THANK YOU

Q&A



Thank you!



SCAN ME

Vicki@mcphoeassociates.co.uk

Julia.turner@woodrecyclers.org

Tel: 0330 325 0490

<http://www.woodrecyclers.org/>

