

Guidance Document

Management and Disposal of Treated Wood Waste in California.

Pressure treated wood products contain chemical preservatives which, when the products become a **waste**, may cause the material to be classed as a non-RCRA hazardous waste under California law. Such waste material must be disposed of in a manner that is protective of human health and the environment. This document provides guidance to help assure the material is handled and disposed of in a manner appropriate and in compliance with Health and Safety Code (HSC) §§ 25150.7 and 25150.8 as amended by Assembly Bill 1353 (Matthews, Ch. 597, 2004). **The current codes replace variances and provide that treated wood waste can be disposed of at an appropriately permitted landfill as solid waste and will not require disposal at the State's hazardous waste landfills.** For detail on the new law see the *Treated Wood Waste Management Fact Sheet* prepared by the California EPA, Department of Toxic Substances Control (DTSC) available at dtsc.ca.gov or WWPInstitute.org.

The treated wood industry provides this information as general guidance and believes it is accurate based upon consultation with the Department of Toxic Substance Control (DTSC). The handler of the treated wood waste is responsible for legal compliance and should review the laws applicable to treated wood material and discuss any handling concerns with the appropriate agency.

What is Treated Wood?

Treated Wood means wood that has been treated with a preservative to protect it from insects, microorganisms or fungi that can lead to wood decay or deterioration. The most common types of wood preservatives are alkaline copper quaternary (ACQ); copper azole (CA-B); copper boron azole (CBA-A); chromated copper arsenate (CCA); ammoniacal copper zinc arsenate (ACZA); creosote; pentachlorophenol and copper naphthenate. The wood preservatives are registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and with the California Department of Pesticide Regulation. Surface applied coatings, such as paint, varnish and oil stain, are not considered wood preservatives.

What Is Treated Wood Waste And Where Do These Guidelines Apply?

Treated Wood Waste means a treated wood product that is now a waste. Treated wood waste includes treated wood debris (trimmings, scrap and sawdust) and products permanently removed from use (decks, fences, docks, timbers, etc.).

- Treated wood materials that are reused in a manner that is consistent with their original use are not a waste.
- Under federal hazardous waste regulations (RCRA), most wood product wastes are nonhazardous or are exempted from hazardous waste designation. Treated wood waste that is a RCRA hazardous waste must comply with the applicable hazardous waste requirements including manifesting, transportation, treatment, and disposal at a hazardous waste landfill.
- The requirements of HSC §§ 25150.7 and 25150.8 do not apply to treated wood waste that is nonhazardous waste. Nonhazardous waste is 1) not a federal RCRA hazardous waste and 2) does not exhibit hazardous characteristics according to CCR Title 22, Division 4.5, Chapter 11. An example is Disodium Octaborate Tetrathhydrate treated wood, commonly known as borate treated wood.
- Treated wood removed from utility services is not subject to hazardous waste requirements when specified conditions are met. (HSC § 25150.7).

Do I have Treated Wood Waste? Identifying Treated Wood Material.

The following evaluation tools can help you determine if the waste wood has been treated.

- The wood may be identified by an ink stamp or an end tag indicating treatment.
- Most treated wood used in construction or industrial applications will have been *incised* to enhance treatment. Incised wood, identified by the presence of small closely spaced incisions on the full surface of the wood, has been treated.
- If the material has not been stained or painted it may appear greenish in color. Materials used in industrial or transportation systems may be dark brown in color with a slight petroleum odor.
- A crosscut section of the wood may reveal the preservative treatment as a darker color in the outer ¼ to 1 inch.
- The location of the wood within a project and the project type may also suggest the presence of treated wood. If the wood was in contact with the ground or water, or exposed to the elements, and is not a decay resistant species such as redwood or cedar, it is likely treated material.
- As a generator you can determine if your waste is nonhazardous or choose to manage the material as treated wood waste in accordance with HSC § 25150.7.
- If doubt remains after applying the above evaluation tools, laboratory testing can make a positive evaluation.

How and Where Can I Dispose of Treated Wood Waste?

- Do not burn treated wood.
- Do not discard the material on the land or use treated wood as ground mulch.
- Some types of treated wood can be used as fuel in specifically approved co-generation facilities.
- Most waste material should be delivered to an appropriately permitted landfill.
- Over fifty municipal landfills in the State are eligible to take treated wood but the decision to accept the material is up to the individual landfill and approval by the applicable Regional Water Quality Control Board. **Always contact the landfill or transfer station prior to delivery to see if the material will be accepted and if any limitations exist!** The State Water Resources Control Board maintains a list of landfills at swrcb.ca.gov/cwphome/land/walist.html.
- Households may send Treated Wood Waste to approved landfills, transfer stations or their local Household Hazardous Waste Collection Center – **but always call ahead to see if there are limitations.**

Management Standards.

The Health and Safety Code requires that treated wood waste be managed in a specified manner. Some of the requirements are:

- The treated wood waste should be kept separate and not mixed with other waste.
- Scavenging is not allowed.
- Store the waste for no longer than 90 days.
- Stored treated wood waste should be protected from run-on and run-off of water and placed on a surface sufficiently impervious to prevent to the extent practical, contact with, and any leaching to soil or water. For example the material could be stacked on skids and covered with an impervious plastic tarp secured to keep water off; or placed

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in a shed or covered container. Treated wood waste may not be placed directly onto land.

- For utility produced treated wood waste, see HSC § 25150.7.

Certain additional standards may apply to treated wood once it is under the authority of the disposal operator or facility.

Handling Precautions.

There are certain precautions that should be followed in handling treated wood as a product or as a waste.

- Handle according to all applicable California Occupational Safety and Health Act (Cal/OSHA) requirements.
- Avoid contact with skin. Wear gloves and long sleeved shirts. Wash exposed skin areas thoroughly with mild soap and water after working with treated wood.
- Wear a dust mask when machining any wood to reduce the inhalation of wood dust. Avoid frequent or prolonged inhalation of sawdust. Machining operations should be performed outdoors whenever possible to avoid indoor accumulations of airborne sawdust.
- Wear appropriate eye protection to reduce the potential for eye injury from wood particles and flying debris during machining.
- If preservative or sawdust accumulates on clothes, launder before reuse. Wash work clothes separately from other household clothing.

Further Information.

For additional information on use, handling and disposal of treated wood waste visit WWPinstitute.org (click on Treated Wood in California) or www.dtsc.ca.gov. You can contact the industry disposal hot line at 866-696-8315 or the California Department of Toxic Substances Control at 800-728-6942.