

**wra**



Wood  
Recyclers'  
Association

**Serving the Waste Wood Sector for 21 Years**

001

**2001-2022**

2.30 –2.35 pm

## Welcome and Introduction to the Workshop

Julia Turner, WRA Executive Director

2.35 –3.10 pm

## Demolition Waste Wood Classification Made Easy

Vicki Hughes, WRA Board Member and Technical Lead

**What are the Potentially Hazardous Items?**

**What do you need to do with them?**

**Why?**

**Sampling**

**Testing Suites and Laboratories**

**Analysis of Results**

3.10 –3.30 pm

## Q&A Session

All

002

In association with

**UROC**  
UNITED RESOURCE  
OPERATORS CONSORTIUM

**NFDC**  
National Federation of Demolition Contractors  
Voice of the Global Demolition Industry

# WWC Results

- Sampling/Testing work 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 2022
- **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

# Guidance Documents & RPSs

- Guidance Docs live
- EA, SEPA and NRW have confirmed positions
- In England – RPS 249 and RPS250
- EA also looking at permit review process



# RPS249 & RPS250

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

- Further testing will be required to show decline in hazardous content over next two years
- No additional admin burden

<https://www.gov.uk/government/publications/receiving-hazardous-waste-wood-at-household-waste-recycling-centres-rps-249>

<https://www.gov.uk/government/publications/hazardous-waste-wood-from-demolition-and-refurbishment-activities-rps-250/hazardous-waste-wood-from-demolition-and-refurbishment-activities-rps-250>

The screenshot shows the GOV.UK website header with the crown logo and 'GOV.UK' text. Below the header is a navigation bar with 'Topics' and 'Government activity' dropdowns, and a search icon. The breadcrumb trail reads: 'Home > Environmental permits > Receiving hazardous waste wood at household waste recycling centres: RPS 249'. The Environment Agency logo is displayed. The main content area has a blue background with the text: 'Guidance', 'Receiving hazardous waste wood at household waste recycling centres: RPS 249', and 'Published 23 July 2021'. A red '005' is overlaid on the bottom left of the page.

GOV.UK

Topics Government activity

Home > Environmental permits > Receiving hazardous waste wood at household waste recycling centres: RPS 249

Environment Agency

Guidance

**Receiving hazardous waste wood at household waste recycling centres: RPS 249**

Published 23 July 2021

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GOV.UK

Topics Government activity

Home > Environmental permits > Hazardous waste wood from demolition and refurbishment activities: RPS 250

Environment Agency

Guidance

**Hazardous waste wood from demolition and refurbishment activities: RPS 250**

Updated 9 September 2021

# RPS 250

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## Demolition RPS 250 expires Sept 2023 and allows business as normal, BUT:

- The raw material producer will need to assess and consign waste accordingly
- Then either segregate the hazardous items and get them tested to prove non haz
- Or consign them as hazardous wood - making sure they give an ACCURATE % declaration of actual hazardous content on the HCN
- Recycling members will be able to receive this hazardous or blended material under RPS 250 without changing their permits - as long as the final blended wood goes to Chapter IV biomass/panelboard
- **England only at this stage**

# Demolition Waste Wood Classification Made Easy

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**Vicki Hughes – WRA Board Technical Lead**



# 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 Battens ▼



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

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	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.



# Potentially Hazardous Items

## IDENTIFY . TEST . ASSIGN OR CONSIGN?

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(Not Fence Panels) ▼



2. Decking ▼



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3. Barge Boards, Fascias and Soffits ▼



4. External Joinery (wooden windows and conservatories) ▼



5. External doors ▼



6. Roof Timbers ▼



7. Tiling and Cladding Battens ▼



8. Timber Frames / Joists ▼



# Other Examples



# Other Examples



# What do you need to do with them?

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- **Regulatory Duty of Care – Must Assess in line with RPS250**

- Get externally tested using WRA01 (HWRC) or WRA02 (C&D) test suites to determine if haz or non-haz
- If confirmed as hazardous, consign using Hazardous Consignment Note
- 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
- Move under dual EWC codes to Reprocessor
- Reprocessor should confirm % and complete appropriate paperwork including Waste Data Flow returns

# Why Sample?

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- To confirm IF items are hazardous or not
- Provide credible data to EA and other regulators
- Ensure a benchmark in 2023
- Reduce paperwork and costs
- Ensure no waste wood gets wasted or goes to the wrong destination
- Demonstrate our environmental credentials to customers



# Use Form on Quick Guide to Detail Samples

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

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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

**wra** Wood Recyclers' Association

See [WRA-Demolition-Wood-Quick-Guide.pdf](https://www.woodrecyclers.org/WRA-Demolition-Wood-Quick-Guide.pdf) ([woodrecyclers.org](https://www.woodrecyclers.org)) for full version

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**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) .....

# Testing Suites

<b>WRA01 &amp; WRA02 Testing Suites – August 2022</b>			
		<b>WRA01 HWRC</b>	<b>WRA02 C &amp; D</b>
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
Tin	Sn		x
<b>Where Tin &gt;25mg/kg</b>			
Tributyltin			x
Dieldrin			x
Lindane			x
Permethrin			x
Pentachlorophenol (PCP)			x
Moisture Content		x	x
<b>Sample Prep</b>			
Acid Peroxide Extraction		x	x
No smaller than 150 mm long		x	x

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

## **Marchwood, part of Cawood**

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

## **Tom Ayles**

02380 786979

[cawood.co.uk/marchwood/](http://cawood.co.uk/marchwood/)  
[Tom.Ayles@marchwood-scientific.co.uk](mailto:Tom.Ayles@marchwood-scientific.co.uk)

## **SOCOTEC UK Ltd**

Renewable Energy  
Unit 3 [anna.lloyd@socotec.com](mailto:anna.lloyd@socotec.com)  
Canal Street  
Burton on Trent  
DE15 0YZ

## **Chris Pollitt**

Business Development Manager  
07826 884624

[chris.pollitt@socotec.com](mailto:chris.pollitt@socotec.com)  
[socotec.co.uk](http://socotec.co.uk)

## **Anna Lloyd**

Commercial Manager  
07803262082  
[anna.lloyd@socotec.com](mailto:anna.lloyd@socotec.com)

**Other Laboratories can be  
used as long as they use  
WRA 01 and 02 Approved  
Testing Suites**

# Process & Analysis of Results

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- Firstly check the laboratory can undertake the WRA suite of test, as we need consistent data.
- All Laboratories will need you to complete their Duty of Care paperwork as well as the WRA form including permission to share the results and data
- Once you book your test the lab will also confirm the exact sample preparation
- Some may be able to analyse results and confirm haz or non haz or will provide data to allow it to be determined on HazWasteOnline
- All results will be processed through the WRA profile on HazWasteOnline to provide a report to UK Regulators and / or yourselves if required
- Either way need raw results to be sent to a specific email at HazWasteonline to provide impartiality and confidentiality of data sources.
- We ideally need 300 + samples

# Example HazWasteOnline Report

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 LoW Code: 19: Wastes from Waste Management Facilities, Off-site Waste  
Moisture content: 0.1% (no correction) 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 Note	User entered data		Conv. Factor	Compound conc.	Classification value	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 %	
		033-005-00-1								
2	✓	cadmium ( cadmium sulfate )			<0.2	mg/kg	1.855	<0.371 mg/kg	<0.0000371 %	<LOD
		048-009-00-9	033-331-6							
3	✓	chromium in chromium(III) compounds ( = chromium(III) oxide (worst case) )			75	mg/kg	1.482	109.617 mg/kg	0.011 %	
			015-160-9							
4	✓	copper ( copper sulphate pentahydrate )			40	mg/kg	3.929	157.162 mg/kg	0.0157 %	
		029-023-00-4	031-847-6							
5	✓	lead ( lead chromate )		1	53	mg/kg	1.56	82.67 mg/kg	0.0053 %	
		002-004-00-2	031-846-0							
6	✓	tin ( tributyltin compounds, with the exception of those specified elsewhere in this annex )		1	2.2	mg/kg		2.2 mg/kg	0.00022 %	
		050-008-00-3								
7	✓	zinc ( zinc chromate )			2.2	mg/kg	2.774	6.103 mg/kg	0.00061 %	
		024-007-00-3	036-878-9							
8		pentachlorophenol			<0.1	mg/kg		<0.1 mg/kg	<0.00001 %	<LOD
		004-002-00-6	001-778-6							
9		dieldrin (ISO)			<10	mg/kg		<10 mg/kg	<0.001 %	<LOD
		002-049-00-9	000-484-5							
10		hexachlorocyclohexanes, including lindane			<10	mg/kg		<10 mg/kg	<0.001 %	<LOD
		002-043-00-6	010-168-9, 000-401-2, 006-270-8, 006-271-3							
11		permethrin (ISO); m-phenoxybenzyl 3-(2,2-dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate			<10	mg/kg		<10 mg/kg	<0.001 %	<LOD
		013-058-00-2	058-067-9							
Total:									0.0427 %	

# Why? – What are the Benefits for you?

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- **If we don't test and analyse results:**
  - All of these items will be classified as hazardous from 01.09.23
  - They could then need haz disposal at >£200 per tonne
  - Huge volume of wood lost to the market and not recovered
- **All those in the waste wood supply chain may need hazardous permits:**
  - Extra time on sites – more skips, segregation and checks
  - Increased costs to everyone in the supply chain
  - Public perception issues for waste handlers
  - Lack of sustainability for waste producer

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# Q&A

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# Thank you!

[Julia.turner@woodrecyclers.org](mailto:Julia.turner@woodrecyclers.org)

Tel: 0330 325 0490

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

