



Dear RON SMITH Customer,

RE: RPS-250 Removal from 1st September 2023

01st September 2023

You may or may not be aware that from **1st September 2023** the RPS250 was withdrawn and removed by the Environment Agency (EA). This RPS refers to wood waste from demolition, and elements of construction, how it is handled for disposal, and has until now, allowed for the processing of mixed hazardous and non-hazardous wood waste at processing sites.

From 1st September 2023 disposal facilities (wood recycler's) will not be able to accept mixed or specific loads containing coding 17 02 04* unless they have a hazardous waste permit and relevant hazardous codes relating to hazardous wood waste.

The onus will be on the waste producers to classify the wood waste correctly and in accordance with guidance as set out by the Wood Recyclers Association (WRA) & National Federation of Demolition Contractors (NFDC), see the below Annex (1) & the Link, along with the supporting documents attached to this notice for ease of reference. These items are in addition to the hazardous list that already contains telegraph poles, wooden railway sleepers and treated woods.

Businesses and suppliers will have to check, assess, determine and correctly classify waste wood materials, which may include having to undertake laboratory testing to ensure any waste wood being identified for disposal is not contaminated (hazardous) in-line with the new regulations. If found to be hazardous, the material must be disposed of at a licensed hazardous waste facility containing the appropriate hazardous EWC codes for wood on the permit (EP).

We urge ALL business owners, management teams, environmental teams, project engineers, project managers, site managers and site foreman to look at their processes and waste segregation systems now to ensure all waste wood is properly assessed and correctly coded prior to coming to our facilities. Failure to comply could mean fines and prosecution from the EA as well as formal load rejections and associated costs for our services provided.

We understand that any new regulation can be confusing so if you have any further questions or queries, please do not hesitate to ask as we are here to assist.

Kind regards,

Ryan Geere
Environmental Compliance Principal TCM
Ron Smith Recycling Limited



Annex (1)

The ten items below from pre-2007 buildings may contain hazardous elements;

- barge boards
- external fascia
- soffit boards
- external joinery
- external doors
- roof timber
- tiling cladding
- tiling battens
- timber frames
- timber joists

It is expected that these items and the volumes will diminish to near extinction levels in years ahead.

Link

<https://woodrecyclers.org/toolkit-for-withdrawal-of-rps-250/>

IDENTIFY. TEST. ASSIGN OR CONSIGN?

The items BELOW are potentially hazardous if FROM pre-2007 buildings

1. Barge Boards, Fascias and Soffits



2. External Joinery (wooden windows & conservatories)



3. External Doors



4. Roof Timbers



5. Tiling & Cladding Battens



6. Timber Frames / Joists



These items are unacceptable and should be rejected alongside items such as telegraph poles and railway sleepers unless they have been tested and proved non-hazardous

GRADE	Typical Wood Types	Typical Non-wood Content Prior to Processing
Grade A Pre-Consumer Waste Wood and untreated wooden packaging = Clean un-treated	Solid softwood and hardwood. Packaging waste, scrap pallets, packing cases and cable drums. Process off-cuts from the manufacture of virgin/sawn timber and untreated board products.	Nails and metal fixings. Minor amounts of non-hazardous surface coatings, such as water-soluble paint.
Grade B Business waste wood = Treated Non-hazardous	May contain Grade A material as above plus building and demolition materials and domestic furniture made from solid wood.	Nails and metal fixings. Some paints, plastics, glass, grit, non-hazardous coatings, binders and glues. Limits on treated or coated materials as defined by end users and IED.
Grade C Municipal waste wood = Treated Non-hazardous	All of the above plus flat pack furniture made from board products and DIY materials. HWRC generated waste wood	Nails and metal fixings. Paints, coatings and glues, paper, plastics and rubber, glass, grit. Coated and treated timber (non CCA or creosote).
Grade D Hazardous waste wood = Treated hazardous	Agricultural fencing, telegraph poles, railway sleepers. 1 Potentially hazardous waste wood items are: barge boards; external fascias; soffit boards; external joinery (wooden windows and conservatories); external doors; roof timbers; tiling and cladding battens; timber frames and joists from pre-2007 buildings	Copper chrome arsenic (CCA) preservation treatments and creosote Any of the items listed in the WRA Waste Wood Assessment as 'Potentially Hazardous' (*1) must be segregated and tested to prove that they are non-hazardous. Otherwise they must be categorised as Grade D – Hazardous requiring disposal at facilities licensed to accept hazardous waste.



TYPICAL UNACCEPTABLE MATERIALS

DO NOT ACCEPT – PAPER, PLASTIC, CARDBOARD, FELT, GLASS, BLACK BAGS, FOAM, FABRIC, PLASTIC COATED WIRE, GRADE D HAZARDOUS WOOD WASTE INCLUDING ANY CREOSOTE AND CCA TREATED RAILWAY SLEEPERS, TELEGRAPH POLES (AND OTHER ITEMS OBVIOUSLY TREATED WITH CREOSOTE), 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.

All wood processors will have acceptance criteria based on their permits so please check for specific requirements from your processor as this is just a guide.

GRADE	Typical Markets	Typical Sources of raw material for recycling and/or recovery	Typical Materials	Typical non-wood content prior to processing	Notes
Grade A Pre-Consumer Waste Wood (*1) and untreated wooden packaging = Clean untreated	<p>A feedstock for the manufacture of professional and consumer products such as animal bedding, equine and landscaping surfacing. May also be used as a fuel in domestic and non-IED Chapter IV biomass installations and for the manufacture of pellets and briquettes.</p>	<p>Wood Product Manufacturing, Distribution, Retailing, Packaging and Secondary manufacture, e.g. joinery and pallet reclamation.</p>	<p>Solid softwood and hardwood. Packaging waste, scrap pallets, packing cases and cable drums. Process off-cuts from the manufacture of virgin/sawn timber and untreated board products.</p>	<p>Nails and metal fixings. Minor amounts of non-hazardous surface coatings, such as water-soluble paint.</p>	<p>This is a waste as defined by the waste regulations. Does not require an IED Chapter IV installation and should not contain any treated or low-grade material.</p>
Grade B Business waste wood = Treated Non-hazardous	<p>This is the preferred feedstock for industrial wood processing operations such as the manufacture of panel board products. Can also be used for IED Chapter IV biomass.</p>	<p>As Grade A, plus construction and demolition operations, skip operators, transfer stations.</p>	<p>May contain Grade A material as above plus building and demolition materials and domestic furniture made from solid wood.</p>	<p>Nails and metal fixings. Some paints, plastics, glass, grit, non-hazardous coatings, binders and glues. Limits on treated or coated materials as defined by end users and IED.</p>	<p>This is mostly solid wood. Some feedstock specifications contain a 5% to 10% limit on former panel products such as chipboard, MDF and plywood. Is a waste for the requirements of Waste Management Regulations. Will require an IED Chapter IV compliant installation for biomass. Any of the items listed in the WRA Waste Wood Assessment Guidance as 'Potentially Hazardous' (*2) must be segregated and tested to prove that they are non-hazardous. Otherwise they must be categorised as Grade D – Hazardous.</p>
Grade C Municipal waste wood = Treated Non-hazardous	<p>For use in the IED Chapter IV biomass installations and for panel board in controlled volumes.</p>	<p>All above plus municipal collections, transfer stations and HWRCs.</p>	<p>All of the above plus flat pack furniture made from board products and DIY materials.</p>	<p>Nails and metal fixings. Paints, coatings and glues, paper, plastics and rubber, glass, grit. Coated and treated timber (non CCA or creosote).</p>	<p>This is mostly board products. Mainly suitable for IED Chapter IV compliant biomass installations, but also suitable for panel board manufacture with correct processing and blending. Is a waste for Waste Management Regulations.</p>
Grade D Hazardous waste wood = Treated hazardous	<p>Requires disposal at facilities licensed to accept hazardous waste.</p>	<p>Waste wood from hydraulic engineering, such as wood from docks. Waste wood from industrial applications such as cooling tower timbers, woodblock flooring or moulds. Waste wood from boats, carriages and trailer beds. Waste wood treated with CCA or creosote. Any of the items listed in the WRA Waste Wood Assessment Guidance as 'Potentially Hazardous' (*2) must be segregated and tested to prove that they are non-hazardous. Otherwise they must be categorised as Grade D – Hazardous</p>	<p>Agricultural fencing, telegraph poles, railway sleepers.</p> <p>2 Potentially hazardous waste wood items are: barge boards; external fascias; soffit boards; external joinery (wooden windows and conservatories); external doors; roof timbers; tiling and cladding battens; timber frames and joists from pre-2007 buildings</p>	<p>Copper chrome arsenic (CCA) preservation treatments and creosote.</p>	<p>These materials must be segregated and consigned as hazardous to sites permitted to accept hazardous wood.</p>

Clean/untreated waste wood is suitable for processing into animal bedding, panel board feedstock, landscaping or equestrian surfaces and biomass. Treated, but non-hazardous waste wood is suitable for processing as a feedstock for panel board or energy recovery in a Chapter IV compliant facility. Hazardous waste wood can only be disposed of in a facility licensed for this purpose.

1 Pre-consumer waste wood is waste wood material created during the manufacturing process of virgin wood, not involving the application of treatments, e.g. offcuts or trimmings from virgin/sawn timber. It is also waste wood material created during the manufacturing process of raw, untreated board products such as panel board, MDF and plywood (for clarity, this waste wood can only be used/burnt at source). Waste from joinery activity using these untreated wood materials is also included in this definition.

Source: The Wood Recyclers' Association September 2023