



METRO

Metro Solid Waste Regulatory Guidance Bulletin

GB 3

Effective November 12, 2015

Painted and Treated Wood Waste at Material Recovery Facilities, Yard Debris Reload Facilities and Yard Debris Composting Facilities

The potential for improper feedstocks to contaminate compost and the associated adverse impacts on human health and the environment is increasing as fuel and compost markets fluctuate. Therefore, Metro is giving greater scrutiny to the definition, proper classification and responsible management of painted and treated wood waste at Metro-regulated facilities. This *Metro Solid Waste Guidance Bulletin* (the “Bulletin”) is intended to describe the general management practices for wood waste at Metro-regulated facilities.

Many facilities authorized to accept yard debris are also accepting “clean” wood waste and “painted” and/or “treated” wood waste. Depending on the type of facility, these wastes should be managed based on how they will be processed and used, such as compost feedstock, hogged fuel production or disposal. This distinction is critical, as Metro prohibits the use of painted or treated wood for the production of compost. Metro requires special authorization for facilities to accept creosote-treated wood wastes such as railroad ties and telephone poles.

Definitions

The following are informal definitions used by Metro in licensing and franchising solid waste operations and will be useful in understanding and applying the concepts in the Bulletin:

Clean wood waste means solid waste consisting of raw dimensional wood pieces that do not contain paint, stain, laminate, bonding agents, chemical preservatives, strapping, shrink wrap or shipping labels.

Painted wood waste means solid waste consisting of wood pieces and particles containing paint, bonding agents, laminate or stain. This includes manufactured wood debris such as plywood, particleboard and oriented strand board.

Treated wood waste means solid waste consisting of wood pieces and particles containing chemical preservatives such as pentachlorophenol or chromated copper arsenate (CCA).

Creosote-treated wood waste means solid waste consisting of wood pieces and particles containing creosote or creosols such as railroad ties and telephone poles.

General Discussion

With more emphasis in the Metro region on recovering wood waste and recycling construction and demolition debris, more painted wood, treated wood and creosote-treated wood are expected to be delivered to recovery facilities. Proper classification of wood wastes as clean, painted, treated, or creosote-treated is an important distinction to make at Metro-regulated facilities, especially when receiving authorized loads of mixed wood materials or construction and demolition debris. This is of particular importance at yard debris reload and yard debris composting facilities that also process hogged fuel, as the improper management of painted or treated wood waste could result in contamination of the finished compost product.

A Metro-authorized facility will have a license or franchise that describes the types of waste it is authorized to accept for processing. The following chart outlines the general management practices required by Metro for wood wastes at different facility types. Each facility's operating plan should contain a more detailed description of how the wood waste is to be managed and kept separate from compost feedstocks.

Type of Wood Waste	Yard Debris Reload / Yard Debris Composting / Material Recovery Facility
Clean wood waste	If used for compost feedstock, must be kept separate from painted or treated wood waste.
Painted or treated wood waste	Prohibited unless specifically authorized by Metro. Must be kept separate from all compost feedstock.
Creosote-treated wood waste	Prohibited unless specifically authorized by Metro. Must be kept separate from all compost feedstock.

Metro has updated many of the solid waste facility licenses to include provisions that require greater controls over the acceptance and management of wood waste types. For example, wood waste unloading areas should be kept separated from compost feedstock unloading and processing areas. Signs that are clearly readable should be posted at unloading areas to direct customers where to unload wood waste intended for hogged fuel production. Finally, the facility operator must ensure that painted or treated wood is managed in such a manner as to keep it physically separated from compost feedstock and prevent it from becoming incorporated into compost feedstock either deliberately or accidentally.



Example of signage where wood waste for hogged fuel is kept separated from compost

If you have any questions about managing wood waste, please call Metro's Solid Waste Compliance & Cleanup Division at (503) 797-1835.

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