



Best Practices in Wood Waste Recycling

Techniques for Hazardous Material Control

Material: Wood Waste

Issue: *Hazardous materials generated by or delivered to a facility that is not licensed to receive, process, or transfer such materials might cause a temporary close down of the facility, or parts of its operations, until the hazardous materials are safely confined, removed, or disposed. The local health department and a Hazmat Team might be required to handle the incident and approve the reopening of the facility depending on the facility's size and permit conditions. During a temporary close down, the facility might be restricted to receive materials, operate processing equipment, or deliver finished products. Lead -based paints and asbestos are the common hazardous materials of concern.*

Best Practice: This Best Practice recommends communicating to the facility's customers definitions of acceptable, and unacceptable, waste materials by means of:

- Ads;
- Handouts;
- Large, Readable Signs at the Point of Entry;
- Establishment and Posting of Penalties at the Point of Entry; and
- Other Educational and Feedback Methods.

Additionally, an inspector should be stationed at the unloading area to observe the activities. This method identifies the potential suspect loads immediately while the driver is still at the site to answer any questions. Key inspection and operations staff should receive hazardous waste training on how to handle and take safety precautions. Courses are typically offered by the State's environmental department. Under most circumstances, a facility unknowingly receives or produces toxic or volatile materials. Therefore, facilities should be prepared to mitigate this situation should it develop unexpectedly.

Implementation: When a new facility opens, literature is prepared for the initial mass mailing announcing the new operation. This initial literature should clearly note not only what is accepted at the facility, but also what cannot be accepted. A large sign at the facility's point of entry should list the types of acceptable and unacceptable wood wastes. The latter is most important when commingled loads of wood waste and other materials are allowed under the terms of the facility's permits.

The scalehouse attendant and the inspection staff should become aware of the wood waste stream make-up of incoming loads, and the legal obligations and requirements of the facility if hazardous materials are brought to the site. The staff must be trained to identify the types of hazardous material in the waste stream of typical delivery sources. If the presence of a hazardous waste is suspected, the facility personnel must take the appropriate actions to protect themselves, other personnel, equipment, the facility, and the environment. These actions should be part of the facility's written hazard communication program. This program should be instituted to comply with OSHA's hazard communication standard.

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Facility personnel should not handle hazardous waste materials if an immediate danger exist. The local Fire Department should be contacted immediately. For example, compressed gas cylinders, fuming material, noxious items, and possible explosives should be left undisturbed. If possible, the on-site staff should attempt to identify and contact the hauler. The hauler might be able to provide information about the source of the material, thus, avoiding a crisis situation. If the hazardous material does not pose an immediate danger and the conditions permit, it should be properly isolated in a secured area until further investigation into its characteristics and source is conducted.

The facility should maintain a Material Safety Data Sheet (MSDS) library on every substance on the list of hazardous chemicals in the plant. The MSDSs should be readily available to all employees and safety personnel required to respond to an incident. Meanwhile, the facility owner should become familiar with the rules that wood waste haulers place on waste generators to minimize the presence of hazardous materials. The up-front costs of vigilance and load inspection must be considered part of the cost of doing business. While infrequent, the temporary shutdown (to remove a small quantity of hazardous materials) or the long term shutdown (a major incident with ensuing investigation) of a facility could be detrimental to a facility's profits. The shutdown might force regular customers to dispose of their wood waste materials at a competitors' facility. It might also cause some customers to slowly return after such a incident knowing that there might have been flaws in the facility's safety program.

Benefits: The delivery or potential processing of hazardous materials at an unlicensed facility could result in major fines and serious legal problems depending upon the facility's size and the number of receiving, processing, and product storage areas. Therefore, rapid identification and segregation of the materials are critical to controlling the impact of the incident, and potentially, keeping the facility operational. Depending upon the nature of the spilled material or inadvertently delivered hazardous material, the deployment of an off-site Hazmat Team would impact the facility's operations.

If the hazardous material is identified before the hauler leaves the facility, the origin of the material should be easily identified and the costs for handling and clean-up could be allocated accordingly. If the incident is isolated to a portion of the tipping area, the facility's operation might be minimally impaired. However, if the hazardous materials have spread throughout the facility onto the processing equipment, the processing lines might be shut down and production halted. Controlling hazardous waste materials on-site with the techniques presented in this Best Practice ensures personnel safety and continued facility operations.

Application Site: Processing Facility.

Contact: For more information about this Best Practice contact CWC (206) 443-7746, e-mail info@cwc.org.

References:

1. Brickner, Robert H. Gershman, Brickner & Bratton, Inc. Falls Church, VA.
2. OSHA. Washington, DC.
3. Taylor, Mike. National Association of Demolition Contractors. Doylestown, PA.

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