

# Annex 4 - T6 Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising

## Part 1: Specific issues and proposed changes

	Issue detail	Rationale for change	Proposed changes
<b>Risks from stockpiling</b>	Stockpiling of waste is a common issue on T6 sites and can lead to risks of abandonment and fire.	Collected waste should be treated and sent onto a recovery site as soon as possible to ensure that it does not deteriorate to the point that recovery becomes more difficult.	3 month storage to encourage turnover.  Therefore reduced storage limit to 300 m <sup>3</sup> in total on site regardless of the stage of processing or storage.
<b>Risks from combustible wastes</b>	Wood is a combustible waste and has a high risk of fire. Chipped wood especially can start to degrade rapidly and self-ignite.	All combustible wastes should have the same controls as identified in the Fire Prevention Plan (FPP) Guidance to reduce and control the risk from fire where that risk is the same as a permitted site.  Where that risk is lower the controls can be less restrictive.	3 month storage limit for combustible waste to align with the FPP Guidance.  Waste stacks and piles limited to 4m high in accordance with FPP Guidance.  Storage quantities are less than that of permitted sites and therefore not all the FPP requirements are needed.
<b>Risks from specific types of waste</b>  <b>Wood from construction 17 02 01</b>	Hazardous waste wood is being mixed with non-hazardous waste wood either at the place of production (prior to collection) or at the T6 Treatment facility. Proper assessment in accordance with WM3 is not being carried out and the hazardous waste wood is not being separated out.  In particular 17 02 01 is a non-hazardous mirror entry code that requires a hazardous waste assessment to be carried out.	A non-hazardous mirror entry code cannot legally be assigned to an item of treated wood (or any mixed wood waste that contains it) unless an appropriate assessment has been performed (in accordance with <a href="#">technical guidance WM3</a> ).  The consequence of not carrying out this assessment is that the wood is chipped and then goes down the wrong recovery route. It can end up in animal bedding which is then later spread to land. Most ends up being burnt for energy recovery but if it hasn't been properly assessed it will end up at the wrong type of facility without appropriate environmental controls.	We propose removing 17 02 01 wood from construction from T6.

	Issue detail	Rationale for change	Proposed changes
		Hazardous waste wood and treated waste wood are subject to Chapter IV of the Industrial Emissions Directive (IED) which specify the standards that must be adhered to to prevent pollution of the environment and harm to human health.	
<b>Changes to waste coding or description</b>	Wood 03 01 01	03 01 01 should be described as waste bark and cork not wood.	Change to bark and cork. Update all descriptions to make sources more explicit.

## Part 2: Option 2 - Proposal T6 -Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising

All	Current conditions			Changes proposed under Option 2		
<b>Specified activities</b>	Chipping, shredding, cutting, pulverising and associated storage.			Sorting, chipping, shredding, cutting, pulverising and associated storage.		
<b>General conditions applying to all wastes</b>	None			Where there is no sealed drainage then the site must be more than 50m from a spring, well or borehole and 10 metres from any water course.		
Waste types	Waste codes	Waste acceptance	Storage limits and conditions	Waste codes	Waste acceptance	Storage limits and conditions
Plant tissue waste	02 01 03	26,000 tonnes per year 500 tonnes per 7-days	3 months after treatment  No limit before treatment  500 tonnes treated	02 01 03, Plant tissue waste from agriculture, horticulture, aquaculture, forestry, hunting and fishing	500 tonnes per year  Maximum acceptance 10 tonnes per week (30 m3)	3 months total on site  Maximum of 300m <sup>3</sup> of waste on site at any one time. (3 months' worth at 30m <sup>3</sup> per week)  Max stack height 4m
Plant tissue waste	200201		No containment measures specified	200201, Plant tissue waste from parks and gardens (including cemeteries)		
Wood	030101, 030301,			030301,		

All	Current conditions			Changes proposed under Option 2		
	170201			Wood and bark wastes from pulp, paper and cardboard production and processing		
Wooden packaging only	150103			150103, Wooden packaging only		
				030101, Waste bark and cork wastes from wood processing and the production of panels and furniture		