

Wood treating wastes

A wide range of pesticides, often referred to as preservatives, are currently or have historically been used for treating wood. The same properties that make these chemicals effective for treating wood also render many of their wastes hazardous. Wood treating wastes from businesses and government agencies are regulated in Minnesota by the Minnesota Pollution Control Agency (MPCA) and the Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties).

Note: This fact sheet discusses management of wastes from wood treating, including residuals, drippage, spent or discarded formulations, wastewater, and contaminated equipment. For management of treated wood itself, see MPCA fact sheet #w-hw4-67, Treated wood, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw4-67.pdf>.

Are my wood treating wastes hazardous?

In Minnesota, all business wastes from wood treating must be assumed to be hazardous and managed accordingly unless evaluated as non-hazardous. Find guidance on how to evaluate wastes in MPCA fact sheet #w-hw1-01, Evaluate waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.

Manage wastes from wood treating as hazardous wastes following the general hazardous waste requirements and the specific requirements discussed below in this fact sheet unless you have evaluated the wastes as non-hazardous. For general hazardous waste requirements, see MPCA Factsheet #w-hw1-00, Summary of hazardous waste requirements, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-00.pdf>.

How do I capture wood treating wastes?

If you treat wood as a business operation, you must either hold the treated wood in a treatment vessel until it stops dripping or meet the requirements for a drip pad. If you only are treating wood incidentally, you may use a temporary method to absorb or contain any drippage.

Even after treatment is completed, treated wood may sometimes resume dripping residuals when stored outside off of a drip pad due to precipitation or changes in temperature or humidity. If you treat wood as a business operation, you must prepare and follow a written plan on how you will clean up any incidental drippage in storage yards and maintain records of cleanups. All businesses treating wood must immediately clean up and properly dispose of any drippage to the ground or any surface other than a compliant drip pad.

Drip pads must be impermeable to the wood treating wastes, curbed, and able to fully contain the waste on the pad. Able to fully contain the waste means that a drip pad must prevent runoff, be protected from precipitation, and not have any gaps, cracks, or deterioration that might hinder the containment. A drip pad must either be assessed and certified annually by a licensed professional engineer or have a synthetic liner installed below the drip pad and a leak detection system placed above the liner.

Drip pads must be cleaned and inspected weekly, and records kept of the inspection findings. The wood treating wastes captured by the drip pad's collection system must be removed from the system at least every 90 days. After it is removed from the collection system, the waste may be accumulated on the generator's site with other hazardous wastes for up to the normal maximum time for the site's hazardous waste generator status. For help determining a site's status, also referred to as its 'size', see MPCA fact sheet #w-hw1-02, Determine generator size, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf>.

What if I shut down a wood treating operation or change preservatives?

When a wood treatment operation, or part of an operation like a production line, is shut down, all equipment must be decontaminated or removed and managed as a hazardous waste. The operator must also take reasonable measures to assess and ensure that the soil beneath any drip pad is not contaminated with hazardous constituents, including soil sampling.

Operations that used chlorophenolic preservatives, such as pentachlorophenol, must continue to manage all their wood treating wastes as F032 hazardous wastes, even if they have substituted a non-hazardous preservative in their process, until all equipment at the operation that has ever come into contact with a chlorophenolic preservative is decontaminated or replaced.

Operations that did not previously use chlorophenolic preservatives, such as those that used creosote or chromated arsenicals, may manage their wood treating wastes according to the present identity and characteristics of the preservative.

More information

Requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045. Visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs> to review applicable Minnesota Statutes and Rules.

Contact the MPCA or your Metro County for questions. The MPCA's Small Business Environmental Assistance Program can also provide free, confidential compliance assistance. The Minnesota Technical Assistance Program (MnTAP) can assist you with waste minimization. Report all spills and hazardous waste and hazardous materials incidents immediately to the Minnesota Duty Officer.

Metro County Hazardous Waste Offices

Anoka	763-324-4260
.....	https://www.anokacounty.us/
Carver	952-361-1800
.....	http://www.co.carver.mn.us/
Dakota	952-891-7557
.....	https://www.co.dakota.mn.us/
Hennepin	612-348-3777
.....	http://www.hennepin.us/
Ramsey	651-266-1199
.....	https://www.ramseycounty.us/
Scott	952-496-8177
.....	http://www.scottcountymn.gov/
Washington	651-430-6655
.....	https://www.co.washington.mn.us/

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
All offices	651-296-6300
.....	https://www.pca.state.mn.us/

Small Business Environmental Assistance Program

Toll free	1-800-657-3938
Metro	651-282-6143
.....	https://www.pca.state.mn.us/sbeap/

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Metro	612-624-1300
.....	http://www.mntap.umn.edu

Minnesota Duty Officer

Toll free	1-800-422-0798
Metro	651-649-5451