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United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

April 8, 1994

MEMORANDUM

Subject: Regulatory Status of Wood Stickers Used For Wood
Preserving Operations

From: Rick Brandes, Chief
Waste Identification Branch

To: Jeff Ingalls, Inspector
Oregon Department of Environmental Quality

This letter is in response to your request that we make a regulatory interpretation as to the status of discarded wood stickers which were used during wood preserving operations.

Wood stickers are typically used in wood preserving operations to separate bundled wood to ensure that more surface area of wood is exposed during treatment. Typically, these stickers are reused for multiple wood treating operations. When these wood stickers have reached their useful lifetime, they are discarded, and it is how these stickers are disposed of which is the basis of this letter.

Wood stickers which are disposed of by plants following wood preserving operations that use pentachlorophenol, creosote, or CCA are classified as listed hazardous waste for the following reason: Dripping from wood preserving operations that use pentachlorophenol, creosote, and CCA is classified as F032, F034, and F035, respectively. Wood stickers, because of their intended use, come in contact with this dripping, thereby carrying the hazardous waste code when disposed. The Agency does not consider these stickers to be treated wood product since they are part of the process of treating the wood.

These stickers, however, do not need to be a part of a plant's monthly hazardous waste reporting requirement until they are

ultimately discarded since they are being used as a tool to treat the wood.

If you have any questions or comments regarding this issue, please contact Mr. David J. Carver on (202) 260-6775.