



BMPs

Best Management Practices for N.H. Solid Waste Facilities

Brush Pile

As a practical matter, there are two basic methods for managing brush piles: **chipping**, which is preferred, and **burning**, which is least preferred. Both methods require the brush pile to be free of “non-conforming materials,” including:

- Construction and demolition debris;
- Combustible domestic waste, including trash, tires, plastics, Styrofoam, paper, cardboard and garbage;
- Composite material, such as plywood, chipboard, flakeboard, masonite, plastic decking, laminated wood; and
- Any wood that is glued, painted, stained, coated with plastic, pressure treated, creosoted, or otherwise treated, laminated or veneered.

In other words, the only materials allowed in brush piles are brush, timber and untreated sawn dimensional lumber from sources other than construction or demolition projects.

Did You Know?

- The disposal of leaf and yard waste in landfills and incinerators has been banned in New Hampshire since 1993.
- In 2008, N.H. banned the combustion of construction and demolition (C&D) debris, even the clean wood portion. However, the law does not apply to the incidental combustion of untreated C&D wood at any municipal transfer station under the supervision of a solid waste facility operator.

When you chip your brush pile, you produce a valuable material that can be used as ground cover in landscaping projects and as a bulking agent at compost facilities. When you burn your brush pile, you produce ash and wood smoke. Although the ash can be used in certain agricultural and composting applications when it is produced strictly from virgin wood, the wood smoke contributes to air pollution. Wood smoke contains fine particulates, nitrogen oxides, sulfur oxides, carbon monoxide, volatile organic compounds, dioxins and furans. Breathing air containing wood smoke can cause a number of serious respiratory and cardiovascular health problems.

Air pollution from brush piles is made worse by burning non-conforming materials. In addition, burning non-conforming materials can produce ash that is a hazardous waste due to the presence of toxic heavy metals such as lead and cadmium.

If you burn your brush pile and you keep non-conforming materials from being burned, you can be reasonably certain, without having it tested, that the ash is not a hazardous waste. However, if you burn non-conforming materials, you will have to hire a qualified professional to have the ash tested by a laboratory to determine if it is toxic for heavy metals or other contaminants. If test results show it is a hazardous waste, you will have to dispose of it at a hazardous waste facility and pay hazardous waste generator fees, all of which can be very expensive.

Best Management Practices for Brush Piles

- Inspect all incoming loads of brush and wood destined for the brush pile to be certain they do not contain non-conforming materials.
- To avoid having non-conforming materials added to the brush pile, instruct residents to leave their waste wood in a stockpile near the brush pile and allow only trained facility operators to add waste wood to the brush pile.

- If you chip your brush pile (most preferred):
 - > Locate the stockpile of wood chips over a firm surface to prevent soil, stones and other potential contaminants from entering the pile.
 - > A pile of wood chips can generate strong odors after just a few days, so make plans to get rid of it quickly. For example, coordinate the chipping events with landscapers and your own public works department or road agent, and advertise the event so your residents know when the chips will be available.
 - > If you hire a contractor to chip your brush pile, rather than doing it yourself, consider contacting other towns to coordinate your chipping event with theirs, to possibly save money.
- If you burn your brush pile (least preferred):
 - > Obtain a burn permit from the local Fire Department or Fire Warden and comply with other state and federal open burning requirements.
 - > Provide a minimum 50-foot distance from the edge of the brush pile to the nearest structure and tree line. Contact your Forest Ranger or Fire Warden for additional guidance.
 - > Keep fire suppression equipment close by when burning.
 - > Be a good neighbor; consider wind direction and weather conditions before burning.
 - > Properly manage ash from burning clean, untreated wood and brush, as follows:
 - Actively manage it. Do not stockpile it for long periods of time. Do not bury it.
 - Dispose of it at a permitted landfill or have it used as a soil amendment in controlled agricultural applications, a compost bulking agent, or an odor control agent for septage and sludge management, if it meets NHDES standards for these uses.
 - > Manage ash from burning anything other than clean, untreated wood and brush as a hazardous waste, unless laboratory testing shows it is not a hazardous waste. While waiting for the test results, contain and cover it to keep out rain and storm water and prevent dust.



Burned and unburned non-conforming material.



Burning of non-conforming material.

Burn pile with a clear containment area, minimal lumber and a wide fire lane.



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