



June 7, 2021

The Honorable Benjamin Allen  
 Chair, Senate Environmental Quality Committee  
 State Capitol, Room 4076  
 Sacramento, CA 95814

**RE: Assembly Bill 332 (Quirk) – SUPPORT  
 As Amended May 20, 2021**

Dear Senator Allen:

On behalf of the local government and solid waste organizations listed above, we are writing to express our strong support for Assembly Bill 332 concerning treated wood waste (TWW), authored by Assembly Member Bill Quirk.

Treated wood is commonly used as a building material in many construction, agricultural, and aquatic settings, as it has been specifically treated with preservatives to

resist decay related to moisture, pests, and exposure to the environment. Because TWW contains hazardous chemicals, it must be carefully managed and disposed. Until January 1, 2021, TWW could be disposed of in either a Class I hazardous waste landfill or in a composite-lined portion of a solid waste landfill and did not have to be transported by a registered hazardous waste hauler.

On September 29, 2020, Governor Newsom vetoed Senate Bill 68 (Galgiani), which sought to repeal the sunset date allowing the alternative management of TWW. This left residential and commercial customers with no practical disposal options because of the significantly greater costs and complexities of managing and transporting these materials as hazardous wastes to a Class I hazardous waste disposal facility.

Over the last several months, the Department of Toxic Substances Control has worked diligently to develop a temporary, short-term fix by issuing variances to generators, transporters, handlers, and disposal facilities for the management and disposal of TWW. This variance system was not intended to be a permanent solution, but instead facilitates the proper management and disposal of TWW while the Legislature crafts a long-term approach.

AB 332 facilitates the safe and proper handling and disposal of TWW by codifying the Alternative Management Standards found in 22 CCR 67386.1 et seq. that sunset on January 1, 2021. Those standards significantly eased the burdens associated with proper transportation, management, and disposal of TWW.

We support AB 332 because it establishes a clear and reasonable path for the proper management and disposal of TWW while protecting the environment. Management and disposal of TWW as a hazardous waste is unreasonable because of the extremely limited transportation and disposal opportunities, the massive cost increases that accompany such special treatment, and the volumes involved. Without the alternative management options for TWW that AB 332 establishes, we are particularly concerned that costs for management and disposal of TWW will remain at unsustainable levels and we will continue to experience the increase in illegal dumping and burning, which has led to even greater costs on state and local governments to clean up that waste.

For these reasons, RCRC respectfully requests your 'Aye' vote when this measure is heard before your Committee.

Sincerely,



JOHN KENNEDY  
Legislative Advocate  
RCRC



DEREK DOLFIE  
Legislative Representative  
League of California Cities



CATHERINE FREEMAN  
Legislative Representative  
CSAC



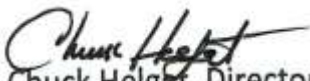
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CWRA



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Executive Director  
CPSC



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Governmental Relations & Legislative  
Officer  
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KRISTA BERNASCONI  
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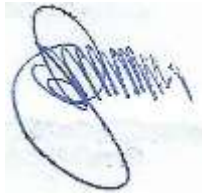
DIANE BURGIS  
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Western Placer Waste Management  
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ROBERT C. FERRANTE  
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Los Angeles County Sanitation Districts

JOHN SNYDER  
Vice President/CAO  
EDCO Waste & Recycling

cc: The Honorable Bill Quirk, Member of the State Assembly  
Members of the Assembly Environmental Safety & Toxic Materials Committee  
Members of the Senate Environmental Quality Committee  
Consultant, Senate Environmental Quality Committee  
Members of the Senate Judiciary Committee  
Consultant, Senate Judiciary Committee  
Scott Seekatz, Consultant, Senate Republican Caucus  
Morgan Branch, Consultant, Senate Republican Caucus