



March 30, 2021

The Honorable Bill Quirk  
 Chair, Environmental Safety & Toxic Materials Committee  
 State Capitol, Room 2163  
 Sacramento, CA 95814

**RE: Assembly Bill 332 – SUPPORT  
 As Amended March 25, 2021**

Dear Assembly Member Quirk:

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

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 the reasons stated above, we appreciate your attention to this urgent matter of statewide concern and support AB 332.

Sincerely,



JOHN KENNEDY  
Legislative Advocate  
RCRC




CATHERINE FREEMAN  
Legislative Representative  
CSAC



DOUG KOBOLD  
Executive Director  
CPSC



NATASHA DRANE  
Governmental Relations & Legislative  
Officer  
Sacramento County



Chuck Helget, Director Government Affairs  
Republic Services

LESLIE LUKACS  
Executive Director  
Zero Waste Sonoma



CHRISTINE WOLFE  
Public Policy Manager  
Recology



ALEX OSEGUERA  
Director of Government Affairs  
Waste Management

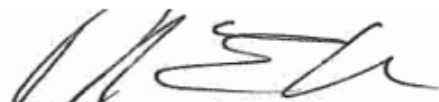
MICHAEL RIVERA  
Solid Waste Division Manager  
City of Watsonville



DEREK DOLFIE  
Legislative Representative  
League of California Cities



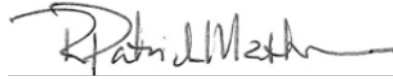
JENNIFER LOMBARDI  
General Manager  
Mendo Recycle



DAVID E. FAHRION  
CEO  
CWRA



RACHEL ROSS-DONALDSON  
Agency Manager  
Tehama County Solid Waste  
Management Agency



PATRICK MATHEWS  
General Manager/CAO  
Salinas Valley Solid Waste Authority



PETER HOLTZCLAW  
Executive Director  
RecycleMore



KRISTA BERNASCONI  
Mayor  
City of Roseville



LAURA FERRANTE  
Government Affairs Advocate  
Resource Recovery Coalition of  
California



WENDY SOMMER  
Executive Director  
StopWaste



JOE LA MARIANA  
Executive Director  
RethinkWaste



KEVIN BELL, P.E.  
Deputy Executive Director  
Western Placer Waste Management  
Authority

LESLIE ROBINSON  
Program Manager  
Santa Barbara County  
Resource Recovery & Waste  
Management Division



DIANE BURGIS  
Chair of the Board  
Contra Costa County



JOHN KELLY ASTOR  
General Counsel, Legislative and  
Regulatory Affairs  
California Waste Haulers Council



CAROL J. HUCHINGSON, M.A.  
County Administrative Officer  
Lake County



ROBERT C. FERRANTE  
Chief Engineer & General Manager  
Los Angeles County Sanitation Districts

cc: Members of the Assembly Environmental Safety & Toxic Materials Committee  
Josh Tooker, Chief Consultant, Assembly Environmental Safety & Toxic  
Materials Committee  
Gregory Melkonian, Consultant, Assembly Republican Caucus