



July 1, 2021

The Honorable Anthony Portantino
 Chair, Senate Appropriations Committee
 State Capitol, Room 5050
 Sacramento, CA 95814

**RE: Assembly Bill 332 (Quirk) – SUPPORT
 As Amended June 29, 2021**

Dear Senator Portantino:

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



DAVID E. FAHRION
CEO
CWRA



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



JENNIFER LOMBARI
General Manager
Mendo Recycle



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

JILL DUFFY
Executive Director
HWMA



PETER HOLTZCLAW
Executive Director
RecycleMore

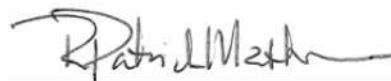


LAURA FERRANTE
Government Affairs Advocate
Resource Recovery Coalition of
California



JOE LA MARIANA
Executive Director
RethinkWaste

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



PATRICK MATHEWS
General Manager/CAO
Salinas Valley Solid Waste Authority



KRISTA BERNASCONI
Mayor
City of Roseville



WENDY SOMMER
Executive Director
StopWaste



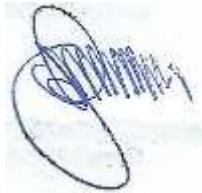
DIANE BURGIS
Chair of the Board
Contra Costa County



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



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



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



MICHAEL GROSS
Director of Sustainability
Zanker Recycling



ROBERT C. FERRANTE
Chief Engineer & General Manager
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 Senate Appropriations Committee
Consultant, Senate Appropriations Committee