



## **Treated Wood Waste in California: What You Need to Know About Lawful Disposal**

Treated wood is a commonly used material in construction, agriculture, transportation and aquatic applications where exposure to moisture, insects or other elements compromise the strength and useful life of various wood products. Wood products are treated with preservatives [authorized by the U.S. Environmental Protection Agency](#). The wood preserving industry has been a leader in promoting the proper handling and proper disposal of treated wood waste.

Since 2005, [California state law](#) has provided management alternatives for disposing treated wood waste (TWW), which include properly separating, reporting and disposing TWW in a composite-lined landfill. *Disposing treated wood waste anywhere other than a composite-lined landfill or Class I hazardous waste landfill is prohibited by law.*

The law requires landfills and transfer stations to submit semi-annual reports on the TWW they receive. The Department of Toxic Substances Control (DTSC) launched a Treated Wood Waste Tracking System (TWWTS) in 2007 to better understand the amount of TWW received by approved facilities throughout California and improve compliance through outreach and education.

Enacted in 2015, [SB 162](#) extended these provisions through 2020 and mandated a study to assess whether generators of TWW were following the law by separating, reporting and disposing TWW in composite-lined landfills. A TWW generator site is any location where treated wood is cut, sanded or drilled. Remnants from these activities, including the sawdust, are TWW. And, at the end of its service life, preserved wood is considered TWW for disposal purposes.

Typically, TWW generators include public works departments, landfills, parks, ports, railroads, transportation agencies, schools, universities, industrial facilities, manufacturers, construction companies, agricultural enterprises, private residences and other locations.

A [2011 report](#) by DTSC indicated a 95% compliance rate with TWW disposal requirements. However, the study was criticized for its small sample size. Currently, DTSC is seeking to vastly expand the number of TWW generators they inspect to get a more comprehensive understanding of whether TWW generators and TWW facilities are complying with the law and regulations.

The TWW compliance study mandated by SB 162 was funded during the 2016 legislative session for \$370,000 and included an extension for completing the study. The TWW compliance report must be presented to the Legislature no later than July 1, 2018.

The study of TWW compliance mandated by SB 162 is now underway. DTSC has started the process of hiring three full-time inspectors and a senior scientist to assess how and where businesses, government entities and private individuals dispose of treated wood.



## Treated Wood Waste: What You Need to Know About Lawful Disposal Page 2

In the spring of 2017, DTSC staff will initiate communication with generators of TWW and begin inspecting their facilities to determine whether generators are separating treated wood from untreated wood, disposing of TWW in composite-lined landfills and reporting the disposed TWW accordingly.

Western Wood Preservers Institute (WWPI) is a non-profit trade association founded in 1947 to serve the interests of the preserved wood industry in western North America. WWPI works with federal, state and local agencies, as well as designers, contractors and users over the entire preserved wood life cycle, ensuring that preserved wood is used in a safe, responsible and environmentally friendly manner.

WWPI is currently working with the Department of Toxic Substances Control and CalRecycle to monitor implementation of the study and educate California regulators on TWW and how to identify it.

For more information on treated wood waste and compliance, see:

PreservedWood.org Website (managed by WWPI)

[http://wwpi.info/TWW\\_pubs](http://wwpi.info/TWW_pubs)

WWPI Treated Wood Guide Smartphone App

[http://wwpi.info/TWGuide\\_app](http://wwpi.info/TWGuide_app)

CalRecycle Detailed Landfill Facility Search

<http://www.calrecycle.ca.gov/FacIT/Facility/Search.aspx#LIST>

DTSC Treated Wood Waste Information and Fact Sheets

[http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/TWW\\_information.cfm](http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/TWW_information.cfm)

DTSC Approved TWW Landfills

<http://www.dtsc.ca.gov/HazardousWaste/upload/lanfillapr11PDATED1.pdf>

DTSC Treated Wood Waste Regulations

[http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/TWW\\_Regulations.cfm](http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/TWW_Regulations.cfm)

DTSC Treated Wood Waste Training

[http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/TWW\\_Training.cfm](http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/TWW_Training.cfm)

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