

Treated Wood Waste (TWW) Frequently Asked Questions:

December 22, 2020

Q. Where do I find information on the management of TWW in California?

A. DTSC updated the TWW [fact sheet](#) to provide most current information on management of TWW in California. If you would like more information on hazardous waste generation or the management of hazardous waste, visit the links provided at the end of the FAQ.

Q. When can I get a temporary Variance to continue the management of TWW pursuant to alternative management standards (AMS) and disposal in approved composite lined landfills?

A. DTSC is currently developing systems and processes that will allow us to efficiently process an expected large number of TWW variance requests. Presently, our plan is to invite interested parties to apply for variances beginning in mid-February 2021, and to begin issuing variances in early March 2021.

Please visit the [TWW web](#) page for updates on the timing.

Q. Who needs a variance?

A. Anyone that generates, transports, receives and consolidates TWW from other locations, or disposes of TWW as hazardous waste starting January 1, 2021, but wants to manage TWW according to alternative management standards in lieu of full hazardous waste management standards.

Q. How should I manage TWW after December 31, 2020? What should I do with my TWW, until I receive a variance?

A. Until you apply for and receive a variance from DTSC, you must manage your TWW in accordance with full hazardous waste management standards. Please see the TWW fact sheet for information on the hazardous waste management requirements that apply to the handling of TWW.

Q. What is the cost of obtaining a variance?

A. DTSC is obligated to charge all applicants costs associated with evaluating the variance application and issuing the variance. DTSC is currently gathering information regarding its expected costs and will have additional information available by mid-February 2021, when the variance application is available.

Q. How long will a DTSC variance for TWW be in effect?

A. Variances are intended to be short term arrangements. DTSC expects the term of the TWW variances to be six months. This six-month period is intended to allow TWW handlers reprieve of the full hazardous waste management standards until a solution to the AMS is instituted. DTSC is hopeful that within the six months, treated wood waste advocates, the Legislature and DTSC will be able to find a more protective, longer term solutions to replace the continuation of the alternative management standards and disposal in solid waste landfills. If a solution is not available within six months, DTSC is considering offering a one-time extension of up to an additional six months.

Q. How do I dispose of hazardous TWW?

A. Hazardous TWW must now be transported to a class I hazardous waste landfill in California, or to a landfill in another state that is authorized to receive and dispose TWW.

Q. How Do I determine if my TWW is a non-RCRA hazardous waste?

A. Information regarding how to determine if TWW is a hazardous waste can be found in DTSC's TWW fact sheet.

Q. Can I cut TWW?

A. Under the AMS, TWW can be cut, or resized, only to facilitate transport. Starting January 1, 2021, cutting will be considered a form of treatment under the full hazardous waste management standards. In order to cut TWW after the point of generation, a hazardous waste facility permit or other grant of authorization from DTSC is required to conduct treatment of hazardous waste.

Q. Where can I find links to additional information?

A. Information regarding hazardous waste generator and transporter requirements can be found at:

Generator information:

- Managing Hazardous Waste: <https://dtsc.ca.gov/managing-hazardouswaste/Generator>
- Fact Sheet: <https://dtsc.ca.gov/hazardous-waste-generator-requirementsfact-sheet/>
- Waste Classification: <https://dtsc.ca.gov/defining-hazardous-waste/>
- Waste Classification Tutorial: https://ccelearn.csus.edu/wasteclass/intro/intro_01.html

Transporter information:

- Managing Hazardous Waste: <https://dtsc.ca.gov/transporters/>
- Managing Hazardous Wastes at Transfer Facilities: https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/02/Transportation_FS_Transfer_Facilities.pDf
- Hazardous Waste Transporter Requirements Fact Sheet: <https://dtsc.ca.gov/hazardous-waste-transporter-requirements-fact-sheet/>

Treated wood information:

- General Information: <http://npic.orst.edu/factsheets/treatedwood.html>
- DTSC's Treated Wood Waste web page: <https://dtsc.ca.gov/toxics-in-products/treated-wood-waste/>
- Contact Information: <https://dtsc.ca.gov/toxics-in-products/treated-wood-waste-contacts/>