



Department of  
Toxic Substances  
Control

*Our Mission is to provide the highest level of safety, and to protect public health and the environment from toxic harm.*



State of California



California  
Environmental  
Protection Agency

Factsheet, January 2008

## Requirements for Generators of Treated Wood Waste (TWW)

### What is Treated Wood Waste (TWW)?

TWW is wood lumber commonly used in ground or water contact applications that has been removed from service. This wood is typically treated with preserving chemicals that protect the wood from insect attack and fungal decay during its use. Examples include fence posts, sill plates, landscape timbers, pilings, guardrails and decking.

### What are the Health and Environmental Hazards?

TWW contains hazardous chemicals that pose a risk to human health and the environment. Arsenic, chromium, copper, and pentachlorophenol are among the chemicals added to preserve the wood. These chemicals are known to be toxic or carcinogenic. Harmful exposure to these chemicals may result from dermal contact with TWW, or from inhalation or ingestion of TWW particulate (e.g., sawdust and smoke).

### What are the Hazardous Waste/Alternative Management Standards (AMS)?

Because TWW contains hazardous chemicals, at elevated levels, it is subject to California's Hazardous Waste Control Law. Department of Toxic Substances Control (DTSC) has developed alternative management standards (AMS) for TWW (California Code of Regulations (CCR), Title 22, Division 4.5, Chapter 34) that are based upon full hazardous waste requirements but are adjusted for the unique circumstances associated with TWW. In summary, AMS lessen storage requirements, extend accumulation periods, allow shipments without a hazardous waste manifest and a hazardous waste hauler, and allows disposal at specific non-hazardous waste landfills. The AMS simplify and facilitate the safe and economical disposal of TWW. (Note -TWW that is removed from utility services or RCRA hazardous waste is not eligible for AMS.)

### What are the Handling and Disposal Requirements for TWW?

The new AMS, which went into effect on July 1, 2007, are intended to ease regulatory burdens. Although hazardous waste generators are required to properly classify their waste through knowledge or laboratory analysis, generators of TWW can presume their TWW is hazardous waste and avoid expensive laboratory testing. Generators can then manage their waste in accordance with the AMS, including disposal at certain non-hazardous waste landfills. Upon acceptance at these certain landfills, the TWW, at that point, becomes non-hazardous (Health & Safety Code § 25150.8). Specific generator requirements for households, small business and all others are presented in the following sections.



## Households

Households typically generate TWW when a fence or deck is replaced. Under AMS, households must:

1. Keep their TWW segregated from other materials.
2. Store less than 1,000 pounds of their TWW for no more than 30 days following its removal from use.
3. Transport it to an authorized TWW facility. If the TWW is going to a Household Hazardous Waste (HHW) Collection Center, call and confirm the acceptance of TWW. (Not all HHW Collection Centers handle treated wood waste or can only collect limited amounts.)
4. Identify TWW to TWW facility personnel.

It is important to note that AMS also prohibit TWW from being burned, chipped, ground, or mulched. TWW stored for more than 30 days would invoke additional requirements on the household that apply to businesses.

### **Businesses generating TWW incidental to the normal course of business.**

Incidental generation occurs when a business generates TWW as a result of activities not associated with the business's core operation. For example, a retail store, a doctor's office, or an autobody repair shop might generate TWW when repairing or replacing signage or fencing at their place of business. This TWW is considered "incidentally generated" because these businesses are not routinely involved in construction, demolition, or other activities that involve treated wood. Under AMS, businesses that "incidentally" generate TWW can generally comply with handling and disposal requirements by:

1. Keeping TWW segregated from other materials.
2. Storing no more than 1,000 pounds of TWW for no longer than 30 days. Incidental generators who store TWW for more than 30 days are subject to the additional requirements for businesses that are routine generators of TWW.
3. Labeling all TWW bundle/shipments with the

following information:

***TREATED WOOD WASTE – Do not burn or scavenge.***

***TWW Handler***

***Name:*** \_\_\_\_\_

***Address:*** \_\_\_\_\_

***Accumulation Date:*** \_\_\_\_\_

4. Taking TWW to an authorized TWW facility. See the listings at the end of the factsheet for information on facilities who have been authorized to accept TWW in California.

### **Businesses generating TWW during the normal course of business.**

Businesses that generate, handle, or accumulate more than 1,000 pound in 30 days engaged in activities expected to routinely generate or handle TWW, such as, construction/demolition contractors, and business and homeowners generating large quantities (i.e., accumulating more than 1,000 pounds in 30 days) must meet the requirements listed below. In complying with the TWW AMS, these generators will minimize their liability concerns and eliminate possible future cleanup cost associated with mismanagement of TWW.

1. Get prior confirmation that the solid waste facility or hazardous waste facility will accept your TWW shipment. Not all facilities accept TWW, so check with the facility before transporting to ensure that your load will not be rejected. To locate the nearest TWW facilities, please contact DTSC at (916) 324-0064. (CCR § 67386.7(b))
2. Store TWW off the ground by placing it on blocks, on concrete surfaces, or in containers. Movement of large quantities of TWW can be facilitated by bailing and or palletizing TWW, which may also prevent ground contact. (CCR § 67386.6)
3. Do not store TWW beyond the allowed limits (90 days – blocked, 180 days – concrete surfaces, 1 year – container).(CCR § 67386.6(a)(2))
4. Cover your TWW during inclement weather

to prevent rain water from leaching chemicals out of the TWW.

5. Accumulate the waste away from public access to prevent scavenging. (CCR § 67386.6(a))
6. Do not burn TWW. It is illegal to burn TWW without a hazardous waste permit. (CCR § 67386.3)
7. Contact DTSC if you plan to reuse the removed TWW to ensure compliance with existing hazardous waste laws. (CCR § 67386.3)
8. Keep segregated TWW from mixing with other waste. (CCR § 67386.3(a))
9. Label all TWW bundle/shipments with the following information:

***TREATED WOOD WASTE – Do not burn or scavenge.***

***TWW Handler***

***Name:*** \_\_\_\_\_

***Address:*** \_\_\_\_\_

***Accumulation Date:*** \_\_\_\_\_

10. Keep records for three years to demonstrate that your TWW was properly managed. Records should include: (1) name and address of the TWW facility to which the TWW was sent; (2) estimated weight of TWW, or the weight of the TWW as measured by the receiving TWW facility; and (3) date of the shipment of TWW. (CCR § 67386.8(a))
11. Notify DTSC if you generate more than 10,000 lbs of TWW per calendar year. See the listings at the end of this factsheet for the online notification weblink.

The following information must be submitted: (1) your name and mailing address; (2) Identification Number; (3) name and telephone number of the TWW contact person; (4) address or physical location of the TWW management activities; (5) date you exceeded the 10,000 pound limit; and (6) a statement indicating that the handler is generating more than 10,000 pounds of TWW

per calendar year. An Identification Number can be obtained by calling 1-800-618-6942. (CCR § 67386.9)

12. Arrange for shipment to a TWW facility. Disposal is allowed at a hazardous waste landfill or a qualified solid waste landfill. See the listings at the end of the factsheet for information on facilities who have been authorized to accept TWW. Contact the TWW facility to obtain costs as they may be adjusted based upon volume. (CCR § 67386.11)
13. Train your employees involved in TWW handling and keep the training records for 3 years. The training shall include applicable Cal/OSHA requirements, methods for identifying and segregating TWW, safe handling practices, requirements of AMS; and proper disposal methods. (CCR § 67386.12)

### **Frequently Asked Questions (FAQs)**

- Q: Does the TWW need to be transported with a hazardous waste manifest or use a hazardous waste hauler?
- A: No, you can transport using a shipping document, bill of lading, or invoice as documentation and you can use any hauler to transport your TWW off-site.
- Q: What information needs to be provided to TWW facility personnel?
- A: ID Number or site name, address, contact person's name, mailing address and phone number.
- Q: Can I reuse my TWW after its initial removal from service?
- A: Yes, with the restriction that you use it on-site for its intended use and if you store it no longer than the allowed time limits. (90 days – blocked, 180 days – concrete surfaces, 1 year – container)
- Q: Am I allowed to cut TWW?
- A: Yes, but solely for resizing to accommodate for shipping limitations. Any sawdust must be captured and managed as TWW.

## Additional Information

For more information on TWW requirements, call the Regulatory Assistance Officers at: (800) 72TOXIC (1-800-728-6942) or (916) 255-3618 if you are calling from outside of California.

For Identification Number issuances contact DTSC at (800) 618-6942.

## Treated Wood Waste Webpage Listings

The following items are found on our TWW webpage at:

[http://www.dtsc.ca.gov/HazardousWaste/Treated\\_Wood\\_Waste.cfm](http://www.dtsc.ca.gov/HazardousWaste/Treated_Wood_Waste.cfm)

- [Regulations and Rulemaking Background](#)
- [Treated Wood Waste Online Notification Form](#)
- [Permanent Identification Number Form](#)
- [List of Landfills Accepting TWW](#)
- Contact for the Nearest Authorized TWW Facility
- Treated Wood Waste Training Materials

### Caution:

This factsheet is intended as a basic overview and guidance document for the management of TWW. It does not replace or supersede Federal or State statutes and regulations.