



MARK PESTRELLA, PE, CHAIR
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

June 17, 2021

The Honorable Benjamin Allen, Chair
Senate Committee on Environmental Quality
State Capitol, Room 2205
Sacramento, CA 95814

Dear Senator Allen:

SUPPORT – ASSEMBLY BILL 332 (ASSEMBLY COMMITTEE ON ENVIRONMENTAL SAFETY AND TOXIC MATERIALS) AS AMENDED ON MAY 20, 2021 – HAZARDOUS WASTE: TREATED WOOD WASTE: MANAGEMENT STANDARDS

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **Supports** Assembly Bill 332 (AB 332), as amended on May 20, 2021.

Alternative Management Standards (AMS) for the handling of Treated Wood Waste (TWW) were adopted in the State regulations {Title 22 of the California Code of Regulations (CCR), Section 67386.1 et seq.} pursuant to Assembly Bill 1353 (Matthews, 2004) to effectively manage TWW and allow for the disposal of TWW in a composite-lined portion of a solid waste landfill. The AMS sunset on December 31, 2020, and as a result TWW must now be managed as Hazardous Waste. The many additional Hazardous Waste management requirements, including transport to and disposal at a Class I hazardous waste landfill will significantly increase the costs of proper handling and disposal which could lead to an increase in illegal dumping of TWW. AB 332 would incorporate appropriate sections of the 22 CCR 67386.1 et seq. that sunset on December 31, 2020, to facilitate a clear and reasonable path for the proper management and disposal of TWW while protecting the environment. AB 332 as amended on May 20, 2021, would create additional requirements on the wood preserving industry for updating the Department of Toxic Substances Control on trends within the industry and the preparation and updating of outreach materials on the appropriate handling, disposal, and management of TWW for generators and receiving facilities.

The Task Force is in support of such a measure because while treated wood products have many beneficial uses, their proper management and disposal require this act to take effect immediately to protect human health and safety as well as to prevent further contamination of our environment and waste stream.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Based on the foregoing, the Task Force **Supports** AB 332. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor, City of Rosemead

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cc: Each Member and staff of the Assembly Committee on Environmental Safety and Toxic Materials
Each Member and staff of the Senate Committee on Environmental Quality
California State Association of Counties
League of California Cities – Los Angeles County Division
Rural County Representatives of California
Each Member of the Los Angeles County Board of Supervisors
Fesia A. Davenport, Los Angeles County Chief Executive Officer
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each City Recycling Coordinator in the County of Los Angeles
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force