

Guidance for Large Generators Disposing of More Than 10,000 lbs. of Treated Wood Waste Annually

The California Health and Safety Code defines specific responsibilities for individuals generating or disposing more than 10,000 lbs. of treated wood waste, or TWW, in a calendar year. These individuals or companies are considered Large Generators of TWW and they have specific responsibilities under state law.

A TWW Generator is defined in the safety code as any person, company or property owner whose act or process produces TWW. A Generator is **not** someone hired by a property owner whose actions or process produces TWW on site. For example, a hired contractor or transporter are not considered Generators. However, if the contractor generates TWW in a shop or off site, they are considered a TWW Generator.

Given the high volume of TWW disposed by Large Generators, they must meet the following requirements:

- Establish proper recordkeeping for TWW disposal.
- Register for a California State EPA ID or Federal EPA ID number by calling 800-618-6942 or obtain one at this link: <https://dtsc.ca.gov/hazardous-waste-id-numbers>
- Notify the [California Dept. of Toxic Substances Control](https://dtsc.ca.gov/toxics-in-products/treated-wood-waste/) (DTSC) within 30 days of exceeding 10,000 lbs. of TWW disposed. Link: <https://dtsc.ca.gov/toxics-in-products/treated-wood-waste/>

The wood treating industry has developed a website at www.TWWDisposal.org to assist Californians and businesses in properly disposing TWW. Detailed information for Large Generators can be reviewed on the website. Below is a summary of these topics:

Identifying TWW

Wood products used in outdoor exposures where they are subjected to weather are often preservative treated to protect the wood against deterioration from insects and decay fungi. When outdoor structures built with preservative-treated wood – such as decks, gazebos, fences and retaining walls – are demolished and discarded, the wood is considered TWW. Scraps and sawdust from new construction also are considered TWW.

Preservative-treated wood may be identified by any end tag on the wood that shows the use conditions and preservative used. If any wood in the structure still has an end tag, it is likely the rest of the wood in similar applications is preservative treated. Also, treated wood may have incisions, or small slits in the wood to allow the preservative to penetrate into the fiber. If the wood has these slits, it is most likely preservative treated. Fire-retardant-treated wood is not TWW.

Review details at:

twwdisposal.org/tww-basics/identifying-tww/



Accumulating & Storing TWW

Large Generators must follow specific requirements in storing TWW to prevent unauthorized access and minimize run-off from precipitation. These storage requirements include blocking and tarping, containerizing, use of storage buildings, containment pads and other methods. TWW may not be accumulated for more than one year from the date of generation. Review details at: twwdisposal.org/tww-basics/storage/

Labeling TWW

All TWW generated, accumulated, stored or transported by Large Generators within California must be clearly marked and visible for inspection. A sample label can be downloaded from: twwdisposal.org/tww-basics/labeling/

TREATED WOOD WASTE - Do not burn or scavenge

Treated Wood Waste Handler

Name: _____

Address: _____

Accumulation Date: _____

Notifications

For those generating more than 10,000 lbs. of TWW, you must apply for a Hazardous Waste Identification Number with the state Dept. of Toxic Substances Control (DTSC). Once the identification number has been issued, the Large Generator must submit a notification form to DTSC within 30 days of exceeding the 10,000 lbs. threshold. For information on applying for an identification number or completing the notification form, go to: twwdisposal.org/tww-basics/notifications/

Recordkeeping

All Generators are required to keep records of TWW disposal, which may take the form of a log, invoice, manifest, bill of lading, shipping document, or receipt from an approved TWW facility. Such records must be maintained for a minimum of three years. Review details at: twwdisposal.org/tww-basics/recordkeeping/

Handling

It is safe to handle TWW and you can use the same personal protective equipment that you would use in handling untreated wood products. When handling TWW, take the following precautions:

- Wear long-sleeved shirts and long pants, and use gloves impervious to chemicals (for example, gloves that are vinyl coated).
- Wear a dust mask to avoid inhalation of sawdust. If demolition of a treated wood structure requires sawing, wear a dust mask and eye protection to protect eyes from flying particles.
- Follow good personal hygiene after handling TWW. Wash hands and any exposed areas thoroughly after handling, especially before eating, drinking or using tobacco products.
- If preservative or sawdust from TWW accumulates on clothes, launder before reuse. Be sure to wash work clothes separately from other clothing.

Prohibited Activities

The state of California has adopted the following specific prohibitions for TWW after it is removed from its original application:

- TWW may not be burned in open flame, fireplaces or residential boilers.
- TWW may not be scavenged for other uses.
- TWW may not be comingled with other waste prior to disposal, if previously segregated.
- TWW may not be stored in contact with the ground or water.
- TWW may not be recycled.
- TWW may not be resized, except for minimal cutting, breaking, or sawing to facilitate transport or reuse. If size reduction of the TWW results in sawdust, particles or other material smaller than one cubic inch, the material must be captured and managed as TWW.
- TWW may not be chipped into mulch for landscaping, animal bedding or other uses.
- Any label, mark, or end tag that identifies the wood as preservative-treated wood shall not be intentionally removed, obliterated, defaced, or destroyed prior to disposal in an approved landfill.

Authorized TWW Disposal Facilities

Only landfills authorized by the California Water Resources Control Board are allowed to accept TWW for disposal. The Board maintains a list of landfills and disposal facilities authorized to accept TWW. The list of approved disposal sites is updated frequently, so review it periodically here:

www.waterboards.ca.gov/water_issues/programs/land_disposal/treated_wood_waste.html

For additional information on these and other topics for Large Generators, please go to the website:

www.TWWDisposal.org

DISCLAIMER - Western Wood Preservers Institute (WWPI) believes the information on TWW disposal is based on current California regulations and is intended for general informational purposes. The Institute makes no warranty or representation, either expressed or implied, as to the reliability or accuracy of such information; nor does the Institute assume any liability resulting from use of or reliance upon the information by any party.