COMMUNITY DEVELOPMENT DEPARTMENT

Roger Root, CAO
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Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

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December 19, 2025

Mr. Bruce Slaton
18955 Industry Way
Sonora, CA 95370

Subject: **Clarification of Activities Not Subject to LEA Permitting and Follow-up for LEA-Unpermitted Type A Inert Debris Fill for Property Located at 18955 Industry Way, Assessor's Parcel No. 97-090-10**

Dear Mr. Slaton,

On October 17, 2025 this Division acting as the solid waste Local Enforcement Agency (LEA) conducted an inspection at the above referenced property to verify conditions and operations under LEA jurisdiction. Mr. Rick Barrieau, Senior Building Inspector, was also present to evaluate the slope finish in the area of the LEA-unpermitted Type A Inert Debris Fill and the future area proposed for the manufactured home.

The purpose of this letter is to formally clarify operational standards for ongoing Type A Inert Debris handling that does not currently require LEA permitting, and address the status of the LEA-unpermitted Type A Inert Debris Fill.

Surface Handing (above grade)/Storage of Type A Inert Debris
To be excluded from LEA permitting for surface-handling of Type A Inert Debris the Business/Owner shall maintain the following regulatory limits pursuant to CCR, Tile 14:

1. **No processing may occur** – crushing, grinding or similar activities are not allowed on site.
2. **All intake of product shall be source separated** – no separation activities are allowed on site,
3. **Storage/handling maximum limit is 15 cubic yards** at any time on the property.
4. **If operating as a recycling center not subject to Article 5.9**, proof/recordkeeping of storage times shall me maintained and the site remains subject to LEA verification to ensure compliant status. Storage limits are increased when operating under this category.

Subsurface (below grade) Deposits of Type A Inert Debris/Type A Inert Debris Fill
No additional Type A Inert Debris fill may be added to the parcel. The existing LEA-unpermitted fill has been evaluated by State and County stakeholders. At this time, it has not been determined

whether CalRecycle will direct the LEA to require ongoing permitting for the fill. The LEA has requested CalRecycle to consider an alternative to ongoing permitting such as a Notice of Action.

Cover Over Type A Inert Debris Fill

Stormwater best management practices were discussed to mitigate stormwater illicit discharges. Mr. Slaton and Mr. Barrieau discussed that Mr. Slaton would hydroseed the face of the completed fill. The path for the stormwater was discussed and the practices appeared satisfactory. The practices have also been reviewed by Lowell Cottle, QISP, QSD/P, CPESC, at the Waterboard.

Fill Area for Manufactured Home

Mr. Slaton and Mr. Barrieau discussed the method and materials to be used, including lifts of clean dirt, for the area under the proposed manufactured home and that compaction testing would be required to verify the adequacy of the fill.

Manufactured Home Siting

The LEA and the Community Development Department (CDD) may require further clarification regarding the siting of the manufactured home. Current permit documentation may indicate that the manufactured home is situated over a portion of the LEA-unpermitted fill. Additional review and coordination between Mr. Slaton, the LEA, and CDD may be necessary to determine if the placement indicated in Attachment A (below) is permissible.

If you have questions, please feel free to contact me at 209-533-5665.

Sincerely,

Debbie Larson, REHS
Environmental Health Director
Tuolumne County Local Enforcement Agency

Attachment A

