COMMUNITY DEVELOPMENT DEPARTMENT

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May 11, 2026

Trustee Diane Woodworth
Trustee Robert A. Woodworth
Owner John Lamar Slaton
P.O. Box 1031
Soulsbyville, CA 95372

Subject: **Removal of Pile(s) Containing Serpentinite and Testing of Crushed Material at 18955 Industry Way, Sonora; Assessor's Parcel No. 97-090-10**

Dear Trustees Woodworth and Woodworth, and Mr. Slaton,

The Tuolumne County Environmental Health Department is the certified Local Enforcement Agency (LEA) for solid waste permitting within the County of Tuolumne, including the solid waste facility permitting requirements in Public Resources Code sections 44001 et seq., and the state minimum standards and related regulations applicable to the handling, storage, processing, and disposal of solid waste. The LEA's authority includes enforcement of solid and hazardous waste laws and regulations including:

- California Public Resources Code (PRC) Division 30, Part 4, Chapter 2, Article 5,
- California Code of Regulations (CCR) Title 14 Division 7, Chapter 3, Article 5.9, 17381.1,
- CCR Title 22, Chapter 11, Article 1, section 66261.3 et. seq. (hazardous waste).

Enforcement authority is delegated under the PRC section 44000, and the California Health and Safety Code (CHS), Division 20 section 25404.

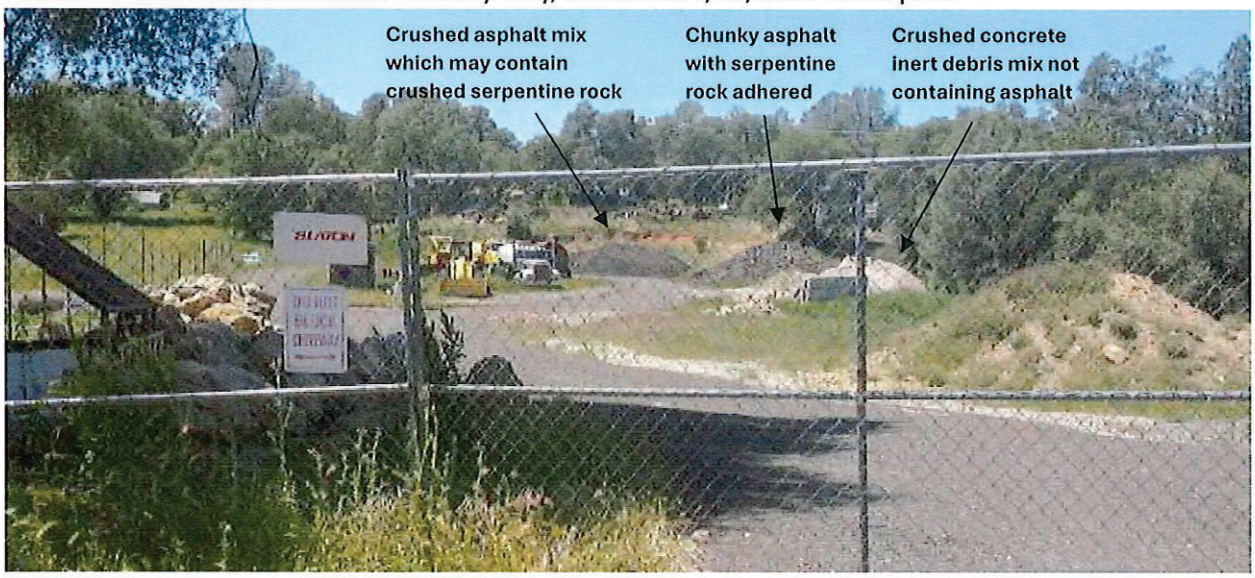
This letter outlines the required actions regarding stockpiled uncrushed and crushed material that appears to contain serpentinite or serpentinite-adhered debris and the pile that contains crushed concrete. Material stored under the CalRecycle "Not Subject to Article 5.9" for inert debris allowance must be free of hazardous waste and must be removed within one year of storage. Because serpentinite-known to potentially contain asbestos-is adhered to chunky asphalt debris and may be present within the crushed asphalt pile, the material may pose a respirable asbestos concern. Respirable asbestos is subject to, at a minimum, hazardous waste control law.

Based on the information currently available to the County, the following requirements apply:

Uncrushed asphalt inert debris with serpentine adherence
This material must be removed from the parcel and disposed of at an approved facility. All transfer operations must include effective dust control. Submit to the Environmental Health Department (EHD) your removal plan, the destination facility, and receipts verifying proper disposal or recycling.

Crushed material containing serpentinite
Asbestos sampling is required to determine whether the material meets hazardous waste criteria and to establish the appropriate disposal or allowable use(s). The EHD will initiate sampling and will arrange for a third-party consultant to collect composite samples. Samples will be split so that you may conduct independent testing if desired. All samples will be collected under chain of custody and analyzed by a California certified approved laboratory.

Picture 1: Site conditions 18955 Industry Way, Sonora on 4/30/2026 12:11 p.m.



Any pile that tests as hazardous waste must be covered, labeled, and properly disposed of within 30 days. Such material shall be subject to the Certified Unified Program Agency (CUPA) hazardous waste control laws and regulations found in the California Health and Safety Code and CCR Title 22 also enforced by the EHD. Material stored on-site without documentation establishing storage duration must likewise be removed within 30 days.

Crushed concrete – As part of site sampling, the crushed concrete pile will be sampled for crystalline silica content to establish if the pile would be considered a hazardous material.

The EHD will contact you shortly to schedule sample collection.

Please note: The County acknowledges receipt of your correspondence disputing the applicability of the December 19, 2025 letter and asserting that the site is "grandfathered," that prior County discussions authorized broader operations, and that the County cannot change the land use or zoning of the property. While the Business Park Zoning Ordinance allows certain processing activities, bringing solid

waste onto the property requires Local Enforcement Agency (LEA) oversight. Because you have chosen not to obtain LEA permits only limited activities involving inert debris are permitted.

For purposes of solid waste regulation and LEA oversight, the December 19, 2025 letter remains the County's controlling clarification of the activities that may occur on the site without LEA permits. The operational thresholds identified in the December 19, 2025 letter are statewide solid waste regulatory requirements under Title 14 of the California Code of Regulations, not discretionary County conditions that may be waived, negotiated, or contractually superseded by the property owner. Any prior communications with County staff or other officials cannot override current state solid waste regulations or the LEA's duty to enforce them; however, if you possess written proof of LEA approval or other documentation you contend is relevant, please feel free to provide it.

Please feel free to reach out with any questions.

Respectfully,

Debbie Larson, REHS
Environmental Health Director
Local Enforcement Agency
CUPA