



**Yana Garcia**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
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[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

October 1, 2025

Steve Santa Croce  
Senior Waste Management Engineer  
California Department of Resources Recycling and Recovery (CalRecycle)  
1001 "I" Street  
Sacramento, CA 95814  
[steve.santacroce@calrecycle.ca.gov](mailto:steve.santacroce@calrecycle.ca.gov)

RE: MITIGATED NEGATIVE DECLARATION FOR THE CALRECYCLE ROTELLI  
BURN DUMP REMEDIATION PROJECT DATED SEPTEMBER 10, 2025, STATE  
CLEARINGHOUSE NUMBER [2025090436](#)

Dear Steve Santa Croce,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the CalRecycle Rotelli Burn Dump Remediation Project (Project). The Project would remove surficial waste (if found to be present at the time of remediation) and excavate waste materials from 2 burn dump areas, consolidate the waste, and cap it with clean fill from an adjacent area. The Project Area is composed of 5 distinct areas: 1) Rotelli Primary Burn Dump Area (Primary Area), 2) Secondary Burn Dump Area (Secondary Area), 3) Borrow Area, 4) Consolidation Area, and 5) Construction Staging Area, as well as access roads and stream areas receiving improvement. At the start of remediation activities, the Primary Area, Secondary Area, Consolidation Area, and Borrow Area would be cleared and grubbed, and all trees would be removed. Transport of waste and clean soil within the Project Area would occur along the existing access roads between the Staging Area, Borrow Area, the 2 burn dump areas, and the Consolidation Area. The grading of the final soil cover would

consist of an approximately 60-foot-wide by 200-foot-long flat area that slopes to the east at approximately 4 percent.

DTSC has reviewed the provided documents outlining the proposed activities by CalRecycle at a site adjacent to State Route 49 southwest of the City of Sonora in Tuolumne County known as the [Rotelli Burn Dump on EnviroStor](#). The draft Initial Study/Mitigated Negative Declaration states: *“The Project is proceeding according to the Burn Dump Protocol in coordination with the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB), who are providing regulatory oversight.”*

To clarify, DTSC has not been identified as the lead oversight agency for the Project. On [July 18, 2024](#), DTSC received a Remediation Project Notification from CalRecycle in accordance with the Burn Dump Protocol describing the proposed activities. DTSC responded on [August 15, 2024](#) requesting a site consultation to determine a lead agency and subsequently met with staff from CalRecycle and RWQCB on August 26, 2024. On August 27, 2024, DTSC requested additional information from CalRecycle for consideration. To date, a response to DTSC’s request has not been received. As DTSC does not have the requested information, we cannot provide additional comments at this time. DTSC recommends continuing to work with DTSC and CVRWQCB, as necessary under the Burn Dump Protocol to determine a lead agency and ensure the proposed activities are protective of human health and the environment.

Once a response to DTSC’s request has been received, DTSC reserves the right to comment on any future circulated documents related to this Project based on our review or proposed or incorporated changes, measures, or project features. Furthermore, any development and/or activity should be discussed with DTSC moving forward. The contact for this site is Abraham Serrato. Abraham can be reached via phone (916) 255-3657 or [email](#).

DTSC would like to thank you for the opportunity to comment on the MND for the CalRecycle Rotelli Burn Dump Remediation Project. Thank you for your assistance in protecting California’s people and environment from the harmful effects of toxic

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substances. If you have any questions regarding these comments, please contact us via our [CEQA Review email](#).

Sincerely,



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HWMP - Permitting Division – CEQA Unit  
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