



PIMA COUNTY
REGIONAL WASTEWATER RECLAMATION DEPARTMENT
 201 NORTH STONE AVENUE
 TUCSON, ARIZONA 85701-1207

JACKSON JENKINS
 DIRECTOR

PH: (520) 724-6500
 FAX: (520) 724-9635

November 3, 2015

TO: C.H. Huckelberry, County Administrator

THRU: John M. Bernal, P.E., Deputy County Administrator - Public Works

FROM: Jackson Jenkins, Director

SUBJECT: **Wastewater Biosolids Disposal Contract**

On November 10, 2015 the Wastewater Biosolids Disposal Contract will be on the BOS agenda. This solicitation resulted in a protest by the low bidder as they were deemed non-responsive in their bid submission. It is highly likely that representatives from Synagro will be in attendance to further their protest to the Board of Supervisors.

There were several entities represented at the pre-bid activity for this contract. However, only two of those firms provided bids (Synagro-WWT Inc. and AvraGro Systems Inc.). Unfortunately, the low bidder was deemed non-responsive for failing to provide evidence of the minimum quantity of registered land (4,500 acres) dedicated to Pima County. The second place bid was from our current biosolids disposal contract provider, AvraGro. While AvraGro's bid came in at \$1,090,972 per year (\$2,181,944 for the two year contract) which was approximately \$171,785 per year more than the lowest bid. However, this bid price is significantly less than FY2014/15 actual biosolids disposal cost of \$1,482,280 under our current biosolids disposal contract.

Please find attached a copy of the Procurement Director's response to Synagro's protest which provides a more thorough explanation of the determination of being non-responsive.

Please let me know if you have any questions.

Attachments

- c: John Sherlock, Deputy Director – Treatment - RWRD
- Houssam ElJerdi, WW Technical Services Manager – RWRD
- Mary Jo Furphy, Procurement Director
- Walter Lewandoski, Commodity Contracts Officer - Procurement Department
- Charles Wesselhoft, Deputy County Attorney



PIMA COUNTY

PROCUREMENT
130 W. CONGRESS ST., 3rd FLOOR
Mailstop DT-AB3-126
TUCSON, ARIZONA 85701-1317
TELEPHONE (520) 724-8161, FAX (520) 222-1484

October 7, 2015

Alan Slepian, Esq
Deputy General Counsel
SYNAGRO-WWT, Inc.
435, Williams Court
Baltimore, MD 21220
EMAIL: Aslepian@synagro.com
FAX: 443-489-9043
PHONE: 443-489-9167

Re: **Protest of Synagro-WWT, Inc.**
Under Solicitation No. 189261

Dear Mr. Slepian,

I have received your protest letter submitted to the Pima County Procurement Department on September 30, 2015. In your letter you assert as a basis for your protest (i) the County's improper rejection of Synagro's bid as nonresponsive and (ii) the basis upon which Synagro's bid was found to be nonresponsive relies upon a Solicitation requirement that could ONLY be fulfilled by the incumbent service provider. As relief, you request that your protest be sustained and that award of contract be made to Synagro.

In your letter under the heading '**FACTUAL BACKGROUND**' you reference, acknowledge and restate the Offer Agreements Minimum Qualification Item 3 of the Solicitation which states: "**Contractor must demonstrate the availability of a minimum of 4,500 acres of land registered by the bidder with the State of Arizona for the dedicated acceptance of Pima County Biosolids. The availability of land registered must span the life of the Agreement. At the time of bid submission, Bidder must demonstrate land availability by providing copies of contracts with landowners. The contracts may be in the form of an option.**" This language details an important requirement of the solicitation and mandatory compliance by all respondents. Although Synagro certified in their signed bid submission that all requirements of the solicitation were met, Synagro's bid submission failed to comply with this requirement which required that the County find Synagro's bid nonresponsive.

In your letter you allege that Synagro, albeit after the bid submission deadline, provided documentation showing Synagro met this requirement and provided evidence of agreements with Arizona farmers for more than 6,000 acres, well in excess of the 4,500 acres required. However, a review of the information shows that the documentation provided did not provide the required minimum acres and the required land application

exclusivity contracts. The total acres in Synagro's submittal was 6,783, but the acres dedicated to Pima County Biosolids was only 2,820 acres, well short of the 4,500 acres specified in the solicitation. Additionally, although Synagro submitted a total of ten consent form contracts with farmers; four out of the ten forms were complete and six were incomplete. For instance, Synagro included in the submittal the registration of the University of Arizona Experimental Farm west of I-10 at Exit 236; the 205 acre farm was sold to a developer in 2005 and was taken out of farming and land application of Biosolids.

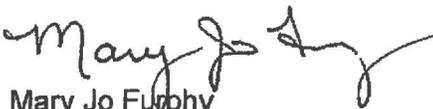
You further allege that the Solicitation was clearly designed so that only the incumbent could submit a responsive bid because the bid process did not provide what you feel was adequate time to 1) obtain samples of the biosolids; 2) submit the samples to a certified laboratory for testing; 3) obtain the results; 4) insert those results into a registration form attaching the lab analysis; 5) submit the registration form to ADEQ; 6) await and obtain approval from ADEQ. However, none of that process was contemplated or required. The Solicitation merely required bidders to obtain contractual (in the form of options) commitments from landowners for exclusive use of their land to receive County biosolids. Furthermore, Section 3, page 3 of 5, Specifications and Deviations of the Instructions to Bidders provides clear guidance regarding the opportunity for Respondents to request deviations to the solicitation specifications and the Pima County Code 11.20.010.B., 'Prebidding Protests' also provides that "Protests regarding solicitation that are apparent before the bid opening or before the time for receipt of proposals shall be filed before bid opening or before the time for receipt of proposals." Although Synagro was present for the August 25, 2015 pre-bid meeting and did submit several questions that were clarified in an addendum to the Solicitation, there was NEVER any mention by Synagro of concerns about demonstrating land availability for the acceptance of Biosolids. If Synagro had concerns about this requirement they should have been raised prior to the submission of bids to remedy this concern.

The savings that could have been obtained (\$171,785/year) had your proposal been responsive is significant and it is unfortunate that the County is not in a position to take advantage of that. However, the County shall closely evaluate market conditions and competitive opportunities towards the end of the initial term of the new contract if the Board of Supervisors approves the award to Avrago, as recommended.

Pursuant to Pima County Procurement Code Section 11.20.010.E, I have determined that you have not stated a valid basis for protest. Therefore, your protest is dismissed.

You may appeal this decision to the Board of Supervisors by filing an appeal with the Clerk of the Board within five business days of the date of this written decision pursuant to Pima County Procurement Code Section 11.20.010 H. If you file an appeal with the Board of Supervisors, the Board will consider the protest at a regularly scheduled meeting within 30 days of this decision. The Board may, with or without a hearing, either accept this decision or determine an appropriate remedy.

Sincerely,



Mary Jo Fufphy
Procurement Director

cc: Jackson Jenkins, Director, RWRD
Charles Wesselhoft, Deputy County Attorney
Terry Finefrock, Division Manager, Procurement
Walter Lewandowski, CCO, Procurement
Interested Parties
file

SYNAGRO DOCUMENT SUBMITTAL AND LANDOWNER CONSENT FOR BIOSOLIDS APPLICATION

IFB 189261 Biosolids Management Services

CHRONOLOGY

August 14, 2015	Publish IFB 189261 Biosolids Management Services
August 25, 2015	Pre-bid Conference and Tour
September 14, 2015	Opening Bids, IFB 189261 Biosolids Management Services
September 16, 2015	Additional time allowed for Synagro to provide documents to validate land availability. Synagro did not provide documentation to validate Minimum Qualification Item # 3 in the IFB on September 14, 2015. Please see 'Note 1 below'
September 21, 2015	RWRD requested Synagro to provide contract/option documentations
September 22, 2015	RWRD completed review of the additional documents submitted by Synagro and determined Synagro submittals did not to validate land availability.

Note 1:

IFB #189261 Biosolids Management Services

Minimum Qualification

Item # 3: Contractor must demonstrate the availability of land registered must span the life of the Agreement. At the time of bid submission, Bidder must demonstrate land availability by providing copies of contracts with landowners. The contracts may be in the form of an option.

LAND AVAILABILITY

The land availability submittals by Synagro are compiled in the document 'Submittal Documents September 16th and September 22nd 2015 Synagro IFB # 189261 Biosolids Management Services'. The document has 48 pages and is used to highlight the parameters needed to determine the land availability.

SUMMARY SYNAGRO DOCUMENT SUBMITTAL AND LANDOWNER CONSENT FOR BIOSOLIDS APPLICATION

IFB 189261 Biosolids Management Services

Compilation Page	Submit Date	Document Type	Site	Acres	Dedicated to Pima County Biosolids	Contract/Option	Dedication to Biosolids Generator in ADEQ Registration	Additional Information
1	September 16, 2015	ADEQ Registration, May 2001	Charles Lawrence Farm	Not Listed	No	No	Town of Casa Grande WWTF	

SUMMARY SYNAGRO DOCUMENT SUBMITTAL AND LANDOWNER CONSENT FOR BIOSOLIDS APPLICATION
IFB 189261 Biosolids Management Services

Compilation Page	Submit Date	Document Type	Site	Acres	Dedicated to Pima County Biosolids	Contract/Option	Dedication to Biosolids Generator in ADEQ Registration	Additional Information
2	September 16, 2015	ADEQ Registration, June 2004	Charles Lawrence Farm	Not Listed	No	No	Town of Casa Grande WWTF;	
3	September 16, 2015	ADEQ Registration, March 2004	Charles Lawrence Farm	Not Listed	No	No	Arizona City WWTP Town of Casa Grande WWTF	
4	September 16, 2015	ADEQ Registration, January 2004	Charles Lawrence Farm	Not Listed	No	No	Town of Casa Grande WWTF	
5	September 16, 2015	ADEQ Registration, February 2004	Charles Lawrence Farm	Not Listed	No	No	Town of Casa Grande WWTF	
6	September 16, 2015	ADEQ Registration, February 2004	Charles Lawrence Farm	Not Listed	No	No	Town of Casa Grande WWTF	
7 - 8	September 16, 2015	ADEQ Registration, December 2006	Charles Lawrence Farm	Not Listed	No	No	Town of Casa Grande WWTF;	
9 - 10	September 16, 2015	ADEQ Registration, March 2007	Charles Lawrence Farm	Not Listed	No	No	Arizona City WWTP Town of Casa Grande WWTF;	
11 - 13	September 16, 2015	ADEQ Registration, September 2001	Triple P Farms	495	Yes	No	Arizona City WWTP Pima County Regional Biosolids Management	Sold 2005; Pecan Creek Ranch
14 - 19	September 16, 2015	ADEQ Registration, April 2002	University of Arizona Farm	286	Yes	No	Pima County Regional Biosolids Management	Farm Sold in 2005
20 - 24	September 16, 2015	ADEQ Re-registration, April 2004	Pretzer Farms	Not Listed	No	No	Re-dedicated to City of Phoenix and Mesa NW WRP	
25 - 27	September 16, 2015	ADEQ Re-registration, November 2000	Burruel and Burruel Farms	Not Listed	Yes	No	Pima County Regional Biosolids Management	

**SUMMARY SYNAGRO DOCUMENT SUBMITTAL AND LANDOWNER CONSENT FOR BIOSOLIDS APPLICATION
IFB 189261 Biosolids Management Services**

Compilation Page	Submit Date	Document Type	Site	Acres	Dedicated to Pima County Biosolids	Contract/Option	Dedication to Biosolids Generator in ADEQ Registration	Additional Information
28 - 30	September 16, 2015	ADEQ Registration, September 2001	Ralph Land Farms	Not Listed	Yes	No	Pima County Regional Biosolids Management	
31 - 32	September 16, 2015	ADEQ Registration, September 2005	Cotton Patch	Not Listed	No	No	Arizona City, Avondale, Casa Grande, Phoenix and Mesa WWTPs	
33 - 35	September 16, 2015	ADEQ Registration, July 2010	Normark Farms	Not Listed	No	No	Arizona City WWTP	
36 - 38	September 16, 2015	Farm Operator/landowner Information	Not Applicable	Not Listed	Not Applicable	Not Applicable	Farm Information Listing	

**SUMMARY SYNAGRO DOCUMENT SUBMITTAL AND LANDOWNER CONSENT FOR BIOSOLIDS APPLICATION
IFB #189261 Biosolids Management Services**

Compilation PAGE	DATE SUBMITTED	FARM OPERATOR	FARM OWNER	DEDICATED TO PIMA COUNTY BIOSOLIDS	Contract/Option	ACRES	DATE SIGNED
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The sum total of acres in the following consent forms submitted on September 22, 2015 is 5,783 (five thousand seven hundred eighty three) acres.

A consent form is equivalent to a contract or option.

These forms do not provide the required 4,500 acres dedicated to Pima County Biosolids.

39	September 22, 2015	Arizona Land and Cattle Co. c/o William Miller	Not Listed	No	Yes	640	June 5, 2014
40	September 22, 2015	Arizona Land and Cattle Co., c/o William Miller	Canacorn, LCC c/o Jim Hamel	No	Yes	640	June 10, 2014
41	September 22, 2015	Normark Farms	Jesse Herfel	No	Yes	40	January 31, 2013
42	September 22, 2015	Normark Farms	Bridgestone Americas Tire Operations LLC	No	Yes	273	October 30, 2012

SUMMARY SYNAGRO DOCUMENT SUBMITTAL AND LANDOWNER CONSENT FOR BIOSOLIDS APPLICATION
IFB #189261 Biosolids Management Services

Compilation PAGE	DATE SUBMITTED	FARM OPERATOR	FARM OWNER	DEDICATED TO PIMA COUNTY BIOSOLIDS	Contract/Option	ACRES	DATE SIGNED
43	September 22, 2015	Gila River Partners	WAL South LLC	No	Yes	500+	April 8, 2014
44	September 22, 2015	WAL South LLC/Gila River Partners	Not Listed	No	Yes	500+	April 24, 2014
45	September 22, 2015	H Four Farms – W. Bruce Heiden	John Farms	No	Yes	1650	April 8, 2015
46	September 22, 2015	Sandelbay Ranch, LLC	Dougherty Living Trust	No	Yes	640	April 21, 2003
47	September 22, 2015	Marvin John	(Dym) River Ranch Joint Venture	No	Yes	900	January 6, 2014
48	September 22, 2015	O & E Farms	Green Acres Ranch LLC	No	Yes	1000	February 5, 2011

Note 1:

IFB #189261 Biosolids Management Services
 Minimum Qualification

Item # 3: "Contractor must demonstrate the availability of land registered must span the life of the Agreement. At the time of bid submission, Bidder must demonstrate land availability by providing copies of contracts with landowners. The contracts may be in the form of an option.

PN-1



Jane Dee Hull
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

3033 North Central Avenue • Phoenix, Arizona 85012-2809
(602) 207-2300 • www.adeq.state.az.us



Jacqueline E. Schafer
Director

May 21, 2001

Rob Fehrmann
Synagro
5615 S. 91st Avenue
Tolleson, Arizona 85353

Dear Mr. Fehrmann:

The Arizona Department of Environmental Quality (ADEQ) received a request for registration for biosolid land application at the Charles Lawrence Farm (Fields: G-1, G-2, G-3, Railroad -1, TM-1, TM-2, TM-3, TM-4, TM-5, FG-1N, FG-2N, FG-1S, FG-2S, TK-1N, TK-1S, TK-2, TK-3, TK-4, TK-5, TK-6, TK-7, TK-8, TK-9, K-1, K-2, S-1, S-2, S-1E, S-2E, S-3, S-4, S-5, and S-6) site on May 14, 2001. ADEQ has reviewed the registration form, and has deemed the registration to be complete for those fields. The information will be placed in the Synagro file. In addition, please be advised, pursuant to Arizona Administrative Code (A.A.C.) R18-13-1501, your company is required to comply with all applicable provisions set forth in A.A.C. Title 18, Chapter 13, Article 15, titled "LAND APPLICATION OF BIOSOLIDS," at each land application site.

If you have any questions regarding this letter, please contact me at (602) 207-4374 or toll free at 1(800) 234-5677 Ext. 4374.

Sincerely,

Jane DeRose-Bamman
Federal Permits and Program Development Unit
Water Permits Section

FPU01:0216



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.adeq.state.az.us



Stephen A. Owens
Director

June 24, 2004

Mr. Mike O'Rourke
Synagro
5645 S. 91st Avenue
Tolleson, AZ 85353

Dear Mr. O'Rourke:

Place ID#14497
LTF - not required

For your information, the following fields are registered at Charles Lawrence Farms: 15W, 16W, H-1, CL-25 through CL-28, 1W through 14W, MO-1 through MO-4, 1E through 5E, M-1 through M-4, P-1 through P-4, NV-1, NV-2, V-1 through V-5, G-1 through G-3, Railroad-1, TM-1 through TM-5, FG-1N, FG-2N, FG-1S, FG-2S, TK-1N, TK-1S, TK-2 through TK-9, K-1, K-2, S-1, S-2, S-1E, S-2E, S-3, S-4, S-5, and S-6.

Residuals from the following generator have been approved for the site: Town of Casa Grande WWTF and Arizona City Sanitation District WWTP.

Please be advised that you, as the registered land applicator are required to comply with A.A.C. R18-9-1013(B)(12) and other applicable provisions established in A.A.C. Title 18, Chapter 9, Article 10, titled "Disposal, Use, and Transportation of Biosolids", for each land application site.

If you have any questions regarding this letter, please contact me at (602) 771-4612 or toll free at 1(800) 234-5677 Ext. 771-4612.

Sincerely,

Diane P. Reed
State Biosolids Coordinator
Water Quality Compliance Section



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.adeq.state.az.us



Stephen A. Owens
Director

March 1, 2004

Mr. Mike O'Rourke
Synagro
5645 S. 91st Avenue
Tolleson, AZ 85353

Dear Mr. O'Rourke:

Place ID#14497
LTF - not required

For your information, the following fields are registered at **Charles Lawrence Farms**: H-1, CL-25 through CL-28, 1W through 14W, MO-2 through MO-4, 1E through 5E, M-1 through M-4, P-1 through P-4, NV-1, NV-2, V-1 through V-5, G-1 through G-3, Railroad-1, TM-1 through TM-5, FG-1N, FG-2N, FG-1S, FG-2S, TK-1N, TK-1S, TK-2 through TK-9, K-1, K-2, S-1, S-2, S-1E, S-2E, S-3, S-4, S-5, and S-6.

Residuals from the following generator have been approved for the site: **Town of Casa Grande WWTF.**

Please be advised that you, as the registered land applicator are required to comply with A.A.C. R18-9-1013(B)(12) and other applicable provisions established in A.A.C. Title 18, Chapter 9, Article 10, titled "Disposal, Use, and Transportation of Biosolids", for each land application site.

If you have any questions regarding this letter, please contact me at (602) 771-4612 or toll free at 1(800) 234-5677 Ext. 771-4612.

Sincerely,

Diane P. Reed
State Biosolids Coordinator
Water Quality Compliance Section

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
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Stephen A. Owens
Director

January 8, 2004

Mr. Mike O'Rourke
Synagro
5645 S. 91st Avenue
Tolleson, AZ 85353

Dear Mr. O'Rourke:

Place ID#14497
LTF - not required

The Arizona Department of Environmental Quality (ADEQ) received your January 7, 2004 request to add the additional fields (Fields H-1, CL-25 through CL-28) for biosolids land application at Charles Lawrence Farms, Casa Grande, AZ in Pinal County.

Residuals from the following generator have been approved for the site: Town of Casa Grande WWTF.

Please be advised that you, as the registered land applicator are required to comply with A.A.C. R18-9-1013(B)(12) and other applicable provisions established in A.A.C. Title 18, Chapter 9, Article 10, titled "Disposal, Use, and Transportation of Biosolids", for each land application site.

If you have any questions regarding this letter, please contact me at (602) 771-4612 or toll free at 1(800) 234-5677 Ext. 771-4612.

Sincerely,

Diane P. Reed
State Biosolids Coordinator
Water Quality Compliance Section

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.adeq.state.az.us



Stephen A. Owens
Director

February 24, 2004

Mr. Mike O'Rourke
Synagro
5645 S. 91st Avenue
Tolleson, AZ 85353

Dear Mr. O'Rourke:

Place ID#14497
LTF - not required

For your information, the following fields are registered at Charles Lawrence Farms: H-1, CL-25 through CL-28, 1W through 12W, 1E through 5E, M-1 through M-4, P-1 through P-4, NV-1, NV-2, V-1 through V-5, G-1 through G-3, Railroad-1, TM-1 through TM-5, FG-1N, FG-2N, FG-1S, FG-2S, TK-1N, TK-1S, TK-2 through TK-9, K-1, K-2, S-1, S-2, S-1E, S-2E, S-3, S-4, S-5, and S-6.

Residuals from the following generator have been approved for the site: Town of Casa Grande WWTF.

Please be advised that you, as the registered land applicator are required to comply with A.A.C. R18-9-1013(B)(12) and other applicable provisions established in A.A.C. Title 18, Chapter 9, Article 10, titled "Disposal, Use, and Transportation of Biosolids", for each land application site.

If you have any questions regarding this letter, please contact me at (602) 771-4612 or toll free at 1(800) 234-5677 Ext. 771-4612.

Sincerely,

Diane P. Reed
State Biosolids Coordinator
Water Quality Compliance Section

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.adeq.state.az.us



Stephen A. Owens
Director

November 6, 2003

Mr. Mike O'Rourke
Synagro
5645 S. 91st Avenue
Tolleson, AZ 85353

Dear Mr. O'Rourke:

Place ID#14497
LTF - not required

The Arizona Department of Environmental Quality (ADEQ) received your November 6, 2003 request to add the additional fields (Fields 1W through 12W and 1E through 5E) for biosolids land application at Charles Lawrence Farms, Casa Grande, AZ in Pinal County.

Residuals from the following generator have been approved for the site: Town of Casa Grande WWTF.

Please be advised that you, as the registered land applicator are required to comply with A.A.C. R18-9-1013(B)(12) and other applicable provisions established in A.A.C. Title 18, Chapter 9, Article 10, titled "Disposal, Use, and Transportation of Biosolids", for each land application site.

If you have any questions regarding this letter, please contact me at (602) 771-4612 or toll free at 1(800) 234-5677 Ext. 771-4612.

Sincerely,

Diane P. Reed
State Biosolids Coordinator
Water Quality Compliance Section

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Stephen A. Owens
Director

Notice of Acceptance Biosolids Application Registration

December 1, 2006
CTS # 143972

Ms. Lorrie L. Loder
Synagro
P.O. Box 326
Dewey, AZ 86327

Re: Land Application Site Registration and Addition of Generators for Charles Lawrence Farms – PN-01

Dear Ms. Loder:

The Arizona Department of Environmental Quality (ADEQ) received the above referenced request for registration December 1, 2006. Upon reviewing this material, ADEQ has determined under A.C.C R18-9-1004 that your submittal is complete. Your registration is accepted. Please be advised that this registration is valid only for biosolids generated by: the City of Casa Grande WWTP and the Arizona City WWTP, to be land applied only at the fields that are now registered, with the following center field coordinates:

<u>Field ID</u>	<u>Latitude</u>	<u>Longitude</u>
1N	N32.51.78	W111.44.54
1S	N32.51.57	W111.44.54
5	N32.51.35	W111.44.55
6	N32.51.36	W111.44.80
35	N32.51.56	W111.44.27
Shop	N32.51.56	W111.44.27
Mill	N32.51.14	W111.43.64
FXTN	N32.51.19	W111.44.27
FXTS	N32.51.09	W111.44.27

As the registered land applicator you are required to comply with all applicable provisions as established in A.C.C. Title 18, Chapter 9, Article 10, titled "Disposal, use, and Transportation of Biosolids", for each land application site. Your annual report is due on or before February 19 of the next year (A.C.C. R18-9-1014). Required forms and more information on land application

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

of biosolids in Arizona can be found on the following site:
<http://www.azdeq.gov/function/forms/appswater.html#bio>.

Please contact me at (602) 771-4612 if you have questions regarding this Notice or the status of your registration.

Sincerely,



Daniel L. Czecholinski, CHMM
Biosolids Program Coordinator
Water Quality Compliance Assurance Unit



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Stephen A. Owens
Director

Notice of Acceptance Biosolids Application Registration

March 22, 2007

Ms. Lorrie L. Loder
Synagro
P.O. Box 326
Dewey, AZ 86327

Re: Land Application Site Registration and Addition of Generators for Charles Lawrence Farms – PN-01

Dear Ms. Loder:

The Arizona Department of Environmental Quality (ADEQ) received the above referenced request for registration December 1, 2006. Upon reviewing this material, ADEQ has determined under A.A.C R18-9-1004 that your submittal is complete. Your registration is accepted. Please be advised that this registration is valid only for biosolids generated by: the Town of Casa Grande WWTP and the Arizona City WWTP, to be land applied only at the fields that are now registered, with the following center field coordinates:

<u>Field ID</u>	<u>Latitude</u>	<u>Longitude</u>
36	N32.50.48	W111.43.24
37	N32.50.69	W111.43.24
38	N32.50.69	W111.42.99
39A	N32.50.66	W111.42.78
39B	N32.50.75	W111.42.67

As the registered land applicator you are required to comply with all applicable provisions as established in A.A.C. Title 18, Chapter 9, Article 10, titled "Disposal, use, and Transportation of Biosolids", for each land application site. Your annual report is due on or before February 19 of the next year (A.A.C. R18-9-1014). Required forms and more information on land application of biosolids in Arizona can be found on the following site:
<http://www.azdeq.gov/function/forms/appswater.html#bio>.

Please contact me at (602) 771-4612 if you have questions regarding this Notice or the status of your registration.

Sincerely,

Daniel L. Czecholinski, CHMM
Biosolids Program Coordinator
Water Quality Compliance Assurance Unit

LTF # 43610

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733



Jane Dee Hull
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

3033 North Central Avenue • Phoenix, Arizona 85012-2809
(602) 207-2300 • www.adeq.state.az.us



Jacqueline E. Schafer
Director

September 20, 2001

Steve Putzer
9490 Baumgartner Road
Eloy, Arizona 85231

Dear Mr. Putzer:

The Arizona Department of Environmental Quality (ADEQ) received an September 20, 2001 request for registration for biosolid land application at the Triple P Farms (Fields 1A, 1B, 2, 3, 5, 7, 8A, 8B, 9.) ADEQ has reviewed the registration form and has deemed the registration to be complete. The information will be filed. You may reference the registration by using the Licensing Time Frame (LTF) Number: 23999.

In addition, please be advised, pursuant to Arizona Administrative Code (A.A.C.) R18-9-1001 (recodified from A.A.C. R18-13-1501 et seq on June 15, 2001), the Pima County Regional Biosolids Management is required to comply with all applicable provisions set forth in A.A.C. Title 18, Chapter 9, Article 10, titled "LAND APPLICATION OF BIOSOLIDS," at each land application site.

If you have any questions regarding this letter, please contact me at (602) 207-4816 or toll free at 1(800) 234-5677 Ext. 4816.

Sincerely,

Vivian J. Horsey
Program and Project Specialist I
Water Quality Compliance Section

cc: Rob Fehrman

WQCS/011/9-20-01/VH1

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(520) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

*** APPLICATION SITE INFORMATION ***				
Name of Company or Individuals: Triple P Farms Steve Putzer		Telephone: 520-466-9575		
Address: 9490 Baumgartner Rd				
City: Eloy	State: AZ	Zip: 85231		
Contact Person: Steve Putzer		Telephone: 520-466-9575		
Site Location Cross Streets/Landmarks: Baumgartner Rd & S Wheeler Rd				
Directions to Site: Exit I-10 south of Eloy on Picacho Rd go south to Bo Baumgartner Rd go east to Wheeler Rd.				
Nearest City or Town: Eloy		County: Pinal		
Legal Description: Section 36 of township 9S range 8E				
Township: 9S		Range: 8E	Section: 36	
Total Acres: 495 unbuffered		Dept of Groundwater: 550'		
Field ID: 1A	Latitude: N32 36.10'	Longitude: W111 28.66'	Number of Acres: 52.3	
Field ID: 1B	Latitude: N32 36.10'	Longitude: W111 28.20'	Number of Acres: 61	
Field ID: 2	Latitude: N32 35.88'	Longitude: W111 28.18'	Number of Acres: 79.7	
Field ID: 3	Latitude: N32 35.88'	Longitude: W111 35.91'	Number of Acres: 56.6	
Field ID: 5	Latitude: N32 35.71'	Longitude: W111 28.85'	Number of Acres: 42	
Field ID: 7	Latitude: N32 35.61'	Longitude: W111 28.14'	Number of Acres: 54	
Field ID: 8A	Latitude: N32 35.50'	Longitude: W111 28.87'	Number of Acres: 50	
SOIL METAL CONTENT IN Mg/Kg ON DRY WEIGHT BASIS				
As ()	Cd ()	Cr ()	Cu ()	Pb ()
Hg ()	Mo ()	Ni ()	Se ()	Zn ()
Laboratory Name:		No of Samples:	Date:	
Indicate the name of the U.S. Quadrangle map used and attach a diagram indicating 6% of slope. Proof of Public Notice must accompany Request for Registration.				

I certify that the above information is complete and true to the best of my knowledge.

Rob Lehmann
Signature

Tech Services Mgr
Title

9/19/01
Date

***** APPLICATION SITE INFORMATION CONTINUED*****

Name of Company or Individuals: Triple P Ranch Telephone: 520-466-9575

Legal Description: Section 36, township 9S, range 8E

Township: 9S Range: 8E Section: 36

Total Acres: 495 Dept of Groundwater: 550'

Field ID: 8B Latitude: N32 35.50' Longitude: W111 28.54' Number of Acres: 50

Field ID: 9 Latitude: N32 35.50' Longitude: W111 28.31' Number of Acres: 25

Field ID: Latitude: Longitude: Number of Acres:

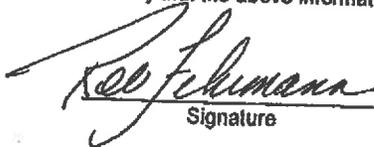
SOIL METAL CONTENT IN Mg/Kg ON DRY WEIGHT BASIS

As () Cd () Cr () Cu () Pb ()
 Hg () Mo () Ni () Se () Zn ()

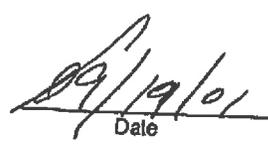
Laboratory Name: No of Samples: Date:

Indicate the name of the U.S. Quadrangle map used and attach a diagram indicating 6% of slope. Proof of Public Notice must accompany Request for Registration.

I certify that the above information is complete and true to the best of my knowledge.


 Signature


 Title


 Date

Jane Dee Hull
GovernorARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY3033 North Central Avenue • Phoenix, Arizona 85012-2809
(602) 207-2300 • www.adeq.state.az.usJacqueline E. Schafer
Director

April 16, 2002

Rob Fehrmann
Synagro
5645 S. 91st Avenue
Tolleson, Arizona 85353AZ-PI-4
U of A Farm
Dan Foster

Dear Mr. Fehrmann:

RE: Registration/LTF # 26733

The Arizona Department of Environmental Quality (ADEQ) received an April 16, 2002 request for registration for biosolid land application at the University of Arizona, Marana Experimental Farm (Fields A1, A2, A3, A4, B1, B2, B3, B4, C1, C2, C3, C4, D1, D2, D3, D4, E1, E2, E3, E4) site. ADEQ has reviewed the registration form and deemed the registration complete. The information will be tracked in the Sweeper Database and filed in the Biosolids filing cabinet.

Pursuant to Arizona Administrative Code (A.A.C.) R18-9-1001 (recodified from A.A.C. R18-13-1501 et seq on June 15, 2001), the Pima County Regional Biosolids Management is required to comply with all applicable provisions as set forth in A.A.C. Title 18, Chapter 9, Article 10, titled "LAND APPLICATION OF BIOSOLIDS," at each land application site.

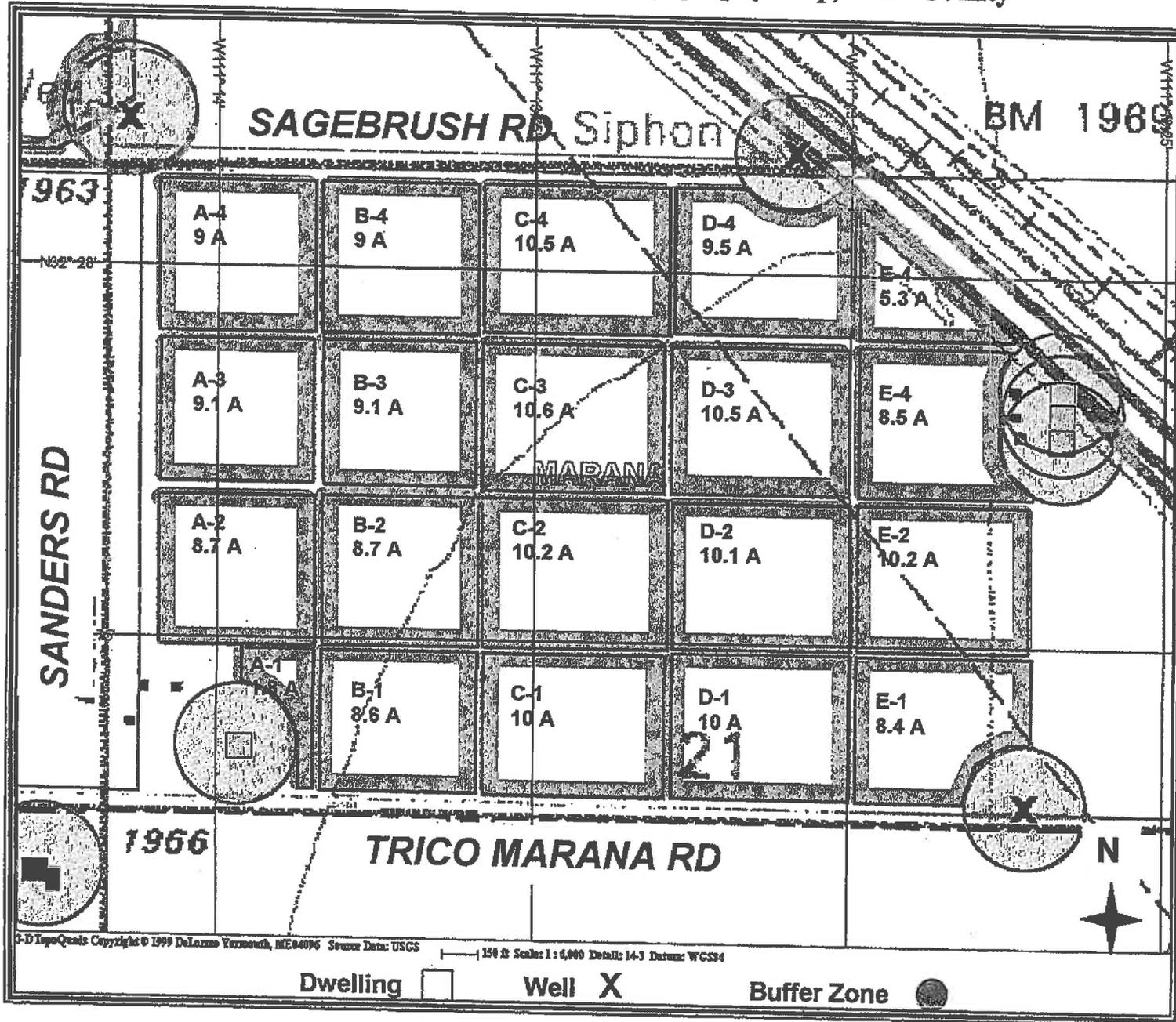
If you have any questions regarding this letter, please contact me at (602) 207-4816 or toll free at 1(800) 234-5677 Ext. 4816.

Sincerely,

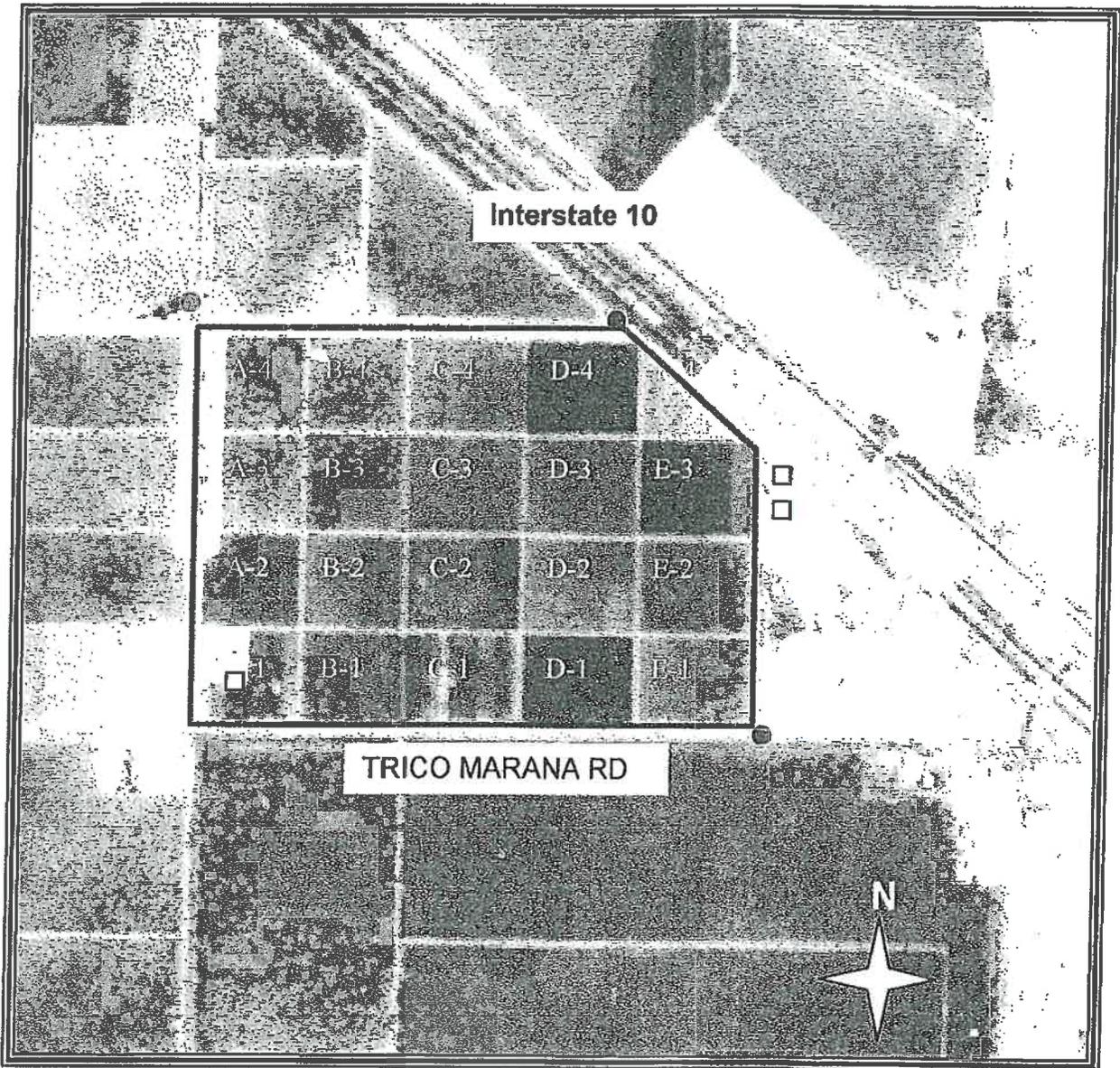
Vivian J. Horsey
Program and Project Specialist I
Water Quality Compliance Section

WQC9-026UofA/4-16-02/VH1

U of A, Marana Experimental Farm, Topography Map, Pima County



U of A Experimental Farm, Aerial, Pima County



PIMA GRO SYSTEMS, INC.

AGRICULTURAL REUSE SPECIALISTS

2305 Rutherford Rd.
Tucson, AZ. 85705
Phone (602) 293-4472

SLUDGE REQUEST

Sludge Source: Pima County Date: 4/22/96

Operator: Name BURRUEL, Arnold
Address 17007 W Trico - Marana Rd
Marana, AZ 85653
Phone _____

Owner: Name BURRUEL + BURRUEL Farms (acquired from Allen Jones)
Address 17007 W. Trico - Marana Rd.
Marana, AZ 85653
Phone _____

Farm Location(s): Section 21 + 28
Township 11S
Range 10E

AZ-PI-2
Burruel and
Burruel Farms

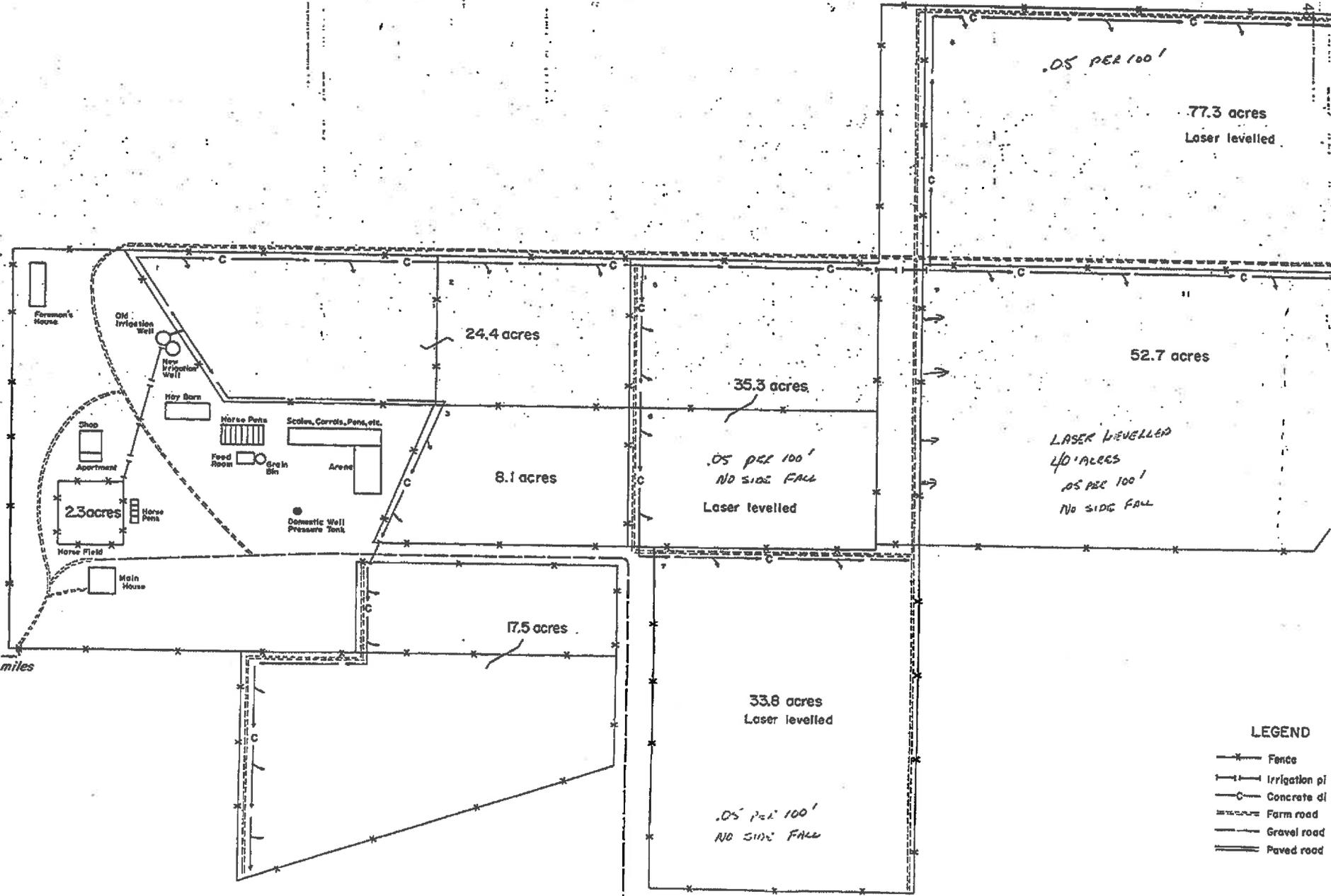
Total Acres: 286

County: Pima

- Conditions:
1. Public access must be denied for a period of 12 months.
 2. Grazing animals or forage harvesting not permitted for 30 days.
 3. Direct consumption food chain crops consumed raw are not permitted for 18 months.

Operator Signature: _____

Owner Signature: Burruel's Burruel by Arnold Burruel



Jerringer Road
to El Tiro Road 1.1 miles

LEGEND

- x— Fence
- |— Irrigation pi
- C— Concrete di
- Farm road
- Gravel road
- == Paved road





LEGEND

- x— Fence
- |— Irrigation pipe (underground)
- C— Concrete ditch
- |— Farm road
- |— Gravel road
- |— Paved road

