



Land Application of Biosolids

Synagro has identified adequate farmland acreage in Pinal County for land application of Pima County's biosolids. The approximate annual acreage required is 4,000 acres. Synagro will strive to permit 8,000 acres to allow for rotation of land and to account for variability in the crops grown.

After off-loading at the site, the biosolids are subsequently loaded by a rubber-tired loader into the field application equipment staged at the sites. Synagro uses a John Deere 4-wheel drive tractor and a Knight 8030 spreader or equivalents. From time-to-time additional spreading equipment may be used to work off inventory created due to inclement weather or other conditions. The 8030 spreader is much larger than other spreading units commonly in use in the industry and is capable of spreading approximately 24 cubic yards in one pass. This capacity reduces the number of times the operator needs to return to the staging area which in turn reduces the potential for field compaction.

Biosolids applications are limited to standard agricultural field crops, including corn, hay and grasses. The actual application rate is determined by the requirement for the crop selected and yield goals. Based upon all recent analysis of the biosolids, the typical application rate is 3.0 to 5.5 dry tons per acre.

Fields to receive biosolids, including the location of any staging areas, are flagged by the Field Manager or Technical Services Specialist before any material is sent to the farm; the flagging is confirmed before any spreading occurs. The Project Manager keeps track of all loads and tons that are sent to each farm and that information is reviewed with both the Field Manager and Technical Services Manager on a routine basis.

Buffer zone distances are observed in accordance with all applicable local, state and federal regulations; when a field is subject to multiple buffers requirements, the most restrictive buffer outlined in the regulations applies. Synagro always reserves the right to increase these buffers. Buffer zones are flagged and no biosolids will be applied within the buffer zones.

Operations are planned to prevent soil loss through erosion. Provisions will include contour application and avoidance of areas where surface drainage may result in concentrated flow of runoff from rainfall. In accordance with good agronomic practice, areas which are unseasonably wet are not utilized for biosolids application operations during those periods, as operating equipment on those areas could produce rutting or damage to the field. Operations are discontinued when soils are saturated and will not be resumed until sufficient drying of the field has occurred.

In accordance with management practices established in the regulations, public access will be restricted at applied sites. In addition, field and/or site use restrictions will be discussed with the



land owner/farm operators, so they are informed of their responsibilities under the regulations for grazing and crop harvesting restrictions.

3. Detailed Work Description on how the Work related to Contractor's complete operation will be accomplished without creating impacts on the RBMF and Tres Rios WRF operations. The description will address, but not be limited to, the following:

3.1 Overview of the Plan that describes the Contractor's operations.

Biosolids from the County's Regional Biosolids Management Facility (RBMF) will be conveyed to truck loading hoppers by the County. The material will be dropped into staged trucks within the loading bay. Synagro will provide three to four water-tight, covered, semi trucks with trailers for the County's project. A Synagro employee or subcontractor will be on-site to manage truck loading.

Synagro will utilize an available certified scale provided by the County for loads going to land application sites and landfill loads.

Synagro will obtain all permits, licenses, and authorizations required for the transportation and beneficial use of the County's biosolids.

All trucks transporting biosolids will have full mud flaps and dump beds will be equipped with sealed tailgates to prevent leakage. In addition, each loaded truck will be covered by tarpaulin prior to exiting the site to prevent accidental release of biosolids during transport.

A typical truck loading process includes the following procedures:

1. At the start of each shift, each driver will conduct a pre-trip inspection for their assigned equipment and document utilizing a DOT approved DVIR and driver logs. Trucks shall be in full compliance with all AZ DOT registration requirements, fully insured, and in safe operating condition.
2. The driver will weigh in on the plant scale on site to produce a tare weight before loading.
3. The driver will place the truck under the hopper and the County operator will load the material into the trailer. The truck and trailer will be moved as needed during the loading process to balance the load in the trailer.



4. Once the material is loaded into the truck for transportation to the disposal site (and sealed end-gates checked and the load tarped), the driver will conduct a pre-trip inspection and make sure to clean any debris that may be on the outside of the equipment. The truck will be routed to the onsite scale for a gross weight (full load).
5. The driver will complete a Synagro cake ticket and obtain a weight certificate which will be attached to the Synagro cake ticket. A copy of the cake ticket and the scale ticket will be left at the plant as documentation for measurement, billing and payment. The cake ticket will include land application field destination or landfill destination.

In the case of landfill, measurement, billing and payment will be based on the landfill weight certificate. The net weight per the landfill will be compared to the weight determined at the plant to ensure there are no material discrepancies.

6. The above process will be completed for each load.

4.1 Standard Operational Procedure(s) which addresses the following:

- **Communicate daily with Pima County the time of arrival of the first transport vehicle, the number of transport vehicles planned for the day and the estimated round-trip travel time to the disposition location.**
- **Daily receipt of County's Biosolids**
- **Load and haul all Biosolids on a schedule approved by the County.**
- **Accept Biosolids as the County provides to the contractor**
- **Provide daily application inventories accounting for all Biosolids removed from Tres Rios WRF**

Synagro developed the following Land Application Site File Contents Checklist SOP for proper documentation of required land application paperwork and filing.



SYNAGRO

Land Application Site File Contents SOP

Location: Technical Services – all locations

SOP Title: Land Application Site File Contents Checklist

SOP Document #: SDCW01

Effective Date: 06/30/2015

Revision #: N/A

Prepared/Revised By: Carolanne Whiteside, Technical Services Coordinator

Approved By: Lorrie Loder, Sr. Technical Services Director

Purpose: To establish State specific land application site file contents checklists so Technical Services staff knows what documents/completed forms need to be saved in a file and to standardize the filing system used within a State.

Responsible Parties: Technical Services Staff

Procedure:

The Technical Services Manager (TSM) or, in States where there is no TSM, the Technical Services Director (TSD), is responsible for ensuring a State specific land application site file checklist is developed and is used to set up and maintain site files.

The TSM or his/her designee is responsible for ensuring a random spot check of the land application site files is conducted (? Frequency) to confirm the required documents/completed forms are being maintained in the site files.

The land application site file contents checklist must include the Synagro required documents/forms listed below and State specific documents and forms. A typical list of State required documents and forms is provided below as a guide for the TSM and/or TSD to use when developing the State specific list of documents and forms to be kept in the land application site files.

Section 1 – Synagro Required Documents/Forms:

1. Pre-Operating Checklist
2. Safe Work Permit
3. Pre-Biosolids/Residuals Application Crop & Landowner Verification Form
4. Synagro Landowner Consent for Biosolids/Residuals Application
5. Synagro Request and Consent for Biosolids/Residuals
6. Application Rate Calculation Sheet (when used in addition to the Pre-Op Checklist)
7. Site Specific Correspondence (e.g. with/from farmer, regulatory agencies, neighbors etc.)



8. Permit Specific Correspondence (e.g. interpretation of permit conditions etc.). Note for States where site specific permits are not issued (e.g. permits issued to generators with multiple sites, permits issued for all sites within a County etc.) permit files can be kept separately from the site files.

Section 2 – State/Local Required Documents/Forms:

1. Permit Application/Site Book (includes renewal applications)
2. Land Application Permit (either in the site file for site specific permits or in a separate file for permits issued by generator, county etc.)
3. State Specific Landowner Consent/Farm Operator Consent Forms
4. Permit Source List verifying approved source(s)
5. Map(s)
6. Soil Test Results
7. Nutrient Management Plans
8. Soil Conservation Plans
9. Buffer Zone Reduction Forms
10. Soil Boring Logs (e.g. to verify appropriate depth to the water table prior to or during land application operations)
11. Soil Test Results
12. State/Local Notification Letters
13. Biosolids/Residuals Management Plan (either in the site file for site specific management plans or in a separate file for permits issued by generator, county etc.)

Revision History:

Rev. No.	Effective Date	Preparer/ Modifier	Description
0	6/30/2015	Carolanne Whiteside	Created original procedure.



4.2 Other Processes: Controlling further preparation or derivation processes.

Synagro does not intend to utilize other processes for management of Pima County biosolids.

4.3 Conveyance system: Describe the routes biosolids will be transported to each approved landsite for application and storage (i.e., haul routes).

Truck haul routes from all plants will primarily be northwest to Pinal County using I-10 and exit roads to the designated farms. Specific routes can be provided once land base is finalized after contract award.

4.4 Land Application Site Specific Plans: in accordance with 40 CFR 501.15(a) (2) (vi) through (viii), in accordance with 40 CFR 501.15(a) (2) (ix) through (xi) for Land Application Sites, and in accordance with R18-9-1013(B) (8) and R18-9-1-13(B) (9), and any other applicable requirement.

Biosolids applications are limited to standard agricultural field crops, including corn, hay and grasses. The actual application rate is determined by the requirement for the crop selected and yield goals. Based upon all recent analysis of the biosolids, the typical application rate is 3.0 to 5.5 dry tons per acre.

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Operations are planned to prevent soil loss through erosion. Provisions will include contour application and avoidance of areas where surface drainage may result in concentrated flow of runoff from rainfall. In accordance with good agronomic practice, areas which are unseasonably wet are not utilized for biosolids application operations during those periods, as operating equipment on those areas could produce rutting or damage to the field. Operations are discontinued when soils are saturated and will not be resumed until sufficient drying of the field has occurred.



In accordance with management practices established in the regulations, public access will be restricted at applied sites. In addition, field and/or site use restrictions will be discussed with the land owner/farm operators, so they are informed of their responsibilities under the regulations for grazing and crop harvesting restrictions.

Compliance with ADEQ R18-9-10 and 40 CFR Part 503

Specific procedures which have been incorporated into Synagro's beneficial use programs to implement the requirements of ADEQ R18-9-10 (having primacy for regulatory enforcement) and 40 CFR Part 503 Rule are listed below.

General Requirements (§503.12)

- Obtaining signed farm operator (lessee) and/or landowner agreements which include the federal site restrictions.
- Obtaining Notice and Necessary Information from the biosolids generators to establish that the biosolids meet the pathogen and vector attraction reduction requirements and the ceiling limits for metals.
- Determining past metal loadings since July 20, 1993 if generator's biosolids do not meet the Table 3 metal standards.
- Sending notification letters to EPA on the location of sites where non-Table 3 biosolids will be land applied.
- Sending notification letters to EPA on the location of sites where non-exceptional quality biosolids are land applied outside the state of generation.
- Sending reports to the farm operator regarding nitrogen applied and metals applied for non-Table 3 biosolids and advising the farmer of the site restrictions he/she must follow.

Management Practices (§503.14)

- Ensuring the management practices are met using our standard pre-operating procedures.
- Obtaining approval from EPA for application of biosolids above the agronomic rate on reclamation sites.

Record Keeping (§503.17)

- Completing certification statements addressing compliance with management practices, site restrictions, tracking past metal loadings (if applicable) and meeting vector attraction reduction requirements through injection or incorporation (if applicable).
- Generating field reports which contain biosolids application information required by EPA if non-Table 3 biosolids are applied.



- Maintaining the above records for the required period of time (certification statements for 5 years and non-Table 3 biosolids land application records indefinitely).

Pathogens (§503.22)

- Incorporating the site restrictions in §503.22(b)(5) into our farm operator and landowner biosolids use agreement forms and our land application operating procedures when Class B pathogen treatment biosolids are land applied.

4.5 Past and present land uses at the application sites including baseline soil data for each site.

Land application will occur where Synagro has previously permitted and available farm land, most of which remains in active farm production featuring row crops, hay and grasses. Additional farms will be permitted as necessary. Baseline soil data for available farms will be provided upon contract award.

4.6 Staging / Storage areas (locations, sizes, odor and nuisance control, duration of storage, etc.).

Staging/storage will occur on permitted farms (as needed) until biosolids can be land applied. Storage will not exceed a maximum time of two years. Odor and nuisance control will be handled on a farm by farm basis which takes into consideration distance, neighbors and neighboring land use.

5. Emergency Response Plan which addresses at least the removal and disposal of the following:

5.1 Material or accidents at the Regional Biosolids Management Facility.

5.2 Material or chemical spills or accidents within Contractor's operations facilities, storage facilities, along the conveyance systems, and at all Land Application Sites.

5.3 Transportation vehicle accidents.

5.4 Transport route closures.

5.5 Land application contingencies during inclement weather conditions.

A Spill Response Plan for Synagro's West Region is attached.

Synagro – Arizona Division	
Subject: Biosolids Spill Response Plan	Effective Date: November 1, 2004
Approved by: Regional EHS&T Manager; Regional Technical Services Director	Last Review/Revision Date: December 29, 2011

IMPORTANT NOTICE - A copy of this document shall always be maintained in all transport vehicles carrying biosolids on behalf of Synagro and/or its subsidiaries and be readily available in the event of a spill.

Biosolids Spill Response Plan

Biosolids are non-hazardous and non-toxic. If a spill occurs, there is no need for special equipment or emergency procedures beyond those outlined in this plan. Biosolids are processed solids, primarily organic, that are used for agricultural fertilizers and soil amendments. Biosolids are produced in water reclamation or wastewater treatment plants and transported to farms or to composting facilities.

Biosolids spilled onto pavement pose a potential road hazard because they can create wet, slick conditions for motor vehicles, and/or can obstruct traffic flow. If biosolids remain on the surface for enough time they could be a source of potential contamination of nearby storm drains, waterways, or ground water. Biosolids should be thoroughly removed so that no significant residues remain to be washed into any storm drain or waterway by surface water (rain, runoff, etc.). All spilled biosolids must be returned to the trailer from which they spilled or be loaded into another appropriate transport vehicle and delivered to an approved location.

GENERAL INFORMATION

- A. Biosolids characteristics are:
 - a. Solids content: 2% - 95%
 - b. Consistency: Moist to dry paste or mush up to about 40% solids; dirt-like when solids exceed 45%.
Can also be in liquid form.
 - c. Volatile solids: 40% - 60+% (percentage of total solids)
 - d. pH: 5 – 10, most commonly about 7.5
 - e. Chemical character: NON-HAZARDOUS - Processed organic residual solids from domestic wastewater treatment facilities, containing nitrogen, phosphorous, trace metals, and some pathogenic organisms.
- B. Drivers should make sure they always have the following safety equipment in/on their vehicle at all times while transporting biosolids:
 - a. First Aid Kit
 - b. Reflective triangles
 - c. Fire Extinguisher
 - d. Push Broom (to sweep up debris and biosolids from roadway)
 - e. Shovel (use to prevent biosolids from draining into waterways / ditches)
- C. Personnel cleaning up a spill must follow basic personal hygiene procedures in handling biosolids.
 - a. Wear gloves for shoveling, sweeping, or handling biosolids.
 - b. Wash hands (and, as necessary, arms, face, etc.) with waterless anti-bacterial hand cleaner or mild soap and water following spill clean up and prior to eating or drinking.

QUICK REFERENCE GUIDE TO BIOSOLIDS SPILL CLEANUP PROCEDURES

- 1) **INFORMATION ABOUT BIOSOLIDS:** Biosolids are the non-hazardous organic material remaining from the wastewater treatment process. The material is highly treated, nutrient-rich, mud-like, black/brown in color, organic fertilizing material which is considered **Non-hazardous material per EPA and state law.**
- 2) **SAFE HANDLING PRECAUTIONS:** You may be exposed to biosolids during loading, unloading and spills through inhalation or ingestion. To prevent this, the following precautions are recommended:
 - Wear personal protective equipment (PPE)
 - Leather gloves
 - Boots (*optional, but recommended during spill cleanup*)
 - Liquid repellent coveralls (*optional, but recommended during spill cleanup*)
 - Wash hands with soap after handling biosolids
 - Disinfect and cover cuts
 - Don't eat, smoke, or chew around biosolids
- 3) **CALLS TO MAKE IMMEDIATELY AFTER SPILL – Within the first 30 minutes**
 1. Immediately notify your Supervisor (within 15 minutes of spill).
 2. Independent carriers (IC) must also notify the appropriate Synagro Project Manager immediately (within 30 minutes of spill). If hauling Pima County material, contact RWRD OCC contact (520-724-6047) regarding any spill or accident event within 30 minutes of spill.
 3. Then notify highway patrol (911) if spill occurred on public right-of-way. Give location and amount of spill to individual(s) contacted. If the spill occurs on State Highways/Interstates in California or Arizona then CALTRANS or AZDOT will most likely take the lead on providing equipment and crew to clean up the spill, however, check with your Supervisor. If possible, SYNAGRO labor and equipment are to be utilized. The Project Manager shall also communicate with the authorities and the public on the scene, answering questions and advising of the clean up activities.

If hauling truck and trailer are not disabled -

1. Minimum of 2 laborers (more depending on size of spill).
2. Class B, rubber tire front-end loader (this may not be required if spill is 2 cubic yards or less).
3. Dump truck with sand
4. Shovels
5. Brooms
6. Traffic Cones

If hauling truck and/or trailer are disabled -

- Same as above, plus a hauling truck and/or trailer as required.

4) **HALT SOURCE OF SPILL:** Such as a ruptured container or damaged transport unit. The first SYNAGRO representative (whether IC, operator, or manager) at the scene will begin procedures to halt the spill and initiate clean up activities.

5) **CONTAIN SPILL:** Form a barrier. Sufficient quantities of straw shall be used for such purposes. Earthen barriers may be constructed to augment the straw bale containment area. The Project Manager or the person in charge on the spill site will advise the clean up personnel where to get the straw or other items necessary to complete the clean up operation, i.e. local farmers, farm supply center, nursery, etc.

6) **CLEAN UP:** At the spill site, the driver and/or clean-up crew shall perform the following clean-up procedures:

1. Park the hauling truck on the side of the road, if possible.
2. Administer emergency first aid, as appropriate, if personal injuries are encountered.
3. Place traffic cones, reflectors, and/or flares to divert traffic around the spill site.
4. Determine the extent of the spill and take photos of spill and final clean-up.
5. Spread sand over and around biosolids to absorb moisture and prevent movement into storm drains or other waterway inlets.
6. Move biosolids into a pile using shovels and brooms.
7. Using the front-end loader, reload piled biosolids into the hauler's truck (if not disabled) or into another available truck (if the hauler's truck is disabled). If the trailer is disabled, transfer to new trailer. For very small spills (2 cubic yards or less) use of the front-end loader may not be necessary; biosolids can be shoveled into a small truck for transport back to the plant.
8. Final clean-up is by means of shovels and brooms. **At no time should any biosolids be hosed down into any storm drains. Do not wash off tools or trucks at the spill location.**
9. Cooperate with law enforcement and/or fire department personnel responding to the spill. Inform them of the non-hazardous nature of the spilled material and actions to be carried out according to this plan.

7) FINAL CLEAN UP: Disposal of spilled biosolids following clean-up shall be as follows:

1. If not disabled, the hauler's truck may proceed to the original destination.
2. Any biosolids that have been loaded into a pick-up truck are to be returned to the Plant and loaded into the next available trailer or taken to the original destination.
3. Following clean-up and disposal of the spilled biosolids, all equipment used for spill response is to be returned to its originating location for cleaning.
4. The ultimate goal will be to restore the spill area to its original condition, if possible.

SPILL RESPONSE - NOTIFICATION & RESPONSIBILITIES

Driver - The following assumes the driver is not hurt and is able to contact the Facility's Spill Response Coordinator (see definition below).

1. The driver will park the truck on the side of the road if possible and place traffic cones and reflectors to divert traffic around the spill.
2. The driver will remain with the truck and spilled material, unless it is necessary to leave temporarily in order to contact the Facility Spill Response Coordinator.
3. The driver will contact the Facility Spill Response Coordinator immediately - within 15 minutes of the spill. The driver will also complete the "Driver's Vehicle Accident" report form and provide the Spill Response Coordinator with the information on the form to record details of the accident. Be sure to diagram and photograph and describe the accident or spill.
4. The driver will assist with traffic control and clean-up and will NOT leave the scene of any spill, not even a small one, until it is reported to the Spill Response Coordinator and cleaned up. Note: Call the Spill Response Coordinator first (within 15 minutes); then notify the Dispatcher and/or Project Manager; then call 911.
5. If the spill occurs on State Highways/Interstates in California or Arizona then CALTRANS or AZDOT will most likely take the lead on providing equipment and crew to clean up the spill, however, check with your Supervisor.
6. Do not move equipment if its position is helpful to traffic control or containment unless leaving it where it is will create a hazard.
7. While awaiting police and/or cleanup crew, help the other party (or parties), if safely able to do so.
8. Don't give statements or sign anything other than bona fide papers presented by a law enforcement officer or public health officials.
9. In accidents involving a fatality, don't talk or give any statements until you are represented by an attorney. You have this right by law.
10. Don't admit responsibility or agree to pay for anything.
11. Don't argue responsibility for the accident. Be courteous.
12. **Contract Hauler Responsibilities** - Hauler is required to notify Synagro immediately after a spill and upon completion of clean-up of all spills. Hauler is required to complete and forward a copy of the spill response form to Synagro.

Clean-Up Crew - The **clean-up crew** will perform the following clean-up procedures:

1. Place traffic cones, reflectors, and/or flares, as appropriate, to divert traffic around the spill site.
2. Spread sand around biosolids to absorb moisture and prevent movement into storm drains or other waterways. Place sandbags at storm drains and other waterway inlets. Clean un-weathered wheat or other small grain straw can also be used as an absorbent and temporary drain block.
3. Move biosolids into a pile using shovels and brooms.
4. Using the rubber-tired loader or equivalent, reload piled biosolids into the truck, if it isn't disabled, or into a replacement truck for hauling to the appropriate destination. For small spills, use of the loader may not be necessary. Biosolids can be shoveled into a truck for transport to the reuse site.
5. Final clean-up is by means of shovels and brooms for small spills and a street sweeper for larger spills. Pick up all accumulations of biosolids. Police the area and pick up all biosolids. Do not hose down or wash significant amounts of biosolids into any storm drain, drainage ditch, stream, or other waterway. Do not wash off tools or trucks at the spill location. Follow instructions from the local health official(s) on site at the spill location.

Spill Response Coordinator - The Spill Response Coordinator will normally be the Project Manager(s) for the facility of destination. He/she will notify the state police or local jurisdiction officials, the State Department of Transportation, or any other agencies as appropriate, as well as the customer. The Project Manager will also notify the project area Technical Services Manager who will, in turn will notify the County Health Department, EPA or other regulatory agencies.

The Spill Response Coordinator assumes complete responsibility for directing all activities associated with the clean-up of a

spill. He/she will:

1. Designate and dispatch a clean-up crew plus necessary equipment to the spill site to clean-up the spill and notify the appropriate agencies.
2. Photograph the spill and final clean up.
3. Inform the producing facility's contact person of the spill, as well as the project area's Technical Services Manager and the Regional EHS&T Manager.
4. Load spilled biosolids back into the haul vehicle, if it is operable. If the vehicle is unable to complete the trip to the delivery destination, load the spilled material into an alternate vehicle.
5. Dispatch another truck and/or trailer to the spill location if the hauling truck and/or trailer is/are disabled.
6. Dispatch some or all of the following to the spill location:
 - a. Minimum of two-person clean-up crew (more personnel as needed; dependent on size of spill).
 - b. An appropriate rubber-tired loader or equivalent to pick up spilled material (may not be required for a small spill). Coordinator will have discretion to select the most efficient loading option based on equipment availability and spill size.
 - c. Sand and sandbags and/or fresh small-grain straw (e.g., wheat straw), or alternative absorbents and drain blocking material
 - d. Street sweeper
 - e. Additional shovels, brooms, traffic cones and/or flares
7. Oversee and coordinate retrieval of any damaged or disabled transportation equipment involved in the spill.
8. Contact the project area Technical Services Manager during the clean-up if any unusual situations arise, or if the Spill Response Coordinator requires special assistance.
9. Provide liaison and coordinate with agencies that may respond to the spill whether expressly notified by Synagro or not. Such agencies may include:
 - f. Highway Patrol or State Police
 - g. Local (municipal or county) law enforcement
 - h. Local fire department(s)
 - i. State Department of Transportation
 - j. State Department of Fish and Game
 - k. State Department of Forestry
 - l. Others as deemed required
10. After clean-up, transport spilled biosolids to the designated use or processing site, whether the original vehicle or a substitute truck / trailer is used.
11. Transport all equipment used for spill response to the wastewater plant or to the destination site, whichever is nearer, for cleaning after completing clean-up and removal of the spilled biosolids. Truck beds and other equipment should be hosed down at the field or the processing site.
12. The ultimate goal will be to restore the spill area to its original condition, if possible.

FOLLOW UP NOTIFICATION AND REPORTS

Additional responsibilities of the Spill Response Coordinator require that he/she:

1. Notify the Regional Operations Manager immediately following completion of the spill clean-up and ensure the load data and spill response section of the "Driver's Vehicle Accident Report" is completed.
2. Inspect the site after clean-up and attest to the adequacy of the clean-up. Take necessary photos.
3. Maintain a log of pertinent information about the biosolids spill.
4. Complete a descriptive incident report and forward copies to the Regional Vice President, EHS&T Manager, project area Technical Services Manager and the producing plant's contact person within 24 hours of any spill.
5. **Immediate Notification:** Synagro must notify the affected Plant Superintendent in the event of a spill if 1) someone is seriously injured or killed, 2) if there is a public health concern, 3) if 2 tons or more is spilled or (4) if there is media coverage of the spill.
6. **Within 30 minutes of the spill** of any Pima County material notification must be given to the RWRD OCC contact at (520-724-6047).
7. The project area Technical Services Manager will complete and transmit the required information to the appropriate regulatory agency, within five (5) days of spills involving entry of biosolids into storm drains (unless other requirements supersede this time-frame) and include the following additional information:
 - a. Waterways or ground water affected
 - b. Written confirmation of the previous telephone notifications

IN CASE OF SEVERE EMERGENCY: DIAL 911

Name	Area of Responsibility	Phone Number
Brian Millage	Technical Services Manager - Arizona	Office: 623-936-6328 Mobile: 623-236-0974
Frank Foster	EHS Manager – West Region	Office: 443-389-9091 Mobile: 850-712-0436
Craig Geyer	Regional Operations Director	Office: 623-936-6328 Mobile: 520-631-4982
Bruce MacLeod	Technical Services Director – West Region	Mobile: 937-361-0972

Date: _____

Plant or Operations Manager Name: _____

RECEIPT OF ACKNOWLEDGEMENT:

By signing below, I hereby acknowledge that I have received a copy of the Synagro Biosolids Spill Response Plan and understand that I am to carry a copy of this plan at all times while transporting biosolids on behalf of Synagro.

Driver's Name		Motor Carrier Name	Signature
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

Once signed, please return this form to Plant or Operations Manager for recordkeeping.



6. Contingent Plans for disposal, isolation or recovery which address the following:

6.1 When pollutants in Biosolids exceed §503.13, Table 1 limits, R18-9-1005 Table 1.

Landfill back up will be provided at the inception of the project in the event the County's biosolids exceed §503.13, Table 1 limits, R18-9-1005 Table 1.

6.2 End products from Contractor's preparation or derivation process which do not meet the minimum specification requirements.

This is not applicable to Synagro's Plan of Operations for Pima County biosolids. Biosolids will be managed as produced by the plant and will not be transformed or treated further.

7. Details on Further Preparation/derivation methods, process description, additives, markets, distribution, and recall of the product.

This is not applicable to Synagro's Plan of Operations for Pima County biosolids.

8. Health and Safety Plan for RWRD, the public, and Contractor's personnel.

Through participation in Synagro's Environmental, Health and Safety (EHS) Centers of Excellence workshops and other safety committees, operational leaders work hand-in-hand with safety professionals to ensure employees are fully engaged in safety, and that accountability for safety begins with the employee and includes the performance of the work team. Employee engagement is monitored and tracked for all employees and is created through several key company-wide initiatives. All employees are required to participate in online compliance-based training, as well as site and job specific training. Employees have the opportunity to volunteer for, and to participate in site safety committees, safety and housekeeping inspections, the development and review of Job Safety Analysis, and pre-start up safety reviews. Synagro believes in recognizing performance of employees that exhibit the values of a compliant and pro-active organization in regards to EHS. Recognition programs are based on milestone performance for some of our key initiatives, as well as for individual employees who demonstrate personal commitment required to lead Synagro to top quartile safety performance in our industry.

Key to our continuous improvement efforts are our commitment to a drug-free Synagro, Company-wide defensive driver training, site and regional safety action plans, and pre-start up safety reviews to ensure our projects are set up for success. Sustainable improvement comes from our commitment to



management systems and, therefore to our program designed around Prevention, Assessment, Corrective actions, and Training initiatives (PACT) that enable compliance (see #12 below). Some of our key compliance initiatives include online compliance-based training, personal protective equipment standardization, non-compliance corrective action tracking, compliance-based auditing, and the use of third-party auditors to verify our internal audits. These programs and initiatives are just a small representation of the commitment Synagro has made to driving excellence in EHS.

9. Environmental Controls of odors, fumes, dust, smoke, waste products, industrial discharges, storm water runoff, and any other potential release of pollutants into the environment.

9.1 Provide a written contingency plan for mitigating potential thermal/fire hazards resulting from the staging of Cake Biosolids; the mitigation measures must be included in the Plan of Operations.

Should a fire hazard occur from the staging of cake biosolids, the burning material will be segregated with a loader and smothered if possible, or flames/smoke will be extinguished with water if necessary.

9.2 Provide a written schedule for mitigating of odors and flies for staged Cake Biosolids and include these mitigation measures in a Plan of Operations.

Synagro implements the following Odor Management Plan for all biosolids land application programs. This plan addresses these specific areas: Prevention; Complaint Response and Corrective Actions; and Mitigation Measures. These areas are explained in greater detail below:

Site Assessment

When permitting sites, an assessment of the area is conducted by the Technical Specialist. As part of this inspection, the Technical Services Manager identifies the location of potential off-site sensitive receptors such as homes, schools and offices. If necessary, buffer distances are increased or certain fields (or even the entire sites) may be excluded from permit application submittals.

Operational Management

When an application site is being flagged and otherwise prepared for the initiation of spreading operations, and each day of operations, the Technical Services Manager and/or the Field Manager will assess expected weather conditions on-site (e.g. temperature inversions, high heat and humidity) and wind directions to determine if an unusual situation may be anticipated which



would increase the potential for nuisance conditions at sensitive off-site receptors. If such conditions exist, the following management practices may be implemented:

- Spreading operations may be shifted on-site to different fields or the more remote portions of fields to increase the buffer distance;
- Where feasible, field loading areas may be shifted; and
- Spreading operations may be more tightly timed to minimize the length of time biosolids sit in the staging area or the volume of staged material awaiting spreading will be reduced.

Enhanced Odor Surveillance

The Project Manager/Technical Services Manager will monitor the area and train field personnel to increase sensitivity to odor concerns and insure proper implementation of the procedures specified in this odor control plan. Inspections of the site and surrounding areas for odor will be increased and conducted regularly when biosolids land application operations are underway. This monitoring system combined with Synagro's long-standing community communications strategy will minimize the potential for unacceptable off-site nuisance conditions.

- All trailers will be covered with a tarpaulin to minimize the impact of odor during the transportation of biosolids to the land application site and/or the landfill.
- Synagro has developed a formal protocol to respond to and address odor complaints.
- Staff member receiving citizen questions or complaints will collect the individuals name and phone number and promptly pass this information on to the Technical Services Manager and the Project Manager so that an on-site investigation can be initiated.
- Synagro will investigate the situation and keep a log of the investigation.
- If unacceptable odor levels are present, Synagro will undertake steps to mitigate. We will inform complainants of any mitigation and corrective actions to be taken and the schedule for implementation, if requested.
- Complaints regarding odorous material or other generator-related biosolids quality issues will also be provided to the City within 24-hours of impact.

Mitigation Measures

If upon investigation it is determined that sustained, unacceptable, off-site odors are being generated, Synagro will undertake one or more of the following corrective actions depending on the source and/or activity generating unacceptable odor levels:

- Check housekeeping and sanitation of equipment, site and access roads and clean as necessary;



- Inspect any storage area for accumulated water and ensure measures are employed to prevent it. If any standing water is present it will be treated with lime;
- If nuisance conditions arise, spreading operations may be moved to more remote areas on the site or the land application activity may relocate to another site until conditions improve; and
- Cease spreading operations and wait until weather conditions are more suitable for odor dispersion.

Dust Control

Dust control will be managed through use of either a 1,500 to 2,000 gallon water truck or a water tank trailer that can be towed with a heavy duty pick-up truck. The water supply will also be used for cleaning of tires and trailers as needed.

10. Operation and Maintenance Manual for each of Contractor's facilities relating to this Agreement. The Contractor needs to maintain adequate equipment to support continuity of operations at the Tres Rios WRF.

All land application and transportation equipment will be maintained per the manufacturer's recommendations.

11. Operation Training Program that properly trains management, operation, and maintenance personnel.

Synagro's training program involves:

- Identifying training needs and requirements;
- Assigning personnel to provide training and providing them the resources they need to conduct training;
- Documenting and tracking that mandatory training has occurred; and
- Assessing the effectiveness of the training that is provided.

An employee's training needs and requirements as well as their training responsibilities are based on his/her position within the company.

Each new employee receives Synagro's New Employee Safety Orientation during their first week of employment. Synagro partners with an outside vendor to provide on-line safety training. Mandatory courses are assigned out quarterly based on an employee's job responsibilities. The employee is required to complete their courses by the end of the quarter in which it was assigned. A course



consists of training lessons and there are quizzes at the end of each lesson to assess the employee's comprehension of the lesson. The employee must pass all the lesson quizzes to successfully complete a course.

The on-line safety training is supplemented by on-site safety meetings which occur at least monthly and include a monthly safety topic and a review of safety alerts and near misses as applicable.

Synagro's Technical Services Staff receive comprehensive training relative to biosolids and residuals regulatory requirements and they in turn provide training to the field operations staff. For example, Synagro's Technical Services Specialists are responsible for completing and reviewing the Pre-Operating Checklists (which include land application requirements) with the project/field manager or equipment operator prior to beginning field operations.

Ongoing training and updates on new requirements are also provided for all Technical Services staff through regularly scheduled training sessions at the corporate and regional offices or through web-ex sessions. For example, Synagro held several training sessions for Technical Services and Operations personnel after the 40 CFR Part 503 Rule was published and developed a 40 CFR Part 503 Compliance Manual and Standard Operating Procedure which are available to all employees.

Synagro employees also receive training through State biosolids and nutrient management planning training and certification programs. Several employees have served as instructors for such programs.

12. Budget Management Plan providing evidence of having an adequate budget for operation and maintenance.

Synagro is the largest service provider in the biosolids management industry. With operations in 35 states as well as Canada, Synagro has sufficient resources to manage any and all of its contractual obligations. Synagro successfully manages 11,000,000 tons per year of biosolids of varying qualities using multiple processes. Synagro's budget management plan for this project takes into account the following major cost components:

1. **Loading and transportation.** Synagro contracts with GIC Trucking to perform loading and transportation services throughout Southern California and Arizona. GIC will be a listed transportation subcontractor on this project. GIC performs the work on a cost per ton or a cost per load basis. This cost accounts for the following components:
 - a. Labor and benefits
 - b. Fuel, repairs and maintenance



- c. Insurance and registration
 - d. Compliance
 - e. Capital equipment replacement.
2. **Land Application.** Synagro anticipates use of its own equipment and personnel to perform the land application of biosolids. The factors included in the cost for this activity are:
- a. Labor and benefits
 - b. Fuel, supplies, repair and maintenance
 - c. Compliance, including permitting and monitoring costs.
 - d. Insurance and other overhead activities
 - e. Capital equipment replacement.
3. **Region and corporate overhead.** All overhead items that are not identified above are captured in a region and corporate overhead allocation.
4. **Final price determination.** Synagro's final pricing determination is driven by an accumulation of the above costs and an extensive review by corporate management. Due to the size and duration of this project, our proposed pricing is approved by our Executive Leadership Team (Chief Operating Officer and Chief Financial Officer) upon review of the accumulated costs as described above. This ensures that Synagro has adequate visibility to the inputs required to successfully perform the project.

13. Quality Control/Assurance Plan for sampling, testing, certifications, and operational procedures.

Biosolids/residuals management programs are subject to a myriad of different environmental, health, safety and transportation (EHS&T) regulatory requirements at the federal, state, and local levels. Regulatory requirements associated with biosolids/residuals management have increased and become more complex over time. A strong compliance program is essential to ensure that regulatory requirements are adhered to and to build and maintain public confidence and acceptance of these programs.

To achieve compliance with regulatory requirements, Synagro has implemented a compliance assurance program referred to as PACT. The PACT program has four key elements - Prevention, Assessment, Corrective Action, and Training. Each of these elements is described below along with the programs Synagro has established under each of the elements.



Prevention

The goal of a compliance assurance system is to prevent compliance issues from occurring.

Prevention involves:

- Ensuring personnel know and understand their role in assuring compliance;
- Identifying compliance requirements at the federal, state and local levels;
- Implementing a system where compliance tasks are scheduled, assigned and tracked to completion;
- Developing standard operating procedures where appropriate; and
- Reviewing the compliance task list and standard operating procedures on an ongoing basis and modifying them as appropriate to account for changes in regulations/requirements and operating methods, and to address compliance deficiencies.

Employee's Compliance Role

Synagro ensures employees know and understand their role in assuring compliance through new employee orientation programs and on the job training.

Compliance Requirements Tracking

Synagro identifies and keeps current with compliance requirements at the federal, state and local levels through the use of:

- Membership and participation in trade associations such as the National Association of Clean Water Agencies (NACWA), the Water Environment Federation (WEF) and its member associations, and the National Biosolids Partnership
- Membership and participation in Regional Biosolids Associations such as the Mid-Atlantic Biosolids Association (MABA), New England Biosolids and Residuals Association (NEBRA) and the Northwest Biosolids Management Association (NBMA)
- Monitoring regulatory and legislative web sites
- Serving on state and local technical advisory committees
- Ongoing communication with state and local regulatory officials
- Weekly BLR Regulatory Updates

Standard Operating Procedures (SOPs)

Synagro develops and implements SOPs to ensure compliance tasks are completed consistently across the company. For example, after the 40 CFR Part 503 Regulation was published, Synagro developed an implementation SOP to ensure the notification requirements, management practices, site restrictions, and monitoring, record keeping and reporting requirements are met. The SOP provides standard forms to use, approved biosolids analytical methods, frequency of monitoring information, etc.



Another key SOP relative to preventing compliance issues from occurring is the use of a "Pre-Operating Checklist" and a "Buffer Zones & Spreader Operator Instruction Sheet". Synagro develops these documents for each State where land application operations are conducted.

The Pre-Operating Checklist ensures federal, state and local regulations and permit requirements are met prior to initiating biosolids applications at field sites. Compliance items on the Pre-Operating Checklist include:

- The field is permitted and suitable for the biosolids/residuals type being applied;
- Pre-application requirements are met;
- Farmer and landowner agreements are current and the crop to be grown has been verified;
- The field is flagged to prevent applications in buffer zones and restricted areas;
- The appropriate application rate and field capacity is calculated; and
- Any special permit or local requirements are met.

The Buffer Zones & Spreader Operator Instruction Sheet provides the field operations staff:

- A listing of the buffer zones and restricted areas where biosolids/residuals cannot be applied
- A listing of operating requirements including notification requirements, application method requirements, and inclement weather operating requirements

A third key SOP is Synagro's Land Application Lab Results Review and NANI Receipt and Review Procedures. This SOP provides instructions on how to review biosolids lab results and Notice and Necessary Information (NANI) Forms from biosolids generators to ensure the biosolids are suitable for land application.

As regulations and permits conditions change the SOPs are updated as appropriate to ensure compliance with the new requirements. For example, the lab review forms, Pre-Operating Checklists and Buffer Zones & Operator Instruction Sheets are updated as appropriate to capture the most current requirements.

Assessment

To help ensure compliance requirements are being met and the compliance assurance system is implemented and working, periodic, consistent, objective and documented assessments of a project/facility's compliance status need to be conducted. Personnel must have clearly-defined compliance assessment responsibilities and time to conduct such assessments.

Synagro conducts informal site inspections and formal audits on an ongoing basis. Facility and land application audits are conducted by personnel from the corporate Environmental, Health, Safety and Transportation staff.



Internal and outside vendor audit checklists are used which cover federal requirements, state requirements and Company requirements. State, local and client requirements are researched prior to the audit and a list of the requirements is recorded prior to the audit or the audit is conducted directly from highlighted sections of the regulations, permits and contract documents.

Informal inspections and assessments are also done periodically by Synagro's EH&S and Technical Services staff as they visit land application operations to provide compliance assistance and training.

Corrective Action

Once compliance issues have been identified during the course of day to day business and through internal and external audits and inspections a system must be in place which ensures that appropriate and timely corrective action is taken, the cause of the compliance issue is identified, and actions are taken to prevent recurrence of the issue.

Synagro's goal is to have no instances of non-compliance. However, issues and incidents occur and when this happens employees work to correct the incident in a timely and thorough manner. When compliance issues are identified, the situation is examined to determine the root cause of the problem and the corrective and preventive action that must be taken. The preventive action must address the root cause with the ultimate goal of preventing the incident from occurring again.

Depending on the nature of the compliance issue, it is assigned to one or more responsible parties to ensure the corrective and preventive actions are completed/implemented. A deadline for completion of the task is assigned and the issue is tracked to completion by regional and corporate compliance personnel.

Training

An effective compliance training program involves:

- Identifying training needs and requirements;
- Assigning personnel to provide training and providing them the resources they need to conduct training;
- Documenting and tracking that mandatory training has occurred; and
- Assessing the effectiveness of the training that is provided.

An employee's training needs and requirements as well as their training responsibilities are based on his/her position within the company.

Each new employee receives Synagro's New Employee Safety Orientation during their first week of



employment. Synagro partners with an outside vendor to provide on-line safety training. Mandatory courses are assigned out quarterly based on an employee's job responsibilities. The employee is required to complete their courses by the end of the quarter in which it was assigned. A course consists of training lessons and there are quizzes at the end of each lesson to assess the employee's comprehension of the lesson. The employee must pass all the lesson quizzes to successfully complete a course.

The on-line safety training is supplemented by on-site safety meetings which occur at least monthly and include a monthly safety topic and a review of safety alerts and near misses as applicable.

Most states do not have mandatory training requirements relative to biosolids/residuals land application operations. However, there appears to be an increasing trend to establish such programs.

Synagro's Technical Services Staff receive comprehensive training relative to biosolids and residuals regulatory requirements and they in turn provide training to the field operations staff. For example, Synagro's Technical Services Specialists are responsible for completing and reviewing the Pre-Operating Checklists (which include land application requirements) with the project/field manager or equipment operator prior to beginning field operations.

Ongoing training and updates on new requirements are also provided for all Technical Services staff through regularly scheduled training sessions at the corporate and regional offices or through web-ex sessions. For example, Synagro held several training sessions for Technical Services and Operations personnel after the 40 CFR Part 503 Rule was published and developed a 40 CFR Part 503 Compliance Manual and Standard Operating Procedure which are available to all employees.

Synagro employees also receive training through State biosolids and nutrient management planning training and certification programs. Several employees have served as instructors for such programs.

Conclusion

Maintaining compliance with all the federal, state, local and client requirements associated with biosolids/residuals management programs is a challenging and never-ending task. PACT is a way of dividing this major task into manageable components. Achieving and maintaining compliance with regulations is an important element in gaining public confidence and acceptance of beneficial use programs.



14. Communication Plan which includes names and phone numbers of Contractor's personnel to contact for routine operations, emergencies, and the location of records. Include an organization chart of key personnel and identify the primary contact person.

14.1 Contractor is required to attend a monthly update meeting with Pima County to discuss the past month's issues and challenges, status of staged or applied Biosolids and next month's projected applied fields, truck schedule, and any upcoming changes or projects planned by Pima County.

It is important that Synagro and the County have consistent, structured, and open communication and working relationships. Table 1 below illustrates the type of communications and procedures that Synagro proposes during performance of the contract.

Communication with the County will take place formally at a minimum of monthly, and informally on a daily basis. Communication is expected daily between the Synagro project manager and the County designee responsible for day to day management of the contract. Formal monthly communication will take place as reviews of planned operations and past month's performance. Issues that require a more senior level involvement will be escalated only after discussion at the lowest level where resolution can occur.

Table 1 – Project Communication

Communication Meeting/Event	Project Staff	Plant Manager	Regional Vice President	Synagro Support
Monthly Operating Report / Meeting	✓	✓	✓	✓
Bi-Weekly Performance Schedule	✓	✓	✓	
Monthly Financial Review		✓	✓	✓
Daily Production Plan Meeting	✓	✓		
Monthly Environmental, Health, Safety Review		✓	✓	✓
Reporting to Regulatory Agencies	✓	✓	✓	✓

Synagro's project team is comprised of the following:

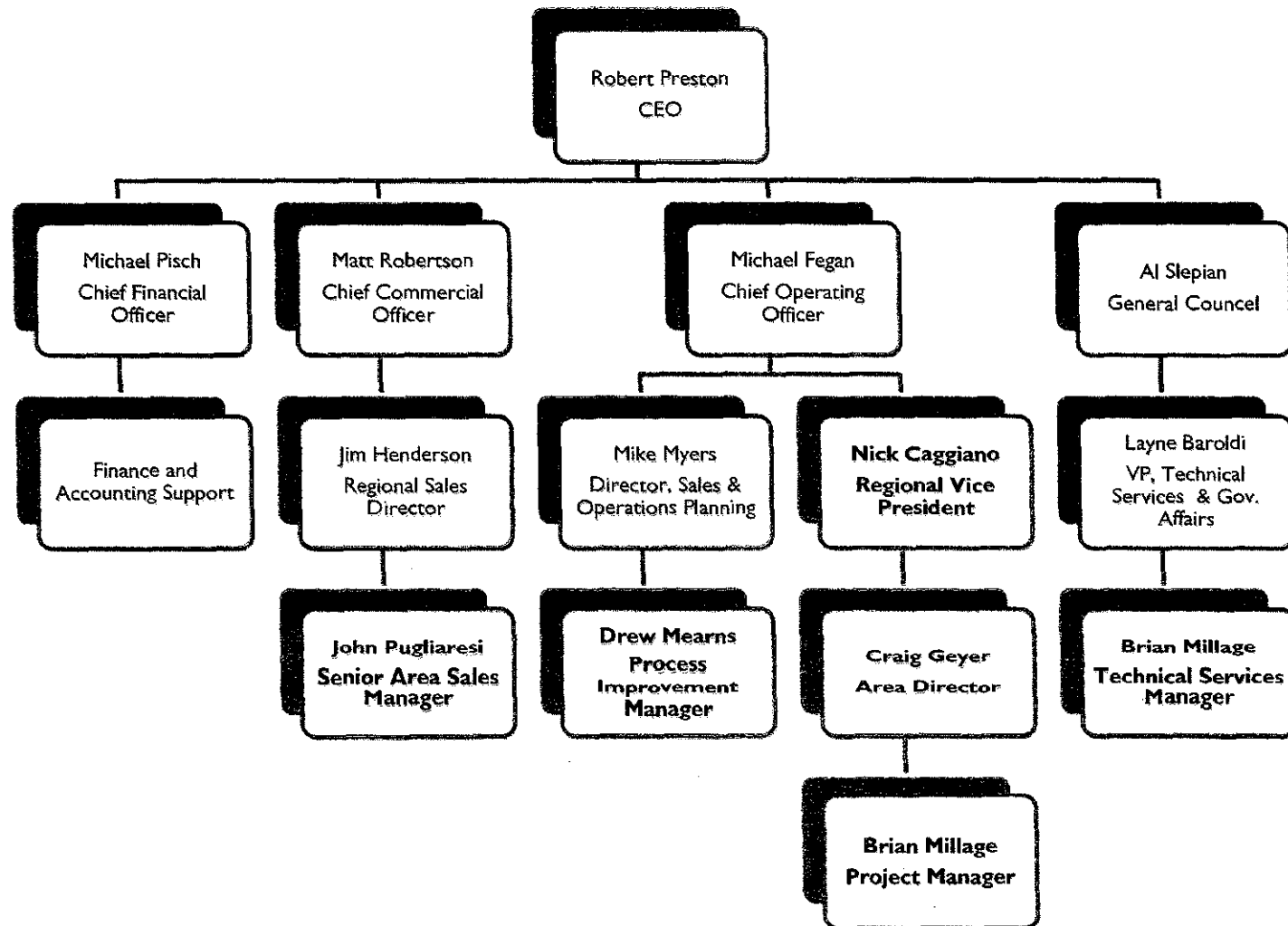
- Arizona Area Director – Craig Geyer
- Arizona Project Manager and Technical Services Manager – Brian Millage
- Arizona Area Administrative Office Manager – Craig Geyer
- West Region Sales and Development Manager – John Pugliarese



Region and Corporate Support personnel:

- West Region Technical Services Director – Bruce McLeod
- West Region Vice President – Nick Caggiano
- West Region Safety Officer – Frank Foster
- West Region Process Improvement Manager – Drew Mearns
- Corporate Director of Technical Services – Layne Baroldi
- Corporate Director of Sales and Operations Planning – Michael Myers
- Corporate General Counsel – Al Slepian

The project organizational chart provided on the next page highlights our project team members in green.





15. Regulatory Compliance Plan showing Contractor will meet the regulatory requirements on a continuing basis.

15.1 Obtain and maintain all approvals, permits, and licenses required to perform every aspect of Contractor's operation including ensuring that all land application sites are and remain properly registered.

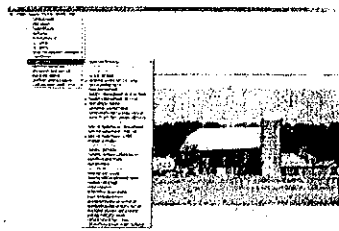
15.2 Maintain all recordkeeping required by regulation or by the terms of this Agreement.

A critical element for the long-term success of a residuals management program is the certainty of compliance with local, state and federal regulations. Accurate and timely documentation of regulatory compliance is a necessity. Synagro provides this service, through its proprietary Residual Management System (RMS). The RMS was developed and written by our own software engineers and programmers specifically for the purpose of ensuring regulators, our clients, and ourselves that all of our organic waste management programs meet the highest standards of permit compliance.

RMS is an integrated data management system that has been designed to store, manage and report information about our programs. RMS is updated daily to record the characteristics of the material, how much was moved, when it was moved, who moved it and where it went. In addition, residuals laboratory analyses are recorded to track both annual and cumulative loading rates for metals and nutrients.



This information is used in two ways. First and foremost, it provides a database for regulatory reporting and provides the information required for monthly and annual technical reports. Additionally, this information is used as an integral part of the invoicing process. This check and balance system provides a link between the operational, technical and accounting departments of Synagro, to ensure correct accounting and regulatory compliance.



management information systems.

RMS gives Synagro and our clients the information necessary for accurate residuals management. We will soon make secure internet access to RMS data available for operational information for clients and field nutrient loading information for our farmers. In addition, we will be able to provide electronic reporting to the EPA and other regulatory agencies. Synagro continues to invest in RMS so that we remain at the cutting edge of residuals

One of the key elements associated with obtaining and maintaining public acceptance for biosolids beneficial use programs is compliance with regulatory requirements. Biosolids beneficial use programs are subject to a myriad of different regulatory requirements at the federal, state, and local levels. Regulatory requirements associated with the land application of biosolids have increased and become more complex over time.

A strong compliance program is essential to ensure that regulatory requirements are adhered to and to build and maintain public confidence and acceptance of land application programs.

Field Operations

To ensure compliance with federal, state, and local regulations, the following items are addressed through the completion of a pre-operating checklist to applying biosolids to a site.

- Site is permitted for biosolids source
- Farmer and landowner agreements are current
- Site is not restricted from receiving biosolids based on:
 - Previous nutrient and metal loadings
 - Water table restrictions
 - Floodplain restrictions
- Site is flagged to prevent application in restricted areas:
 - Buffer zones
 - Steep slopes
 - Floodplains
 - Unsuitable soils
 - Unpermitted areas
- Site changes are accounted for and eligible acreage is calculated and recorded
- Special site conditions including local ordinance requirements (if applicable) are addressed
- Biosolids applier/field manager has received a site book and has clear instructions regarding:



- Application rate, total amount of biosolids that can be applied to a field, and the method of application
- Flagged areas and site boundaries

Monitoring, Record Keeping & Reporting

Description, Flow Chart, Sample Forms

This section describes the internal controls employed by Synagro to ensure compliance with established dosage rates and the procedures for preparing reports of land application operations.

Land application activities are monitored on a daily basis through the use of Truck Reports/Daily Reports and on a weekly basis through the use of a Weekly Report. These reports, along with biosolids analysis information and field specific information, provide the data used for preparation of monthly and annual reports.

A Field Report is prepared monthly to portray activity for each field receiving biosolids during the reporting period. It specifies the amount of biosolids applied; the method of application; nutrient and trace metal loadings (nitrogen, phosphorus, potassium, arsenic, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, selenium, and zinc); date of application and the lifetime addition of trace metals (where applicable).

A Monthly Report includes a Dosage Rate Evaluation for each biosolids type applied, (including biosolids chemical analyses), and a Field Report for each field where biosolids were applied.

Synagro completes federal certification statements required by the 40 CFR Part 503 Rule addressing compliance with management practices, site restrictions, tracking past metal loadings (if applicable) and meeting vector attraction reduction requirements through injection or incorporation (if applicable). The signed certification statements are kept on file at Synagro for the required period of time.

Farmer Reports and Follow-up

A successful land application program depends on the willingness of farmers to use biosolids for their crop production. Communication with the farmer is essential. Synagro provides farmers with Farm Reports to show them the nutrients and trace metals (and lime) applied through the biosolids application. Follow-up visits with farmers are performed to explain the reports and help them minimize supplementary expenditures on commercial fertilizers.



- 16. Access Plan with a clear explanation of how Contractor will assure that designated representatives of PCRWRD, State, or Federal Government are allowed unrestricted access to Contractor's operational facilities and land application sites during the term of the Agreement.**

16.1 Allow County the ability to tour the land to be used prior to the "Notice to Proceed."

Synagro encourages all its generators to be actively engaged in the land application process. This includes visits before, during and after land application activities have been completed. Synagro recommends that visits be arranged ahead of time out of respect for the land owner/farmers. All reasonable access requests will be honored.

Charles Lawrence Farms

- Synagro falsely reported 2,208 acres available (Synagro's Exhibit D)
 - Reality: only 1,103 acres available
 - Approximately 1,105 acres have been sold as follows:

Field	Current Owner	Acres
• 36,37	Benross Investments LLC	49
• 38,39,40	Benross Investments LLC	92
• Chapman 1A,1B,2	Benross Investments LLP	98
• TM1 thru TM5	Greg White LLC	201
• Shop, Hillside, L	Trekell Ranch LLC	
• Foxtail N&S, 35	Trekell Ranch LLC	
• Mill, G1,G2,G3	Trekell Ranch LLC	290
• 1W thru 12W, 15W	Casa Grande I-8 & Trekell Road LLC	
• 16W, 1E thru 5E	Casa Grande I-8 & Trekell Road LLC	299
• M1 thru M4	Pinal County	76
Total 1,105 Acres		

Synn GRO
EXHIBIT D - Registered Land

If bidding on and awarded Group A or Group E for Land Application of Biosolids, Bidder must demonstrate the availability of a sufficient number of acres of land registered by the Bidder with the State of Arizona for the dedicated acceptance of all 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 potentially available by providing discussions with potential landowners. Final contracts must be put in place and provided to the County within 30-days of notification of contract award but not later than fifteen (15) days prior to commencement of award.

Submit additional copies of this form and its attachments as necessary to document all available registered land available for use under any contract resulting from this solicitation.

1.	
Land Description including acreage	Charles Lawrence Farms 2208 Acres
Land Address	2275 E. Selma Highway, Casa Grande, AZ 85122 (Various Sections)
Land Owner	Charles Lawrence, Barbara Lawrence, et al
Attached are the following document(s)	<input type="checkbox"/> DEQ request to register land for biosolids application <input checked="" type="checkbox"/> DEQ land registration document <input type="checkbox"/> Land owner consent to use land for biosolids application <input checked="" type="checkbox"/> Other - Specify <u>Farm map, public notice, and description of verbal conversation</u>

2.	
Land Description including acreage	Cotton Patch - Joe Auza Ranches 675 Acres
Land Address	PO Box 10008 Casa Grande, AZ 85230 (T8S, R6E, Section 30) primarily
Land Owner	Joe Auza, Auza Estates <i>PVC Properties - No Consent</i>
Attached are the following document(s)	<input type="checkbox"/> DEQ request to register land for biosolids application <input checked="" type="checkbox"/> DEQ land registration document <i>Wrong legal description</i> <input type="checkbox"/> Land owner consent to use land for biosolids application <input checked="" type="checkbox"/> Other - Specify <u>Farm map, public notice, and description of verbal conversation</u>

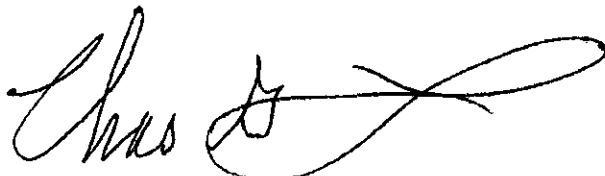
3.	
Land Description including acreage	
Land Address	
Land Owner	
Attached are the following document(s)	<input type="checkbox"/> DEQ request to register land for biosolids application <input type="checkbox"/> DEQ land registration document <input type="checkbox"/> Land owner consent to use land for biosolids application <input type="checkbox"/> Other - Specify _____

NAPVESCO Farms Inc
Lawrence Farms Partnership
5650 W Linda Lane
Chandler, Az 85226

My name is Nap Lawrence and I have farmed in Pinal County for over 40 years. I once farmed about 2,200 acres. I sold a number of farms and currently farm about 1200 acres. I have worked with a few biosolids companies over the years. Currently I am working with Avragro Systems and successfully applying biosolids. Avragro transports, spreads, and incorporates the biosolids before I plant a new crop.

I understand that currently in Maricopa County the farmers are responsible for spreading the biosolids once they are transported and offloaded by Synagro. It appears the biosolids are stored on the field perimeter until the crop is harvested and the field is ready to accept biosolids.

I will not allow any company to simply transport and offload the biosolids on my farm. I require the biosolids to be spread and incorporated immediately at the expense of the biosolids company.

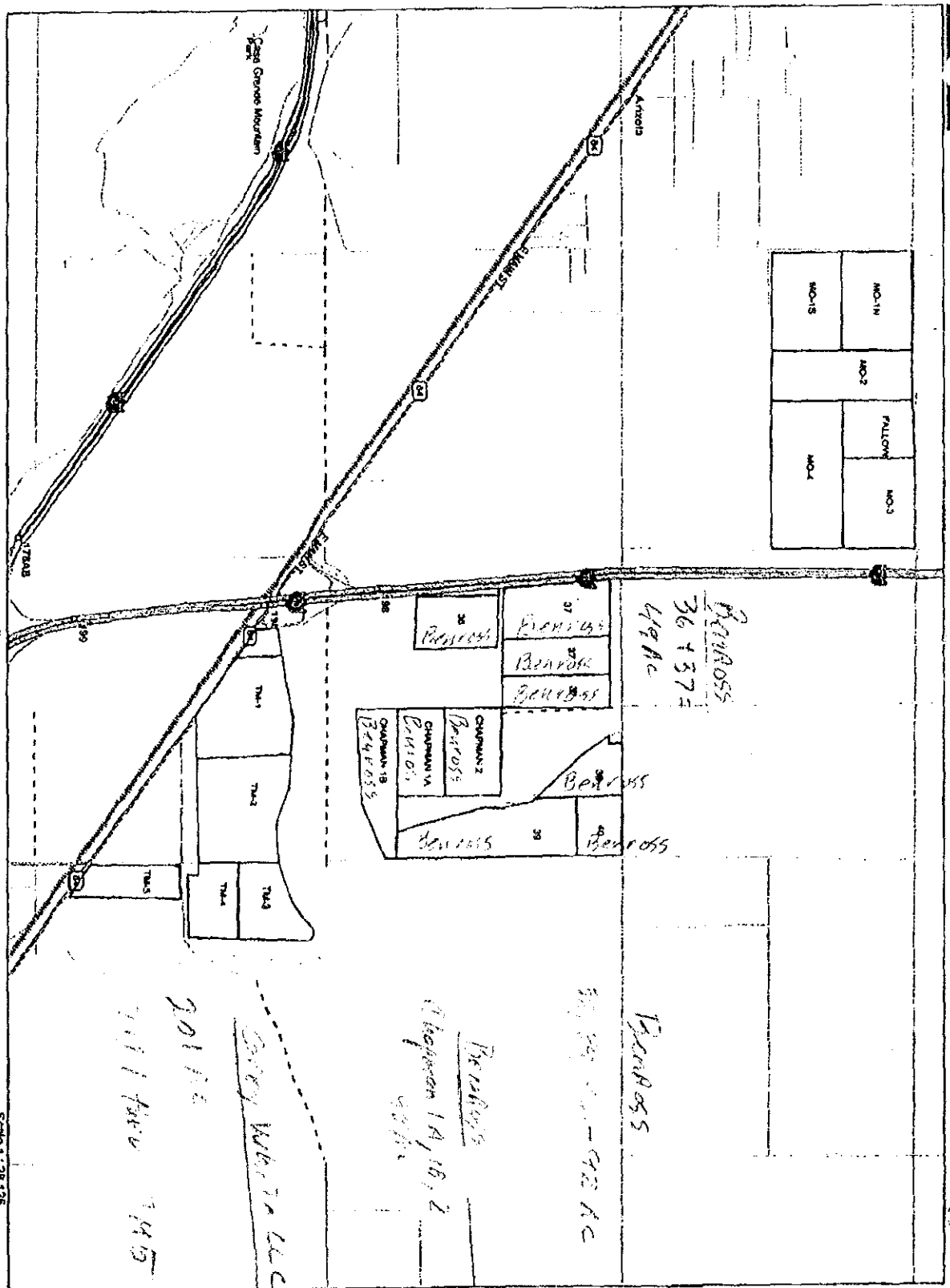

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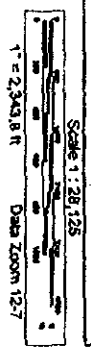
Charles Lawrence Farms – Synagro indicates 2,208 acres available (Exhibit D)
Approximately 1,105 acres have been sold as follows:

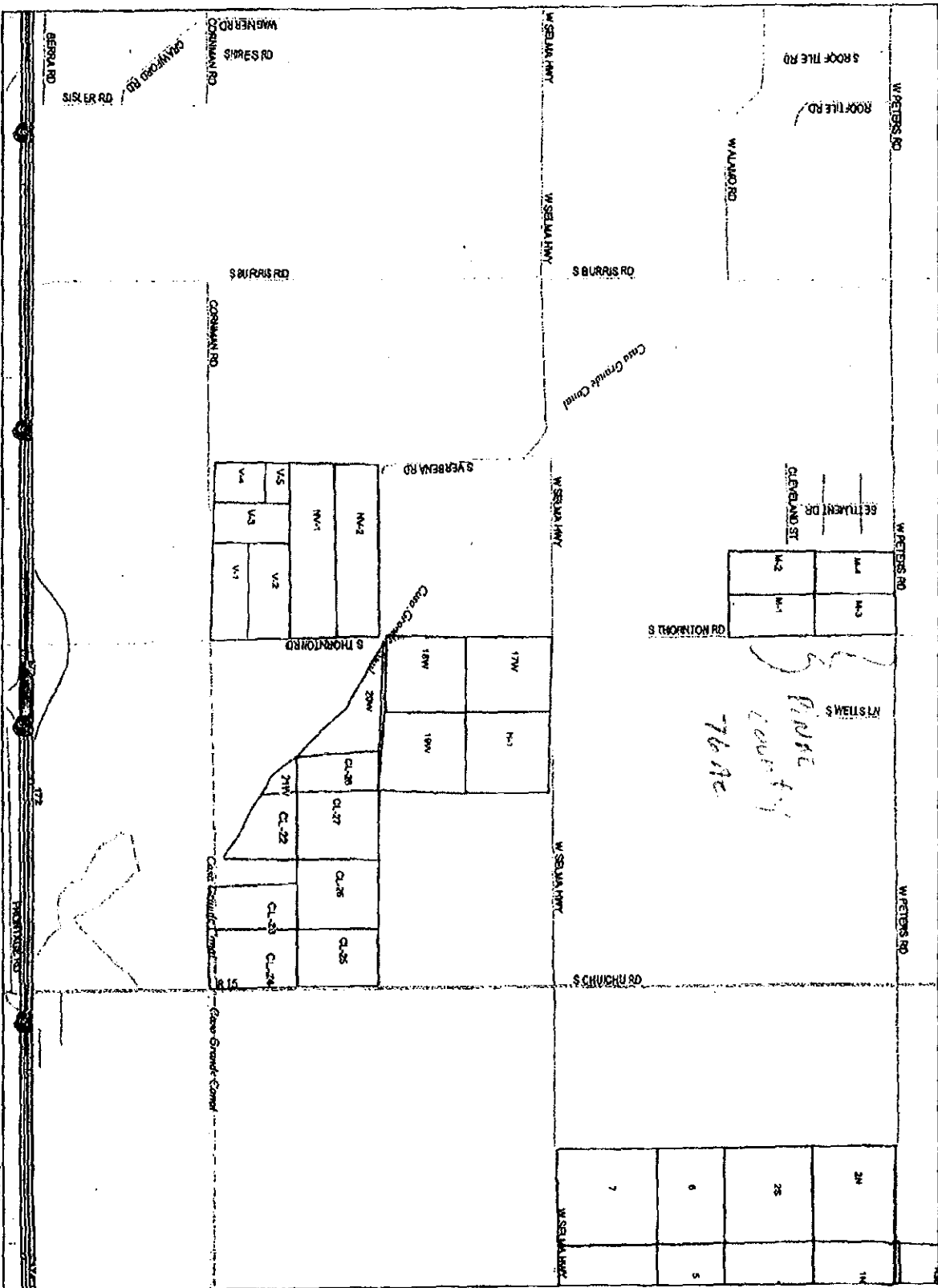
Field	Current Owner	Acres
36,37	Benross Investments LLC	49
38,39,40	Benross Investments LLC	92
Chapman 1A,1B,2	Benross Investments LLP	98
TM1 thru TM5	Greg White LLC	201
Shop, Hillside, L	Trekell Ranch LLC	
Foxtail N&S, 35	Trekell Ranch LLC	
Mill, G1,G2,G3	Trekell Ranch LLC	290
1W thru 12W, 15W	Casa Grande I-8 & Trekell Road LLC	
16W, 1E thru 5E	Casa Grande I-8 & Trekell Road LLC	299
M1 thru M4	Pinal County	76
Total		1,105 Acres

MO-1	MO-2	MO-3	FOLLOW
MO-1S	MO-2	MO-4	



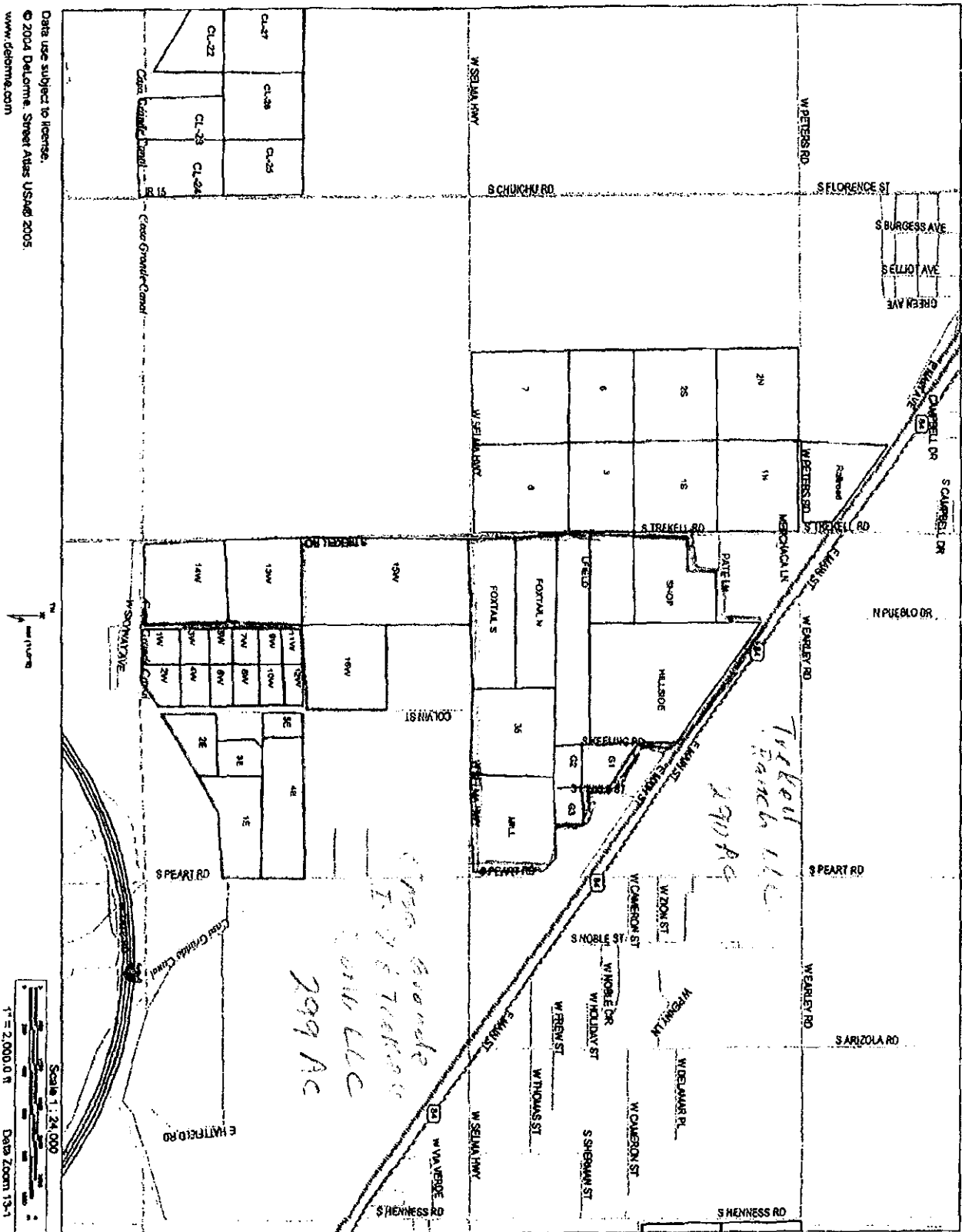
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Scale 1 : 25,000
1" = 2,000.0 ft Data Zoom 13-1





Search APN or Address or

Parcels:

Assessor Parcel Number
40207016B

First Owner Name
WHITE GREGG LLC

Second Owner Name
C/O HUGHES JEFF

Property Address

Mailing Address
2263 N TREKELL RD LOT 186

City
CASA GRANDE

State
AZ

Zip
85122

Sub or Condo Name

Property Description
REF AT W 1/4 CR TH N. 1720' TH N. EASTLY

[Zoom to](#)

Earthstar Geographics | Esri, HE

Lawrence # TM3 + TM4

Currently owned by Corey White LLC

0.6mi



▼

Search APN or Address or

Q

12 12

12 12

12 12

Parcels:

Assessor Parcel Number
51132001H
First Owner Name
WHITE GREGG LLC
Second Owner Name
C/O HUGHES JEFF
Property Address

Mailing Address
2263 N TRECKELL RD LOT 186
City
CASA GRANDE
State
AZ
Zip
85122
Sub or Condo Name

Property Description
POR OF N1/2 OF SEC 12-7S-6E LYING S OF
[Zoom to](#)

Earthstar Geographics | Esri, HE

Lawrence # TM#1 + TM#2

Currently owned by Greg White LLC

0.6mi



Search APN or Address or

Q

1 of 3

Parcels:

Assessor Parcel Number

402070240

First Owner Name

WHITE GREGG LLC

Second Owner Name

C/O HUGHES JEFF

Property Address

2716 E HIGHWAY 84 CASA GRANDE, 85131

Mailing Address

2263 N TREKELL RD LOT 186

City

CASA GRANDE

State

AZ

Zip

85122

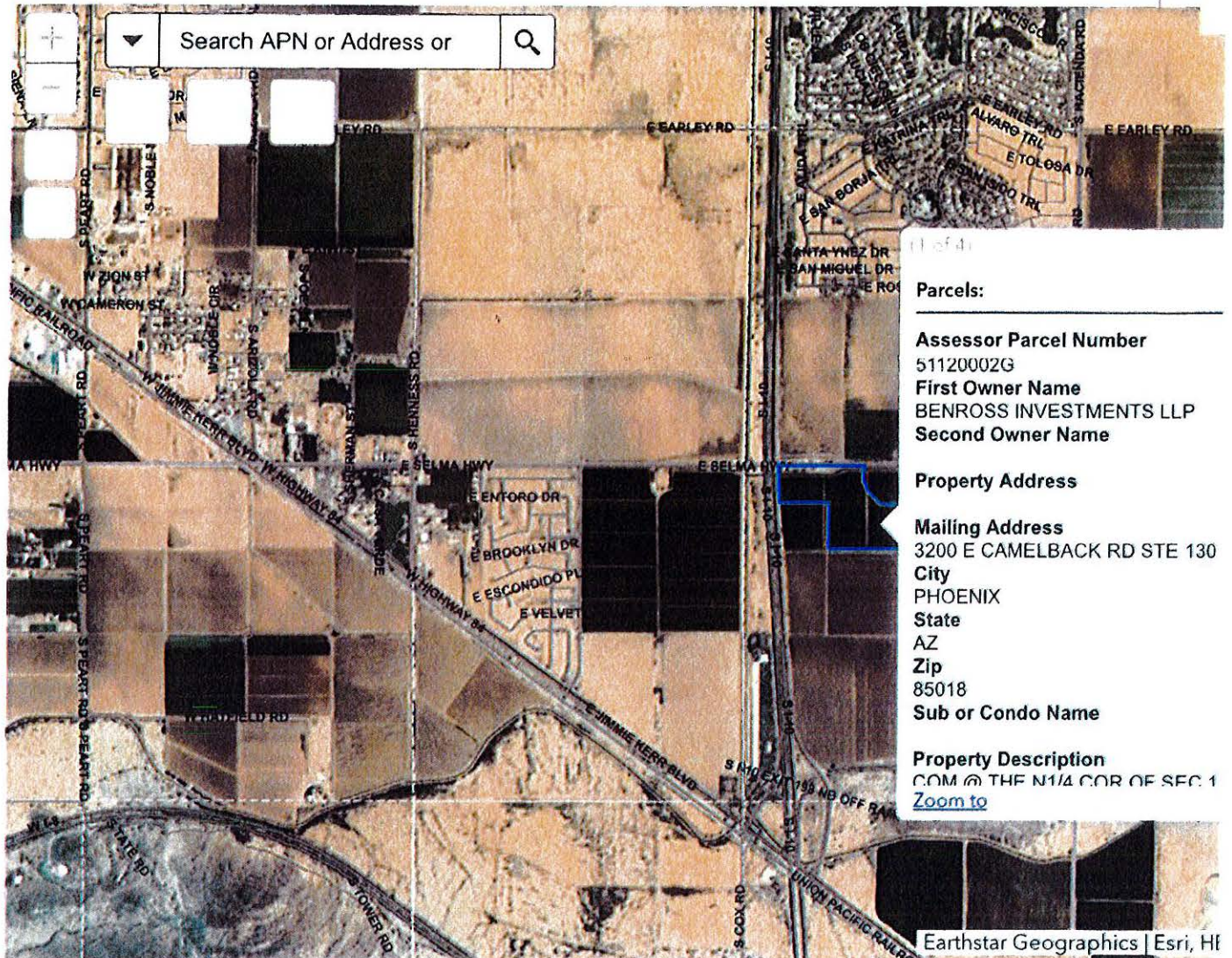
Sub or Condo Name

Property Description

[Zoom to](#)

Lowrance # TM 5

Currently owned by Greg White LLC



Laurence #37 Currently owned by Benross

0.6mi



+

Search APN or Address or

Q

1 of 4

Parcels:

Assessor Parcel Number
51120002A

First Owner Name
BENROSS INVESTMENTS LLP

Second Owner Name

Property Address

Mailing Address
3200 E CAMELBACK RD STE 130

City
PHOENIX

State
AZ

Zip
85018

Sub or Condo Name

Property Description
COM @ W/4 COR OF SEC 1-7S-6E TH N-
[Zoom to](#)

Earthstar Geographics | Esri, H

Lawrence # 36 Currently owned by
Benross

Ben 1055



PINAL COUNTY Assessor Parcel Viewer

Assessor Home Page

Search APN or Address or

Search

Parcels:

Assessor Parcel Number
51120001P

First Owner Name
BENROSS INVESTMENTS LLP

Second Owner Name

Property Address

Mailing Address
3200 E CAMELBACK RD STE 130

City
PHOENIX

State
AZ

Zip
85018

Sub or Condo Name

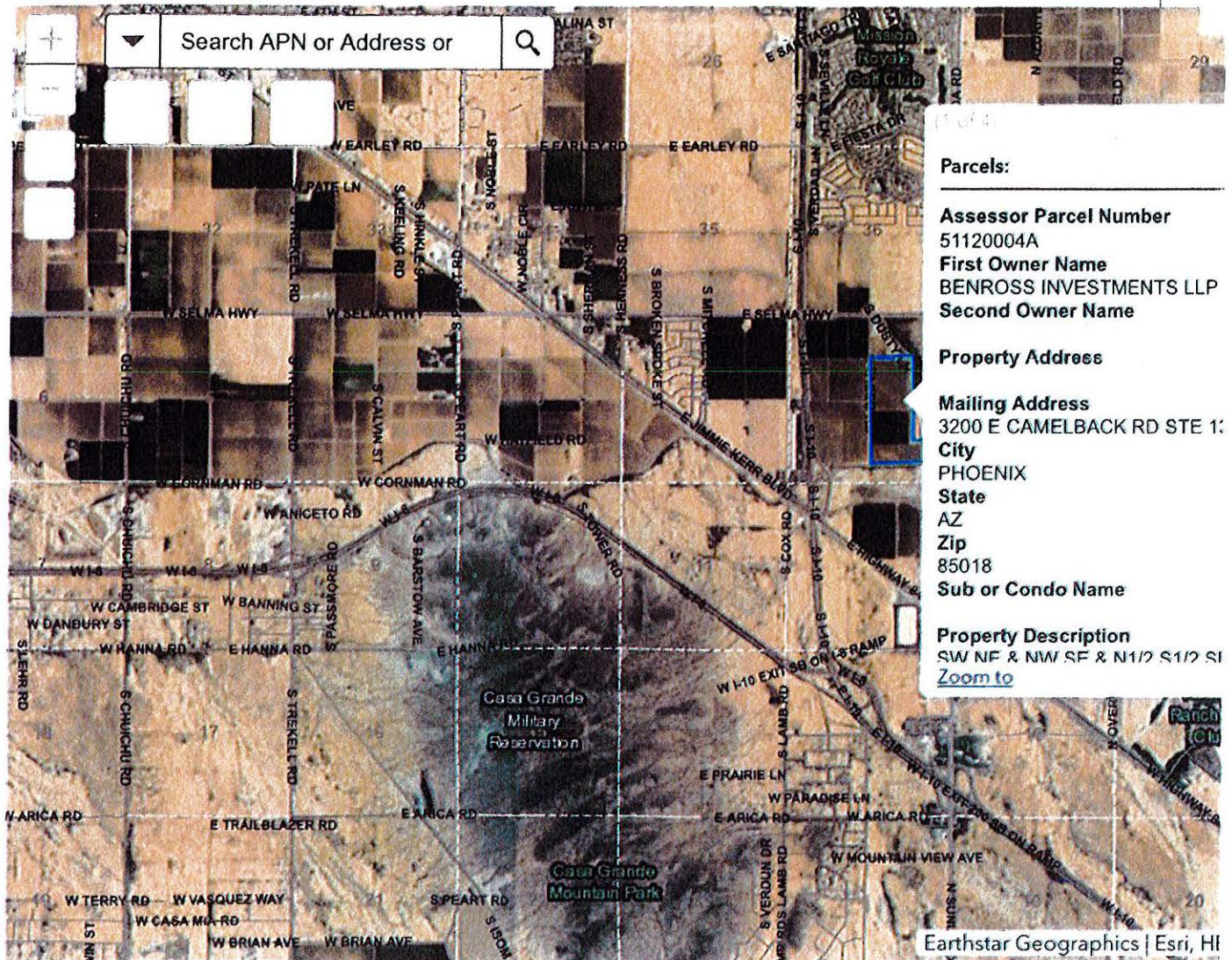
Property Description
COM @ THE N1/4 COR OF SEC 17S 6E TH

[Zoom to](#)

Earthstar Geographics | Esri, H

Lawrence fields # 38, 39, 40
Currently owned by Benross

1mi



Lawrence Field Chapman 1A, 1B, 2
Currently owned by Ben Ross



Map interface showing a grid of parcels. A search bar at the top left contains the text "Search APN or Address or" and a magnifying glass icon. A sidebar on the right displays property details for a selected parcel.

Parcels:

Assessor Parcel Number
50533004A

First Owner Name
TREKELL RANCH LLC

Second Owner Name

Property Address

Mailing Address
PO BOX 10038
City
CASA GRANDE
State
AZ
Zip
85130

Sub or Condo Name

Property Description
SF SF OF SEC 33-6S-6E EXC THAT POR
[Zoom to](#)

Latitude: 33.111111 Longitude: -111.777778

Lawrence (Mill) Field Currently owned
by Trekell Ranch LLC

0.3mi



Search APN or Address or

Parcels:

Assessor Parcel Number
505330100

First Owner Name
TREKELL RANCH LLC

Second Owner Name

Property Address

Mailing Address
PO BOX 10038

City
CASA GRANDE

State
AZ

Zip
85130


Sub or Condo Name


Property Description
SW 1/4 SEC 33-6S-6E 40 AC
[Zoom to](#)

Earthstar Geographics | Esri, HI

Lawrence Field #5 currently owned
by Trekell Ranch LLC



Search APN or Address or 



(1 of 3)

Parcels:

Assessor Parcel Number
505330190

First Owner Name
TREKELL RANCH LLC

Second Owner Name

Property Address

Mailing Address
PO BOX 10038

City
CASA GRANDE

State
AZ

Zip
85130

Sub or Condo Name

Property Description
NW SW 40AC

[Zoom to](#)

Earthstar Geographics | Esri, HI

Lawrence "L" Field currently owned
by Trekell Ranch LLC

0.3mi