Board Meeting
April 16-17,2002

Agenda Item
Attachment 4

Sludge Diversion Claim

To request diversion credit for the material type sludge when calculating your diversion rate, a jurisdiction must provide documentation to substantiate that the sludge diversion meets certain statutory conditions. Below is a list of questions that will assist in addressing the statutory conditions. Please complete, sign, attach appropriate documentation, and return this form to your Office of Local Assistance (OLA) representative at the address below. Please note that upon review of your request, OLA staff may ask for additional information if the information provided in the form is not clear. OLA staff will review your request as part of the Annual Report/Biennial Review process; therefore, it is recommended that this form be included as part of your Annual Report to the California Integrated Waste Management Board (Board.)

If you have any questions about this form, please call your OLA representative at (916) 341- 6199.

Mail completed documents to:

California Integrated Waste Management Board
Office of Local Assistance
1001 I Street, 9th Floor
P.O. Box 4025
Sacramento, CA 95812-4025

General Instructions:

Please complete both Section I and Section II, and Section III if applicable.

Section I: Jurisdiction Information and Certification

I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:

Jurisdiction Name **City of Adelanto**	County **San Bernardino**
Authorized Signature	Title **Special Projects Director**

Type/Print Name of Person Signing **Dave Crandell**	Date **December 31, 2001**	Phone **(760) 246-2300 ext. 3034**
Person Completing This Form (please print or type) **Dave Crandell**	Title **Special Projects Director**	Phone **(760) 246-2300 ext. 3034**

Mailing Address **P.O. Box 10**	City **Adelanto**	State **CA**	ZIP Code **92301**

E-mail Address: **dmcadelanto@aol.com**

Board Meeting
April 16-17, 2002

Sludge Diversion Claim

Agenda Item
Attachment 4

To request diversion credit for the material type sludge when calculating your diversion rate, a jurisdiction must provide documentation to substantiate that the sludge diversion meets certain statutory conditions. Below is a list of questions that will assist in addressing the statutory conditions. Please complete, sign, attach appropriate documentation, and return this form to your Office of Local Assistance (OLA) representative at the address below. Please note that upon review of your request, OLA staff may ask for additional information if the information provided in the form is not clear. OLA staff will review your request as part of the Annual Report/Biennial Review process; therefore, it is recommended that this form be included as part of your Annual Report to the California Integrated Waste Management Board (Board.)

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Authorized Signature	Title **Special Projects Director**

Type/Print Name of Person Signing **Dave Crandell**	Date **December 31, 2001**	Phone **(760) 246-2300 ext. 3034**
Person Completing This Form (please print or type) **Dave Crandell**	Title **Special Projects Director**	Phone **(760) 246-2300 ext. 3034**

Mailing Address **P.O. Box 10**	City **Adelanto**	State **CA**	ZIP Code **92301**

E-mail Address: **dmcadelanto@aol.com**

1. Was the material type sludge "normally disposed" of as of January 1, 1990 [14 CCR section 18720 (44)]?
   XX Yes. If yes, please attach documentation* and proceed to question 2 (*e.g. copy of table in SWGS showing sludge tons disposed in 1990).
   ☐ No. If no, **stop**. You may not claim sludge diversion credit [PRC Section 41781 (a)(2)(B)].

* Prior to 1990, the City of Adelanto and other jurisdictions joined together and disposed of sewer and septic waste materials at the Victor Valley Wastewater Reclamation Authority (VVWRA). In 1990 this facility treated a total of 2,341.25 million gallons, with a capacity of 9.5 million gallons per day (mgd). Wastewater processed was from Adelanto, Apple Valley, Hesperia, Victorville and unincorporated areas.

In September 1998 a new facility in the City of Adelanto, the Adelanto Wastewater Treatment Facility, began processing the City's sewage and septic materials. This is a new program was implemented that had not been included under the old SRRE. Starting in September 1998 the City, after treatment at the plant, diverted a majority of the bio-solids to the Synagro Composting facility in Corona. The materials that are not diverted to the Synagro facility are disposed of at the Victorville Landfill on a regular basis.

2. Is the facility generating sludge (waste water treatment plant, etc.) located within the boundaries of your jurisdiction?
   XX Yes. If yes, please provide address and go to Question 3.
   ☐ No. If no, **stop**. You may not claim sludge diversion credit.
   Address of facility generating sludge:

   Adelanto Wastewater Treatment Plant
   City of Adelanto Public Utility Authority
   1160 Air Base Road
   Adelanto, CA 92301

3. Is this tonnage claimed for diversion credit representative of the "typical" annual amount of sludge generated by the jurisdiction?
   XX Yes. If Yes, attach documentation and proceed to Section 3. Documentation could include a letter from the wastewater treatment facility verifying this is annual tonnage.
   ☐ No. If No, you may not be able to claim the entire tonnage, please call your Office of Local Assistance representative.

To claim sludge diversion credit, a jurisdiction must document that the activity used to divert sludge meets certain statutory criteria. A jurisdiction may use the model Sludge Diversion Facility Questionnaire provided by OLA staff to obtain this information from the facility, and then attach the completed questionnaire to its request.

1. Sludge tonnage diverted in **1999** from the City/County **1,569.50** tons

Per call to Synagro — their records show 1310.0 tons.

2. What is the name and address/location of the facility where the sludge is being diverted?

RSB

Synagro Technologies Inc.
104 Dawson Canyon Road
Corona, CA 92883

3. Please describe the selected activity used to divert sludge; be as specific as possible (e.g. land spreading, alternative daily cover or other beneficial use at solid waste disposal facility, etc.). Information should describe the method used to divert sludge; application rates; frequency of application, etc.

   Raw sludge is stabilized to Class B by means of Anaerobic Digestion. Digested sludge is dewatered by belt fiber presses then trucked to the Synagro Compost Facility in Corona in the County of Riverside. Sludge is then composted at the above address. Sludge is trucked to the site almost every day.

   At Synagro, Adelanto bio-solids are mixed with horse stable bedding and recycled compost "overs" in a 1:1:1 ratio, composted and turned according to USEPA 40CFR503 to meet PFRP and cured for up to six months before screening and marketing.

4. Please describe the monitoring program(s) that are in place to insure that the sludge diversion activity will not pose a threat to public health or the environment. Include inspection frequency, names of federal, state, or local agency(s) monitoring, inspecting, or regulating activity, the frequency of analysis of the sludge to verify it is not hazardous, and any systems in place to protect the public health or the environment. Please attach any supporting documentation concerning the analysis of the material.

   The City analyzes bio-solids quarterly for CCR Title 22 metals (TTLC) and Individual Metals (STLC). Daily bio-solids production and disposal quantities are recorded and reported to the California Regional Water Quality Control Board, Lahontan Region-Victorville Branch monthly.

   The City, under a service contract, sends most of its bio-solids to a privately owned and operated composting facility in Riverside County. Operated by Synagro Composting Company Inc., the facility converts bio-solids and building material into Class A composted bio-solids that is marketed throughout Southern California. The remainder of the City's bio-solids are transported by Burrtec Waste Industries, Inc. to the Victorville Landfill, located in Victorville, which is operated by the County of San Bernardino Solid Waste Management Division. In the year 2000, the City disposed of 533.51 tons of bio-solids at the Victorville Landfill. The City, per requirements of California Regional Water Quality Control Board, Lahontan Region-Victorville Branch, manages its sludge in accordance with the requirements of CFR Parts 257, 2458, 501 and 503, including all monitoring, record keeping and reporting requirements. Since the State of California, and thereby the State and Regional Water Quality Control Boards, have not been delegated the authority by the USEPA to implement the sludge program, enforcement of the CFR Part 503 sludge requirements are under the jurisdiction of the USEPA.

   Monitoring frequency of sludge quality depends on the generators NPDES permit and WDR from the relevant Water Board. For Adelanto, at least once annually bio-solids are analyzed for priority pollutants and standard operating procedure at the Synagro Regional Composting Facility is to test monthly incoming bio-solids for trace metals regulated under 40CFR503. Monthly, a composite sample is collected from compost being sold to landscape contractors. This sample is analyzed for 40CFR503 metals, nitrogen species, and total and fecal coliform.

Synagro Composting Facility is regulated by Waste Discharge Requirements 2000-80 issued by the Santa Ana Regional Water Quality Control Board, a Solid Waste Facilities Permit (SWFP 33-AA-0225) issued by the Local Enforcement Agency and concurred on by the California Integrated Waste Management Board and a Conditional Use Permit (2999) issued by the County of Riverside.

5. Has the sludge diversion activity received a permit or been identified under an existing permit, waste discharge requirements (WDR), or have other conditions been imposed by one or more of the following agencies specified in PRC Section 41781.1?
   - (i) The State Water Board and the regional water boards.
   - (ii) The State Department of Health Services.
   - (iii) The State Air Resources Board and air pollution control districts and air quality management districts.
   - (iv) The Department of Toxic Substances Control.

   XX Yes. If Yes, go to number 6.
   ☐ No. If No, go to number 7.

6. Include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions. If the facility is a permitted solid waste disposal facility, include the Local Enforcement Agency name and facility's SWIS number.

<u>Victorville Landfill</u> (owned and operated by the County of San Bernardino Solid Waste Management Division) – regulated by Waste Discharge Requirements 89-09 and 93-86 issued by the California Regional Water Quality Control Board, Lahontan Region-Victorville Branch, a Solid Waste Facilities Permit (SWIP 36-AA-0045) issued by the Local Enforcement Agency and concurred on by the California Integrated Waste Management Board.

<u>Synagro Composting Facility, Temescal Canyon</u> (owned and operated by Synagro Composting Company Inc.) – regulated by Waste Discharge Requirements 2000-80 issued by the Santa Ana Regional Water Quality Control Board, a Solid Waste Facilities Permit (SWFP 33-AA-0225) issued by the Local Enforcement Agency and concurred on by the California Integrated Waste Management Board and a Conditional Use Permit (2999) issued by the County of Riverside.

7. Attach written certification from the agent(s) responsible for implementing the sludge diversion activity that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.

City of Adelanto

"Progress through unity"

TRISTAN PELAYES
Mayor

RICHARD A. ALTF
Mayor Pro Tem

JIM NEHMENS
WILLIAM "TED" HART
JERRY STEFFANUS
Council Members

RICHARD C. OAKLEY
City Manager

December 28, 2001

Synagro Technologies, Inc.
P.O. Box 7027
Corona, CA 92878-7027

Dear Facility/Operations Manager:

This letter is a request for information on your facility's processing/diversion of sludge material received from the City of Adelanto. California Integrated Waste Management Board (CIWMB) statutes and subsequent regulations require that jurisdictions requesting AB 939 diversion credit for sludge must provide specific information and certification to the CIWMB concerning the re-use or diversion of this material type. The information required is as follows:

1) Description of the selected diversion alternative(s);
2) Description of monitoring program(s) that are in place or which will be established to insure that the sludge diversion will not pose a threat to public health or the environment;
3) Written certification from the agent(s) responsible for implementing the sludge diversion program that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request;
4) If the sludge diversion activity receives a permit or is identified under an existing permit, waste discharge requirements, or has other conditions imposed by one or more of the agencies specified in question 4 of the attachment, include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions.

The questions on the reverse side of this letter address the information required by the CIWMB. Attached is a copy of the relevant statutes and regulations that define requirements for claiming diversion credit for sludge. Please complete the questionnaire, attach any documentation, sign the certification, and return them to:

Dave Crandell
City of Adelanto
P.O. Box 10
Adelanto, CA 92301

Thank you in advance for your prompt assistance in this request.

Respectfully,

Dave Crandell
Special Projects Director

Board Meeting
April 16-17, 2002

AGenda Item
Attachment 4

Sludge Diversion Facility Questionnaire

Name of facility diverting sludge:

Also referenced as "Recyc"

Synagro Technologies, Inc.

Facility's geographic address (include jurisdiction, e.g., within City or County unincorporated limits):

Synagro Technologies, Inc.
104 Dawson Canyon Road
Corona, CA 92883
Riverside County

Location/address of verifiable records that answers are based upon:

Synagro Technologies, Inc.
104 Dawson Canyon Road
Corona, CA 92883
Riverside County

Facility or Operations manager contact name/phone number:

Dr. Mark Grey @ 909/277-2662 ext. 23

1. Tonnage of sludge received by the facility in **2000** from the City/County **3,078.16** tons.

2. Please describe the selected activity used to divert sludge, be as specific as possible (e.g., land spreading, alternative daily cover or other beneficial use at solid waste disposal facility, etc.). Information should describe the method used to divert sludge (e.g., application rates, amount of application, frequency, etc.).

   Diversion Alternative: Composting. Product is sold to landscape contractors in Southern California. Compost meets USEPA 40CFR503 regulations for a Class A, exceptional quality bio-solids product.

3. Please describe monitoring program(s) that are in place to insure that the sludge diversion activity will not pose a threat to public health or the environment.

   Monitoring Programs: Monitoring and reporting programs are conducted according to CRWQCBWDR 00-80 and Riverside County CUP No. 2999.

   Include inspection frequency, names of federal, state, or local agency(s) monitoring, inspecting, or regulating activity, the frequency of analysis of the sludge to verify it is not hazardous, and any systems in place to protect the public health or the environment. Please attach any documentation confirming the analysis of the sludge material.

   Monitoring frequency of sludge quality depends on the generators NPDES permit and WD from the relevant Water Board. For Adelanto, at least once annually bio-solids are analyzed for priority pollutants and standard operating procedure at the Synagro Regional Composting Facility to test monthly incoming bio-solids for trace metals regulated under 40CFR503. Monthly, a composite sample is collected from compost being sold to landscape contractors. This sample is analyzed for 40CFR503 metals, nitrogen species, and total and fecal coliform.

Sludge Diversion Facility Questionnaire

4. Has the sludge diversion activity received a permit or been identified under an existing permit, waste discharge requirements (WDR), or have other conditions been imposed by one or more of the following agencies specified in PRC Section 41781.1?
   (i) The State Water Board and the regional water boards.
   (ii) The State Department of Health Services.
   (iii) The State Air Resources Board and air pollution control districts and air quality management districts.
   (iv) The Department of Toxic Substances Control.

   XX Yes If Yes, go to number 5.
   ☐ No If No, go to number 6.

5. Include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions. If the facility is a permitted solid waste disposal facility, include the Local Enforcement Agency name and facility's SWIS number.

Agency	Number or Agency Code of Permit, WDR, or other condition
California Regional Water Quality Board, Santa Ana Region	WDR 00-80
Riverside County	Conditional Use Permit No. 2999
State of California CIWMB	Standardized Composting Permit #33-AA-0225

Other Relevant Data: Adelanto bio-solids are mixed with horse stable bedding and recycled compost "overs" in a 1:1:1 ratio, composted and turned according to USEPA 40CFR503 to meet PFRP, and cured for up to six months before screening and marketing.

6. Attach written certification from the agent(s) responsible for implementing the sludge diversion activity that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.

Sludge Diversion Facility Questionnaire

Facility Information and Certification

I certify under penalty of perjury the sludge diversion activity or reuse meets all applicable requirements of state and federal law, that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:

Facility Name **Synagro Regional Composting Facility**		County **Riverside**	
Authorized Signature		Title **Regional Director of Technical Services**	
Type/Print Name of Person Signing **Dr. Mark Grey**	Date	Phone **(909) 277-2662**	
Person Completing This Form (please print or type) **Dr. Mark Grey**	Title **Regional Director of Technical Services**	Phone **(909) 277-2662** XT. 23	
Mailing Address **P.O. Box 7027**	City **Corona**	State **CA**	ZIP Code **92878-7027**
E-mail Address: **Mgrey@synagro.com**			

Sludge Diversion Facility Questionnaire

(1) A request for allowing sludge diversion shall include the following information:

(A) Description of the selected diversion alternative(s);

(B) Projected annual quantity of sludge waste to be diverted through the year 2000;

(C) Documentation that waste type "sludge" has been categorized, quantified and documented in the applicable "solid waste generation study" as defined in section 18722 of this chapter;

(D) Written certification from the agent(s) responsible for implementing the sludge diversion alternative that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.

(E) Description of monitoring program(s) that are in place or which will be established to insure that the sludge diversion alternative will not pose a threat to public health or the environment.

(F) If the sludge diversion alternative receives a permit or is identified under an existing permit, waste discharge requirements, or has other conditions imposed by one or more of the agencies specified in PRC Section 41781.1, include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions.

Note:

Authority cited:
Section 40502, Public Resources Code.

References:
Section 41780 and 41781.1, Public Resources Code.

18720. Definitions.
(a) (69) Sludge.
"Sludge" means residual solids and semi-solids resulting from the treatment of water, waste water, and/or other liquids. Sludge includes sewage sludge and sludge derived from industrial processes, but does not include effluent discharged from such treatment processes.

Sludge Diversion Facility Questionnaire

Public Resources Code Sections

41781.1.

(a) Prior to determining that the diversion of sludge may be counted toward the diversion requirements established under Section 41780, but within 180 days of receiving such a request, the board shall do both of the following:

(1) Make a finding at a public hearing, based upon substantial evidence, that the sludge has been adequately analyzed and will not pose a threat to public health or the environment for the reuse which is proposed.

(A) Except as provided in subparagraph (B), prior to making the finding required to be made pursuant to this paragraph, the board shall consult with each of the following agencies, and obtain their concurrence in the finding, to the extent of each agency's jurisdiction over the sludge or its intended reuse:

i. The state water board and the regional water boards.

ii. The State Department of Health Services.

iii. The State Air Resources Board and air pollution control districts and air quality management districts.

iv. The Department of Toxic Substances Control.

(B) If, prior to the board making the finding required to be made pursuant to this paragraph, an agency specified in subparagraph (A) issues a permit, waste discharge requirements, or imposes other conditions for the reuse of sludge, the agency shall have been deemed to have concurred in that finding.

(2) Establish, or ensure that one or more of the agencies specified in subparagraph (A) of paragraph (1) establishes, ongoing monitoring requirements which ensure that the proposed sludge reuse does not pose a threat to health and safety or the environment.

(b) It is not the intent of this section to require the board, or the agencies listed in subparagraph (A) of paragraph (1) of subdivision (a), to impose additional requirements or approval procedures for sludge or sludge reuse applications, apart from the requirements and approval procedures already imposed by state and federal law. It is the intent of this section to require that the board determine that each sludge diversion, for which diversion credit is sought, meets all applicable requirements of state and federal law, and thereby provides for maximum protection of the public health and safety and the environment.

Title 14, California Code of Regulations (CCR) Sections

18775.2. Sludge Diversion.

(a) Jurisdictions that wish to claim diversion of waste type "sludge" shall submit a written request to the Board pursuant to PRC 41781.1. Within 45 days of receipt of a jurisdiction's request, Board shall notify the jurisdiction in writing whether sufficient information has been included in the request to enable the Board to make findings pursuant to PRC Section 41781.1. Requests that are found by the Board to be incomplete, pursuant to the criterion set forth in this section, shall be revised by the jurisdiction to correct any inadequacy. The Board shall make the findings required by PRC Section 41781.1 at a public hearing no later than 180 days after receipt of a complete request for sludge diversion credit.

From: Grey, Mark [MGrey@SYNAGRO.com]
Sent: Thursday, January 03, 2002 11:49 AM
To: Brown, Rebecca
Subject: Adelanto biosolids tonnage 1999

Ms. Brown,

Here are the Adelanto numbers for 1999, in wet tons: 1310.19. My records (I was not working for Synagro at that time) show we accepted biosolids from March to December, with no loads delivered in Jan or Feb. 1999.

Also, I did not want to leave the impression with you that I wouldn't certify what we have done for our customers. If you want me to sign the form, then no problem. As I told our customers, I did not feel it was my place to fill out their diversion credit forms, only to provide them with all the necessary tonnage data and site processing and permit data necessary so they could include biosolids as a diversion component. I fully, wholeheartedly, passionately, support recycling of organics and can't believe for a second why we allow biosolids to go into landfills in California when proven, environmentally safe alternatives exist.

So I will help you in any way possible. All the best,

Mark

Mark A. Grey, Ph.D.
Regional Director of Technical Services
Synagro West, Inc.
909.277.2662, x. 23 (office)
909.322.0390 (mobile)
909.277.2960 (fax)

Solid Waste Information System (SWIS)

Facility/Site Summary Details

New Search

Search for site 33-AA-0225

Top of Page

SWIS Number: 33-AA-0225 County: Riverside

Identification:

Synagro Regional Composting Facility
22500 Temescal Canyon Road ?

Place: Corona
Latitude: 33.79329
Longitude: -117.48128

Enforcement Agency:

County of Riverside
County Health Services Agency
Department of Environmental Health
4080 Lemon St 9th Fl
PO Box 1280
Riverside, CA 92502-1280

Phone: (909) 955-8982
Fax: (909) 781-9653

Operator/Business Owner:

Recyc, Incorporated
114 Business Center Drive
Corona, CA 91720

Phone: (909) 371-3929
Fax: (909) 737-0956

Land Owner(s):

Recyc, Incorporated
114 Business Center Drive
Corona CA 91720

Phone: (909) 371-3929
Fax: (909) 737-0956

Surrounding Land Use: Industrial

Unit Specifications:

Permit Issue Date: **August 13, 1997**

Activity: 01 Composting Facility (Sludge)

Classification:	Solid Waste Facility	**Inspection Frequency:**	Monthly
Category:	Composting	**Permitted Throughput:**	500.00 Tons/day
Regulatory Status:	Permitted	**Remaining Capacity:**	Cubic Yards
Operational Status:	Active	**Remaining Capacity Date:**	
Operational Type:	.	**Permitted Capacity:**	102,488 Cubic Yards
Closure Date:		**Total Acreage:**	81 Acres
Closure Type:		**Disposal Acreage:**	
Waste Types:	Sludge (BioSolids)	**WDR Landfill Class:**	

Solid Waste Information System http://www.ciwmb.ca.gov/SWIS/
Skip Amerine: samerine@ciwmb.ca.gov (916) 341-6322
Donnaye Palmer: donnayep@ciwmb.ca.gov (916) 341-6321
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