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## Central Valley Regional Water Quality Control Board

15 November 2021

**CERTIFIED MAIL**  
**7018 1830 0001 2774 7763**

Jerry Havens, Operator  
Synagro West, LLC  
13757 Harmon Road  
Dos Palos, CA 93620

**CERTIFIED MAIL**  
**7018 1830 0001 2774 7756**

Joe Mullinax, Owner  
Mullinax Ranch  
1460 Venture Lane  
Turlock, CA 95380

**NOTICE OF APPLICABILITY (NOA); STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2004-0012-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR THE DISCHARGE OF BIOSOLIDS TO LAND FOR USE AS A SOIL AMENDMENT IN AGRICULTURAL, SILVICULTURAL, HORTICULTURAL, AND LAND RECLAMATION ACTIVITIES; SYNAGRO WEST, LLC AND JOE MULLINAX; SYNAGRO-MULLINAX RANCH (20 HILLS RANCH) BIOSOLIDS LAND APPLICATION AREA; MERCED COUNTY**

On 16 August 2021, Synagro West, LLC (or Synagro) submitted a Notice of Intent (NOI) and application fee for coverage under the State Water Resources Control Board's Water Quality Order 2004-0012-DWQ, *General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities* (General Order). The NOI was signed by Michael Kotelec with Synagro and Joe Mullinax owner of the Mullinax Ranch (or 20 Hills Ranch).

According to the NOI, Synagro plans to apply biosolids from various municipal generators throughout California, to approximately 1,094 acres (687 net acres) of agricultural farmland and grass land owned by Joe Mullinax in Merced County. Both Synagro and Joe Mullinax are collectively and jointly referred to as "Discharger" for the purpose of this Notice of Applicability (NOA). Supplemental information to support the application was provided on 29 September and 29 October 2021.

Central Valley Water Board staff's review of the August 2021 NOI is discussed in more detailed in the attached staff memorandum. Based on the information provided in the NOI and supplemental information, this project meets the conditions for enrollment under the

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KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

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enclosed General Order. All the requirements contained within the General Order described as applicable to Sewage Sludge – Class “B” biosolids apply to your application. The discharge is hereby covered under **enrollee number 2004-0012-DWQ-0032** Please include this number on all correspondence related to this discharge.

## **PROJECT LOCATION**

The proposed project includes applying between four to seven dry tons of biosolids per year on approximately 1,094 acres of agricultural land owned by Joe Mullinax in northeastern Merced County. Site 1 (ME-39a) is approximately five miles northwest of Snelling near Olson and Los Cerritos Roads (37° 34' 47.6" N, 120° 29' 37.6" W), and Site 2 (ME-39b) is approximately 1.5 miles west of Ballico near West Harding Road and Cortez Avenue (37° 27' 23.3" N, 120° 43' 47.1" W) as shown in **Attachment A**. Detailed maps showing applicable buffer zones for Site 1 and Site 2 are provided in **Attachments B and C**.

This portion of Merced County is within the Sacramento and San Joaquin River Basins. The operative *Water Quality Control Plan for the Sacramento and San Joaquin River Basins* (hereafter Basin Plan), designates beneficial uses, establishes narratives and numerical water quality objectives, and contains implementation programs and policies to achieve water quality objectives for all waters within the basins.

## **MONITORING AND REPORTING PROGRAM**

The General Order includes Monitoring and Reporting Program (MRP) 2004-0012-DWQ. MRP 2004-0012-DWQ requires the submittal of an annual monitoring report by **15<sup>th</sup> February** of each year identifying quantity of biosolids applied to the various fields and cumulative pollutant loading calculations.

## **SPECIFIC REQUIREMENTS**

1. Application of biosolids at a location or in a manner different from that described in the NOI and this NOA is prohibited.
2. The application shall not cause or threaten to cause pollution as defined by California Water Code section 13050.
3. There shall be no discharge of biosolids from the storage or application areas to adjacent land areas not regulated by this General Order, to surface water, or to surface water drainage courses.
4. There shall be no application of biosolids on ground with greater than 15 percent slopes.
5. The staging and application of biosolids shall comply with all applicable setbacks contained in the General Order as specified in Discharge Specification B.11.

6. Biosolids with less than 75% moisture shall not be applied during periods when the surface wind speed exceeds 25 miles per hour as determined by the nearest calibrated regional weather station (e.g., airport, CIMIS).
7. The application of Class "B" biosolids containing a moisture content of less than 50% is prohibited.
8. Grazing of domesticated animals or harvesting of crops on fields receiving biosolids shall not occur until the necessary waiting periods, as specified in the General Order, have elapsed.
9. The application of biosolids to water-saturated or frozen ground or during periods of precipitation that includes runoff from the permitted site is prohibited.
10. Application of biosolids at rates in excess of the nitrogen requirements of the crops or at rates that would degrade groundwater quality is prohibited.
11. In accordance with the General Order's Monitoring and Reporting Program, the Discharger shall submit the required annual monitoring report by **15<sup>th</sup> of February of each year.**
12. The Discharger shall submit the required annual fee (as specified in the annual billing statement issued by the State Water Resources Control Board) until this NOA is officially terminated.
13. Failure to abide by the conditions of General Order 2004-0012-DWQ, including its monitoring and reporting requirements, and this NOA could result in enforcement actions, as authorized by provisions of the California Water Code.
14. The Discharger shall continue to comply with the Salt and Nitrate Control Programs (discussed in more detail below).

### **SALT AND NITRATE CONTROL PROGRAMS**

As part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments (Resolution R5-2018-0034) incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting. The Basin Plan amendments were approved by the State Water Resources Control Board and the Office of Administrative Law and became effective on 17 January 2020.

For the Salt Control Program, dischargers that are unable to comply with stringent salinity requirements will need to meet performance-based requirements and participate in a basin-wide planning effort (Prioritization and Optimization Study or P&O Study) to develop a long-term salinity strategy for the Central Valley. On 29 September 2021,

Synagro (CV-SALTS ID: 3599) submitted its Notice of Intent and paid the fee to join the P&O Study.

For the Nitrate Control Program, the Synagro-Mullinax Biosolids Ranch falls within Groundwater Sub-Basin 5-22.03 (San Joaquin Valley – Turlock Basin), a Priority 1 basin. Dischargers that are unable to comply with stringent nitrate requirements will be required to take on alternative approaches that include providing replacement drinking water to persons whose drinking water is affected by nitrates. Dischargers may comply with the Nitrate Control Program either individually (Pathway A) or collectively as part of a Management Zone Group (Pathway B). On 29 September 2021, Synagro submitted its Notice of Intent to select Pathway B and join the Turlock Management Zone Group.

### **DOCUMENT SUBMITTALS**

All monitoring reports and other correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to [centralvalleyfresno@waterboards.ca.gov](mailto:centralvalleyfresno@waterboards.ca.gov). Documents that are 50MB or larger should be transferred to a disk and mailed to the Central Valley Water Board office at 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

**Program:** Non-15,

**Place ID:** 876455

**Place Name:** Synagro-Mullinax Ranch (20 Hills Ranch) Biosolids

**Order:** 2004-0012-DWQ-0032

All documents, including responses to inspections and written notifications, submitted to comply with this General Order shall be directed, via the paperless office system, to the Compliance and Enforcement Unit, attention to Russell Walls. Mr. Walls can be reached at (559) 488-4392 or [russell.walls@waterboards.ca.gov](mailto:russell.walls@waterboards.ca.gov). Questions regarding the permitting aspects of the General Order and notification for termination of coverage under the General Order, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention to Katie Carpenter.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this NOA falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board by 5:00 p.m. on the next business day. [Copies of the law and regulations applicable to filing petitions](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) may be found on the internet ([http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality)) or will be provided upon request.

Coverage for your Facility under the General Order shall become effective subject to this Notice of Applicability immediately.

If you have any questions regarding this matter, please contact Katie Carpenter by phone at (559) 445-5551 or by email at [Katie.Carpenter@waterboards.ca.gov](mailto:Katie.Carpenter@waterboards.ca.gov).

*Original Signed by Clay L. Rodgers for:*  
Patrick Pulupa  
Executive Officer

Attachments:

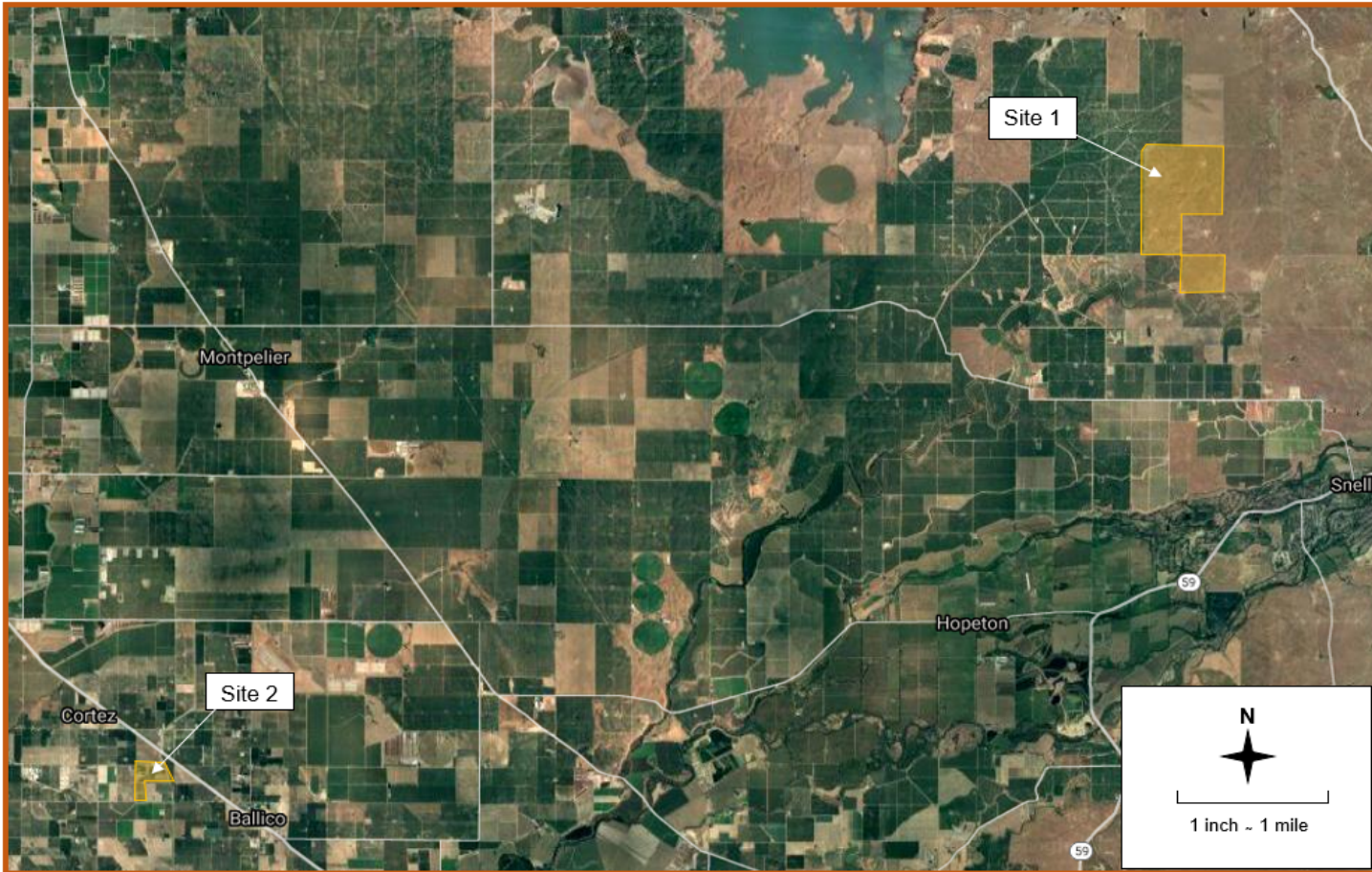
- Attachment A – Site Location Map
- Attachment B – Site 1 Biosolids Application Area (ME-39a)
- Attachment C – Site 2 Biosolids Application Area (ME-39b)

Enclosures:

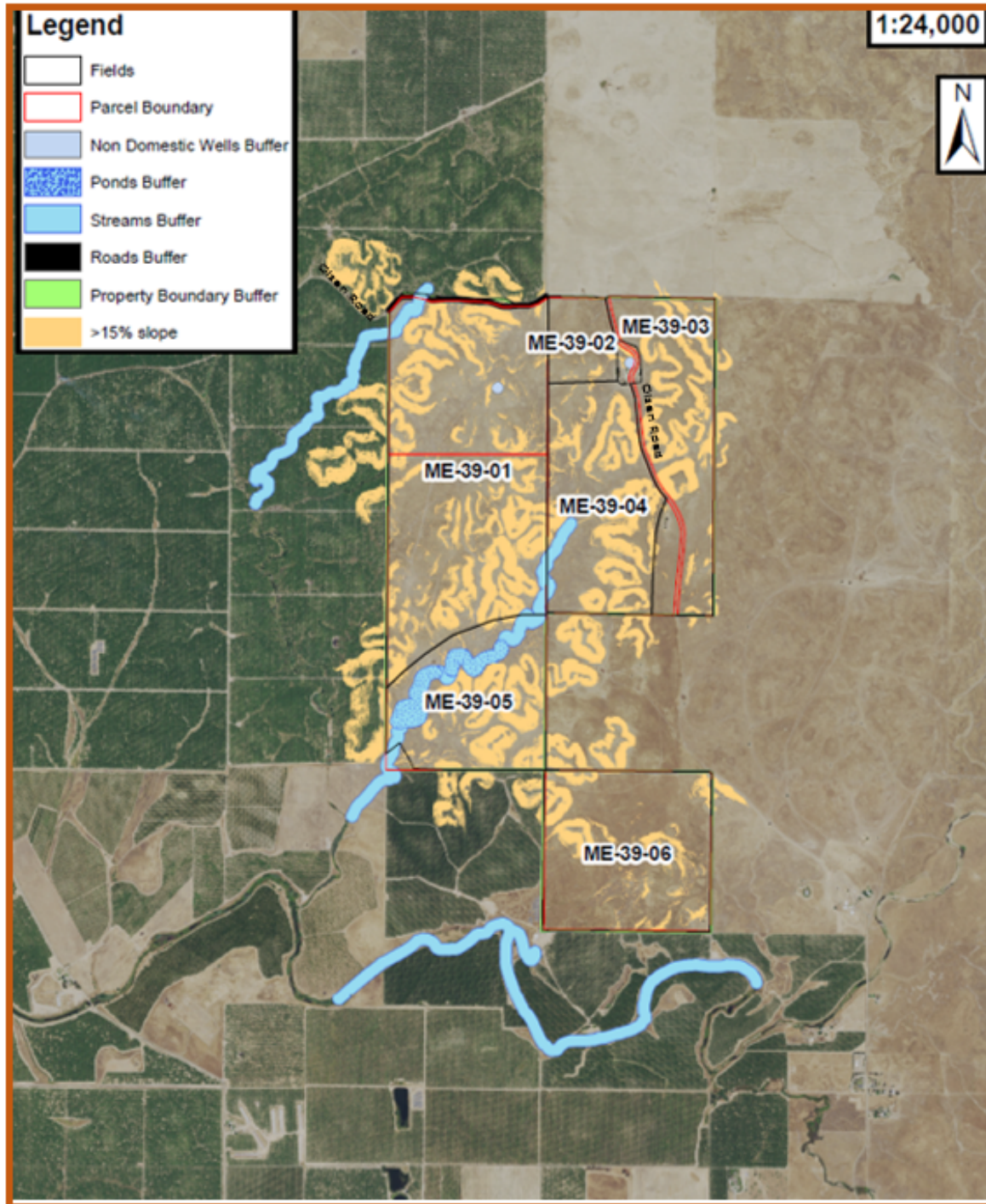
- 15 November 2021 Central Valley Water Board Staff Memorandum
- State Water Resources Control Board Order WQ 2014-0153-DWQ

cc:

- David Lancaster, State Water Resources Control Board, OCC, Sacramento (via email)
- Laurel Warddrip, State Water Resources Control Board, DWQ, Sacramento (via email)
- Laleh Rastegarzadeh, State Water Resources Control Board, DWQ, Sacramento (via email)
- Russell Walls, Central Valley Water Board, Fresno Office (via email)
- Adam Forbes, Division of Drinking Water, Fresno (via email)
- Jose Valencia, Synagro West LLC, Rancho Cordova (via email)
- Esther Canal, Merced County Environmental Health, Merced (via email)
- Bill Reichle, Ballico (via email)

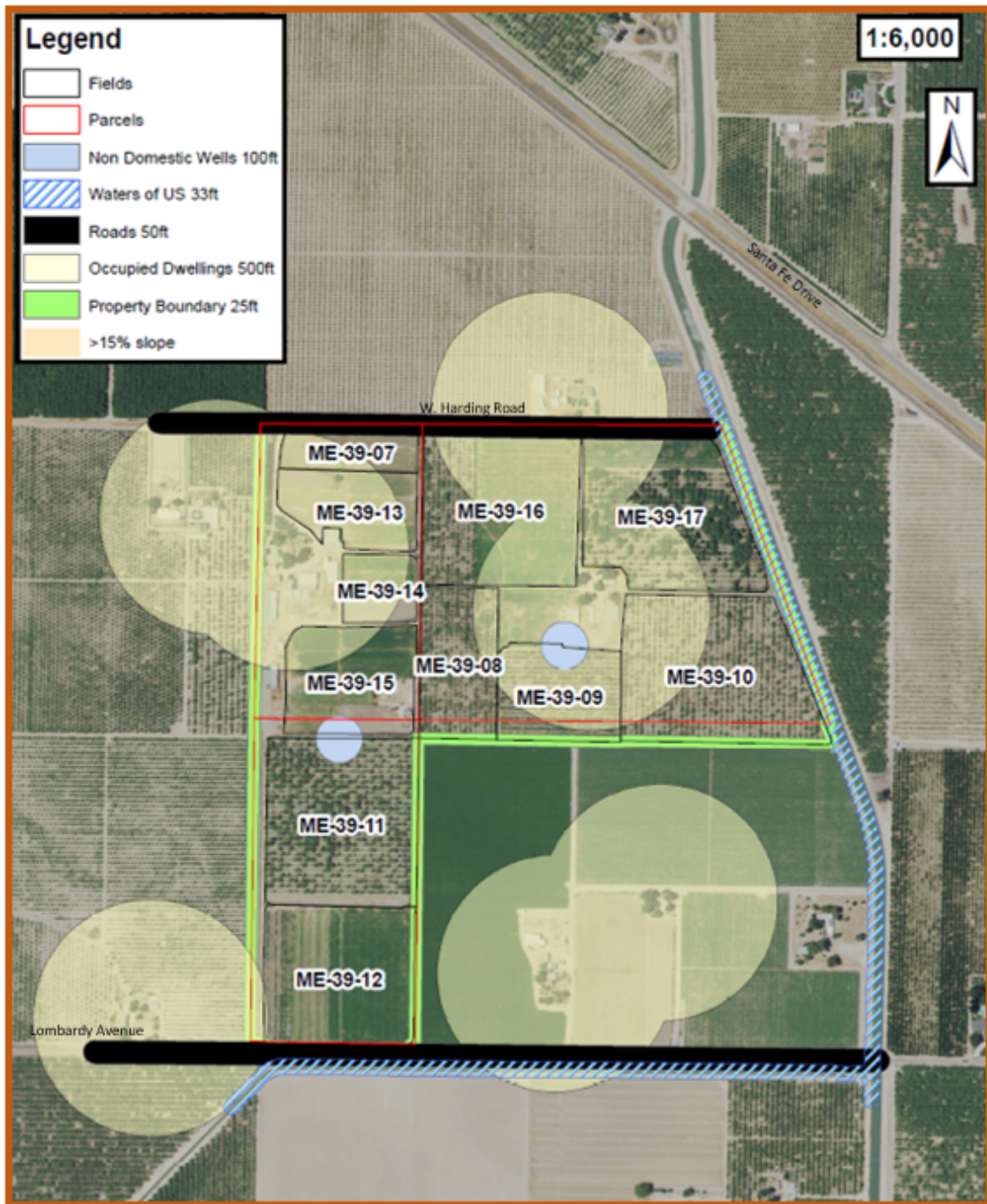


**ATTACHMENT A – SITE LOCATION MAP**  
NOTICE OF APPLICABILITY 2004-0012-DWQ-0032  
FOR  
SYNAGRO WEST, LLC AND JOE MULLINAX  
SYNAGRO-MULLINAX RANCH BIOSOLIDS LAND APPLICATION AREA  
MERCED COUNTY



*Design Reference: Synagro West, LLC (Notice of Intent, 16 August 2021)*

**ATTACHMENT B – SITE 1 BIOSOLIDS APPLICATION AREA (ME-39a)**  
 NOTICE OF APPLICABILITY 2004-0012-DWQ-0032  
 FOR  
 SYNAGRO WEST, LLC AND JOE MULLINAX  
 SYNAGRO-MULLINAX RANCH BIOSOLIDS LAND APPLICATION AREA  
 MERCED COUNTY



*Design Reference: Synagro West, LLC (Notice of Intent, 16 August 2021)*

**ATTACHMENT C – SITE 2 BIOSOLIDS APPLICATION AREA (ME-39b)**  
 NOTICE OF APPLICABILITY 2004-0012-DWQ-0032  
 FOR  
 SYNAGRO WEST, LLC AND JOE MULLINAX  
 SYNAGRO-MULLINAX RANCH BIOSOLIDS LAND APPLICATION AREA  
 MERCED COUNTY



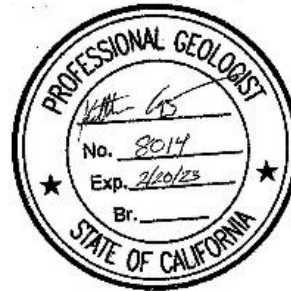
## Central Valley Regional Water Quality Control Board

**TO:** Scott J. Hatton  
Supervising Water Resource Control Engineer

**FROM:** Alexander S. Mushegan  
Senior Water Resource Control Engineer  
RCE 84208

Kathleen Carpenter  
Engineering Geologist  
PG 8014

**DATE:** 15 November 2021



**APPLICABILITY OF COVERAGE; STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2004-0012-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR THE DISCHARGE OF BIOSOLIDS TO LAND FOR USE AS A SOIL AMENDMENT IN AGRICULTURAL, SILVICULTURAL, HORTICULTURAL, AND LAND RECLAMATION ACTIVITIES; SYNAGRO WEST, LLC AND JOE MULLINAX; SYNAGRO-MULLINAX RANCH (20 HILLS RANCH) BIOSOLIDS LAND APPLICATION AREA; MERCED COUNTY**

### **BACKGROUND INFORMATION**

On 16 August 2021, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Notice of Intent (NOI) with an application fee from Synagro West LLC (Synagro) for coverage under State Water Resources Control Board's Water Quality Order 2004-0012-DWQ, *General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities* (General Order) for application of Class B biosolids at the Mullinax Ranch (or 20 Hills Ranch) owned by Mr. Joe Mullinax in Merced County. Additional information to support the NOI was provided on 29 September and 29 October 2021.

This memorandum provides a summary of Central Valley Water Board staff's review of the NOI and the applicability of the discharge to be covered under the General Order.

The submittal includes the following information:

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

- Form 200;
- Notice of Intent;
- Operator Instructions and Buffer Sheet;
- Description of Sites;
- Landowner Consent Form;
- Generator Request Form;
- Regional Soil Map, Site Maps, and Field Maps with buffer zones;
- Hauler and Generator Information;
- Erosion Control Plan;
- Biosolids Storage Plan;
- Spill Response and Adverse Weather Plans;
- Documentation of Adjacent Property Owner Notifications;
- Soil Analysis Report;
- Pre-Application Report with Land Productivity Assessment; and
- Generator Vector Attraction and Reduction Measures (NANI Forms).

### ***PROJECT DESCRIPTION***

According to the NOI, Synagro receives Class “B” biosolids from various generators within California, these can vary from year to year but typically include the following:

- Delta Diablo Sanitation District
- San Francisco Public Commission – Oceanside Plant
- San Francisco Public Utilities Commission – Southeast Plant
- Union Sanitation District
- City of Burlingame
- North San Mateo County Sanitation District (Daly City)
- City of Millbrae
- Silicon Valley Clean Water (SVCW)
- Calera Creek Water Recycling Plant
- City of Stockton
- City of Livermore
- Fresno-Clovis Regional WWTF
- East Bay Municipal Utility District

The proposed project includes the application of biosolids on approximately 1,094 acres (687 net acres) of agricultural land in northeastern Merced County as shown in **Attachment A** of the Notice of Applicability (NOA). The fields will be used for growing

pasture/forage mix including alfalfa, wheat, rye grass, oats, and peas. According to Synagro, some of the fields intended for biosolids applications will be used as pasture for sheep grazing.

The biosolids application area consists of 17 fields in two sections (Site 1 and Site 2) as shown in **Attachment B and Attachment C** of the NOA and detailed in the Tables below:

**Table 1 – Site 1 Biosolids Application Area (ME-39a)**

Field	Acreage	Adjusted Acreage (see 1 below)	APNs
ME-39-01	353.87	221.23	038-030-012, and 038-030-010
ME-39-02	35.92	33.72	038-100-006
ME-39-03	147.35	98.23	038-100-006
ME-39-04	152.25	92.61	038-100-006
ME-39-05	155.21	58.47	038-100-001
ME-39-06	174.07	139.39	038-100-011
<b>Total</b>	<b>1,018.67</b>	<b>643.65</b>	<b>--</b>

- Adjusted to remove land used for buffer zones and areas with slopes greater than 15 percent.

**Table 2 – Site 2 Biosolids Application Area (ME-39b)**

Field	Acreage	Adjusted Acreage (see 1 below)	APNs
ME-39-07	2.31	0.93	041-170-005
ME-39-08	4.85	3.92	041-170-006
ME-39-09	5.15	0.78	041-170-006
ME-39-10	10.98	6.73	041-170-006
ME-39-11	10.40	9.65	041-170-010
ME-39-12	9.00	8.04	041-170-010
ME-39-13	3.90	0.54	041-170-005
ME-39-14	2.08	0.41	041-170-005
ME-39-15	5.69	4.22	041-170-005
ME-39-16	10.34	3.11	041-170-006
ME-39-17	10.19	4.62	041-170-006
<b>Total</b>	<b>748.90</b>	<b>42.95</b>	<b>--</b>

- Adjusted to remove land used for buffer zones and areas with slopes greater than 15 percent.

Depth to groundwater in the area is greater than 100 feet below ground surface (bgs) based on available groundwater data from nearby wells and the California Department of Water Resources (DWR) SGMA Water Data Library. Therefore, groundwater monitoring is not required.

At Site 1 (ME-39a) the biosolids application area consists of grassland with rolling terrain and slopes ranging from 0 to 45 percent. According to the NOI, no biosolids will be applied on areas with slopes greater than 15 percent (per Merced County requirements). The NOI includes an Erosion Control Plan prepared by Mark Gray, a certified Soil Scientist (ARCPACS 30228) as required by the General Order for application of biosolids on land with slopes greater than 10 percent. According to the Erosion Control Plan, biosolids applications will be limited to once per year during dry weather. On fields with slopes greater than two percent, the biosolids will be applied using contour application and incorporated into the soil by parallel disking within about three hours. The area will then be planted with a cover crop consisting of a pasture/forage mix. Site 2 (ME-39b) consists of tilled farmland in relatively flat terrain, with a minimal erosion hazard. In accordance with Merced County ordinance, the biosolids application areas in erosion prone areas will be surrounded with a 33-foot buffer zone of un-mowed vegetation to contain biosolids and prevent off-site erosion.

Several soil samples collected as part of the site evaluation had a low pH and cation exchange capacity in the range that could present a severe limitation to land productivity and potential metal phytotoxicity. The Pre-Application Report included a Land Productivity Assessment prepared by Mark Gray (ARCPACS 30228), a certified soil scientist, to address this issue. According to Mr. Gray, metal concentrations in the soil and biosolids is low to moderate and does not present a significant risk at the site. The annual application of biosolids at agronomic rates will provide an annual source of organic matter and slow release of nutrients to improve land productivity and increase pH and cation exchange capacity of the sandy soils. Mr. Gray recommends that lime be added to the fields in conjunction with the biosolids to condition the soil and increase pH and the cation exchange capacity to reduce potential nutrient imbalances and metal phytotoxicity in the short-term.

The biosolids application fields are located in rural areas with limited access and bounded by private agricultural or grazing land. In addition, according to the NOI, the biosolids application areas will be fenced to prevent public access. Therefore, the biosolid application areas meet the site restrictions for Class B biosolids in section 503.32(b)(5), 40 CFR.

### ***BIOSOLIDS TREATMENT AND SAMPLING***

Synagro proposes to apply between four to seven dry tons of biosolids per acre per year on up to 687 acres of land owned by Joe Mullinax. Synagro and Joe Mullinax are collectively and jointly referred to as "Discharger".

The submitted data characterizes biosolids from various generators within California. Metal concentrations in biosolids from the various generators is summarized in Table 2 and compared to the 40 Code of Federal Regulations (CFR), Part 503 requirements for the application of biosolids to land.

**Table 3 – Biosolids Metal Concentration**

Constituent/ Parameter	Units	Range	Ceiling Concentration Limits	Pollutant Concentration Limits for Exceptional Quality Biosolids
Arsenic	mg/kg	2.5 - 22.3	75	41
Cadmium	mg/kg	<0.3 - 2.55	85	39
Copper	mg/kg	208 - 710	4,300	1,500
Lead	mg/kg	8 - 103	840	300
Mercury	mg/kg	<0.1 - 1.07	57	17
Molybdenum	mg/kg	<0.3 - 18.9	75	--
Nickel	mg/kg	14.9 - 42	420	420
Selenium	mg/kg	0.3 - 20.3	100	100
Zinc	mg/kg	559 - 1,500	7,500	2,800

As shown in Table 3, the metal concentrations in the biosolids generated by the various municipal generators are below the Ceiling Concentrations Limits (Table 1, section 503.13 CFR) and the Pollutant Concentration Limits for Exceptional Quality (EQ) Biosolids (Table 3, section 503.13 CFR).

Under 40 CFR part 503 biosolids used for land application are required to meet Pathogen Reduction Requirements and Vector Attraction Reduction Requirements. As shown in Table 4, the biosolids generated at the various generators meets the Class B Pathogen Reduction Requirements by either Alternative 1 of section 503.32(b)(2) or Alternative 2 of section 503.32(b)(3), 40 CFR. Under Alternative 1, the geometric mean of the density of fecal coliform in the biosolids is less than 2,000,000 Most Probable Number per gram. Under Alternative 2, biosolids from the generators are treated in anaerobic digesters with a detention time of at least 15 days at 35 to 55 degrees Celsius meeting the Pathogen Treatment Processes Requirements listed in Appendix B of 40 CFR, Part 503.

**Table 4 – Pathogen Requirements**

Generator	Alternative	Detention Time (days)	Temperature (Degrees Celsius)	Fecal Coliform (MPN/g)
Delta Diablo Sanitation District	2	31-34	35.7 - 39.4	--
San Francisco Public Utilities Commission – Oceanside Plant	2	19 - 57	43.2 - 56.7	---
San Francisco Public Utilities Commission – Southeast Plant	2	18-44	37.2 - 45	--

Generator	Alternative	Detention Time (days)	Temperature (Degrees Celsius)	Fecal Coliform (MPN/g)
Union Sanitation District	2	23-52	36.6 - 37.2	--
City of Burlingame	2	30-47	37.6 - 38.6	--
City of Millbrae	2	85-146	35.5 - 36.6	--
Silicon Valley Clean Water	2	27-32	35.5 - 38.3	--
Calera Creek Water Recycling Plant	1	--	--	491.04
East Bay Municipal Utility District	2	--	--	--
North San Mateo County Sanitation District	2	25-30	34.3-39.7	--
City of Stockton	2	52-74	24 - 38	--
Fresno-Clovis Regional WWTF	2	--	--	--

In addition, biosolids generated by the various generators meets the Vector Attraction Reduction Requirements by either Option 1 of section 503.33(b)(1), or Option 10 of section 503.33(b)(10), 40 CFR (see Table 5) since all biosolids will be incorporated into the soil within six hours.

**Table 5 - Vector Attraction Reduction Requirements**

Generator	Option	Volatile Solids Reduction (%)	Biosolids Incorporation Time (hours)
Delta Diablo Sanitation District	1	>38	--
San Francisco Public Utilities Commission – Oceanside Plant	1	>38	--
San Francisco Public Utilities Commission – Southeast Plant	1	>38	--
Union Sanitation District	1	>38	--
City of Burlingame	1	>38	--
City of Millbrae	1	>38	--
Silicon Valley Clean Water	1	>38	--
Calera Creek Water Recycling Plant	10		6
East Bay Municipal Utility District	1	>38	--
North San Mateo County Sanitation District	1	>38	--
City of Stockton	1	>38	--
City of Livermore	1	65	--
Fresno-Clovis Regional WWTF	1	>38	--

### **SALT AND NITRATE CONTROL PROGRAMS**

As part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments (Resolution R5-2018-0034) incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting. The Basin Plan amendments were approved by On the State Water Resources Control Board (Resolution 2019-0057), and the Office of Administrative Law (OAL Matter No. 2019-1203-03) and became effective on 17 January 2020.

Pursuant to the Basin Plan amendments, dischargers will need to comply with the Salt and Nitrate Control Programs.

For the Salt Control Program, dischargers that are unable to comply with stringent salinity requirements will need to meet performance-based requirements and participate in a basin-wide planning effort (Prioritization and Optimization Study or P&O Study) to develop a long-term salinity strategy for the Central Valley. On 29 September 2021, Synagro (CV-SALTS ID: 3599) submitted its Notice of Intent and paid the fee to join the P&O Study.

For the Nitrate Control Program, the Synagro-Mullinax Biosolids Ranch falls within Groundwater Sub-Basin 5-22.03 (San Joaquin Valley – Turlock Basin), a Priority 1 basin. Dischargers that are unable to comply with stringent nitrate requirements will be required to take on alternative compliance approaches that include providing replacement drinking water to persons whose drinking water is affected by nitrates. Dischargers may comply with the Nitrate Control Program either individually (Pathway A) or collectively as part of a Management Zone Group (Pathway B). On 29 September 2021, Synagro submitted its Notice of Intent selecting Pathway B and join the Turlock Management Zone Group.

### **COMMENTS**

Based on the information presented in the 16 August 2021 NOI; and supplemental information, the discharge of biosolids to land at Mullinax Ranch (20 Hills Ranch) in Merced County is consistent with the requirements of 40 CFR, Part 503 for the use of Class B biosolids. In addition, as discussed in the Land Productivity Assessment, lime should be added to fields with low pH and cation exchange capacity in conjunction with the biosolids as needed to condition the soil.