"People Serving People"

CITY OF RIVERSIDE

February 17, 2000

U.S. EPA Region 9
ATTN: WTR-7, Biosolids Coordinator
75 Hawthorne Street
San Francisco, CA 94105-3901

SUBJECT: Annual Report for 1999, Biosolids Disposal

Dear Ms. Fondahl:

In compliance with 40 CFR Part 503, we are submitting the 1999 Annual Report of Biosolids Disposal for the City of Riverside Water Quality Control Plant.

If you have any questions or comments, please contact me at (909) 351-6183.

Sincerely,

Gail Briggs McPherson
Wastewater Systems Manager

Enclosures

cc: Mark Adelson, Regional Water Quality Control Board
Admin. File

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PUBLIC WORKS DEPARTMENT
3900 MAIN STREET • RIVERSIDE, CALIFORNIA 92522 • (909) 782-5341
FAX: (909)-782-5622
SEWERAGE SYSTEMS DIVISION • (909) 351-6140
5950 ACORN STREET • FAX: (909) 687-6978

BACKGROUND INFORMATION

1. NAME AND ADDRESS OF FACILITY

Facility Name: Riverside Regional Water Quality Control Plant
Address: 5950 Acorn Street
City: Riverside State: CA Zip: 92504
Facility Contact: John A. Claus Phone: 909-351-6187
Signatory: Gail Briggs McPherson

2. NAME AND ADDRESS OF FACILITY OWNER

Facility Owner's Name: City of Riverside
Address: 3900 Main Street
City: Riverside State: CA Zip: 92522

3. REPORTING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	1999	01	01	TO	1999	12	31

CA010530
4. NPDES PERMIT NUMBER

5. SLUDGE PERMIT NUMBER

6. FACILITY STATUS
- [X] Preparer of sewage sludge
- [ ] Land applier
- [ ] Owner/operator of surface disposal site
- [ ] Owner/operator of incinerator

7. TOTAL ANNUAL VOLUME OF SEWAGE SLUDGE

5,229.48

Units: [X] (metric tons; dry weight)
[ ] Other

8. FINAL USE AND DISPOSAL METHODS
- [X] Land application
- [ ] Surface disposal
  - [ ] Unlined or [ ] Lined
- [ ] Incineration
- [ ] Other, explain

9. Name and address of persons performing final use or disposal (attach additional sheets if necessary)

[ ] Same as preparer

Facility Name: Gardner-Arciero Saltdale Farms
Address: P.O. Box 277
City: Buellton State: CA Zip: 93427
Facility Contact: Slick Gardner
Volume of sludge received from preparer: 5,104.90 Metric Tons
Final use/disposal method for sludge: Land Application

Facility Name: Residuals Processing, Inc.
Address: 33333 Western Avenue
City: Union City State: CA Zip: 94587
Facility Contact: Jeff Thurber
Volume of sludge received from preparer: 5,076.42 Metric Tons
Final use/disposal method for sludge: Land Application

Facility Name:
Address:
City: State: Zip:
Facility Contact:
Volume of sludge received from preparer:
Final use/disposal method for sludge:

Facility Name:
Address:
City: State: Zip:
Facility Contact:
Volume of sludge received from preparer:
Final use/disposal method for sludge:

10. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information submitted, it is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

Name and Official Title (type or print): Gail Briggs McPherson, Wastewater Systems Manager
Signature: GBMcPherson
Area Code and Phone: (909) 351-6183
Date Signed: 2-17-00

VECTOR ATTRACTION REDUCTION AND PATHOGEN REDUCTION

1. Facility Name Riverside Regional Water Quality Control Plant
   Address 5950 Acorn St.
   City Riverside
   State CA Zip 92504

2. Facility Owner's Name City of Riverside
   Address 3900 Main Street
   City Riverside
   State CA Zip 92522

3. Monitoring Period: From 01/01/99 To 02/28/99
   Reporting Period: From 01/01/99 To 02/28/99

4. NPDES Permit No: CA 0105350
   Sludge Permit No: N/A

5. Facility Latitude: 33° 57' 55" N
   Facility Longitude: 117° 27' 28" W

Site Map Attached Yes ✓ No ____

6. Attach a description of vector attraction reduction procedures that identifies specific treatment units or activities and describes operating procedures. Include target values for all operating parameters such as treatment capacity, sludge detention time, operating temperature, pH, and percent solids. Also include a description of standard procedures for regular evaluation of the operating parameters.
   16 Number of pages attached ✓ Schematic diagram or drawing attached.

VECTOR ATTRACTION REDUCTION - OPTION 1 [40 CFR 503.33 (B)(1)]

7. The City of Riverside utilizes Alternative 1 (Mass of volatile solids in the sewage sludge been reduced by at least 38%) to demonstrate compliance with the regulations.

   a. Alternative 1 - Time and Temperature
      Has the mass of volatile solids in the sewage sludge been reduced by at least 38%?

yes	no
✓	

      Frequency volatile solids reduction is verified 30 per period.

PATHOGENS REDUCTION CLASS B - ALTERNATIVE 2 [40 CFR 503.32 (B) (3)]

8. Anaerobic Digestion
   a. Was the residence time for the sewage sludge between 15 days at 35°C to 55°C and 60 days at 20°C?

yes	no
✓	

   b. Provide the frequency of temperature measurements (i.e. continuous, 1 per hour, etc.)
      1/shift, 3 shifts/day

   c. Provide the average detention time and digester operating temperature for the reporting period 19.72 days at 35.2 °C.

Water Reclamation Division
Public Works Department
City of Riverside, CA

Monthly Sludge Disposal Report

August 1999
Month Year

During this month, 1,180.30 tons of Biosolids were removed by our subcontractor, Residuals Processing, Inc., located at 108500 Von Karman Ave., #900, Irvine, CA, 92612. They are currently performing land application of the biosolids.

Laboratory analysis data is attached certifying the Biosolids generated at this plant to be a clean Class B sludge.

Digester data is attached certifying the Biosolids have met the time and temperature requirements for Class B Pathogen Reduction through Anaerobic Digestion as well as the Vector Attraction requirement of more than 38% volatile solids reduction.

"I certify, under penalty of law, that the Class B pathogen requirements in 503.32(b) and the vector attraction reduction requirement in 503.33(b)1 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including fine and imprisonment."

Signature

Date 9/30/99

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Biosolids Processing Data
July - August 1999

DATE	Digester Influent Volatile Suspended Solids %	Digester Effluent Volatile Suspended Solids %	AverageVolatile Suspended Solids Reduction %	Belt Press Discharge Dry Tons	Digester #1 Temperature °C	Digester #2 Temperature °C	Digester Detention Time Days
7/1/99	78	67	42.74	12.49	37	37	15.17
7/2/99	78.36			3.12	37	37	15.6
7/3/99				0	37	37	16.29
7/4/99				0	37	37	16.44
7/5/99	77.93	63	51.78	18.25	37	37	17.37
7/6/99	78.48	68	41.74	12.35	37	37	17.47
7/7/99				29.08	37	37	17.64
7/8/99	78.99			9.75	37	37	18.23
7/9/99	79.98			10.54	37.16	37.16	18.65
7/10/99				0	37	37	18.99
7/11/99				22.79	37	37	18.99
7/12/99	79.55			14.47	37.5	37.5	19.16
7/13/99	78.11	67	43.11	19.73	37.5	37.5	22.07
7/14/99	77.84	65	47.12	24.02	37.3	37.3	17.89
7/15/99	77.94			8.7	37.3	37.3	19.12
7/16/99	80.81	68	49.53	10.81	37.3	37.3	19.12
7/17/99				0	37	37	19.14
7/18/99				0	37.5	37.5	18.33
7/19/99	79.06	68	43.72	18.33	37.4	37.5	18.85
7/20/99	78.09	67	43.03	21.03	37.4	37.5	19.54
7/21/99	78.94	70	37.75	30.17	37.16	37.16	19.42
7/22/99	77.95	67	42.58	15.95	37	37	25.37
7/23/99	77.14	66	42.48	19.39	37	37	19.32
7/24/99				0	37	37	18.72
7/25/99				0	37.2	37.2	17.62
7/26/99	77.44	66	43.44	18.36	37.26	37.26	18.37
7/27/99	77.24	65	45.28	13.17	37.5	37.5	18.32
7/28/99	77.67			8.36	37.5	37.5	17.81
7/29/99	78			0	37.5	37.5	17.25
7/30/99	78	65	47.62	18.85	37.5	37.5	16.49
7/31/99				0	37.16	37.3	18.53
8/1/99				19.23	37.3	37.3	21.66
8/2/99	79.68	69	43.24	21.37	37.43	37.43	21.35
8/3/99	78.87	68	43.07	11.54	37.3	37.3	20.71
8/4/99	77.24	59	57.59		37	37	20.44
8/5/99	87.32			8.2	37.3	37.3	20.38
8/6/99	82.47	68	54.82	13	37.1	37.2	19.18
8/7/99				0	37	37.5	19.19

Biosolids Processing Data
July - August 1999

DATE	Digester Influent Volatile Suspended Solids %	Digester Effluent Volatile Suspended Solids %	AverageVolatile Suspended Solids Reduction %	Belt Press Discharge Dry Tons	Digester #1 Temperature °C	Digester #2 Temperature °C	Digester Detention Time Days
8/8/99				0	37	37	20.42
8/9/99	78.45	66	46.67	0	37.36	37.36	20.47
8/10/99	77.21	66	42.69	17.4	37.5	37.5	18.35
8/11/99				32.18	37	37	18.2
8/12/99	76.79	67	38.63	9.83	37.1	37.2	18.01
8/13/99				8.09	37.1	37.1	17.48
8/14/99				0	37	37	17.93
8/15/99				0	37.2	37.2	18.3
8/16/99	80.29	66	52.33	20.84	37.36	37.36	16.93
8/17/99	78.55	64	51.45	20.66	37.43	37.43	15.67
8/18/99	81.37	68	51.34	30.06	37.1	37.1	17.37
8/19/99	87.25			3.75	37	37	17.68
8/20/99	78.16	67	43.27	9.76	37.4	37.3	17.47
8/21/99				0	37.5	37.5	17.52
8/22/99				11.76	37.16	37.16	18.23
8/23/99	83.06	64	63.75	16.38	37.5	37.5	18.17
8/24/99		65		0	37.4	37.4	18.46
8/25/99	76.55	66	40.52	28.87	37.16	37.16	18.58
8/26/99	87.27	66	71.69	10.01	37.1	37.1	17.75
8/27/99	77.26	65	45.35	20.54	37.1	37.1	18.27
8/28/99				7.53	37	37	17.83
8/29/99				0	37.16	37.16	18.3
8/30/99		66		17.99	35.5	35.26	16.88
8/31/99		66		20.36	37.2	37.26	17.52
Minimum	**76.55**	**59**	**37.75**	**0**	**35.5**	**35.26**	**15.17**
Maximum	**87.32**	**70**	**71.69**	**32.18**	**37.5**	**37.5**	**25.37**
Average	**79.30**	**66.19**	**47.18**	**11.79**	**37.2**	**37.2**	**18.48**
Total				**719.06**			

VECTOR ATTRACTION REDUCTION AND PATHOGEN REDUCTION

1. Facility Name Riverside Regional Water Quality Control Plant
   Address 5950 Acorn St.
   City Riverside
   State CA Zip 92504

2. Facility Owner's Name City of Riverside
   Address 3900 Main Street
   City Riverside
   State CA Zip 92522

3. Monitoring Period: From 09/01/99 To 10/31/99
   Reporting Period: From 09/01/99 To 10/31/99

4. NPDES Permit No: CA 0105350
   Sludge Permit No: N/A

5. Facility Latitude: 33° 57' 55" N
   Facility Longitude: 117° 27' 28" W

Site Map Attached Yes ✓ No ____

6. Attach a description of vector attraction reduction procedures that identifies specific treatment units or activities and describes operating procedures. Include target values for all operating parameters such as treatment capacity, sludge detention time, operating temperature, pH, and percent solids. Also include a description of standard procedures for regular evaluation of the operating parameters.
   16 Number of pages attached ✓ Schematic diagram or drawing attached.

VECTOR ATTRACTION REDUCTION - OPTION 1 [40 CFR 503.33 (B)(1)]

7. The City of Riverside utilizes Alternative 1 (Mass of volatile solids in the sewage sludge been reduced by at least 38%) to demonstrate compliance with the regulations.

   a. Alternative 1 - Time and Temperature
      Has the mass of volatile solids in the sewage sludge been reduced by at least 38%?

yes	no
✓	

      Frequency volatile solids reduction is verified 28 per period .

PATHOGENS REDUCTION CLASS B - ALTERNATIVE 2 [40 CFR 503.32 (B) (3)]

8. Anaerobic Digestion
   a. Was the residence time for the sewage sludge between 15 days at 35°C to 55°C and 60 days at 20°C?

yes	no
✓	

   b. Provide the frequency of temperature measurements (i.e. continuous, 1 per hour, etc.)
      1/shift, 3 shifts/day

   c. Provide the average detention time and digester operating temperature for the reporting period 18.93 days at 37.1 °C.

MONITORING PERIOD

September 1, 1999 through October 31, 1999

Parameter	Table 3 Pollutant Concentrations	Maximum Pollutant Concentration MG/KG	Frequency of Analysis	Sample Type, Grab or Composite	Analytical Method
Arsenic	41	11.6	2	Composite	6010B
Cadmium	39	3.43	2	Composite	6010B
Chromium	1200	62.1	2	Composite	6010B
Copper	1500	940	2	Composite	6010B
Lead	300	70.2	2	Composite	6010B
Mercury	17	0.67	2	Composite	245.5
Molybdenum	--	25.6	2	Composite	6010B
Nickel	420	52.4	2	Composite	6010B
Selenium	36	11.0	2	Composite	6010B
Zinc	2800	1130	2	Composite	6010B

Certification

I certify under penalty of law that this document and all attachments were prepared under my supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information submitted, it is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

John A. Claus, Operations Manager

Name and Title (Type or print)

(909) 351-6187

Area Code and Phone

John A. Claus

Signature

2/14/2000

Date Signed

Table 3 concentration limits are referenced to demonstrate that the sludge is of exceptional quality in regards to metals.

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ASSOCIATED LABORATORIES
806 North Batavia - Orange, California 92868 - 714/771-6900

FAX 714/538-1209

CLIENT City of Riverside (7444)
ATTN: Annie/Diane Whitney
5950 Acorn St.
Riverside, CA 92504

LAB REQUEST 42127

REPORTED 10/11/99
RECEIVED 9/ 8/99

PROJECT Qtrly

SUBMITTER Client

COMMENTS Sludge sample calculated on a "Dry Weight Basis"

This laboratory request covers the following listed samples which were analyzed for the parameters indicated on the attached Analytical Result Report. All analyses were conducted using the appropriate methods as indicated on the report. This cover letter is an integral part of the final report.

Order No.	Client Sample Identification
141096	Dry Sludge
141097	FCE Grab
141098	Comb Inf Grab Comp
141099	FCE Grab

Thank you for the opportunity to be of service to your company. Please feel free to call if there are any questions regarding this report or if we can be of further service.

ASSOCIATED LABORATORIES by,

Robert A. Webber
Vice President

NOTE: Unless notified in writing, all samples will be discarded by appropriate disposal protocol 30 days from date reported.

The reports of the Associated Laboratories are confidential property of our clients may not be reproduced or used for publication in part or in full without our written permission. This is for the mutual protection of the public, our clients, and ourselves.

TESTING & CONSULTING
Chemical
Microbiological
Environmental

Water Reclamation Division
Public Works Department
City of Riverside, CA

Monthly Sludge Disposal Report

October 1999
Month Year

During this month, 1,463.52 tons of Biosolids were removed by our subcontractor, Residuals Processing, Inc., located at 108500 Von Karman Ave., #900, Irvine, CA, 92612. They are currently performing land application of the biosolids.

Laboratory analysis data is attached certifying the Biosolids generated at this plant to be a clean Class B sludge.

Digester data is attached certifying the Biosolids have met the time and temperature requirements for Class B Pathogen Reduction through Anaerobic Digestion as well as the Vector Attraction requirement of more than 38% volatile solids reduction.

"I certify, under penalty of law, that the Class B pathogen requirements in 503.32(b) and the vector attraction reduction requirement in 503.33(b)1 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including fine and imprisonment."

Signature

Date 11/23/99

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Biosolids Processing Data
September - October 1999

DATE	Digester Influent Volatile Suspended Solids %	Digester Effluent Volatile Suspended Solids %	AverageVolatile Suspended Solids Reduction %	Belt Press Discharge Dry Tons	Digester #1 Temperature °C	Digester #2 Temperature °C	Digester Detention Time Days
9/1/99	78.5	68	41.81	29.3	37	37.1	16.99
9/2/99	78.06	69	37.45	16.51	37.16	36.86	16.97
9/3/99	83.04	68	56.61	25.45	36.5	37	17.13
9/4/99				0	37	37	17.69
9/5/99				0	37	37	17.34
9/6/99	77.75	66	44.44	25.06	37.16	37.16	18.71
9/7/99	81.8	65	58.67	25.42	37.16	37.16	17.62
9/8/99	81.05	67	52.53	31.83	37.3	37.16	18.42
9/9/99	77.48	66	43.58	23.06	37	37	18.82
9/10/99	77.85			0	37	37	17.74
9/11/99				0	37	37	18.43
9/12/99				0	37	37	18.31
9/13/99	79.81	67	48.62	23.49	37	37	18
9/14/99		66		26.05	37.16	37.16	18.76
9/15/99		66		22.35	37.16	37.16	18.65
9/16/99		68		13.23	37.06	37.06	18.54
9/17/99	78.89	68	43.15	8.01	37.06	37.06	19.01
9/18/99				0	37.13	37	19.15
9/19/99				9.63	37	37	19.02
9/20/99	82.45	65	60.47	24.84	37.5	37.16	18.73
9/21/99		66		27.87	37	37	18.66
9/22/99				35.83	37.16	37.3	19.02
9/23/99	80.11	68	47.25	23.42	37.16	37.16	19.16
9/24/99	78			27.43	36.5	37	20.13
9/25/99				22.96			19.97
9/26/99				0	37	37	19.49
9/27/99				10	37	37	19.74
9/28/99	78.69	68	42.44	26.3	37	37.16	19.79
9/29/99				23.21	37.1	37.1	20.33
9/30/99	77.72	68	39.1	26.08	37.2	37.2	19.72
10/1/99	78.09	68	40.36	26.11	37	37.1	19.83
10/2/99	79.92	66	51.22	0	37	37	20.03
10/3/99				0	37.2	37.2	19.31
10/4/99	83.74	66	62.31	18.43	37.16	37.16	18.12
10/5/99	78.59	65	49.4	26.54	37.16	37.16	18.7
10/6/99	83.86			11.9	37.06	37.16	18.51
10/7/99	89.31			16.35	37	37	19.6
10/8/99	80.59			11.98	37	37	17.77

Biosolids Processing Data
September - October 1999

DATE	Digester Influent Volatile Suspended Solids %	Digester Effluent Volatile Suspended Solids %	AverageVolatile Suspended Solids Reduction %	Belt Press Discharge Dry Tons	Digester #1 Temperature °C	Digester #2 Temperature °C	Digester Detention Time Days
10/9/99				0	37	37	17.96
10/10/99				0	37	37	17.53
10/11/99	79.47	66	49.84	23.98	37.1	37.1	17.31
10/12/99				24.48	37	37	17.31
10/13/99	80.67	68	49.09	31.79	37	37	17.72
10/14/99	86.57	66	69.88	25.95	37	37	17.67
10/15/99	79.49	66	49.91	16.79	37	37	18.03
10/16/99				0	37	37	18.15
10/17/99				0	37	37	18.44
10/18/99	83.46	66	61.52	30.36	37	37	18.34
10/19/99	85.9	71	59.8	24.81	37	37	18.32
10/20/99	81.69	69	50.12	35.5	37.16	37.16	18.44
10/21/99	78.55	68	41.96	10.49	37	37	22.15
10/22/99				25.08	37	37	21.04
10/23/99				0	37	37	22
10/24/99				0	37	37	21.55
10/25/99	78.07	66	45.49	27.7	37	37	21.04
10/26/99	84.76	63	69.38	12.05	37	37	20.13
10/27/99	82.74	66	59.51	20.85	37.5	37.5	19.99
10/28/99	83.12			13.89	37.1	37.1	20.22
10/29/99	82.93			10.56	37	37	19.91
10/30/99				0	37	37	19.95
10/31/99				0	37.5	37.5	19.6
Minimum	**77.48**	**63**	**37.45**	**0**	**36.5**	**36.86**	**16.97**
Maximum	**89.31**	**71**	**69.88**	**35.83**	**37.5**	**37.5**	**22.15**
Average	**80.93**	**66.84**	**50.93**	**15.95**	**37.1**	**37.1**	**18.93**
Total				**972.92**			

VECTOR ATTRACTION REDUCTION AND PATHOGEN REDUCTION

1. Facility Name Riverside Regional Water Quality Control Plant
   Address 5950 Acorn St.
   City Riverside
   State CA Zip 92504

2. Facility Owner's Name City of Riverside
   Address 3900 Main Street
   City Riverside
   State CA Zip 92522

3. Monitoring Period: From 11/01/99 To 12/31/99
   Reporting Period: From 11/01/99 To 12/31/99

4. NPDES Permit No: CA 0105350 Sludge Permit No: N/A

5. Facility Latitude: 33° 57' 55" N Facility Longitude: 117° 27' 28" W

Site Map Attached Yes ✓ No ____

6. Attach a description of vector attraction reduction procedures that identifies specific treatment units or activities and describes operating procedures. Include target values for all operating parameters such as treatment capacity, sludge detention time, operating temperature, pH, and percent solids. Also include a description of standard procedures for regular evaluation of the operating parameters.
   16 Number of pages attached ✓ Schematic diagram or drawing attached.

VECTOR ATTRACTION REDUCTION - OPTION 1 [40 CFR 503.33 (B)(1)]

7. The City of Riverside utilizes Alternative 1 (Mass of volatile solids in the sewage sludge been reduced by at least 38%) to demonstrate compliance with the regulations.

   a. Alternative 1 - Time and Temperature
      Has the mass of volatile solids in the sewage sludge been reduced by at least 38%?

yes	no
✓	

      Frequency volatile solids reduction is verified 35 per period.

PATHOGENS REDUCTION CLASS B - ALTERNATIVE 2 [40 CFR 503.32 (B) (3)]

8. Anaerobic Digestion
   a. Was the residence time for the sewage sludge between 15 days at 35°C to 55°C and 60 days at 20°C?

yes	no
✓	

   b. Provide the frequency of temperature measurements (i.e. continuous, 1 per hour, etc.)
      1/shift, 3 shifts/day

   c. Provide the average detention time and digester operating temperature for the reporting period 18.45 days at 36.6°C.

MONITORING PERIOD

November 1, 1999 through December 31, 1999

Parameter	Table 3 Pollutant Concentrations	Maximum Pollutant Concentration MG/KG	Frequency of Analysis	Sample Type, Grab or Composite	Analytical Method
Arsenic	41	12.05	2	Composite	6010B
Cadmium	39	3.86	2	Composite	6010B
Chromium	1200	49	2	Composite	6010B
Copper	1500	1048	2	Composite	6010B
Lead	300	68.7	2	Composite	6010B
Mercury	17	0.37	2	Composite	245.5
Molybdenum	--	18.1	2	Composite	6010B
Nickel	420	41.1	2	Composite	6010B
Selenium	36	10.1	2	Composite	6010B
Zinc	2800	1018	2	Composite	6010B

Certification

I certify under penalty of law that this document and all attachments were prepared under my supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information submitted, it is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

John A. Claus, Operations Manager

Name and Title (Type or print)

(909) 351-6187

Area Code and Phone

Signature

2/14/2000

Date Signed

Table 3 concentration limits are referenced to demonstrate that the sludge is of exceptional quality in regards to metals.