

California Regional Water Quality Control Board, Colorado River Basin  
Prosecution Team Evidence  
on the matter of  
Administrative Civil Liability Complaint R7-2014-0041  
Exhibit 17



# CITY OF BRAWLEY

WATER TREATMENT PLANT / *JC DW*  
WASTE WATER TREATMENT PLANT  
760 WILLARD AVE.  
BRAWLEY, CALIFORNIA  
92227  
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December 11, 2007

Mr. Kirk Larkin  
California Regional Water Quality Control Board  
Colorado River Basin Region  
73-720 Fred Waring Drive, Suite 100 Palm Desert, California 92260

Subject: EPA Region 9 Compliance Evaluation Inspection Report

Dear Kirk:

The city has reviewed the Compliance Evaluation Inspection Report and is hereby by submitting the following corrections to the deficiencies found in the report on pages 2 and 3.

#### Major Finding

The DMRs are now filled out accordance with the EPA Form 3320-1 Completing Pre- Printed Discharge Monitoring Reports. Wastewater Treatment Staff has reviewed the EPA Form 3320-1 instructional booklet and are now following the instructions on the proper submission of Data.

The DMRs do not have a provision to report the MDL Limits or levels. Based on the instructional booklet, when applicable, the non detection or minimum detection limits are to be written as a letter code system, not a numerical system.

#### Self Monitoring Program

The contracted laboratory is now providing the proper sample containers, lab sheets, chain of custody forms with all the data required to ensure sample preservation and the integrity of the sample. Staff will begin to preserve the samples that require preservation

#### Compliance Schedules

The ammonia removal project was completed in July/ August of 2006. The project failed to reduce the ammonia concentration to less than 1.1 mg/l which could not meet the February 1, 2007 Milestone 1D of the CAO. The city has proceeded to hire Lee and Ro to design a wastewater treatment facility that will comply with the 2005 and 2010 permit requirements. Attached is the revised compliance schedule with and without SRF Loan.

Staff issued monthly status reports to the regional board in the cover letters of the Monthly Self Monitoring Reports

The Annual Compliance Plan Report is attached with this report.

#### Operations and Maintenance

The Operations Manual was never submitted by Nolte and Associates. Equipment operations manuals were submitted and are currently on file at the wastewater plant.

Sincerely

Ruben Mireles  
Water and Wastewater Treatment Operations

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REGION 7

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