

California Regional Water Quality Control Board, Colorado River Basin
Prosecution Team Evidence
on the matter of
Administrative Civil Liability Complaint R7-2014-0041
Exhibit 46

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R7-2014-0041
ISSUED TO
NATIONAL BEEF CALIFORNIA, LP, OWNER/OPERATOR
WASTEWATER TREATMENT FACILITY
City of Brawley-Imperial County

NATIONAL BEEF CALIFORNIA, LP, IS HEREBY GIVEN NOTICE THAT:

1. National Beef California, LP (Discharger or NBC), a wholly-owned subsidiary of National Beef Packing Company, LLC (headquartered in Kansas City, Missouri), which in turn is a subsidiary of Leucadia National Corporation, owns and operates a slaughterhouse located at 57 Shank Road, Brawley, CA 92227. The slaughterhouse (Facility) has an onsite wastewater treatment facility (NBC WWTF) that provides wastewater treatment and disposal services for the slaughterhouse. Wastewater from the slaughterhouse is discharged to (1) areal groundwater through unlined ponds and (2) and the city of Brawley Wastewater Treatment Plant (WWTP). **Attachment A**,¹ incorporated herein and made part of this Complaint by reference, shows the location of the slaughterhouse.
2. The Discharger estimated the rate of discharge to groundwater at approximately 12,800 gallons per day. Up to 1.625 million gallons per day (mgd) from the NBC WWTF are discharged into the Brawley municipal wastewater collection system for further treatment and disposal at the Brawley WWTP.
3. The Brawley WWTP is a “publicly owned treatment works” (POTW), as defined in Title 40 Code of Federal Regulations (40 CFR) section 403.3. The POTW consists of the WWTP and associated sewage collection system and infrastructure, which provide sewage collection and treatment services to city residents, and commercial and industrial businesses. The discharge from the Brawley WWTP is governed by Waste Discharge Requirements Order R7-2010-0022 (National Pollutant Discharge Elimination System (NPDES) Permit No. CA0104523) and Cease and Desist Order R7-2008-0008, as amended by Special Board Orders R7-2008-0069 and R7-2010-0003.
4. The Brawley WWTP discharges its effluent into the New River via Discharge Point 001, which is tributary to the Salton Sea. The New River and the Salton Sea are waters of the United States and both are listed as impaired waters pursuant to federal Clean Water Act (CWA) Section 303(d) (33 U.S.C. Section 1313(d)). The entire stretch of the New River in the U.S. is listed in the California 303(d) List because, among other impairments, the New River is impaired by toxicity. On March 20, 2014, the California Regional Water Quality Control Board (Colorado River Basin Water Board) adopted Resolution R7-2014-0025, which approved proposed revisions to the Clean Water Act section 303(d) List of

¹ All attachments identified in this Complaint are incorporated herein and made a part of this Complaint by reference.

impaired water bodies in the Colorado River Basin Region. The revisions included, in relevant part, ammonia as an impairing pollutant for the New River.

5. NBC is an "Industrial User," as defined in 40 CFR Section 403.3(j), because it is a source of "indirect discharge," which is defined in Section 403.3(i) as "the introduction of pollutants into a POTW from any non-domestic source regulated under Section 307(b), (c) or (d) of the [Clean Water] Act." Moreover, NBC is a "Significant Industrial User," as defined in 40 CFR Section 403.3(v)(1)(ii) because such an Industrial User: "discharges an average of 25,000 gallons per day or more of process wastewater to the POTW; contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant; or is designated as such by the Control Authority [here, the city of Brawley] on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement...." NBC satisfies each of these independent criteria for meeting the definition of "Significant Industrial User."
6. The Discharger is alleged to have violated the federal National Pretreatment Standards of 40 CFR Section 403.5, which prohibit an Industrial User from introducing into a POTW any pollutant(s) which cause "Pass Through"² or "Interference" with the POTW regardless of whether the Industrial User is subject to other National Pretreatment Standards or any national, State, or local pretreatment requirements.
7. Specifically, the Discharger introduced pollutants, including Ammonia, Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), and bacteria, into the Brawley WWTP in alleged violation of the National Pretreatment Standards discharge prohibition set forth in 40 CFR Section 403.5 by causing chronic and significant Pass Through and/or Interference with the Brawley WWTP. As a result, the Colorado River Basin Water Board may impose civil liability for this alleged violation pursuant to California Water Code (CWC) Section 13385.
8. CWC Section 13323 authorizes the Executive Officer of the Colorado River Basin Water Board to issue this Administrative Civil Liability Complaint (Complaint), and CWC section 7 authorizes the Executive Officer to delegate these powers and duties to the Assistant Executive Officer. By memo dated October 2, 2006, the Board's Executive Officer expressly delegated to the Assistant Executive Officer the authority to take any enforcement actions the Executive Officer is authorized under the law to take. Therefore, the Board's Assistant Executive Officer has been delegated the authority to issue this Complaint.

² Terms in quotations are defined by reference later in the Complaint.

OVERVIEW OF DISCHARGER'S OPERATIONS, ON-SITE WWTF, AND DISCHARGE

9. Brawley Beef, LLC, formerly known as B.P. Joint Ventures, LLC, built and began operating the Facility in October 2001. The Discharger's parent company, National Beef Packing Company, LLC, bought the Facility from Brawley Beef, LLC, on June 2, 2006, and has been operating it through its wholly-owned subsidiary, National Beef California, ever since then.
10. The Discharger's slaughterhouse processes an average of 2300 cattle per day. NBC's products include boxed beef, ground beef, hides (a closed loop system and no tanning is involved), and other beef and beef by-products. These operations currently generate approximately 1.62 mgd of wastewater.
11. The NBC WWTF consists of two dissolved air flotation (DAF) units, an anaerobic digester (pond 1), an aerobic activated sludge pond (pond 2), a clarifier, a polishing pond (pond 3), a suspended air flotation (SAF) unit, and a belt press. All three on-site ponds are unlined. There is also an unlined storm water pond on-site that is not considered part of the WWTF.
12. The two DAF units remove fats, oils and grease (FOG) and settleable solids from the Facility's wastewater generated. The wastewater then flows to the anaerobic digester for removal of organic material. The anaerobic digester is a covered unit that generates biogas that is used to power boilers at the Facility. Wastewater then flows to the aerobic pond where activated sludge further removes organic material. The aerobic pond is equipped with return activated sludge (RAS) and waste activated sludge (WAS) systems. From the aerobic pond wastewater flows to the clarifier where RAS is re-circulated and WAS is removed. Wastewater then flows to the polishing pond where it is piped to the SAF unit. The SAF is used for final clarification by removing skimmed solids. Skimmed solids are pumped to the filter press for final thickening. Filter press permeate is returned to the SAF unit. Pretreated water from the SAF unit is discharged to the Brawley municipal wastewater collection system. A diagram of this process treatment train is shown in **Attachment B**.
13. The Brawley WWTP consists of three Biolac® activated sludge treatment units equipped with diffusers, three secondary clarifiers, an activated sludge pumping station, a UV disinfection structure, a sludge thickening unit, a sludge holding tank, a centrifuge sludge dewatering unit, and a solar greenhouse sludge drying structure. The Brawley WWTP has treatment capacity for 5.9 mgd. Upgrades to the Brawley WWTP were completed and officially commissioned by the city of Brawley in March 2012. Since that time, the city of Brawley has been in substantial compliance with its NPDES permit.

REGULATORY CONTEXT

14. CWA section 307(b)(1) directs the U.S. Environmental Protection Agency (USEPA) Administrator to "publish proposed regulations establishing pretreatment standards for the introduction of pollutants into treatment works . . . which are publicly owned for those pollutants which are determined not to be susceptible to treatment by such treatment works or which would interfere with the operation of such treatment works." These pretreatment regulatory

standards were promulgated by the USEPA Administrator and are set forth in 40 CFR part 403.

15. 40 CFR part 403 establishes General Pretreatment Regulations to prevent “Pass Through” and “Interference,” and provides that these pretreatment regulations are applicable to Industrial Users regardless of whether the Control Authority (e.g., city of Brawley) has an approved Pretreatment Program. Specifically, 40 CFR section 403.5(a)(1) establishes the following general prohibition:

“A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in paragraph (b) of this section [403.5] apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any national, State, or local Pretreatment Requirements.”

16. “Pass Through” is defined as “a Discharge which exits a POTW into United States waters in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).” [40 CFR section 403.3(p).]
17. “Interference” means “a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both: (1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and (2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.” [40 CFR section 403.3(k).]
18. A “Slug” is defined as “any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions....” [40 CFR section 403.8 (f)(2)(vi).]
19. The Water Quality Control Plan for the Colorado River Basin Region of California (Basin Plan), which was adopted on November 17, 1993, and amended on November 16, 2012, designates the beneficial uses of ground and surface waters in the Region. The Basin Plan designates the following beneficial uses of waters in the New River:

- a. Fresh Water Replenishment of the Salton Sea (FRSH)
 - b. Water Contact Recreation (REC I)
 - c. Non-Contact Water Recreation (REC II)
 - d. Warm Water Habitat (WARM)
 - e. Wildlife Habitat (WILD)
 - f. Preservation of Rare, Endangered or Threatened Species (RARE)
20. Beginning in October 2001, when the slaughterhouse operations commenced, and continuing through July 2011, the city of Brawley has violated its effluent limitations set forth in the NPDES permits in effect during that time period for ammonia, toxicity, TSS, BOD, and bacteria. Especially significant exceedances were reported for both ammonia and toxicity during this period. Based on these reported violations, the pollutants of concern for the purposes of Pass Through and Interference in this Complaint are ammonia, toxicity, nitrogen, BOD, TSS, and bacteria.
 21. On May 11, 2011, the Colorado River Basin Water Board staff requested NBC to file a Report of Waste Discharge (ROWD) and apply for Waste Discharge Requirements for the discharge to and from the unlined ponds to areal groundwater. The Discharger was pro-active and responsive to the request. On June 30, 2011, Board staff received the ROWD from NBC, which was dated June 23, 2011. Because the ROWD was incomplete, however, on January 26, 2012, Board staff requested NBC to provide additional information to complete the ROWD, which was received on May 29, 2012. On November 27, 2012, Board staff requested additional information, which was provided on December 19, 2012, to complete the ROWD.
 22. On June 19, 2013, Colorado River Basin Water Board staff and Board counsel met with NBC corporate officers, its General Counsel, Special Counsel, and local staff to discuss regulatory matters at the Facility. During the meeting, NBC presented a proposal to make upgrades and improvements at the WWTF, including providing a higher and more reliable level of wastewater treatment to comply with the city of Brawley's proposed Pretreatment Program and to address Board staff concerns about the unlined impoundments and the potential groundwater pollution and nuisance conditions that could result.
 23. On June 27, 2013, pursuant to CWC Section 13267, the Colorado River Basin Water Board issued a Technical Order against NBC. The Order required NBC to conduct a groundwater investigation to determine whether the discharge to the unlined ponds adversely impacted groundwater and, if so, the extent of that impact. The Order also required NBC to properly characterize its wastewater for regulatory purposes.
 24. The Discharger has cooperated with Colorado River Basin Water Board staff regarding the Technical Order. The Discharger installed eleven on-site groundwater monitoring wells. It submitted the results of its groundwater investigation and wastewater characterization in a report titled "Groundwater Study Wastewater Pre-treatment System," dated September 27, 2013, and prepared by its consultant, HR Green, Inc. Colorado River Basin Water Board staff reviewed the report and found that the wastewater discharged to the unlined ponds not only adversely impacted groundwater, but it also has caused concentrations of BOD and Nitrate to increase in areal groundwater when compared to background

concentrations, albeit the increase appeared to be confined to the immediate vicinity of the ponds.

25. Based on the groundwater investigation and wastewater characterization, the Colorado River Basin Water Board notified NBC in a letter, dated January 31, 2014, that Pond 1 will be regulated pursuant to Title 27 of the California Code of Regulations (CCR), and that Ponds 2 and 3 will be regulated under Division 7, Chapter 4, Article 4 [commencing with Section 13260] of the California Water Code (CWC). The letter also noted that Ponds 2 and 3 do not require a liner at this time, but recommended compaction of existing clay materials at the next regularly scheduled maintenance following installment of the new Pond 1. Further, the letter explained that all three ponds must be included in the groundwater monitoring program. Finally, the letter requested the Discharger to provide additional technical specifications for the proposed upgrades and improvements to the ponds so that Waste Discharge Requirements could be drafted for all three ponds in one Board Order.
26. On January 31, 2014, the Discharger notified the Colorado River Basin Water Board staff that it intends to close the Facility on April 4, 2014, when it would cease all slaughterhouse operations and cease the discharge of wastes at and from the Facility. Written official notification to the Colorado River Basin Water Board was submitted in a letter dated February 4, 2014. The Discharger also informed Colorado River Basin Water Board staff that it intends to retain its plant as a viable asset (i.e., keep a level of maintenance on the slaughterhouse building) in case there are opportunities to sell it for a similar or alternate business. By letter dated March 14, 2014, NBC notified the Colorado River Basin Water Board that it now plans to cease slaughterhouse operations on May 23, 2014, to provide local cattlemen with an opportunity to deal with their current inventory of cattle.
27. On March 20, 2014, the Colorado River Basin Water Board adopted Cleanup and Abatement Order R7-2014-0038, which, in relevant part, directs the Discharger to close its ponds pursuant to state regulations in accordance with a time schedule.

CONTROLLABLE INDUSTRIAL SOURCES OF PASS THROUGH AND INTERFERENCE

28. The city of Brawley has two significant industrial users (SIUs): NBC and Pioneers Memorial Hospital (PMH). To develop its Pretreatment Program, in 2013 the city of Brawley collected, among other pollutants of concern, ammonia monitoring data to characterize the loading from its residential, commercial, and industrial sources into the Brawley WWTP. Based on the data and flow discharged by its residential, commercial, and industrial sources, the city of Brawley calculated the ammonia load into its WWTP was approximately 1,818 lbs/day, with the following breakdown by sources:³

³ *City of Brawley Local Limits Study*, Appendix IV, Loading Summary, December 2013. The Local Limits Study is incorporated herein and made a part of this Complaint by reference.

Source	Ammonia Load (lbs/day)
Residential	414
Commercial	36
Uncontrolled	451
Controlled [Industrial Sources]	1212

29. Pollutants of concern discharged by PMH are organic substances, such as pharmaceuticals, radionuclides, solvents, and disinfectants,⁴ but not the pollutants of ammonia, BOD, TSS, or total nitrogen. In addition, self-monitoring reports submitted by the city of Brawley, pursuant to its NPDES Permit requirements, and monitoring data provided by the city of Brawley to the Colorado River Basin Water Board regarding the nature and character of PMH's discharge, show that the ammonia loading from PMH into the Brawley POTW has been less than 1 percent of the total load into the POTW. Therefore, these data demonstrate that PMH has never been a significant source of ammonia and/or other pollutants of concern that have caused the city of Brawley to violate its NPDES Permit.
30. In contrast, the city of Brawley's self-monitoring reports, monitoring data provided by the city of Brawley to the Colorado River Basin Water Board about the character of NBC's discharge into the POTW, and data submitted by NBC indicate that the slaughterhouse has been the main controllable source of ammonia into the Brawley WWTP since October 2001, when the Discharger's predecessor company, the former Brawley Beef, LLC, commenced operations, through December 2012. **Attachment C** shows the historic ammonia load from the Discharger's slaughterhouse into the POTW. **Attachments D** and **E** show the average monthly and daily ammonia load discharged by the Brawley WWTP respectively, before and after the slaughterhouse went into operations.
31. As shown by **Attachment C**, the Discharger has discharged ammonia loads into the Brawley WWTP as high as 1122 lbs/day (see reported data for June 20, 2012). Since the slaughterhouse began discharging into the Brawley WWTP, in October 2001 through 2012, the ammonia load discharged from the slaughterhouse WWTF into the Brawley POTW has been significant and, at times, has amounted to up 70 percent of the ammonia load into the Brawley WWTP.
32. Colorado River Basin Water Board monitoring records and city of Brawley data indicate that NBC has also discharged wastewater with extremely high concentrations of BOD and TSS. Records show that as recently as 2012, the organic loading from the slaughterhouse, based on BOD and TSS data, consumed even as much as 80 percent of the Brawley WWTP's treatment capacity. In light of these data, in 2010 the city of Brawley started assessing penalties against NBC based on an ordinance the City adopted in 2001.

⁴ *City of Brawley Local Limits Study*, p. 8, December 2013.

33. Self-monitoring data provided by the city of Brawley indicate that prior to when the slaughterhouse began discharging into the Brawley WWTP, the WWTP was already dealing with ammonia loads in the 300 to 500 lbs/day range from its residential and commercial users. That amount of ammonia loading was already causing the city of Brawley noncompliance problems (i.e., acute and chronic toxicity) with its NPDES permit because the Brawley WWTP at that time lacked the ability to remove ammonia. After the slaughterhouse went into operation in October 2001, the ammonia effluent concentrations and, more importantly, the ammonia load discharged into the Brawley WWTP and into the New River, increased significantly (it essentially doubled and in some months and days tripled for discharges to the New River), the latter shown by **Attachments D and E**.
34. Based on the foregoing, the Discharger's Facility has been a main source of ammonia, BOD, TSS, and bacteria into the Brawley WWTP and has discharged these pollutants into the WWTP in concentrations and amounts (lbs/day) that had the reasonable potential to cause Pass Through and/or Interference with the Brawley WWTP.
35. The city of Brawley has also cited the Discharger on multiple different occasions for alleged slug discharges, which have been characterized by high concentrations of TSS and Chemical Oxygen Demand (COD). For example, by letter dated January 14, 2013, the city of Brawley cited the Discharger for four (4) slug discharges that occurred in November 2012, for five (5) slug discharges that occurred in December 2012, and for two (2) slug discharges that had already occurred in January 2013. Further, based on TSS results for daily composite effluent samples collected from the NBC WWTF, the Discharger has discharged into the Brawley WWTP slug loads of TSS with concentrations as high as 8,114 mg/L, which equate to 55,935 lb/day of TSS into the Brawley WWTP. This TSS load was approximately more than four times greater than the typical Brawley WWTP's incoming TSS load, which was estimated by the city of Brawley at 12,570 lbs/day pursuant to the development of its Pretreatment Program.⁵ **Attachment F**, which is based on monitoring data for the discharge from the NBC WWTF, shows additional slug discharges from the NBC WWTF into the Brawley POTW. **Attachment G**, also based on the same monitoring data, shows the overall average monthly BOD and TSS load from the NBC WWTF into the Brawley POTW.

ALLEGED VIOLATIONS OF PASS THROUGH AND/OR INTERFERENCE

36. As previously discussed in Administrative Civil Liability Complaint R7-2013-0028 issued to the city of Brawley on February 28, 2013, incorporated herein and made a part of this Complaint by reference, prior to the city of Brawley's new and upgraded WWTP being officially commissioned in March 2012, the city of Brawley operated various wastewater treatment facilities, whose main unit treatment process was ponds (mainly facultative ponds). The city of Brawley wastewater treatment facilities lacked the ability to reliably reduce ammonia to non-toxic levels. While undoubtedly some of the total nitrogen, and therefore, some ammonia too, were removed by the Brawley WWTP through the removal of

⁵ City of Brawley Local Limits Study, Table 3.5, p. 23, December 2013.

- sludge from the city ponds and by incidental nitrogen gasification, the amount of ammonia that NBC was discharging overloaded the WWTP to the extent that the net amount of ammonia removed from the wastewater discharged by the city of Brawley was insignificant. **Attachment H** shows the Brawley WWTP ammonia influent and effluent concentrations and the net ammonia percent removal at the WWTP. The data in **Attachment H** indicate that from May 2001 through July 2011, the net removal of ammonia at the Brawley WWTP was not significant. Moreover, the TSS slugs discharged by NBC into the Brawley WWTP only made the city of Brawley's compliance problems worse.
37. Because the wastewater treatment facilities that the city of Brawley owned and operated during the time period NBC discharged to its system (June 2, 2006 to present) were not at all effective to deal with the incoming ammonia load from NBC, the city of Brawley violated:
- a. Its average monthly concentration effluent limit for ammonia contained in WDRs Order R7-2005-0021 (Effluent Limitations and Discharge Specifications IV.A.1.b) on 21 different months (see **Attachment D** for 2/2007 to 11/2008);
 - b. Its maximum daily concentration effluent limit for ammonia contained in WDRs Order R7-2005-0021 (Effluent Limitations and Discharge Specifications IV.A.1.b) on 92 different occasions (see **Attachment E** for 2/7/2007 through 11/17/2008);
 - c. Its average monthly mass effluent limit for ammonia contained in WDRs Order R7-2005-0021 (Effluent Limitations and Discharge Specifications IV.A.1.b) on 21 different months (see **Attachment D** for 2/2007 to 11/2008); and
 - d. Its maximum daily mass effluent limit for ammonia contained in WDRs Order R7-2005-0021 (Effluent Limitations and Discharge Specifications IV.A.1.b) on 92 different occasions (see **Attachment E** for 2/7/2007 through 11/17/2008).
38. As shown in **Attachment I**, the City of Brawley also violated its NPDES Permit BOD, TSS, and bacteria effluent limits 59 times as follows:
- a. Its Average Monthly BOD effluent limits contained in WDRs Order R7-2005-0021 (Effluent Limitation IV.A.2.b): one time on 4/30/2010;
 - b. Its Average Monthly and Average Weekly BOD effluent limits contained in WDRs Order R7-2010-0022 (Effluent Limitation IV.A.1.a): on three and seven different occasions, respectively;
 - c. Its Average Monthly and Average Weekly TSS effluent limits contained in WDRs Order R7-2010-0022 (Effluent Limitation IV.A.1.a): on 5/30/2012 and 5/7/2012, respectively;
 - d. Its Maximum Fecal Coliform effluent limit contained in WDRs Order R7-2010-0022 (Effluent Limitation IV.A.1.d) on three different occasions;
 - e. Its Maximum Enterococci effluent limit contained in WDRs Order R7-2005-0021 (Effluent Limitation IV.A.1.e): one time on 5/10/2010;

- f. Its Maximum and Geometric Mean Enterococci effluent limits contained in WDRs Order R7-2010-0022 (Effluent Limitation IV.A.1.d): on 24 and 5 different occasions, respectively;
 - g. Its Maximum and Geometric Mean E. Coli effluent limits contained in WDRs Order R7-2005-0021 (Effluent Limitation IV.A.1.e): on seven and two different occasions, respectively; and;
 - h. Its Maximum and Geometric Mean E. Coli effluent limits contained in WDRs Order R7-2010-0022 (Effluent Limitation (IV.A.1.d): on two different occasions each.
39. In 2001 and 2002, the city of Brawley conducted Toxicity Identification Evaluation (TIE) studies to determine the cause and source(s) of toxicity. It submitted the results of its study in reports dated July 2, 2001, and July 3, 2002. The 2001 TIE identified ammonia as the primary toxicant. The 2002 TIE found total and unionized ammonia as the source of all toxicity for Ceriodapnia dubia and Pimephales promelas (fathead minnow).
40. At the Colorado River Basin Water Board's request, the city of Brawley prepared a Toxicity Reduction Evaluation (TRE) and submitted a copy of the evaluation to the Board on January 9, 2003. The TRE addressed optimization of the existing treatment system for ammonia reduction and it performed a comprehensive survey of the collection system and industrial or commercial businesses to determine the impact these businesses may have on the city of Brawley's treatment facilities. The optimization of the treatment system failed to achieve the intended results, however, as demonstrated by toxicity monitoring data for the city of Brawley. The data show that from January 2001 through July 2011 the Brawley WWTP effluent consistently exhibited chronic and acute toxicity. **Attachment J** summarizes the toxicity monitoring data. The toxicity problem was significantly exacerbated right after the slaughterhouse began discharging into the Brawley WWTP.
41. From June 2006, when NBC commenced discharging to the Brawley WWTP, through July 2011, the city of Brawley violated **90** times the Effluent Limitations and Receiving Water Limitations for acute and chronic toxicity prescribed in WDRs Orders R7-2005-0021 and R7-2010-0022. As shown in **Attachment J**, the breakdown of the violations is as follows:
- a. The city violated Effluent Limitations IV.A.1.g and Receiving Water Limitations V.A.1.j and V.A.1.k for acute and chronic toxicity of WDRs Order R7-2005-0021 **64** times for the period from June 2006 through May 2010 (see **Attachment J**); and
 - b. The city violated Effluent Limitations IV.A.1.c and Receiving Water Limitations V.A.10 and V.A.11 for acute and chronic toxicity of WDRs Order R7-2010-0022 **26** times for the period from June 2010 through July 2011 (see **Attachment J**).

42. Because the city of Brawley violated its NPDES Permit ammonia Effluent Limitations contained in WDRs Order R7-2005-0021 and its NPDES Permit Effluent Limitations and Receiving Water Limitations for acute and chronic toxicity contained in WDRs Orders R7-2005-0021 and R7-2010-0022, following NBC's commencement of discharges to the Brawley WWTP in June 2006, and because the discharge from NBC was a significant source of ammonia which caused and/or contributed to the violations and their magnitude and frequency, the discharge from NBC into the Brawley WWTP consistently caused Pass Through and/or Interference from June 2006 until approximately July 2011.
43. Monitoring data from the city of Brawley and from NBC also indicate that NBC did not start implementing effective measures to prevent Pass Through and/or Interference until early 2013, when performance data for the slaughterhouse WWTF show that for most of 2013 there was a significant decrease in the ammonia concentrations discharged by the slaughterhouse into the Brawley WWTP (see **Attachment C**). Colorado River Basin Water Board staff believes this improvement was due largely to better operation and maintenance of the NBC WWTF and repair/replacement of broken or inadequate WWTF infrastructure (e.g., pumps, aerators, valves, etc.).
44. From May 1, 2009, to May 31, 2011, NBC received 95 Notices of Violation from the city of Brawley related to its discharge of slaughterhouse pretreated wastes to the Brawley WWTP that failed to comply with applicable city standards to ensure that the discharge would not Pass Through or cause Interference with the Brawley WWTP treatment system. The Discharger, however, has known about its extremely high ammonia loading into the Brawley WWTP since as early as March 13, 2003, when it was cited by the city of Brawley for that high loading.
45. On June 20, 2011, NBC received from the city of Brawley an Order to Show Cause/Cease and Desist Order for discharging effluent to the Brawley WWTP, which did not comply with applicable city standards.
46. In response to the city of Brawley's citations and concerns about the elevated concentrations and slug discharges of ammonia, TSS, BOD, and COD into the Brawley WWTP, the Discharger attempted to improve the quality of its discharge into the Brawley WWTP by implementing short-term measures ever since it bought the Facility in June 2006. For example, it removed solids, which had accumulated in Pond 3 in June 2009 and January 2010, in an effort to increase the Pond's volume and ability to handle solids. It also made operational changes to its treatment system (e.g., adjusted the return activated sludge (RAS) and mixed liquor suspended solids for its aerobic pond) in December 2010; and it put into operation its Suspended Air Flootation (SAF) unit and belt filter press in May 2011. These efforts, and subsequent efforts it undertook through June 2012, were somewhat successful in improving the TSS and BOD quality of the discharge into the Brawley WWTP, but were not successful enough to ensure the discharge would not cause or contribute to Pass Through and/or Interference.
47. It was not until approximately on or about September 2012, when the Discharger contracted with its current consultant, HR Green, Inc., that it finally conducted a thorough assessment of its WWTF and discharges and came up with a sound proposal of WWTF upgrades and improvements to address the city of Brawley's

and Colorado River Basin Water Board staff's water quality concerns. The Discharger's hiring a Grade III certified WWTP Operator in March 2013 to supervise the operation and maintenance of the NBC WWTF, with a corresponding allocation of additional resources for O&M, was also a significant factor in improving the quality of discharge and curbing slug discharges from the NBC WWTF into the Brawley WWTP.

48. Based on the foregoing, the Discharger could have known since as early as 2002, based on the city of Brawley's TIEs conducted, and since as early as March 2003 when the Discharger's predecessor, Brawley Beef, LLC, was cited by the city of Brawley for discharging excessively high ammonia loads, that the slaughterhouse operations have been a significant source of pollutants of concern that have caused or contributed to Pass Through and/or Interference with the Brawley WWTP. Despite this actual or constructive knowledge, and despite the efforts taken by the Discharger to address the city of Brawley's and Colorado River Basin Water Board staff's concerns, the Discharger avoided timely implementing the necessary upgrades to its WWTF, following its acquisition of Brawley Beef, LLC, in June 2006, to prevent such Pass Through and/or Interference—upgrades and improvements that were recommended by the Discharger's consultant, HR Green, which included:
 1. Improving the existing DAFs with respect to aeration, floatables, settleable solids, and consistent operation;
 2. Installing a permanent dissolved oxygen probe in Pond 2;
 3. Adding four new TSS probes to control and alarm of TSS slugs;
 4. Automating Pond 3 level control to maintain a consistent drop over the weir;
 5. Automating slug diversion [automatically send slugs to onsite WWTF instead of the POTW];
 6. Dredging Pond 1;
 7. Converting Pond 1 into an anaerobic contact digester; and
 8. Adding a new clarifier.
49. Even as recently as September 2012, after the new Brawley WWTP was fully operational, the Discharger continued to discharge ammonia loads as high as 732 lbs/day (see **Attachment C**, 9/26/2012 entry), which posed a significant threat to cause Pass Through and Interference, because the city of Brawley's Pretreatment Program determined that the Maximum Allowable Industrial [Ammonia] Load into the WWTP headworks was only 720 lbs/day.⁶
50. Based on publicly available information, NBC is a subsidiary of National Beef Packing Company, LLC, which is headquartered in Kansas City, Missouri, and is one of the largest beef processing companies in the U.S., accounting for approximately 14.5 percent of all of the steer and heifer slaughter regulated by the U.S. Department of Agriculture. In December 2011, Leucadia National Corporation (LNC) acquired 78.9 percent of National Beef Packing Company, LLC. LNC has diversified holdings in its consolidated subsidiaries, which, besides National Beef

⁶ City of Brawley Local Limits Study, Table 6.1, p. 40, December 2013.

Packing Company, also include manufacturing, gaming entertainment, medical products development, and wine operations. For 2012, LNC reported its company shareholder's equity as \$6,767,268,000 and its total consolidated revenue and incomes as \$9,193,689,000.

WATER CODE SECTIONS WHICH PROVIDE FOR ASSESSMENT OF ADMINISTRATIVE CIVIL LIABILITY

51. CWC Section 13385(a)(5) states in relevant part: "A person who violates a requirement of Section 301, 302, 306, 307, 308, 318, 401, or 405 of the federal Clean Water Act (33 U.S.C. Sec. 1311, 1316, 1317, 1318, 1341, or 1345), as amended shall be held liable civilly in accordance with this section."
52. CWC Section 13385(c)(1) provides that "[c]ivil liability may be imposed administratively by the state board or a regional board pursuant to Article 2.5 (commencing with Section 13323) of Chapter 5 [of the Porter-Cologne Water Quality Control Act] in an amount not to exceed the sum of both of the following:
 - (1) Ten thousand dollars (\$10,000) for each day in which the violation occurs.
 - (2) Where there is a discharge, any portion of which is not susceptible to cleanup or is not cleaned up, and the volume discharged but not cleaned up exceeds 1,000 gallons, an additional liability not to exceed ten dollars (\$10) multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons."
53. The violations set forth above relate to the introduction by NBC of pollutants that caused or contributed to Pass Through and/or Interference with the Brawley WWTP.

FACTORS CONSIDERED IN DETERMINING ADMINISTRATIVE CIVIL LIABILITY

54. Pursuant to CWC Section 13385, subdivision (e), and Section 13327, in determining the amount of any civil liability, the Regional Board is required to take into account the nature, circumstances, extent, and gravity of the violations, whether the dischargers are susceptible to cleanup or abatement, the degree of toxicity of the discharges, and, with respect to the violator, the ability to pay, the effect on its ability to continue its business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violations, and other matters that justice may require.
55. On November 17, 2009, the State Water Resources Control Board adopted Resolution 2009-0083 amending the Water Quality Enforcement Policy (Enforcement Policy). The Enforcement Policy was approved by the Office of Administrative Law and became effective on May 20, 2010. The Enforcement Policy establishes a methodology for assessing administrative civil liability. The use of this methodology addresses the factors that are required to be considered when imposing a civil liability as outlined in Water Code Section 13385, subdivision (e), and section 13327. The entire Enforcement Policy can be found at:

http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/enf_policy_final111709.pdf

56. The required factors set forth in CWC Section 13385, subdivision (e), and Section 13327, above, have been considered for the violations alleged herein using the discretionary penalty assessment methodology prescribed in the Enforcement Policy, as explained in detail in **Attachment K** (NBC ACLC Methodology) and **Attachment L** (Penalty Calculation).
57. Pursuant to CWC Section 13385, subdivisions (c)(1) and (2), and the Enforcement Policy, where there is a discharge the Prosecution Team may determine the amount of initial liability on a per day and per gallon basis. The Prosecution Team has information related to the Discharger's daily flow for 4-5 days each month beginning July 2008. For these days the Discharger could be subject to a maximum penalty of \$10 for each gallon over the first 1000 gallons discharged that is not cleaned up or susceptible to cleanup. Pursuant to the Enforcement Policy, effluent violations are generally only addressed on a per day basis, except where it is deemed appropriate to consider also assessing liability on a per gallon basis. Based on the available information, at this time the Prosecution Team has elected not to pursue also assessing liability on a per gallon basis. In light of the purported economic benefit derived from the Discharger's noncompliance, however, the Colorado River Basin Water Board may ultimately assess liability against the Discharger based on both factors.

MAXIMUM ADMINISTRATIVE CIVIL LIABILITY AVAILABLE TO THE REGIONAL BOARD

58. Pursuant to CWC Section 13385, the total maximum administrative civil liability that may be imposed only on the per day assessment basis being pursued at this time for the violations alleged in this Complaint is \$3,750,000.00.

MINIMUM ADMINISTRATIVE CIVIL LIABILITY THE REGIONAL BOARD MUST ASSESS

59. The Enforcement Policy requires that the minimum liability for non-mandatory minimum penalties, i.e., discretionary penalties, imposed must be at least 10 percent higher than the economic benefit or savings the Discharger received resulting from the violations so that the Discharger's liabilities are not construed as simply the cost of doing business, and so that the assessed liability provides a meaningful deterrent to future violations.
60. The economic benefit of non-compliance of the Discharger's violation of 40 CFR part 403 and CWC Section 13385, which is shown in **Attachment M**, is \$11,933,724. Accounting for the 10% markup, the minimum liability that must be assessed for the violations set forth in this complaint is \$13,127,096. Because the economic benefit of non-compliance exceeds the maximum statutory administrative civil liability of \$3,750,000, the statutory limit governs the liability that may be assessed.

PROPOSED ADMINISTRATIVE CIVIL LIABILITY

61. Based on consideration of the above facts, application of the penalty methodology, and the Discharger's Ability to Pay, the Assistant Executive Officer of the Colorado River Basin Water Board proposes that civil liability be imposed administratively on the Discharger in the amount of **\$3,750,000.00**.
62. Notwithstanding the issuance of this Complaint, the Colorado River Basin Water Board retains the authority to assess additional penalties for any violation of the Clean Water Act, its implementing regulations set forth in 40 CFR, and the Porter-Cologne Water Quality Control Act (commencing with Water Code Section 13000) and its implementing regulations not included in this Complaint for which penalties have not yet been assessed or for violations that may occur subsequent to the issuance of this Complaint.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

63. Issuance of this Complaint is an enforcement action and is, therefore, exempt from the California Environmental Quality Act (Pub. Resources Code Section 21000 et seq.), pursuant to title 14, California Code of Regulations, Section 15321, subsection (a)(2).

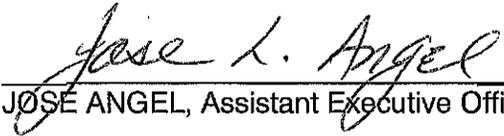
THE DISCHARGER IS HEREBY GIVEN NOTICE THAT:

1. The Assistant Executive Officer of the Colorado River Basin Water Board proposes that the Discharger be assessed:

A penalty of **\$3,750,000.00** for violation of CWC Section 13385 to recover the economic benefit the Discharger derived from noncompliance with the Clean Water Act, its implementing regulations set forth in 40 CFR, and the Porter-Cologne Water Quality Control Act (commencing with Water Code Section 13000) and its implementing regulations, as required by the Enforcement Policy.

2. CWC Section 13323(b) provides that the Regional Board shall conduct a hearing within 90 days after issuance of this Complaint. Such a hearing shall be held unless the Discharger chooses either of the following two options:
 - a. Waives the right to a Hearing before the Colorado River Basin Water Board and pays the proposed penalty of **\$3,750,000.00** in full; or
 - b. Waives the right to a Hearing before the Colorado River Basin Water Board on or before April 23, 2014 to engage the Board Prosecution Team in settlement discussions. Waiver of the right to a Hearing before the Board does not preclude the Board Prosecution Team from proceeding to hearing as set forth in the Hearing Procedures.
3. If a hearing on this matter is held, the Colorado River Basin Water Board will consider whether to affirm, reject or modify the proposed Administrative Civil Liability, or whether to refer the matter to the Attorney General for recovery of judicial civil liability.

4. Regulations of the United States Environmental Protection Agency require public notification of any proposed settlement of the civil liability occasioned by violation of the Clean Water Act. Accordingly, interested persons will be given 30 days to comment on any proposed settlement of this Complaint.

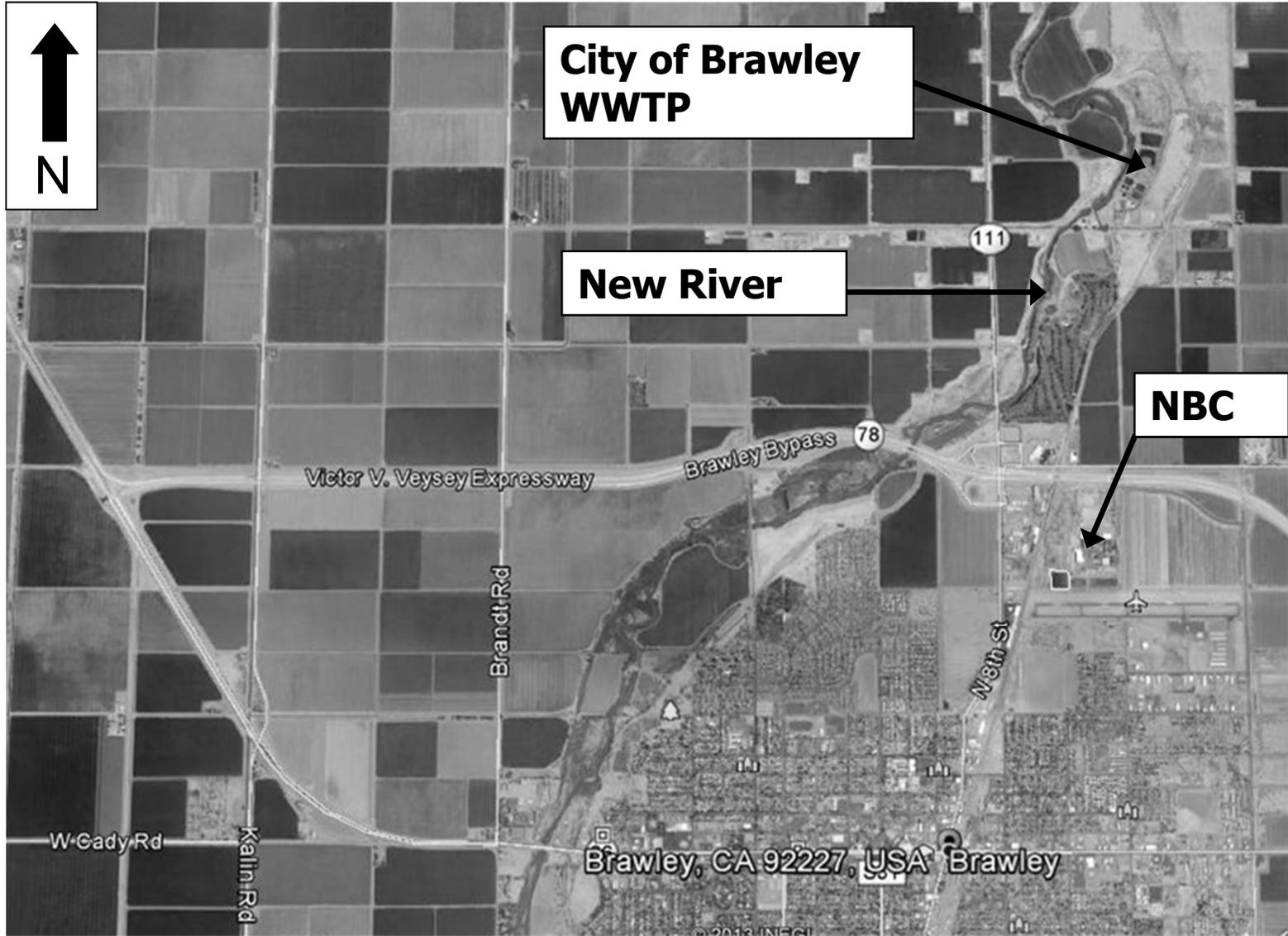


JOSE ANGEL, Assistant Executive Officer, P.E.

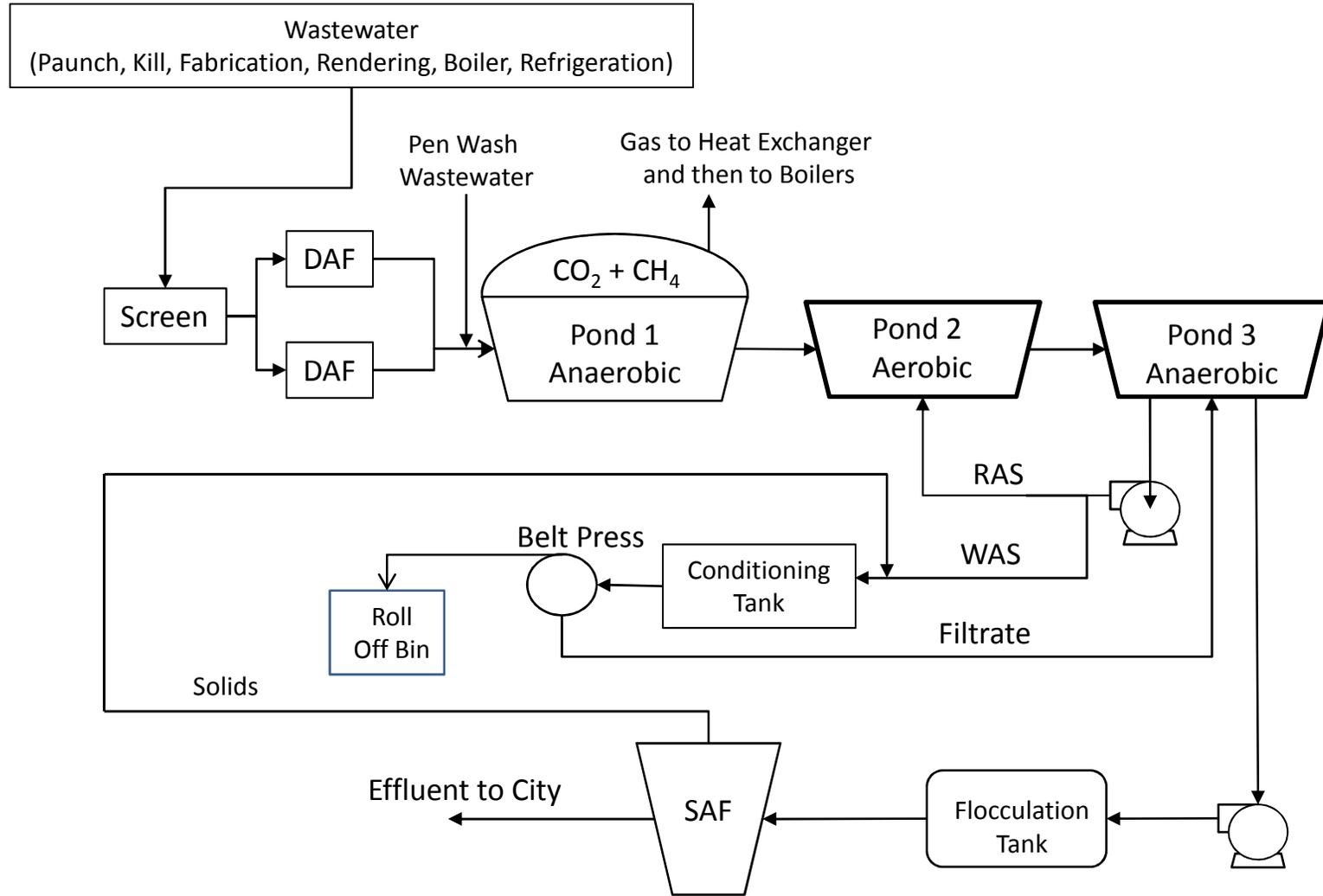


Date

Attachment A – NBC Location Map



Attachment B – NBC WWTF Flow Diagram



Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
2001	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail
Jan-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	68.00	N-Avail
Feb-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	74.50	N-Avail
Mar-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	104.00	N-Avail
Apr-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	148.00	N-Avail
May-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	99.30	N-Avail
Jun-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	61.10	N-Avail
Jul-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	121.00	N-Avail
Aug-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	74.10	N-Avail
Sep-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail
Oct-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	100.00	N-Avail
Nov-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	90.00	N-Avail
Dec-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	90.00	N-Avail
Jan-2003	2	N-Avail	N-Avail	100.00	N-Avail	93.33	N-Avail
	9	N-Avail	N-Avail	90.00	N-Avail		N-Avail
	16	N-Avail	N-Avail	90.00	N-Avail		N-Avail
Feb-2003	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail
Mar-2003	12	N-Avail	N-Avail	100.00	N-Avail	95.00	N-Avail
	20	N-Avail	N-Avail	90.00	N-Avail		N-Avail
	26	N-Avail	N-Avail	95.00	N-Avail		N-Avail
Apr-2003	9	N-Avail	N-Avail	42.00	N-Avail	43.95	N-Avail
	16	N-Avail	N-Avail	53.80	N-Avail		N-Avail
	23	N-Avail	N-Avail	40.00	N-Avail		N-Avail
	30	N-Avail	N-Avail	40.00	N-Avail		N-Avail
May-2003	7	N-Avail	N-Avail	50.00	N-Avail	37.50	N-Avail
	14	N-Avail	N-Avail	30.00	N-Avail		N-Avail
	21	N-Avail	N-Avail	30.00	N-Avail		N-Avail
	28	N-Avail	N-Avail	40.00	N-Avail		N-Avail
Jun-2003	4	N-Avail	N-Avail	80.00	N-Avail	65.78	N-Avail
	11	N-Avail	N-Avail	100.00	N-Avail		N-Avail
	18	N-Avail	N-Avail	23.10	N-Avail		N-Avail
	25	N-Avail	N-Avail	60.00	N-Avail		N-Avail
Jul-2003	2	N-Avail	N-Avail	65.40	N-Avail	49.98	N-Avail
	9	N-Avail	N-Avail	64.20	N-Avail		N-Avail
	16	N-Avail	N-Avail	24.00	N-Avail		N-Avail
	30	N-Avail	N-Avail	46.30	N-Avail		N-Avail

¹ Based on City of Brawley water quality and flow monitoring data for the slaughterhouse.

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Aug-2003	6	N-Avail	N-Avail	47.00	N-Avail	43.05	N-Avail
	13	N-Avail	N-Avail	28.60	N-Avail		N-Avail
	20	N-Avail	N-Avail	28.00	N-Avail		N-Avail
	27	N-Avail	N-Avail	68.60	N-Avail		N-Avail
Sep-2003	3	N-Avail	N-Avail	61.04	N-Avail	39.06	N-Avail
	10	N-Avail	N-Avail	38.08	N-Avail		N-Avail
	17	N-Avail	N-Avail	29.96	N-Avail		N-Avail
	24	N-Avail	N-Avail	27.16	N-Avail		N-Avail
Oct-2003	1	N-Avail	N-Avail	30.80	N-Avail	31.42	N-Avail
	8	N-Avail	N-Avail	32.48	N-Avail		N-Avail
	15	N-Avail	N-Avail	26.04	N-Avail		N-Avail
	22	N-Avail	N-Avail	33.60	N-Avail		N-Avail
	29	N-Avail	N-Avail	34.16	N-Avail		N-Avail
Nov-2003	5	N-Avail	437,800	38.64	N-Avail	35.84	131
	11	N-Avail		22.40	N-Avail		
	19	N-Avail		39.76	N-Avail		
	26	N-Avail		42.56	N-Avail		
Dec-2003	3	N-Avail	414,677	36.40	N-Avail	38.23	132
	9	N-Avail		35.84	N-Avail		
	17	N-Avail		44.80	N-Avail		
	23	N-Avail		28.56	N-Avail		
	30	N-Avail		45.56	N-Avail		
Jan-2004	7	N-Avail	368,612	48.72	N-Avail	47.60	146
	13	N-Avail		54.88	N-Avail		
	20	N-Avail		53.76	N-Avail		
	28	N-Avail		33.04	N-Avail		
Feb-2004	4	N-Avail	450,321	42.00	N-Avail	40.18	151
	11	N-Avail		41.44	N-Avail		
	18	N-Avail		40.88	N-Avail		
	25	N-Avail		36.40	N-Avail		
Mar-2004	2	N-Avail	424,580	39.76	N-Avail	35.14	124
	16	N-Avail		35.84	N-Avail		
	24	N-Avail		30.24	N-Avail		
	31	N-Avail		34.72	N-Avail		
Apr-2004	7	N-Avail	413,233	28.56	N-Avail	26.18	90
	14	N-Avail		24.08	N-Avail		
	21	N-Avail		28.56	N-Avail		
	28	N-Avail		23.52	N-Avail		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
May-2004	4	N-Avail	480,419	22.40	N-Avail	20.02	80
	12	N-Avail		17.36	N-Avail		
	19	N-Avail		20.16	N-Avail		
	26	N-Avail		20.16	N-Avail		
Jun-2004	9	N-Avail	464,300	30.24	N-Avail	17.92	69
	16	N-Avail		29.12	N-Avail		
	23	N-Avail		3.36	N-Avail		
	30	N-Avail		8.96	N-Avail		
Jul-2004	7	N-Avail	492,419	25.20	N-Avail	17.64	72
	14	N-Avail		16.80	N-Avail		
	20	N-Avail		14.56	N-Avail		
	27	N-Avail		14.00	N-Avail		
Aug-2004	4	N-Avail	433,774	9.52	N-Avail	16.24	59
	11	N-Avail		9.52	N-Avail		
	18	N-Avail		15.68	N-Avail		
	25	N-Avail		30.24	N-Avail		
Sep-2004	1	N-Avail	537,033	43.12	N-Avail	48.27	216
	8	N-Avail		40.32	N-Avail		
	15	N-Avail		50.96	N-Avail		
	22	N-Avail		86.80	N-Avail		
	29	N-Avail		20.16	N-Avail		
Oct-2004	6	N-Avail	522,193	49.28	N-Avail	28.98	126
	12	N-Avail		29.68	N-Avail		
	20	N-Avail		14.56	N-Avail		
	27	N-Avail		22.40	N-Avail		
Nov-2004	3	N-Avail	526,100	39.96	N-Avail	50.73	222.59
	11	N-Avail		45.36	N-Avail		
	17	N-Avail		57.68	N-Avail		
	24	N-Avail		59.92	N-Avail		
Dec-2004	1	N-Avail	436,677	56.00	N-Avail	76.98	280.34
	8	N-Avail		80.80	N-Avail		
	15	N-Avail		79.52	N-Avail		
	22	N-Avail		85.12	N-Avail		
	29	N-Avail		83.44	N-Avail		
Jan-2005	6	N-Avail	407,258	75.04	N-Avail	92.96	315.74
	12	N-Avail		82.32	N-Avail		
	19	N-Avail		72.80	N-Avail		
	26	N-Avail		141.68	N-Avail		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Feb-2005	2	N-Avail	497,892	63.84	N-Avail	88.68	368.25
	9	N-Avail		145.09	N-Avail		
	16	N-Avail		57.12	N-Avail		
	23	N-Avail		No Reading	N-Avail		
Mar-2005	2	N-Avail	430,967	47.60	N-Avail	55.78	200
	9	N-Avail		40.32	N-Avail		
	16	N-Avail		53.20	N-Avail		
	23	N-Avail		69.44	N-Avail		
	30	N-Avail		68.32	N-Avail		
Apr-2005	6	N-Avail	364,766	53.20	N-Avail	44.52	135.44
	13	N-Avail		43.68	N-Avail		
	20	N-Avail		40.32	N-Avail		
	27	N-Avail		40.88	N-Avail		
May-2005	4	N-Avail	451,838	31.92	N-Avail	28.00	105.51
	11	N-Avail		31.36	N-Avail		
	18	N-Avail		24.08	N-Avail		
	25	N-Avail		24.64	N-Avail		
Jun-2005	1	N-Avail	480,066	25.76	N-Avail	45.12	181
	8	N-Avail		38.64	N-Avail		
	15	N-Avail		109.76	N-Avail		
	22	N-Avail		24.64	N-Avail		
	29	N-Avail		26.80	N-Avail		
Jul-2005	6	N-Avail	490,967	19.04	N-Avail	16.66	68.22
	13	N-Avail		21.28	N-Avail		
	20	N-Avail		12.88	N-Avail		
	27	N-Avail		13.44	N-Avail		
Aug-2005	3	N-Avail	489,645	16.24	N-Avail	15.57	64
	10	N-Avail		16.80	N-Avail		
	17	N-Avail		19.60	N-Avail		
	24	N-Avail		14.56	N-Avail		
	31	N-Avail		10.64	N-Avail		
Sep-2005	7	N-Avail	454,900	10.64	N-Avail	13.72	52.05
	14	N-Avail		19.04	N-Avail		
	21	N-Avail		14.56	N-Avail		
	28	N-Avail		10.64	N-Avail		
Oct-2005	4	N-Avail	431,580	9.52	N-Avail	10.64	38
	12	N-Avail		10.08	N-Avail		
	26	N-Avail		12.32	N-Avail		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Nov-2005	2	N-Avail	359,000	20.16	N-Avail	25.48	76.29
	9	N-Avail		20.16	N-Avail		
	16	N-Avail		22.96	N-Avail		
	30	N-Avail		38.64	N-Avail		
Dec-2005	6	N-Avail	459,709	53.76	N-Avail	57.96	222.22
	14	N-Avail		67.76	N-Avail		
	21	N-Avail		63.84	N-Avail		
	28	N-Avail		46.48	N-Avail		
Jan-2006	4	N-Avail	521,225	34.16	N-Avail	35.28	153.36
	11	N-Avail		28.00	N-Avail		
	17	N-Avail		35.28	N-Avail		
	24	N-Avail		43.68	N-Avail		
Feb-2006	1	N-Avail	539,107	51.52	N-Avail	48.16	217
	8	N-Avail		52.64	N-Avail		
	22	N-Avail		40.32	N-Avail		
Mar-2006	1	N-Avail	529,290	35.84	N-Avail	40.74	179.84
	8	N-Avail		39.76	N-Avail		
	22	N-Avail		41.44	N-Avail		
	28	N-Avail		45.92	N-Avail		
Apr-2006	4	N-Avail	575,033	38.64	N-Avail	32.50	155.86
	12	N-Avail		34.72	N-Avail		
	19	N-Avail		35.84	N-Avail		
	26	N-Avail		20.80	N-Avail		
May-2006	3	N-Avail	497,032	32.48	N-Avail	31.51	131
	10	N-Avail		31.26	N-Avail		
	17	N-Avail		30.80	N-Avail		
Jun-2006	1	N-Avail	591,833	31.92	N-Avail	36.51	180.21
	7	N-Avail		25.20	N-Avail		
	14	N-Avail		31.92	N-Avail		
	28	N-Avail		57.00	N-Avail		
Jul-2006	5	N-Avail	609,903	67.76	N-Avail	51.66	262.77
	12	N-Avail		38.08	N-Avail		
	19	N-Avail		47.60	N-Avail		
	26	N-Avail		53.20	N-Avail		
Aug-2006	2	N-Avail	624,129	45.36	N-Avail	37.32	194
	9	N-Avail		26.64	N-Avail		
	15	N-Avail		36.96	N-Avail		
	23	N-Avail		40.32	N-Avail		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
	30	N-Avail		27.50	N-Avail		
Sep-2006	20	N-Avail	732,466	45.92	N-Avail	47.88	
	27	N-Avail		49.84	N-Avail		
Oct-2006	4	N-Avail	554,645	27.44	N-Avail	27.58	127.58
	11	N-Avail		28.56	N-Avail		
	17	N-Avail		26.88	N-Avail		
	24	N-Avail		27.44	N-Avail		
Nov-2006	1	N-Avail	600,866	33.04	N-Avail	46.76	234
	7	N-Avail		34.16	N-Avail		
	13	N-Avail		52.64	N-Avail		
	21	N-Avail		67.20	N-Avail		
	29	N-Avail		56.00	N-Avail		
Dec-2006	5	N-Avail	522,741	84.00	N-Avail	88.90	387.57
	12	N-Avail		92.96	N-Avail		
	20	N-Avail		85.12	N-Avail		
	27	N-Avail		93.52	N-Avail		
Jan-2007	3	N-Avail	691,032	89.04	N-Avail	106.74	615
	10	N-Avail		94.08	N-Avail		
	17	N-Avail		90.72	N-Avail		
	23	N-Avail		129.92	N-Avail		
	31	N-Avail		129.92	N-Avail		
Feb-2007	6	N-Avail	724,464	107.52	N-Avail	77.28	466.93
	13	N-Avail		73.92	N-Avail		
	20	N-Avail		59.36	N-Avail		
	27	N-Avail		68.32	N-Avail		
Mar-2007	7	N-Avail	675,967	12.60	N-Avail	23.17	130.62
	13	N-Avail		37.52	N-Avail		
	21	N-Avail		20.72	N-Avail		
	27	N-Avail		21.84	N-Avail		
Apr-2007	4	N-Avail	644,000	44.24	N-Avail	44.38	238.36
	11	N-Avail		37.52	N-Avail		
	17	N-Avail		46.48	N-Avail		
	25	N-Avail		49.28	N-Avail		
May-2007	2	N-Avail	688,709	38.64	N-Avail	44.02	253
	9	N-Avail		47.60	N-Avail		
	15	N-Avail		44.80	N-Avail		
	22	N-Avail		45.92	N-Avail		
	30	N-Avail		43.12	N-Avail		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Jun-2007	6	N-Avail	643,709	49.84	N-Avail	49.28	264.56
	13	N-Avail		47.04	N-Avail		
	20	N-Avail		49.28	N-Avail		
	27	N-Avail		50.96	N-Avail		
Jul-2007	3	N-Avail	664,193	54.32	N-Avail	53.62	297.02
	10	N-Avail		51.52	N-Avail		
	18	N-Avail		53.20	N-Avail		
	25	N-Avail		55.44	N-Avail		
Aug-2007	1	N-Avail	665,967	61.04	N-Avail	55.33	307
	8	N-Avail		72.24	N-Avail		
	14	N-Avail		49.84	N-Avail		
	23	N-Avail		44.80	N-Avail		
	28	N-Avail		48.72	N-Avail		
Sep-2007	5	N-Avail	666,666	45.92	N-Avail	41.25	229.36
	12	N-Avail		40.32	N-Avail		
	19	N-Avail		33.92	N-Avail		
	25	N-Avail		44.85	N-Avail		
Oct-2007	2	N-Avail	546,774	41.44	N-Avail	26.43	121
	10	N-Avail		26.88	N-Avail		
	16	N-Avail		19.04	N-Avail		
	24	N-Avail		22.40	N-Avail		
	31	N-Avail		22.40	N-Avail		
Nov-2007	7	N-Avail	664,166	13.44	N-Avail	15.49	86
	13	N-Avail		15.68	N-Avail		
	28	N-Avail		17.36	N-Avail		
Dec-2007	4	N-Avail	692,741	17.92	N-Avail	17.36	100.30
	11	N-Avail		16.80	N-Avail		
	18	N-Avail		18.48	N-Avail		
	27	N-Avail		16.24	N-Avail		
Jan-2008	N-Avail	N-Avail	659,677	N-Avail	N-Avail	16.15	89
	N-Avail	N-Avail		N-Avail	N-Avail		
	N-Avail	N-Avail		N-Avail	N-Avail		
Feb-2008	N-Avail	N-Avail	761,964	N-Avail	N-Avail	15.4	98
	N-Avail	N-Avail		N-Avail	N-Avail		
Mar-2008	N-Avail	N-Avail	783,065	N-Avail	N-Avail	11.61	76
	N-Avail	N-Avail		N-Avail	N-Avail		
	N-Avail	N-Avail		N-Avail	N-Avail		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Apr-2008	N-Avail	N-Avail	594,833	N-Avail	N-Avail	34.92	173
	N-Avail	N-Avail		N-Avail	N-Avail		
	N-Avail	N-Avail		N-Avail	N-Avail		
May-2008	N-Avail	N-Avail	775,484	N-Avail	N-Avail	46.9	303
	N-Avail	N-Avail		N-Avail	N-Avail		
	N-Avail	N-Avail		N-Avail	N-Avail		
Jun-2008	N-Avail	N-Avail	704,333	N-Avail	N-Avail	14.14	83
	N-Avail	N-Avail		N-Avail	N-Avail		
	N-Avail	N-Avail		N-Avail	N-Avail		
Jul-2008	1	740,000	668,548	1.68	10.37	12.88	72
	8	622,500		15.12	78.50		
	15	637,500		25.20	133.98		
	22	647,500		19.60	105.84		
	29	638,750		2.80	14.92		
Aug-2008	5	647,500	571,613	17.92	96.77	17.50	83
	12	636,428		14.56	77.28		
	19	666,428		22.96	127.61		
	26	683,571		14.56	83.01		
Sep-2008	2	619,285	740,000	19.04	98.34	14.90	92
	9	685,000		15.68	89.58		
	16	655,000		15.12	82.60		
	23	648,571		14.00	75.73		
	30	657,142		10.64	58.31		
Oct-2008	7	657,142	599,194	11.20	61.38	7.84	39
	14	687,857		5.04	28.91		
	21	680,714		7.84	44.51		
	28	647,142		7.28	39.29		
Nov-2008	6	667,143	653,000	7.84	43.62	10.50	57
	13	661,428		11.20	61.78		
	20	661,428		10.64	58.69		
	25	656,428		12.32	67.45		
Dec-2008	2	673,571	668,194	11.76	66.06	10.30	57
	9	651,428		9.52	51.72		
	18	664,285		11.76	65.15		
	23	597,857		10.08	50.26		
	30	672,857		8.40	47.14		
Jan-2009	8	710,000	635,645	10.64	63.00	9.38	50
	14	697,857		11.20	65.19		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
	22	676,428		9.52	53.71		
	29	670,714		6.16	34.46		
Feb-2009	5	669,285	737,500	5.60	31.26	8.12	50
	12	675,625		10.64	59.95		
	19	715,000		7.84	46.75		
	26	695,714		8.40	48.74		
Mar-2009	5	692,857	659,677	10.08	58.25	10.50	58
	12	688,571		11.76	67.53		
	19	687,142		9.52	54.56		
	26	682,857		10.64	60.60		
Apr-2009	2	694,285	647,000	9.52	55.12	9.18	50
	9	699,285		6.16	35.93		
	15	679,285		11.20	63.45		
	23	717,857		10.64	63.70		
	30	717,142		8.40	50.24		
May-2009	7	755,714	707,419	9.52	60.00	9.80	58
	14	742,142		10.64	65.86		
	21	691,250		10.64	61.34		
	28	690,000		8.40	48.34		
Jun-2009	4	737,857	752,500	10.04	61.78	7.27	46
	11	723,571		10.08	60.83		
	18	688,570		3.92	22.51		
	24	687,142		5.04	28.88		
Jul-2009	2	697,857	685,968	15.68	91.26	13.33	76
	9	682,857		15.12	86.11		
	16	655,000		14.56	79.54		
	23	661,428		3.36	18.53		
	30	658,857		17.92	98.47		
Aug-2009	6	681,285	663,387	9.52	54.09	11.20	62
	13	687,714		12.32	70.66		
	20	750,714		11.20	70.12		
	27	820,428		11.76	80.47		
Sep-2009	2	838,428	669,900	17.36	121.39	11.34	63
	10	769,000		14.56	93.38		
	17	850,857		5.60	39.74		
	21	756,285		7.84	49.45		
Oct-2009	7	905,142	810,065	4.48	33.82	6.21	42
	14	865,714		3.92	28.30		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
	21	814,285		7.48	50.80		
	28	645,714		8.96	48.25		
Nov-2009	4	890,000	819,367	7.28	54.04	7.28	50
	11	859,714		7.84	56.21		
	18	856,285		7.84	55.99		
	25	842,571		6.16	43.29		
Dec-2009	2	888,285	836,677	10.64	78.82	10.76	75
	9	913,714		11.78	89.77		
	16	789,000		11.20	73.70		
	23	678,857		9.52	53.90		
	30	815,285		10.64	72.35		
Jan-2010	6	763,428	818,290	5.60	35.66	7.56	52
	13	731,428		1.68	10.25		
	20	723,857		7.28	43.95		
	27	776,571		15.68	101.55		
Feb-2010	3	861,285	995,593	8.96	64.36	11.66	97
	10	835,571		11.20	78.05		
	17	816,428		10.80	73.54		
	24	820,428		15.68	107.29		
Mar-2010	3	848,714	847,742	15.68	110.99	20.83	147
	10	848,857		13.44	95.15		
	17	786,285		15.12	99.15		
	24	824,857		28.00	192.62		
	31	889,000		31.92	236.66		
Apr-2010	1	889,000	957,833	31.92	236.66	21.28	170
	8	858,000		16.80	120.22		
	15	961,142		21.28	170.58		
	21	963,571		17.92	144.01		
	29	968,142		18.48	149.21		
May-2010	6	1,024,285	925,452	16.80	143.51	17.08	132
	13	991,142		17.36	143.50		
	20	968,000		17.92	144.67		
	27	978,142		16.24	132.48		
Jun-2010	3	830,714	885,143	12.32	85.35	57.46	424
	10	792,000		45.92	303.31		
	17	929,000		72.24	559.71		
	24	933,857		62.72	488.49		
	30	940,142		94.08	737.66		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Jul-2010	1	940,142	917,828	94.08	737.66	44.35	340
	8	860,000		43.68	313.29		
	15	973,285		38.64	313.65		
	22	941,285		22.96	180.24		
	29	874,428		22.40	163.36		
Aug-2010	4	890,428	869,321	11.20	83.17	18.62	135
	11	828,714		19.60	135.46		
	18	870,857		20.16	146.42		
	25	887,285		23.52	174.05		
Sep-2010	1	891,571	868,799	1.12	8.33	16.58	120
	8	803,285		20.72	138.81		
	15	901,428		21.84	164.19		
	22	886,142		21.28	157.27		
	29	861,571		17.92	128.76		
Oct-2010	7	889,428	893,857	31.36	232.62	22.12	165
	14	892,571		22.40	166.75		
	21	890,000		17.92	133.01		
	28	903,428		16.80	126.58		
Nov-2010	3	867,142	876,285	16.24	117.45	9.94	73
	10	891,428		2.80	20.82		
	17	895,714		6.16	46.02		
	24	850,857		14.56	103.32		
Dec-2010	1	915,142	866,742	2.64	20.15	34.02	246
	8	920,428		17.36	133.26		
	15	893,285		35.84	267.01		
	20	793,142		67.76	448.22		
	28	811,714		46.48	314.66		
Jan-2011	5	847,571	858,000	24.64	174.17	32.76	234
	12	895,857		23.52	175.73		
	19	826,571		59.36	409.20		
	26	862,000		23.52	169.09		
Feb-2011	2	923,714	893,607	20.16	155.31	41.31	308
	9	880,428		43.16	316.91		
	16	900,142		58.24	437.22		
	23	870,142		43.68	316.99		
Mar-2011	2	888,428	690,178	27.44	203.32	44.14	254
	9	883,285		34.72	255.77		
	16	690,178		52.12	300.01		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
	23	471,000		52.08	204.58		
	30	518,000		54.32	234.67		
Apr-2011	7	997,657	1,207,781	84.56	703.58	82.46	831
	14	1,352,800		81.20	916.13		
	21	1,206,667		84.56	850.98		
	28	1,274,000		79.52	844.91		
May-2011	4	1,280,885	1,088,803	40.32	430.72	66.92	608
	12	1,058,971		68.88	608.34		
	18	1,057,171		70.00	617.18		
	25	958,185		88.48	707.07		
Jun-2011	1	930,028	964,360	43.12	334.46	39.42	317
	8	1,019,900		33.04	281.04		
	15	966,471		40.88	329.51		
	22	1,023,400		43.68	372.82		
	29	882,000		36.40	267.75		
Jul-2011	7	772,857	871,639	18.48	119.12	35.84	261
	14	947,985		45.92	363.05		
	21	885,000		49.84	367.86		
	28	880,714		29.12	213.89		
Aug-2011	4	884,857	922,296	45.36	334.74	30.38	234
	11	880,714		27.44	201.55		
	18	947,000		39.76	314.02		
	25	976,614		8.96	72.98		
Sep-2011	1	964,571	1,013,797	56.00	450.49	29.55	250
	8	880,857		29.60	217.45		
	15	959,714		48.70	389.80		
	22	713,285		10.64	63.30		
	29	1,550,558		2.80	36.21		
Oct-2011	6	1,431,873	1,165,055	1.96	23.41	2.31	22
	13	1,644,318		3.92	53.76		
	20	1,584,029		2.80	36.99		
	27	1,602,382		0.56	7.48		
Nov-2011	2	1,539,482	1,708,086	0.93	11.94	18.10	258
	9	1,983,222		12.60	208.40		
	16	1,712,757		17.60	251.41		
	23	1,488,157		20.16	250.21		
	30	1,816,814		39.20	593.97		
Dec-2011			1,710,680				

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Jan-2012	5	1,726,228	1,676,791	35.00	503.89	27.30	382
	12	1,778,200		22.12	328.04		
	19	1,609,500		25.48	342.02		
	26	1,593,234		26.60	353.45		
Feb-2012	2	1,376,631	1,552,031	37.70	432.84	20.80	269
	9	1,701,899		36.20	513.82		
	16	1,493,753		22.10	275.32		
	23	1,553,693		6.90	89.41		
	29	1,634,181		1.12	15.26		
Mar-2012	7	940,166	1,520,970	18.48	144.90	21.45	272
	14	1,674,935		14.37	200.73		
	21	1,800,594		19.90	298.84		
	28	1,668,186		33.04	459.67		
Apr-2012	4	1,659,130	1,655,187	29.23	404.46	24.12	333
	11	1,699,304		21.50	304.70		
	18	1,605,562		5.60	74.99		
	25	1,656,753		40.13	554.49		
May-2012	3	1,661,981	1,625,651	56.37	781.34	44.29	600
	10	1,642,676		43.60	597.32		
	17	1,882,162		47.00	737.77		
	24	1,502,800		33.60	421.12		
	31	1,438,636		40.88	490.49		
Jun-2012	6	1,659,465	1,633,550	60.40	835.93	51.90	707
	13	1,727,533		45.10	649.78		
	20	1,559,949		86.28	1122.50		
	27	1,587,253		15.80	209.16		
Jul-2012	4	1,536,578	1,630,053	12.04	154.29	45.71	621
	11	1,752,793		60.80	888.79		
	18	1,494,898		54.60	680.72		
	25	1,735,941		55.40	802.07		
Aug-2012	1	1,563,707	1,492,273	80.36	1048.00	48.32	601
	8	1,416,768		36.40	430.10		
	15	1,440,617		55.25	663.81		
	22	1,548,000		21.28	274.73		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
Sep-2012	5	1,489,850	1,539,584	17.36	215.70	43.89	564
	12	1,713,898		47.04	672.39		
	19	1,446,267		52.92	638.31		
	26	1,508,320		58.24	732.62		
Oct-2012	3	1,633,608	1,539,432	37.52	511.18	13.50	173
	10	1,594,322		0.56	7.45		
	17	1,016,580		7.28	61.72		
	24	1,828,731		21.56	328.82		
	31	1,623,917		0.56	7.58		
Nov-2012	7	1,367,030	1,490,945	1.12	12.77	16.94	211
	14	1,655,935		2.80	38.67		
	21	1,475,392		40.32	496.13		
	29	1,465,421		23.52	287.45		
Dec-2012	7	1,367,030	1,490,945	1.12	12.77	16.94	211
	14	1,655,935		2.80	38.67		
	21	1,475,392		40.32	496.13		
	29	1,465,421		23.52	287.45		
Jan-2013	2	1,157,449	1,357,696	12.12	117.00	13.82	156
	9	1,677,668		45.92	642.50		
	16	1,247,067		5.60	58.24		
	23	1,281,508		4.90	52.37		
	30	1,424,786		0.56	6.65		
Feb-2013	6	1,342,674	1,313,943	3.10	34.71	1.48	16
	13	1,256,146		0.84	8.80		
	20	1,227,137		1.40	14.33		
	27	1,429,814		0.56	6.68		
Mar-2013	6	1,451,830	1,314,768	2.24	27.12	1.47	16
	13	1,401,325		0.84	9.82		
	21	1,402,770		0.56	6.55		
	27	1,003,145		2.24	18.74		
Apr-2013	3	1,150,747	1,249,728	1.96	18.81	1.54	16
	10	1,284,081		0.56	6.00		
	17	1,423,740		1.68	19.95		
	24	1,140,343		1.96	18.64		
May-2013	1	1,384,713	1,337,499	0.74	8.55	9.91	111
	8	1,198,336		0.56	5.60		
	15	1,397,696		6.44	75.07		
	22	1,232,868		36.96	380.03		

Attachment C - Ammonia Discharged by Slaughterhouse into POTW¹

Month/Year	day	Daily Flow (gpd)	Avg. Monthly Flow (gpd)	Daily Ammonia Concentration (mg/L)	Daily Ammonia Load (lbs/day)	Avg. Monthly Ammonia Concentration (mg/L)	Avg. Monthly Ammonia Load into WWTP (lbs/day)
	29	1,473,883		4.85	59.62		
Jun-2013	5	1,598,171	1,423,593	5.41	72.11	14.96	178
	12	1,596,094		47.70	634.95		
	19	1,281,793		4.48	47.89		
	26	1,218,313		2.24	22.76		
Jul-2013	3	1,389,760	1,452,835	0.93	10.78	8.87	108
	10	1,501,650		5.80	72.64		
	17	1,512,018		6.16	77.68		
	24	1,160,841		2.24	21.69		
	31	1,699,904		29.24	414.54		
Aug-2013	7	1,425,380	1,524,265	16.80	199.71	7.53	96
	14	1,497,947		7.40	92.45		
	21	1,498,395		3.50	43.74		
	28	1,675,337		2.40	33.53		
Sep-2013	4	1,472,082	1,488,240	2.24	27.50	4.43	55
	11	1,567,981		8.40	109.85		
	18	1,569,353		5.60	73.30		
	25	1,343,542		1.49	16.70		
Oct-2013	2	1,343,698	1,341,348	0.74	8.29	0.74	8
	9	1,394,486		0.56	6.51		
	16	1,266,194		0.74	7.81		
	23	1,393,865		0.74	8.60		
	30	1,308,498		0.93	10.15		
Nov-2013	6	1,157,805		2.05	19.79	2.05	
	13	1,509,292		3.92	49.34		
	20	1,285,788		1.12	12.01		
	27	1,455,094		1.12	13.59		
Dec-2013	4	1,584,649		1.12	14.80	1.47	
	11	1,713,265		2.24	32.01		
	18	1,476,343		1.12	13.79		
	25	1,200,133		1.40	14.01		

Attachment D - Average Monthly Ammonia Load Discharged by Brawley WWTP into New River ¹						
Month, Year	Flow (mgd)	Effluent Ammonia Concentration (mg/L as N)	Violation of NPDES Limit?	Ammonia Load (lbs/day)	Flow-weighted Limit (lbs/day)	Violation of NPDES Limit?
May 2001	3.10	19.30	NA ²	499	NA	NA
Jun 2001	3.04	14.90	NA	378	NA	NA
Jul 2001	3.02	12.20	NA	307	NA	NA
Aug 2001	3.20	7.30	NA	195	NA	NA
Sep 2001	3.30	12.20	NA	336	NA	NA
Oct 2001	3.24	11.80	NA	319	NA	NA
Nov 2001	3.08	15.80	NA	406	NA	NA
Dec 2001	3.12	19.60	NA	510	NA	NA
Jan 2002	3.19	20.60	NA	548	NA	NA
Feb 2002	2.73	20.80	NA	474	NA	NA
Mar 2002	2.66	33.80	NA	750	NA	NA
Apr 2002	2.66	26.40	NA	586	NA	NA
May 2002	2.65	40.00	NA	884	NA	NA
Jun 2002	2.66	36.20	NA	803	NA	NA
Jul 2002	3.81	34.10	NA	1084	NA	NA
Aug 2002	3.56	33.60	NA	998	NA	NA
Sep 2002	3.55	26.80	NA	793	NA	NA
Oct 2002	2.96	30.00	NA	741	NA	NA
Nov 2002	3.49	35.00	NA	1019	NA	NA
Dec 2002	3.24	28.30	NA	765	NA	NA
Jan 2003	3.16	45.00	NA	1186	NA	NA
Feb 2003	3.22	30.00	NA	806	NA	NA
Mar 2003	3.24	41.10	NA	1111	NA	NA
Apr 2003	3.34	45.40	NA	1265	NA	NA
May 2003	3.57	35.00	NA	1042	NA	NA
Jun 2003	3.42	35.00	NA	998	NA	NA
Jul 2003	3.46	33.50	NA	967	NA	NA
Aug 2003	3.85	22.40	NA	719	NA	NA
Sep 2003	3.41	25.00	NA	711	NA	NA
Oct 2003	3.23	19.18	NA	517	NA	NA
Nov 2003	3.10	1.40	NA	36	NA	NA

¹ Data on this table is based on Self-monitoring reports (SMRs) submitted by the City of Brawley to the Colorado River Basin Water Board.

² Not Applicable. WDRs Order No. 00-0087 in effect from 6/28/2000 through 6/28/2005. It does not establish ammonia effluent limits.

Attachment D - Average Monthly Ammonia Load Discharged by Brawley WWTP into New River ¹						
Month, Year	Flow (mgd)	Effluent Ammonia Concentration (mg/L as N)	Violation of NPDES Limit?	Ammonia Load (lbs/day)	Flow-weighted Limit (lbs/day)	Violation of NPDES Limit?
Dec 2003	3.06	24.10	NA	615	NA	NA
Jan 2004	3.41	27.40	NA	779	NA	NA
Feb 2004	3.60	27.00	NA	811	NA	NA
Mar 2004	3.42	24.40	NA	696	NA	NA
Apr 2004	3.44	21.28	NA	611	NA	NA
May 2004	3.40	1.68	NA	48	NA	NA
Jun 2004	3.49	2.24	NA	65	NA	NA
Jul 2004	3.58	1.96	NA	59	NA	NA
Aug 2004	3.55	1.40	NA	41	NA	NA
Sep 2004	3.78	1.96	NA	62	NA	NA
Oct 2004	3.82	0.84	NA	27	NA	NA
Nov 2004	3.40	1.68	NA	48	NA	NA
Dec 2004	3.75	26.32	NA	823	NA	NA
Jan 2005	3.72	34.20	NA	1061	NA	NA
Feb 2005	3.63	27.16	NA	822	NA	NA
Mar 2005	3.28	29.10	NA	796	NA	NA
Apr 2005	3.31	30.80	NA	850	NA	NA
May 2005	3.34	20.44	NA	569	NA	NA
Jun 2005	3.40	11.20	No	318	NA	NA
Jul 2005	3.46	19.04	No ³	549	NA	No
Aug 2005	3.67	18.48	No	566	NA	No
Sep 2005	3.48	17.36	No	504	NA	No
Oct 2005	3.66	19.74	No	603	NA	No
Nov 2005	3.53	16.69	No	491	NA	No
Dec 2005	3.78	27.86	No	878	NA	No
Jan 2006	3.66	26.46	No	808	NA	No
Feb 2006	3.59	30.10	No	901	NA	No
Mar 2006	4.02	27.88	No	935	NA	No
Apr 2006	3.00	31.64	No	792	NA	No
May 2006	3.59	31.25	No	936	NA	No
Jun 2006	3.74	29.06	No	906	NA	No
Jul 2006	3.80	35.14	No	1114	NA	No
Aug 2006	3.84	26.16	No	838	NA	No
Sep 2006	3.76	29.21	No	916	NA	No

³ WDRs Order R7-2005-0021 is adopted on 6/29/2005. From 6/29/2005 through Jan 2007, no Ammonia Limits. Effective 2/1/2007, WDRs R7-2005-0021 set Max. Daily Limits for NH3 at 12 mg/L and 590 lb/day @ 5.9 mgd.

Attachment D - Average Monthly Ammonia Load Discharged by Brawley WWTP into New River ¹						
Month, Year	Flow (mgd)	Effluent Ammonia Concentration (mg/L as N)	Violation of NPDES Limit?	Ammonia Load (lbs/day)	Flow-weighted Limit (lbs/day)	Violation of NPDES Limit?
Oct 2006	3.64	24.64	No	748	NA	No
Nov 2006	3.85	30.34	No	974	NA	No
Dec 2006	3.91	37.38	No	1219	NA	No
Jan 2007	3.92	42.12	No	1377	NA	No
Feb 2007	4.00	50.82	Yes ⁴	1695	37	Yes
Mar 2007	3.92	18.62	Yes	609	36	Yes
Apr 2007	3.71	22.26	Yes	689	34	Yes
May 2007	3.69	31.81	Yes	979	34	Yes
Jun 2007	3.75	33.60	Yes	1051	34	Yes
Jul 2007	3.78	31.78	Yes	1002	35	Yes
Aug 2007	3.78	31.36	Yes	989	35	Yes
Sep 2007	3.79	28.00	Yes	885	35	Yes
Oct 2007	3.79	20.27	Yes	641	35	Yes
Nov 2007	4.07	20.30	Yes	689	37	Yes
Dec 2007	4.25	18.76	Yes	665	39	Yes
Jan 2008	4.27	21.06	Yes	750	39	Yes
Feb 2008	4.30	20.02	Yes	718	39	Yes
Mar 2008	4.11	19.46	Yes	667	38	Yes
Apr 2008	3.00	25.87	Yes	647	28	Yes
May 2008	3.93	30.18	Yes	989	36	Yes
Jun 2008	3.89	21.56	Yes	699	36	Yes
Jul 2008	3.80	19.26	Yes	610	35	Yes
Aug 2008	3.97	17.50	Yes	579	36	Yes
Sep 2008	3.93	17.36	Yes	569	36	Yes
Oct 2008	3.79	16.39	Yes	518	35	Yes
Nov 2008	3.93	16.94	Yes ⁵	555	36	Yes
Dec 2008	3.89	19.60	No	636	NA	No
Jan 2009	4.02	21.28	No	713	NA	No
Feb 2009	3.97	23.66	No	783	NA	No
Mar 2009	NA	NA	No	NA	NA	No
Apr 2009	NA	NA	No	NA	NA	No
May 2009	4.15	19.18	No	664	NA	No
Jun 2009	4.05	12.21	No	412	NA	No

⁴ Effective 2/1/2007, WDRs R7-2005-0021 set Max. Daily Limits for NH₃ at 12 mg/L and 590 lb/day @ 5.9 mgd.

⁵ Effective 11/19/2008, Special Order R7-2008-0069 amends CDO R7-2008-008 and establishes Interim Effluent Limits for ammonia at 120 mg/L and 5900 Lbs/day.

Attachment D - Average Monthly Ammonia Load Discharged by Brawley WWTP into New River ¹						
Month, Year	Flow (mgd)	Effluent Ammonia Concentration (mg/L as N)	Violation of NPDES Limit?	Ammonia Load (lbs/day)	Flow-weighted Limit (lbs/day)	Violation of NPDES Limit?
Jul 2009	4.02	10.92	No	366	NA	No
Aug 2009	4.04	5.56	No	187	NA	No
Sep 2009	4.06	6.86	No	232	NA	No
Oct 2009	3.64	12.88	No	391	NA	No
Nov 2009	3.64	21.67	No	658	NA	No
Dec 2009	4.50	22.89	No	859	NA	No
Jan 2010	4.50	22.82	No	856	NA	No
Feb 2010	4.50	24.22	No	909	NA	No
Mar 2010	4.50	23.86	No	895	NA	No
Apr 2010	3.80	29.82	No	945	NA	No
May 2010	3.80	34.02	No	1078	NA	No
Jun 2010	NA	NA	No ⁶	NA	NA	No
Jul 2010	3.77	35.49	No	1117	NA	No
Aug 2010	3.56	18.34	No	545	NA	No
Sep 2010	3.56	10.78	No	320	NA	No
Oct 2010	3.72	20.58	No	639	NA	No
Nov 2010	3.63	23.64	No	715	NA	No
Dec 2010	3.80	26.88	No	853	NA	No
Jan 2011	3.71	28.32	No	876	NA	No
Feb 2011	3.94	28.84	No	947	NA	No
Mar 2011	3.50	37.58	No	1096	NA	No
Apr 2011	3.63	48.98	No	1481	NA	No
May 2011	3.53	41.55	No	1222	NA	No
Jun 2011	3.58	35.98	No	1075	NA	No
Jul 2011	3.40	18.49	No	525	NA	No
Aug 2011	3.62	1.12	No	34	NA	No
Sep 2011	3.76	2.24	No	70	NA	No
Oct 2011	3.65	0.84	No	26	NA	No
Nov 2011	3.94	0.78	No	26	NA	No
Dec 2011	4.06	2.38	No	81	NA	No
Jan 2012	3.92	1.68	No	55	NA	No
Feb 2012	3.93	0.67	No	22	NA	No
Mar 2012	3.99	0.84	No	28	70	No
Apr 2012	3.80	1.12	No	36	67	No

⁶ WDRs R7-2010-0022 becomes effective on 5/20/2010. For the City New WWTP, it establishes Ammonia limits of Max. Daily of 3.2 mg/L and 157 lbs/day @ 5.9 mgd.

Attachment D - Average Monthly Ammonia Load Discharged by Brawley WWTP into New River ¹						
Month, Year	Flow (mgd)	Effluent Ammonia Concentration (mg/L as N)	Violation of NPDES Limit?	Ammonia Load (lbs/day)	Flow-weighted Limit (lbs/day)	Violation of NPDES Limit?
May 2012	3.79	1.23	No	39	66	No
Jun 2012	3.77	2.94	No	92	66	No
Jul 2012	3.77	0.90	No	28	66	No
Aug 2012	3.69	0.70	No	22	65	No
Sep 2012	3.77	0.56	No	18	66	No
Oct 2012	3.66	0.90	No	27	64	No
Nov 2012	3.85	0.98	No	31	67	No
Dec 2012	3.90	0.84	No	27	68	No

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
1/2/2001	3.34	N-Avail	20.70	NA ²	577	NA	NA
1/8/2001	3.14	N-Avail	22.00	NA	576	NA	NA
2/5/2001	3.08	N-Avail	16.90	NA	434	NA	NA
2/7/2001	3.07	N-Avail	17.80	NA	456	NA	NA
3/5/2001	3.32	N-Avail	17.10	NA	473	NA	NA
4/4/2001	2.97	N-Avail	15.50	NA	384	NA	NA
4/11/2001	3.07	N-Avail	16.90	NA	433	NA	NA
5/3/2001	3.01	23.10	18.50	NA	464	NA	NA
5/10/2001	2.97	22.50	20.00	NA	495	NA	NA
6/6/2001	3.07	22.50	14.80	NA	379	NA	NA
6/13/2001	3.04	27.30	15.00	NA	380	NA	NA
7/5/2001	3.12	17.00	20.10	NA	523	NA	NA
7/10/2001	3.04	13.60	4.30	NA	109	NA	NA
8/1/2001	3.1	2.80	2.70	NA	70	NA	NA
8/8/2001	3.2	20.60	11.90	NA	318	NA	NA
9/5/2001	3.4	13.50	12.20	NA	346	NA	NA
9/6/2001	3.4	14.90	12.20	NA	346	NA	NA
10/3/2001	3.35	12.20	11.60	NA	324	NA	NA
10/10/2001	3.21	14.30	12.00	NA	321	NA	NA
11/7/2001	2.98	14.30	14.40	NA	358	NA	NA
11/14/2001	3.19	15.90	17.10	NA	455	NA	NA
12/5/2001	3.12	17.70	19.70	NA	513	NA	NA
12/12/2001	3.17	19.20	19.40	NA	513	NA	NA
1/2/2002	3.04	21.70	20.4	NA	517	NA	NA
1/9/2002	3.14	21.20	20.7	NA	542	NA	NA
2/6/2002	N-Avail	17.40	20.1	NA	NA	NA	NA
2/13/2002	N-Avail	28.50	21.5	NA	NA	NA	NA
3/6/2002	2.74	N-Avail	30.8	NA	704	NA	NA
3/13/2002	2.76	N-Avail	36.8	NA	847	NA	NA
4/3/2002	2.35	N-Avail	23.8	NA	466	NA	NA
4/10/2002	2.29	N-Avail	28.9	NA	552	NA	NA

¹ Data on this table is based on Self-monitoring reports (SMRs) submitted by the City of Brawley to the Colorado River Basin Water Board.

² Not Applicable. WDRs Order No. 00-0087 in effect from 6/28/2000 through 6/28/2005. It does not establish ammonia effluent limits.

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
5/1/2002	2.65	N-Avail	45.2	NA	999	NA	NA
5/8/2002	2.98	N-Avail	32.6	NA	810	NA	NA
6/5/2002	2.83	N-Avail	37.7	NA	890	NA	NA
6/12/2002	2.53	N-Avail	34.6	NA	730	NA	NA
7/10/2002	N/A	N-Avail	33.3	NA	NA	NA	NA
7/17/2002	2.3	N-Avail	34.8	NA	668	NA	NA
8/7/2002	3.4	N-Avail	37.8	NA	1072	NA	NA
8/14/2002	3.34	N-Avail	29.4	NA	819	NA	NA
9/4/2002	3.53	N-Avail	27.9	NA	821	NA	NA
9/11/2002	3.41	N-Avail	25.8	NA	734	NA	NA
10/2/2002	3.48	N-Avail	30	NA	871	NA	NA
10/9/2002	2.7	N-Avail	30	NA	676	NA	NA
11/6/2002	3.22	N-Avail	40	NA	1074	NA	NA
11/13/2002	3.2	N-Avail	30	NA	801	NA	NA
12/4/2002	3.29	N-Avail	20	NA	549	NA	NA
12/11/2002	3.24	N-Avail	36.6	NA	989	NA	NA
1/2/2003	3.1	N-Avail	60	NA	1551	NA	NA
1/9/2003	3.32	N-Avail	30	NA	831	NA	NA
2/4/2003	2.7	N-Avail	30	NA	676	NA	NA
2/12/2003	3	N-Avail	30	NA	751	NA	NA
3/5/2003	2.89	N-Avail	36.3	NA	875	NA	NA
3/12/2003	2.82	N-Avail	45.9	NA	1080	NA	NA
4/2/2003	3.59	N-Avail	43.8	NA	1311	NA	NA
4/9/2003	3.24	N-Avail	47	NA	1270	NA	NA
5/7/2003	3.37	N-Avail	40	NA	1124	NA	NA
5/14/2003	3.23	N-Avail	30	NA	808	NA	NA
6/4/2003	3.71	N-Avail	30	NA	928	NA	NA
6/11/2003	3.43	N-Avail	40	NA	1144	NA	NA
7/2/2003	3.19	N-Avail	32.3	NA	859	NA	NA
7/9/2003	3.42	N-Avail	34.7	NA	990	NA	NA
8/6/2003	3.5	N-Avail	22.4	NA	654	NA	NA
8/13/2003	3.78	N-Avail	22.4	NA	706	NA	NA
9/3/2003	3.18	N-Avail	23.8	NA	631	NA	NA
9/10/2003	3.41	N-Avail	26.3	NA	748	NA	NA
10/1/2003	3.24	N-Avail	17.64	NA	477	NA	NA

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
10/8/2003	3.29	N-Avail	20.72	NA	569	NA	NA
11/5/2003	3.04	N-Avail	2.24	NA	57	NA	NA
11/12/2003	3.16	N-Avail	0.56	NA	15	NA	NA
12/3/2003	2.83	N-Avail	22.96	NA	542	NA	NA
12/9/2003	2.43	N-Avail	25.3	NA	513	NA	NA
1/7/2004	3.4	N-Avail	26.88	NA	762	NA	NA
1/14/2004	3.39	N-Avail	28	NA	792	NA	NA
2/4/2004	3.32	N-Avail	27.4	NA	759	NA	NA
2/11/2004	3.34	N-Avail	25.76	NA	718	NA	NA
3/3/2004	3.92	N-Avail	23.52	NA	769	NA	NA
3/10/2004	3.51	N-Avail	25.2	NA	738	NA	NA
4/7/2004	3.46	N-Avail	21.28	NA	614	NA	NA
4/14/2004	3.18	N-Avail	21.28	NA	564	NA	NA
5/5/2004	3.22	N-Avail	3.36	NA	90	NA	NA
5/12/2004	3.24	N-Avail	ND	NA	NA	NA	NA
6/2/2004	3.17	N-Avail	1.68	NA	44	NA	NA
6/9/2004	3.55	N-Avail	2.8	NA	83	NA	NA
7/7/2004	3.02	N-Avail	1.12	NA	28	NA	NA
7/14/2004	3.52	N-Avail	2.8	NA	82	NA	NA
8/4/2004	3.46	N-Avail	1.68	NA	48	NA	NA
8/11/2004	3.45	N-Avail	1.12	NA	32	NA	NA
9/1/2004	3.7	N-Avail	2.24	NA	69	NA	NA
9/8/2004	3.15	N-Avail	1.68	NA	44	NA	NA
10/6/2004	3.52	N-Avail	0.56	NA	16	NA	NA
10/13/2004	3.43	N-Avail	1.12	NA	32	NA	NA
11/3/2004	3.24	N-Avail	1.68	NA	45	NA	NA
11/10/2004	3.28	N-Avail	1.68	NA	46	NA	NA
12/8/2004	4.5	N-Avail	23.52	NA	883	NA	NA
12/15/2004	3.58	N-Avail	29.12	NA	869	NA	NA
1/5/2005	4.71	N-Avail	33.6	NA	1320	NA	NA
1/12/2005	3.72	N-Avail	34.72	NA	1077	NA	NA
2/2/2005	3.24	N-Avail	21.84	NA	590	NA	NA
2/9/2005	3.24	N-Avail	32.48	NA	878	NA	NA
3/2/2005	3.25	N-Avail	28.56	NA	774	NA	NA
3/9/2005	3.43	N-Avail	29.68	NA	849	NA	NA

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
4/6/2005	3.2	N-Avail	32.48	NA	867	NA	NA
4/13/2005	2.7	N-Avail	29.12	NA	656	NA	NA
5/4/2005	2.96	N-Avail	23.52	NA	581	NA	NA
5/11/2005	2.75	N-Avail	17.36	NA	398	NA	NA
6/1/2005	3.36	N-Avail	17.92	NA	502	NA	NA
6/8/2005	3.44	N-Avail	4.48	NA	129	NA	NA
7/6/2005	2.68	20.16	16.8	NA ³	376	NA	NA
7/13/2005	3.49	21.84	21.28	NA	619	NA	NA
7/20/2005	3.23	18.00	N-Avail	NA	NA	NA	NA
7/27/2005	3.29	18.00	N-Avail	NA	NA	NA	NA
8/3/2005	4.5	16.24	19.04	NA	715	NA	NA
8/10/2005	4.85	14.56	20.16	NA	815	NA	NA
8/17/2005	3.74	17.92	17.92	NA	559	NA	NA
8/24/2005	3.27	15.68	18.48	NA	504	NA	NA
8/31/2005	3.02	15.68	16.8	NA	423	NA	NA
9/7/2005	20.88	12.88	13.44	NA	2340	NA	NA
9/14/2005	3.35	17.92	17.92	NA	501	NA	NA
9/21/2005	4.2	20.16	20.16	NA	706	NA	NA
9/28/2005	3.34	16.24	17.92	NA	499	NA	NA
10/5/2005	3.24	19.04	19.04	NA	514	NA	NA
10/12/2005	3.25	19.60	19.04	NA	516	NA	NA
10/19/2005	3.88	20.16	20.16	NA	652	NA	NA
10/26/2005	3.38	21.28	20.72	NA	584	NA	NA
11/2/2005	3.24	13.44	10.08	NA	272	NA	NA
11/9/2005	3.39	19.04	8.4	NA	237	NA	NA
11/16/2005	3.34	19.04	18.48	NA	515	NA	NA
11/22/2005	3.38	21.28	20.16	NA	568	NA	NA
11/30/2005	3.59	26.88	26.32	NA	788	NA	NA
12/7/2005	3.69	28.56	26.88	NA	827	NA	NA
12/14/2005	3.95	25.76	25.2	NA	830	NA	NA
12/21/2005	3.87	33.04	31.92	NA	1030	NA	NA
12/28/2005	3.07	29.12	27.44	NA	703	NA	NA
1/4/2006	3.49	31.92	25.76	NA	750	NA	NA

³ WDRs Order R7-2005-0021 is adopted on 6/29/2005. From 6/29/2005 through Jan 2007, no Ammonia Limits. Effective 2/1/2007, WDRs R7-2005-0021 set Max. Daily Limits for NH3 at 12 mg/L and 590 lb/day @ 5.9 mgd.

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
1/11/2006	3.41	29.68	29.12	NA	828	NA	NA
1/18/2006	3.62	29.12	25.2	NA	761	NA	NA
1/25/2006	3.62	24.64	25.76	NA	778	NA	NA
2/1/2006	3.47	26.88	29.68	NA	859	NA	NA
2/8/2006	3.38	29.68	30.8	NA	868	NA	NA
2/15/2006	3.44	24.64	30.8	NA	884	NA	NA
2/22/2006	3.49	26.88	29.12	NA	848	NA	NA
3/1/2006	3.57	27.44	24.08	NA	717	NA	NA
3/8/2006	3.88	25.20	28.56	NA	924	NA	NA
3/15/2006	4.2	25.20	27.44	NA	961	NA	NA
3/22/2006	3.76	24.67	29.12	NA	913	NA	NA
3/29/2006	3.56	26.88	30.24	NA	898	NA	NA
4/5/2006	3.65	25.76	31.36	NA	955	NA	NA
4/12/2006	3.42	23.52	30.8	NA	879	NA	NA
4/19/2006	2.45	26.32	32.48	NA	664	NA	NA
4/26/2006	3.45	33.04	31.92	NA	918	NA	NA
5/3/2006	3.24	24.64	30.8	NA	832	NA	NA
5/10/2006	3.35	34.16	30.8	NA	861	NA	NA
5/18/2006	3.51	24.80	29.12	NA	852	NA	NA
5/24/2006	3.7	38.08	33.6	NA	1037	NA	NA
5/31/2006	2.68	33.60	31.92	NA	713	NA	NA
6/21/2006	N-Avail	28.56	N-Avail	NA	NA	NA	NA
6/28/2006	N-Avail	29.68	30	NA	NA	NA	NA
7/5/2006	3.65	36.40	33.6	NA	1023	NA	NA
7/12/2006	3.79	30.24	37.52	NA	1186	NA	NA
7/19/2006	3.77	31.36	33.04	NA	1039	NA	NA
7/26/2006	3.79	29.12	36.4	NA	1151	NA	NA
8/2/2006	3.72	27.44	27.44	NA	851	NA	NA
8/9/2006	4.17	29.68	27.44	NA	954	NA	NA
8/16/2006	3.68	22.40	23.52	NA	722	NA	NA
8/23/2006	3.75	25.20	24.64	NA	771	NA	NA
8/30/2006	3.64	22.40	27.77	NA	843	NA	NA
9/6/2006	3.54	19.60	22.96	NA	678	NA	NA
9/13/2006	3.84	24.64	25.76	NA	825	NA	NA
9/20/2006	3.94	26.32	36.4	NA	1196	NA	NA

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
9/27/2006	3.7	26.32	31.72	NA	979	NA	NA
10/4/2006	3.54	26.32	27.44	NA	810	NA	NA
10/11/2006	3.56	32.48	30.8	NA	914	NA	NA
10/18/2006	3.18	68.88	17.36	NA	460	NA	NA
10/25/2006	3.43	21.28	22.96	NA	657	NA	NA
11/1/2006	3.64	24.64	32.48	NA	986	NA	NA
11/8/2006	3.54	20.72	26.82	NA	792	NA	NA
11/15/2006	3.69	31.92	21.84	NA	672	NA	NA
11/21/2006	4.17	30.24	36.4	NA	1266	NA	NA
11/29/2006	4.14	29.68	34.16	NA	1179	NA	NA
12/6/2006	4.02	36.40	33.04	NA	1108	NA	NA
12/13/2006	3.93	41.44	40.32	NA	1322	NA	NA
12/20/2006	3.73	33.04	35.28	NA	1097	NA	NA
12/27/2006	3.57	34.88	40.88	NA	1217	NA	NA
1/3/2007	3.81	30.86	35.28	NA	1121	NA	NA
1/10/2007	3.84	34.72	35.84	NA	1148	NA	NA
1/17/2007	3.87	34.72	35.87	NA	1158	NA	NA
1/24/2007	4.09	55.44	52.64	NA	1796	NA	NA
1/31/2007	4.04	52.64	50.96	NA	1717	NA	NA
2/7/2007	3.99	55.44	54.32	Yes ⁴	1808	399	Yes
2/14/2007	3.84	57.12	55.44	Yes	1775	384	Yes
2/21/2007	4.06	58.24	57.12	Yes	1934	406	Yes
2/28/2007	3.96	37.52	36.4	Yes	1202	396	Yes
3/7/2007	4.11	26.88	14.56	Yes	499	411	Yes
3/14/2007	4.03	29.68	22.4	Yes	753	403	Yes
3/21/2007	3.95	30.24	29.12	Yes	959	395	Yes
3/28/2007	3.79	21.19	8.4	No	266	379	No
4/4/2007	3.46	31.26	25.76	Yes	743	346	Yes
4/11/2007	3.99	33.60	29.68	Yes	988	399	Yes
4/18/2007	3.77	33.60	4.48	No	141	377	No
4/25/2007	3.76	34.16	29.12	Yes	913	376	Yes
5/2/2007	3.69	34.72	31.36	Yes	965	369	Yes
5/9/2007	3.76	33.60	30.8	Yes	966	376	Yes
5/16/2007	3.6	34.72	31.92	Yes	958	360	Yes

⁴ Effective 2/1/2007, WDRs R7-2005-0021 set Max. Daily Limits for NH₃ at 12 mg/L and 590 lb/day @ 5.9 mgd.

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
5/23/2007	3.52	34.72	31.92	Yes	937	352	Yes
5/30/2007	10.7	35.28	33.04	Yes	2948	1071	Yes
6/6/2007	3.68	29.68	30.8	Yes	945	368	Yes
6/13/2007	3.8	30.80	33.6	Yes	1065	380	Yes
6/20/2007	3.72	30.80	38.08	Yes	1181	372	Yes
6/27/2007	3.61	31.92	31.92	Yes	961	361	Yes
7/3/2007	3.8	30.80	32.48	Yes	1029	380	Yes
7/11/2007	3.72	32.48	32.48	Yes	1008	372	Yes
7/18/2007	3.6	30.90	33.6	Yes	1009	360	Yes
7/25/2007	3.67	30.24	28.56	Yes	874	367	Yes
8/1/2007	3.74	29.68	33.04	Yes	1031	374	Yes
8/8/2007	3.39	31.36	30.8	Yes	871	339	Yes
8/15/2007	3.64	26.32	32.48	Yes	986	364	Yes
8/22/2007	3.59	26.32	27.44	Yes	822	359	Yes
8/29/2007	3.81	27.44	33.04	Yes	1050	381	Yes
9/5/2007	3.86	26.88	27.44	Yes	883	386	Yes
9/12/2007	3.88	30.24	24.64	Yes	797	388	Yes
9/19/2007	3.62	25.20	32.48	Yes	981	362	Yes
9/26/2007	3.76	27.44	27.44	Yes	860	376	Yes
10/3/2007	3.52	22.96	20.16	Yes	592	352	Yes
10/10/2007	3.81	20.16	28	Yes	890	381	Yes
10/17/2007	3.64	21.24	16.24	Yes	493	364	Yes
10/24/2007	3.66	16.80	17.92	Yes	547	366	Yes
10/31/2007	3.96	19.60	19.04	Yes	629	396	Yes
11/7/2007	3.81	27.44	26.88	Yes	854	381	Yes
11/14/2007	4.31	14.00	15.12	Yes	543	431	Yes
11/19/2007	4.08	15.68	20.72	Yes	705	408	Yes
11/28/2007	4.07	17.92	18.48	Yes	627	407	Yes
12/5/2007	4.24	16.24	19.6	Yes	693	424	Yes
12/12/2007	3.71	17.36	20.16	Yes	624	371	Yes
12/19/2007	4.25	19.60	16.24	Yes	576	425	Yes
12/26/2007	3.65	17.36	19.04	Yes	580	365	Yes
1/2/2008	3.99	17.92	19.6	Yes	652	399	Yes
1/9/2008	4.77	21.84	21.28	Yes	847	477	Yes
1/16/2008	4.13	19.04	21.84	Yes	752	413	Yes

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
1/23/2008	4.04	17.92	21.84	Yes	736	404	Yes
1/30/2008	4.55	17.36	20.72	Yes	786	455	Yes
2/6/2008	3.95	20.16	21.28	Yes	701	395	Yes
2/13/2008	4.38	20.72	19.6	Yes	716	438	Yes
2/20/2008	4.7	20.72	19.6	Yes	768	470	Yes
2/27/2008	4	20.16	19.6	Yes	654	400	Yes
3/5/2008	3.98	20.16	18.48	Yes	613	398	Yes
3/12/2008	3.93	22.50	21.84	Yes	716	393	Yes
3/19/2008	4.17	22.40	19.6	Yes	682	417	Yes
3/26/2008	4.1	19.04	17.92	Yes	613	410	Yes
4/2/2008	4.15	20.20	23.52	Yes	814	415	Yes
4/9/2008	3.86	25.20	24.08	Yes	775	386	Yes
4/16/2008	3.98	25.76	22.96	Yes	762	398	Yes
4/23/2008	4.1	29.12	25.76	Yes	881	410	Yes
4/30/2008	3.76	31.36	33.04	Yes	1036	376	Yes
5/7/2008	3.61	24.08	26.32	Yes	792	361	Yes
5/14/2008	3.72	25.20	28.32	Yes	879	372	Yes
5/21/2008	3.63	36.40	28.56	Yes	865	363	Yes
5/28/2008	3.77	30.80	37.52	Yes	1180	377	Yes
6/4/2008	3.66	28.00	42	Yes	1282	366	Yes
6/11/2008	3.73	20.72	17.92	Yes	557	373	Yes
6/18/2008	3.68	23.52	22.4	Yes	687	368	Yes
6/25/2008	3.72	29.60	3.92	No	122	372	No
7/2/2008	3.84	19.00	19.04	Yes	610	384	Yes
7/9/2008	3.26	19.60	15.68	Yes	426	326	Yes
7/16/2008	3.47	21.84	21.28	Yes	616	347	Yes
7/23/2008	3.53	N-Avail	20.16	Yes	594	353	Yes
7/24/2008	3.73	19.04	N-Avail	Yes	NA	373	Yes
7/28/2008	3.63	25.02	20.16	Yes	610	363	Yes
8/4/2008	3.97	22.96	17.92	Yes	593	397	Yes
8/11/2008	3.68	21.28	18.48	Yes	567	368	Yes
8/18/2008	3.25	20.16	16.8	Yes	455	325	Yes
8/25/2008	4.13	17.36	16.8	Yes	579	413	Yes
9/2/2008	4.13	19.00	17.36	Yes	598	413	Yes
9/8/2008	3.92	19.04	17.02	Yes	556	392	Yes

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
9/15/2008	3.97	19.04	17.36	Yes	575	397	Yes
9/22/2008	3.73	22.40	15.68	Yes	488	373	Yes
9/29/2008	4.03	20.16	18.48	Yes	621	403	Yes
10/6/2008	3.3	15.12	14.56	Yes	401	330	Yes
10/13/2008	4	19.04	14.59	Yes	487	400	Yes
10/21/2008	3.86	21.28	19.6	Yes	631	386	Yes
10/27/2008	3.64	17.92	16.8	Yes	510	364	Yes
11/3/2008	3.73	20.16	18.48	Yes	575	373	Yes
11/10/2008	4.18	18.48	16.8	Yes	586	418	Yes
11/17/2008	3.75	15.12	14.56	Yes	455	375	Yes
11/24/2008	3.6	19.60	17.92	No ⁵	538	NA	No
12/1/2008	3.68	17.92	15.68	No	481	NA	No
12/8/2008	3.89	19.60	21.84	No	709	NA	No
12/15/2008	3.73	17.92	21.84	No	679	NA	No
12/22/2008	3.93	21.28	19.6	No	642	NA	No
12/29/2008	3.72	20.16	19.04	No	591	NA	No
1/5/2009	3.81	20.16	19.04	No	605	NA	No
1/12/2009	3.94	15.68	22.9	No	752	NA	No
1/19/2009	4.1	20.16	19.04	No	651	NA	No
1/26/2009	3.82	28.00	24.08	No	767	NA	No
2/2/2009	3.92	20.16	28.56	No	934	NA	No
2/9/2009	4.14	17.92	24.08	No	831	NA	No
2/16/2009	3.76	31.36	21.28	No	667	NA	No
2/23/2009	3.99	19.60	20.72	No	689	NA	No
3/2/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
3/9/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
3/16/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
3/23/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
3/30/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
4/6/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
4/13/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
4/20/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No
4/27/2009	N-Avail	N-Avail	N-Avail	No	No	NA	No

⁵ Effective 11/19/2008, Special Order R7-2008-0069 amends CDO R7-2008-008 and establishes Interim Effluent Limits for ammonia at 120 mg/L and 5900 Lbs/day.

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
5/4/2009	4.1	17.92	14	No	479	NA	No
5/11/2009	4	22.96	20.16	No	673	NA	No
5/18/2009	3.69	22.40	19.6	No	603	NA	No
5/25/2009	3.87	28.00	22.96	No	741	NA	No
6/1/2009	3.83	31.36	21.16	No	676	NA	No
6/8/2009	3.64	24.06	20.16	No	612	NA	No
6/15/2009	3.62	21.84	10.64	No	321	NA	No
6/22/2009	3.78	15.12	7.84	No	247	NA	No
6/29/2009	3.95	16.80	2.24	No	74	NA	No
7/6/2009	3.7	18.48	3.36	No	104	NA	No
7/13/2009	3.84	17.92	12.32	No	395	NA	No
7/20/2009	3.82	20.72	13.44	No	428	NA	No
7/27/2009	4.02	21.84	14.56	No	488	NA	No
8/3/2009	3.95	19.04	7.28	No	240	NA	No
8/10/2009	3.83	12.88	1.68	No	54	NA	No
8/17/2009	3.93	16.80	5.4	No	177	NA	No
8/24/2009	3.94	17.90	7.84	No	258	NA	No
8/31/2009	4.23	23.52	5.6	No	198	NA	No
9/7/2009	3.93	25.20	10.64	No	349	NA	No
9/14/2009	4.17	20.72	11.2	No	390	NA	No
9/21/2009	4	23.52	2.24	No	75	NA	No
9/28/2009	3.81	19.04	3.36	No	107	NA	No
10/5/2009	3.89	20.16	9.52	No	309	NA	No
10/12/2009	4.06	26.23	10.64	No	360	NA	No
10/19/2009	4.22	22.40	12.6	No	443	NA	No
10/26/2009	4.02	17.64	18.76	No	629	NA	No
11/2/2009	4	17.08	22.12	No	738	NA	No
11/9/2009	4.4	28.28	19.04	No	699	NA	No
11/16/2009	4.22	23.24	25.48	No	897	NA	No
11/23/2009	4.48	14.84	25.2	No	942	NA	No
11/30/2009	4.21	18.76	16.52	No	580	NA	No
12/7/2009	3.87	20.72	19.88	No	642	NA	No
12/14/2009	4.08	21.84	21	No	715	NA	No
12/21/2009	4.36	29.12	23.8	No	865	NA	No
12/28/2009	4.15	21.84	26.88	No	930	NA	No

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
1/4/2010	4.29	22.40	27.44	No	982	NA	No
1/11/2010	4.73	24.92	24.92	No	983	NA	No
1/18/2010	4.44	32.20	21	No	778	NA	No
1/25/2010	5.17	27.20	17.92	No	773	NA	No
2/1/2010	4.79	34.16	23.52	No	940	NA	No
2/8/2010	3.63	16.80	27.72	No	839	NA	No
2/15/2010	2.71	23.80	22.68	No	513	NA	No
2/22/2010	3.7	23.80	22.96	No	708	NA	No
3/2/2010	4.28	24.36	24.64	No	880	NA	No
3/8/2010	8.75	14.00	24.08	No	1757	NA	No
3/15/2010	4.4	19.60	22.12	No	812	NA	No
3/22/2010	3.46	26.88	23.8	No	687	NA	No
3/29/2010	3.67	28.28	24.64	No	754	NA	No
4/5/2010	3.4	35.28	27.72	No	786	NA	No
4/12/2010	3.8	29.96	29.96	No	949	NA	No
4/19/2010	3.8	31.92	29.12	No	923	NA	No
4/26/2010	4.1	34.16	32.48	No	1111	NA	No
5/3/2010	4	32.48	32.76	No	1093	NA	No
5/10/2010	3.6	36.40	N-Avail	No	N-Avail	NA	No
5/17/2010	3.8	39.48	33.32	No	1056	NA	No
5/24/2010	3.7	36.40	34.44	No ⁶	1063	NA	No
5/31/2010	3.8	33.88	35.86	No	1136	NA	No
6/7/2010	N-Avail	N-Avail	N-Avail	No	No	NA	No
6/14/2010	N-Avail	N-Avail	N-Avail	No	No	NA	No
6/21/2010	N-Avail	N-Avail	N-Avail	No	No	NA	No
6/28/2010	N-Avail	N-Avail	N-Avail	No	No	NA	No
7/5/2010	3.6	26.32	47.6	No	1429	NA	No
7/12/2010	3.6	36.40	36.4	No	1093	NA	No
7/19/2010	3.6	32.76	31.08	No	933	NA	No
7/26/2010	3.4	24.36	26.88	No	762	NA	No
8/2/2010	3.3	21.84	22.84	No	629	NA	No
8/9/2010	2.8	20.16	22.4	No	523	NA	No
8/16/2010	3.4	17.36	23.52	No	667	NA	No

⁶ WDRs R7-2010-0022 becomes effective on 5/20/2010. For the City New WWTP, it establishes Ammonia limits of Max. Daily of 3.2 mg/L and 157 lbs/day @ 5.9 mgd.

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
8/23/2010	3.2	23.52	12.88	No	344	NA	No
8/30/2010	3.2	25.76	10.08	No	269	NA	No
9/6/2010	3.6	21.84	10.08	No	303	NA	No
9/13/2010	3.6	20.16	7.84	No	235	NA	No
9/20/2010	3.3	17.36	8.96	No	247	NA	No
9/27/2010	3.2	23.52	16.24	No	433	NA	No
10/4/2010	3.8	24.64	15.68	No	497	NA	No
10/11/2010	3.6	22.40	19.04	No	572	NA	No
10/18/2010	3.4	21.84	25.2	No	715	NA	No
10/25/2010	3.6	22.10	22.4	No	673	NA	No
11/1/2010	3.5	23.52	24.67	No	720	NA	No
11/8/2010	3.4	20.72	22.96	No	651	NA	No
11/15/2010	3.6	22.40	24.08	No	723	NA	No
11/22/2010	3.5	22.96	23.52	No	687	NA	No
11/29/2010	3.7	21.84	22.96	No	708	NA	No
12/6/2010	3.7	21.84	19.6	No	605	NA	No
12/13/2010	3.7	27.44	20.72	No	639	NA	No
12/20/2010	3.7	50.40	31.92	No	985	NA	No
12/27/2010	3.5	36.40	35.28	No	1030	NA	No
1/3/2011	3.3	27.00	30	No	826	NA	No
1/10/2011	3.5	25.00	25	No	730	NA	No
1/17/2011	3.6	31.00	25	No	751	NA	No
1/24/2011	3.6	40.00	33.6	No	1009	NA	No
1/31/2011	3.5	34.00	28	No	817	NA	No
2/7/2011	3.9	28.00	25.2	No	820	NA	No
2/14/2011	3.8	45.36	30.8	No	976	NA	No
2/21/2011	3.8	40.88	31.36	No	994	NA	No
2/28/2011	3.2	36.16	28	No	747	NA	No
3/3/2011	3.8	25.70	N-Avail	No	N-Avail	NA	No
3/5/2011	3.9	N-Avail	33.4	No	1086	NA	No
3/7/2011	3.4	33.60	N/A	No	N-Avail	NA	No
3/12/2011	4	N-Avail	30.8	No	1027	NA	No
3/14/2011	3.4	35.30	N/A	No	N-Avail	NA	No
3/19/2011	3.4	N-Avail	33.6	No	953	NA	No
3/21/2011	2.8	26.80	N-Avail	No	NA	NA	No

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
3/26/2011	4.8	N-Avail	39.7	No	1589	NA	No
3/28/2011	3.1	38.60	N-Avail	No	N-Avail	NA	No
3/31/2011	3.1	N-Avail	50.4	No	1303	NA	No
4/4/2011	2.9	47.60	40.3	No	975	NA	No
4/11/2011	3.2	43.70	52.6	No	1404	NA	No
4/18/2011	2.7	36.40	52.6	No	1184	NA	No
4/25/2011	2.5	47.60	50.4	No	1051	NA	No
5/2/2011	3.5	37.50	53.75	No	1569	NA	No
5/9/2011	2.7	47.00	51.52	No	1160	NA	No
5/16/2011	2.8	26.80	24.64	No	575	NA	No
5/23/2011	3.2	27.44	40.88	No	1091	NA	No
5/30/2011	2.6	50.40	36.96	No	801	NA	No
6/6/2011	2.6	23.50	34.7	No	752	NA	No
6/13/2011	3.2	44.20	37	No	987	NA	No
6/20/2011	2.6	44.20	41.4	No	898	NA	No
6/27/2011	2.7	28.00	30.8	No	694	NA	No
7/6/2011	2.3	32.48	29.68	No	569	NA	No
7/11/2011	3	27.44	28.56	No	715	NA	No
7/18/2011	3.3	28.00	8.4	No	231	NA	No
7/25/2011	3.6	21.80	7.3	No	219	NA	No
8/1/2011	3.1	31.36	1.68	No	43	NA	No
8/8/2011	3.3	29.68	1.12	No	31	NA	No
8/15/2011	2.9	32.48	1.12	No	27	NA	No
8/22/2011	3.6	36.40	1.12	No	34	NA	No
8/29/2011	3.2	35.28	0.56	No	15	NA	No
9/5/2011	3.7	31.36	3.92	No	121	NA	No
9/12/2011	3.9	35.28	1.12	No	36	NA	No
9/19/2011	3.2	32.48	0.56	No	15	NA	No
9/26/2011	2.7	42.56	3.36	No	76	NA	No
10/3/2011	3.3	30.80	1.12	No	31	NA	No
10/10/2011	3.5	16.80	1.12	No	33	NA	No
10/17/2011	2.7	17.92	0.56	No	13	NA	No
10/24/2011	3.7	21.28	0.56	No	17	NA	No
11/2/2011	4.1	23.52	1.12	No	38	NA	No
11/7/2011	2.7	17.36	1.12	No	25	NA	No

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
11/14/2011	3.6	33.60	0.56	No	17	NA	No
11/21/2011	3.8	27.44	0.56	No	18	NA	No
11/28/2011	3.4	19.04	0.56	No	16	NA	No
12/5/2011	4.9	19.04	0.56	No	23	NA	No
12/14/2011	3.9	30.80	1.68	No	55	NA	No
12/19/2011	3.6	31.36	6.16	No	185	NA	No
12/27/2011	4	26.32	1.12	No	37	NA	No
1/3/2012	3.8	25.20	3.92	No	124	NA	No
1/9/2012	3.7	40.88	0.56	No	17	NA	No
1/18/2012	3.6	31.92	2.24	No	67	NA	No
1/23/2012	3.4	33.04	1.12	No	32	NA	No
1/30/2012	4.1	35.28	0.56	No	19	NA	No
2/1/2012	2.8	40.88	0.56	No	13	NA	No
2/6/2012	4.2	29.12	1.12	No	39	NA	No
2/13/2012	4.3	36.40	0.56	No	20	NA	No
2/21/2012	2.7	8.96	0.56	No	13	NA	No
2/27/2012	2.8	30.80	0.56	No	13	NA	No
3/5/2012	3.2	29.12	0.56	No	15	85	No
3/12/2012	3.2	30.80	0.56	No	15	85	No
3/19/2012	3.2	28.00	1.12	No	30	85	No
3/26/2012	3.1	35.84	1.12	No	29	83	No
4/2/2012	2.6	29.12	1.12	No	24	69	No
4/9/2012	3	27.44	1.12	No	28	80	No
4/16/2012	2.7	21.84	1.68	No	38	72	No
4/23/2012	3.9	24.64	0.56	No	18	104	No
5/2/2012	3.9	39.76	1.68	No	55	104	No
5/7/2012	3.5	26.32	0.56	No	16	93	No
5/14/2012	3.1	31.36	1.12	No	29	83	No
5/21/2012	3.8	33.60	1.12	No	35	101	No
5/30/2012	4	20.16	1.68	No	56	107	No
6/6/2012	4	64.40	8.40	Yes	280	107	Yes
6/13/2012	2.7	38.08	1.12	No	25	72	No
6/18/2012	2.9	45.92	1.68	No	41	77	No
6/25/2012	2.5	34.16	0.56	No	12	67	No
7/2/2012	3.9	24.08	1.68	No	55	104	No

Attachment E - Daily Ammonia Load Discharged by Brawley WWTP into New River¹

Date	Flow (mgd)	Influent Ammonia (mg/L)	Effluent Ammonia (mg/L)	Violation of Max. Daily Concentration NPDES Permit Limit?	Ammonia Load Discharged (lbs/day)	Flow-Weighted Max. Daily Load NPDES Permit Limit	Violation of Max. Daily Load Limit of NPDES Permit?
7/9/2012	3.7	26.88	0.56	No	17	99	No
7/16/2012	3.1	49.84	0.56	No	14	83	No
7/23/2012	3.8	44.24	1.12	No	35	101	No
7/30/2012	3.5	46.48	0.56	No	16	93	No
8/6/2012	3.4	50.40	1.12	No	32	91	No
8/13/2012	2.6	44.24	0.56	No	12	69	No
8/20/2012	2.9	29.12	0.56	No	14	77	No
8/27/2012	2.4	28.56	0.56	No	11	64	No
9/5/2012	4.3	21.84	0.56	No	20	115	No
9/12/2012	4.2	25.20	0.56	No	20	112	No
9/19/2012	4.2	42.56	0.56	No	20	112	No
9/26/2012	4.1	40.32	0.56	No	19	109	No
10/3/2012	4.2	22.40	0.56	No	20	112	No
10/10/2012	3.6	20.16	0.56	No	17	96	No
10/17/2012	3.8	13.44	1.68	No	53	101	No
10/24/2012	4	20.16	0.56	No	19	107	No
10/31/2012	4.1	19.04	1.12	No	38	109	No
11/7/2012	3.4	17.92	1.12	No	32	91	No
11/14/2012	3.8	24.08	0.56	No	18	101	No
11/21/2012	4.1	31.36	1.68	No	57	109	No
11/28/2012	3.8	22.40	0.56	No	18	101	No
12/5/2012	4.2	35.28	0.56	No	20	112	No
12/12/2012	4.2	20.72	1.2	No	42	112	No
12/19/2012	4.3	12.32	0.56	No	20	115	No
12/26/2012	3.5	19.60	0.56	No	16	93	No

Attachment F - NBC's TSS Slugs into the POTW ¹				
Month/Year	Date	Flow (gpd)	TSS (mg/L)	TSS (lbs/day)
Dec 2008	9	651428	1734	9418
	30	672857	2230	12514
Jan 2009	14	697857	1711	9955
Apr 2009	15	679,285	2510	14220
May 2009	7	755,714	4706	29660
Jun 2009	11	723,571	2034	12274
Jul 2009	16	655,000	2286	12488
	23	661,428	1669	9204
	30	658,857	2569	14114
Nov 2009	25	842,571	1686	11844
Dec 2009	9	913,714	2606	19855
	16	789,000	1218	8011
	23	678,857	4519	25585
Jan 2010	20	723,857	3072	18546
Feb 2010	3	861,285	1647	11827
Jun 2010	17	929,000	1367	10591
Jan 2011	12	895,857	3290	24581
	19	826,571	8114	55935
	26	862,000	3250	23365
Feb 2011	16	900,142	4340	32581
	23	870,142	6006	43585
Mar 2011	2	888,428	3096	22940
	9	883,285	3042	22409
	16	690,178	7600	43746

¹ Based on City of Brawley water quality and flow monitoring data for the slaughterhouse.

Attachment G - Avg. Monthly BOD and TSS Loading from Slaughterhouse into POTW ¹					
Month & Year	Flow Discharged (gpd)	BOD (mg/L)	BOD Load (lbs/day)	TSS (mg/L)	TSS Load (Lbs/day)
Jan-02	N-Avail	480.0	N-Avail	N-Avail	N-Avail
Feb-02	N-Avail	585.0	N-Avail	N-Avail	N-Avail
Mar-02	N-Avail	580.0	N-Avail	N-Avail	N-Avail
Apr-02	N-Avail	450.0	N-Avail	N-Avail	N-Avail
May-02	N-Avail	170.0	N-Avail	N-Avail	N-Avail
Jun-02	N-Avail	35.0	N-Avail	N-Avail	N-Avail
Jul-02	N-Avail	162.0	N-Avail	N-Avail	N-Avail
Aug-02	N-Avail	87.0	N-Avail	N-Avail	N-Avail
Sep-02	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail
Oct-02	N-Avail	246.0	N-Avail	N-Avail	N-Avail
Nov-02	N-Avail	318.0	N-Avail	N-Avail	N-Avail
Dec-02	N-Avail	186.0	N-Avail	N-Avail	N-Avail
Jan-03	N-Avail	246.67	N-Avail	N-Avail	N-Avail
Feb-03	N-Avail	N-Avail	N-Avail	N-Avail	N-Avail
Mar-03	N-Avail	80.00	N-Avail	N-Avail	N-Avail
Apr-03	N-Avail	213.50	N-Avail	NA	N-Avail
May-03	N-Avail	46.50	N-Avail	47.50	N-Avail
Jun-03	N-Avail	28.50	N-Avail	28.25	N-Avail
Jul-03	N-Avail	55.50	N-Avail	37.08	N-Avail
Aug-03	N-Avail	39.50	N-Avail	38.18	N-Avail
Sep-03	N-Avail	43.25	N-Avail	31.75	N-Avail
Oct-03	N-Avail	67.20	N-Avail	35.70	N-Avail
Nov-03	437,800	70.55	258	35.88	131
Dec-03	414,677	80.80	279	89.90	311
Jan-04	368,612	71.5	220	35.25	108
Feb-04	450,321	43.25	162	31.75	119
Mar-04	424,580	89.5	317	57.75	204
Apr-04	413,233	85.25	294	52.25	180
May-04	480,419	92.75	372	54.125	217
Jun-04	464,300	109.25	423	60.375	234
Jul-04	492,419	80.75	332	71.25	293
Aug-04	433,774	87.75	317	52.25	189
Sep-04	537,033	107	479	78.4	351
Oct-04	522,193	78.75	343	36	157

¹ Based on City of Brawley water quality and monitoring data for the slaughterhouse.

Attachment G - Avg. Monthly BOD and TSS Loading from Slaughterhouse into POTW ¹					
Month & Year	Flow Discharged (gpd)	BOD (mg/L)	BOD Load (lbs/day)	TSS (mg/L)	TSS Load (Lbs/day)
Nov-04	526,100	137.25	602	44.875	197
Dec-04	436,677	100	364	47.5	173
Jan-05	407,258	107.5	365	63.5	216
Feb-05	497,892	113.7	472	116.3	483
Mar-05	430,967	64.3	231	55.9	201
Apr-05	364,766	115.0	350	84.8	258
May-05	451,838	203.3	766	50.1	189
Jun-05	480,066	59.8	239	62.9	252
Jul-05	490,967	83.8	343	76.4	313
Aug-05	489,645	56.5	231	73.2	299
Sep-05	454,900	23.3	88	91.9	349
Oct-05	431,580	64.7	233	75.7	272
Nov-05	359,000	79.8	239	62.5	187
Dec-05	459,709	84.5	324	46.1	177
Jan-06	521,225	139.0	604	52.5	228
Feb-06	539,107	202.7	911	70.5	317
Mar-06	529,290	83.5	369	61.3	270
Apr-06	575,033	50.5	242	37.1	178
May-06	497,032	42.7	177	44.5	184
Jun-06	591,833	86.8	428	60.8	300
Jul-06	609,903	105.5	537	43.9	223
Aug-06	624,129	140.6	732	52.7	274
Sep-06	732,466	83.0	507	80.0	489
Oct-06	554,645	92.3	427	67.0	310
Nov-06	600,866	130.8	655	48.4	243
Dec-06	522,741	216.0	942	60.8	265
Jan-07	691,032	89.8	518	54.7	315
Feb-07	724,464	213.0	1287	46.8	282
Mar-07	675,967	178.0	1003	38.6	218
Apr-07	644,000	104.8	563	46.8	251
May-07	688,709	140.4	806	39.5	227
Jun-07	643,709	171.5	921	57.1	306
Jul-07	664,193	176.8	979	50.9	282
Aug-07	665,967	204.2	1134	94.0	522
Sep-07	666,666	118.8	660	53.5	297
Oct-07	546,774	128.2	585	70.0	319
Nov-07	664,166	112.7	624	73.2	405

Attachment G - Avg. Monthly BOD and TSS Loading from Slaughterhouse into POTW ¹					
Month & Year	Flow Discharged (gpd)	BOD (mg/L)	BOD Load (lbs/day)	TSS (mg/L)	TSS Load (Lbs/day)
Dec-07	692,741	95.0	549	58.5	338
Jan-08	659,677	116.4	640	44.6	245
Feb-08	761,964	138.3	879	39.9	253
Mar-08	783,065	108.5	709	36.4	238
Apr-08	594,833	114.4	568	41.4	205
May-08	775,484	118.3	765	74.0	479
Jun-08	704,333	131.8	774	57.6	338
Jul-08	668,548	117.8	657	53.3	297
Aug-08	571,613	114.6	546	46.3	221
Sep-08	740,000	127.6	787	33.7	208
Oct-08	599,194	122.9	614	60.6	303
Nov-08	653,000	111.8	609	245.9	1339
Dec-08	668,194	28.4	158	1110.7	6190
Jan-09	635,645	47.2	250	861.0	4564
Feb-09	737,500	50.7	312	350.4	2155
Mar-09	659,677	46.3	255	632.8	3481
Apr-09	647,000	44.8	241	865.8	4672
May-09	707,419	40.9	241	1280.8	7556
Jun-09	752,500	57.5	361	1000.0	6276
Jul-09	685,968	67.0	383	1557.0	8908
Aug-09	663,387	35.5	196	149.4	826
Sep-09	669,900	49.9	279	87.3	487
Oct-09	810,065	30.1	203	121.8	823
Nov-09	819,367	44.0	301	470.1	3213
Dec-09	836,677	178.4	1245	1809.1	12624
Jan-10	818,290	68.3	466	1008.5	6883
Feb-10	995,593	96.4	800	568.9	4724
Mar-10	847,742	30.7	217	32.2	228
Apr-10	957,833	50.3	401	39.6	316
May-10	925,452	77.4	597	32.4	250
Jun-10	885,143	144.3	1065	587.5	4337
Jul-10	917,828	283.2	2168	1130.1	8651
Aug-10	869,321	69.0	500	147.4	1068
Sep-10	868,799	92.2	668	122.8	890
Oct-10	893,857	74.0	552	68.8	513
Nov-10	876,285	74.2	542	193.0	1410
Dec-10	866,742	169.8	1227	424.0	3065

Attachment G - Avg. Monthly BOD and TSS Loading from Slaughterhouse into POTW ¹					
Month & Year	Flow Discharged (gpd)	BOD (mg/L)	BOD Load (lbs/day)	TSS (mg/L)	TSS Load (Lbs/day)
Jan-11	858,000	282.0	2018	3801.0	27199
Feb-11	893,607	389.3	2901	2734.3	20377
Mar-11	690,178	303.4	1746	2789.8	16058
Apr-11	1,207,781	166.6	1678	162.8	1639
May-11	1,088,803	43.9	399	43.8	397
Jun-11	964,360	41.3	332	30.3	244
Jul-11	871,639	44.0	320	38.3	278
Aug-11	922,296	34.7	267	39.8	306
Sep-11	1,013,797	51.0	431	73.8	624
Oct-11	1,165,055	39.0	379	48.5	471
Nov-11	1,708,086	77.9	1109	47.3	674
Dec-11	1,710,680	77.9	1111	47.3	675
Jan-12	1,676,791	31.6	442	64.3	898
Feb-12	1,552,031	32.9	426	64.1	830
Mar-12	1,520,970	38.4	487	58.0	735
Apr-12	1,655,187	59.4	820	56.5	780
May-12	1,625,651	67.0	909	53.8	730
Jun-12	1,633,550	54.1	736	84.9	1157
Jul-12	1,630,053	91.5	1244	146.5	1992
Aug-12	1,492,273	62.7	781	82.3	1025
Sep-12	1,539,584	45.3	581	49.5	636
Oct-12	1,539,432	90.3	1159	370.4	4756
Nov-12	1,490,945	105.1	1306	100.5	1250
Dec-12	1,490,945	105.1	1306	100.5	1250
Jan-13	1,357,696	111.30	1260	142.92	1618
Feb-13	1,313,943	61.78	677	72.08	790
Mar-13	1,314,768	26.46	290	46.15	506
Apr-13	1,249,728	53.85	561	68.25	711
May-13	1,337,499	36.79	410	37.34	417
Jun-13	1,423,593	47.17	560	39.83	473
Jul-13	1,452,835	18.72	227	21.53	261
Aug-13	1,524,265	14.03	178	23.63	300
Sep-13	1,488,240	13.50	168	20.90	259
Oct-13	1,341,348	19.51	218	26.18	293
Nov-13	1,351,995	21.10	238	31.02	350
Dec-13	1,493,598	67.58	842	59.53	741

Attachment H - Brawley WWTP Influent, Effluent, and Net Ammonia Removal (%) ¹							
Month & Year	Avg Influent Ammonia (mg/L)	Avg Effluent Ammonia (mg/L)	Net Percent Removal	< 30 % Removal	< 10% Removal	< 5 % Removal	Essentially No Removal (< 2.5 %)
May-01	24.30	19.30	20.6	Yes	No	No	No
Jun-01	24.90	14.90	40.2	No	No	No	No
Jul-01	15.30	12.20	20.3	Yes	No	No	No
Aug-01	11.70	7.30	37.6	No	No	No	No
Sep-01	14.20	12.20	14.1	Yes	No	No	No
Oct-01	13.30	11.80	11.3	Yes	No	No	No
Nov-01	15.10	15.80	0.0	Yes	Yes	Yes	Yes
Dec-01	18.50	19.60	0.0	Yes	Yes	Yes	Yes
Jan-02	21.50	20.60	4.2	Yes	Yes	Yes	No
Feb-02	23.00	20.80	9.6	Yes	Yes	No	No
Mar-02	NR ²	33.80	NA ³	NA	NA	NA	NA
Apr-02	NR	26.40	NA	NA	NA	NA	NA
May-02	NR	40.00	NA	NA	NA	NA	NA
Jun-02	NR	36.20	NA	NA	NA	NA	NA
Jul-02	NR	34.10	NA	NA	NA	NA	NA
Aug-02	NR	33.60	NA	NA	NA	NA	NA
Sep-02	NR	26.80	NA	NA	NA	NA	NA
Oct-02	NR	30.00	NA	NA	NA	NA	NA
Nov-02	NR	35.00	NA	NA	NA	NA	NA
Dec-02	NR	28.30	NA	NA	NA	NA	NA
Jan-03	NR	45.00	NA	NA	NA	NA	NA
Feb-03	NR	30.00	NA	NA	NA	NA	NA
Mar-03	NR	41.10	NA	NA	NA	NA	NA
Apr-03	NR	45.40	NA	NA	NA	NA	NA
May-03	NR	35.00	NA	NA	NA	NA	NA
Jun-03	NR	35.00	NA	NA	NA	NA	NA
Jul-03	NR	33.50	NA	NA	NA	NA	NA
Aug-03	NR	22.40	NA	NA	NA	NA	NA
Sep-03	NR	25.00	NA	NA	NA	NA	NA
Oct-03	NR	19.18	NA	NA	NA	NA	NA
Nov-03	NR	1.40	NA	NA	NA	NA	NA
Dec-03	NR	24.10	NA	NA	NA	NA	NA

¹ Data on this table is based on Self-monitoring reports (SMRs) submitted by the City of Brawley to the Colorado River Basin Water Board.

² NR = Not reported.

³ NA = Not applicable.

Attachment H - Brawley WWTP Influent, Effluent, and Net Ammonia Removal (%) ¹							
Month & Year	Avg Influent Ammonia (mg/L)	Avg Effluent Ammonia (mg/L)	Net Percent Removal	< 30 % Removal	< 10% Removal	< 5 % Removal	Essentially No Removal (< 2.5 %)
Jan-04	26.50	27.40	0	Yes	Yes	Yes	Yes
Feb-04	17.00	27.00	0	Yes	Yes	Yes	Yes
Mar-04	21.50	24.40	0	Yes	Yes	Yes	Yes
Apr-04	20.00	21.28	0	Yes	Yes	Yes	Yes
May-04	19.75	1.68 ⁴	NA	NA	NA	NA	NA
Jun-04	19.20	2.24	NA	NA	NA	NA	NA
Jul-04	18.00	1.96	NA	NA	NA	NA	NA
Aug-04	20.30	1.40	NA	NA	NA	NA	NA
Sep-04	30.60	1.96	NA	NA	NA	NA	NA
Oct-04	20.60	0.84	NA	NA	NA	NA	NA
Nov-04	20.20	1.68	NA	NA	NA	NA	NA
Dec-04	35.33	26.32	25.5	Yes	No	No	No
Jan-05	34.33	34.20	0.4	Yes	Yes	Yes	Yes
Feb-05	30.00	27.16	9.5	Yes	Yes	No	No
Mar-05	NR	29.10	NA	NA	NA	NA	NA
Apr-05	28.00	30.80	0	Yes	Yes	Yes	Yes
May-05	23.00	20.44	11.1	Yes	No	No	No
Jun-05	29.00	11.20	61.4	No	No	No	No
Jul-05	19.50	19.04	2.4	Yes	Yes	Yes	Yes
Aug-05	16.02	18.48	0	Yes	Yes	Yes	Yes
Sep-05	16.80	17.36	0	Yes	Yes	Yes	Yes
Oct-05	20.02	19.74	1.4	Yes	Yes	Yes	Yes
Nov-05	19.94	16.69	16.3	Yes	No	No	No
Dec-05	29.12	27.86	4.3	Yes	Yes	Yes	No
Jan-06	28.84	26.46	8.3	Yes	Yes	No	No
Feb-06	27.02	30.10	0	Yes	Yes	Yes	Yes
Mar-06	25.88	27.88	0	Yes	Yes	Yes	Yes
Apr-06	27.16	31.64	0	Yes	Yes	Yes	Yes
May-06	30.91	31.25	0	Yes	Yes	Yes	Yes
Jun-06	29.10	29.06	0.1	Yes	Yes	Yes	Yes
Jul-06	32.20	35.14	0	Yes	Yes	Yes	Yes
Aug-06	25.42	26.16	0	Yes	Yes	Yes	Yes
Sep-06	24.22	29.21	0	Yes	Yes	Yes	Yes
Oct-06	37.24	24.64	33.8	No	No	No	No

⁴ This and the following six values are not used because given previous performance data and type of WWTF are not realistic.

Attachment H - Brawley WWTP Influent, Effluent, and Net Ammonia Removal (%) ¹							
Month & Year	Avg Influent Ammonia (mg/L)	Avg Effluent Ammonia (mg/L)	Net Percent Removal	< 30 % Removal	< 10% Removal	< 5 % Removal	Essentially No Removal (< 2.5 %)
Nov-06	27.44	30.34	0	Yes	Yes	Yes	Yes
Dec-06	36.44	37.38	0	Yes	Yes	Yes	Yes
Jan-07	41.64	42.12	0	Yes	Yes	Yes	Yes
Feb-07	52.08	50.82	2.4	Yes	Yes	Yes	Yes
Mar-07	27.00	18.62	31.0	No	No	No	No
Apr-07	33.16	22.26	32.9	No	No	No	No
May-07	34.61	31.81	8.1	Yes	Yes	No	No
Jun-07	30.80	33.60	0	Yes	Yes	Yes	Yes
Jul-07	31.11	31.78	0	Yes	Yes	Yes	Yes
Aug-07	28.22	31.36	0	Yes	Yes	Yes	Yes
Sep-07	27.44	28.00	0	Yes	Yes	Yes	Yes
Oct-07	20.15	20.27	0	Yes	Yes	Yes	Yes
Nov-07	18.76	20.30	0	Yes	Yes	Yes	Yes
Dec-07	17.64	18.76	0	Yes	Yes	Yes	Yes
Jan-08	18.82	21.06	0	Yes	Yes	Yes	Yes
Feb-08	20.44	20.02	2.1	Yes	Yes	Yes	Yes
Mar-08	21.03	19.46	7.5	Yes	Yes	No	No
Apr-08	26.32	25.87	1.7	Yes	Yes	Yes	Yes
May-08	29.12	30.18	0	Yes	Yes	Yes	Yes
Jun-08	22.96	21.56	6.1	Yes	Yes	No	No
Jul-08	20.94	19.26	8.0	Yes	Yes	No	No
Aug-08	20.44	17.50	14.4	Yes	No	No	No
Sep-08	19.94	17.36	12.9	Yes	No	No	No
Oct-08	18.34	16.39	10.6	Yes	No	No	No
Nov-08	18.34	16.94	7.6	Yes	Yes	No	No
Dec-08	19.40	19.60	0	Yes	Yes	Yes	Yes
Jan-09	21.00	21.28	0	Yes	Yes	Yes	Yes
Feb-09	22.30	23.66	0	Yes	Yes	Yes	Yes
Mar-09	22.40	NR	NA	NA	NA	NA	NA
Apr-09	NR	NR	NA	NA	NA	NA	NA
May-09	22.80	19.18	15.9	Yes	No	No	No
Jun-09	21.80	12.21	44.0	No	No	No	No
Jul-09	19.70	10.92	44.6	No	No	No	No
Aug-09	23.52	5.56	76.4	No	No	No	No
Sep-09	22.10	6.86	69.0	No	No	No	No
Oct-09	21.60	12.88	40.4	No	No	No	No

Attachment H - Brawley WWTP Influent, Effluent, and Net Ammonia Removal (%) ¹							
Month & Year	Avg Influent Ammonia (mg/L)	Avg Effluent Ammonia (mg/L)	Net Percent Removal	< 30 % Removal	< 10% Removal	< 5 % Removal	Essentially No Removal (< 2.5 %)
Nov-09	20.40	21.67	0	Yes	Yes	Yes	Yes
Dec-09	23.40	22.89	2.2	Yes	Yes	Yes	Yes
Jan-10	26.70	22.82	14.5	Yes	No	No	No
Feb-10	24.60	24.22	1.5	Yes	Yes	Yes	Yes
Mar-10	22.60	23.86	0	Yes	Yes	Yes	Yes
Apr-10	32.80	29.82	9.1	Yes	Yes	No	No
May-10	35.70	34.02	4.7	Yes	Yes	Yes	No
Jun-10	NR	NR	NA	NA	NA	NA	NA
Jul-10	29.96	35.49	0	Yes	Yes	Yes	Yes
Aug-10	21.73	18.34	15.6	Yes	No	No	No
Sep-10	20.72	10.78	48.0	No	No	No	No
Oct-10	22.75	20.58	9.5	Yes	Yes	No	No
Nov-10	22.29	23.64	0	Yes	Yes	Yes	Yes
Dec-10	34.02	26.88	21.0	Yes	No	No	No
Jan-11	31.40	28.32	9.8	Yes	Yes	No	No
Feb-11	37.60	28.84	23.3	Yes	No	No	No
Mar-11	32.00	37.58	0	Yes	Yes	Yes	Yes
Apr-11	43.83	48.98	0	Yes	Yes	Yes	Yes
May-11	37.83	41.55	0	Yes	Yes	Yes	Yes
Jun-11	34.98	35.98	0	Yes	Yes	Yes	Yes
Jul-11	27.43	18.49	32.6	No	No	No	No
Aug-11	33.04	1.12	96.6	No	No	No	No
Sep-11	35.42	2.24	93.7	No	No	No	No
Oct-11	21.70	0.84	96.1	No	No	No	No
Nov-11	24.19	0.78	96.8	No	No	No	No
Dec-11	26.88	2.38	91.1	No	No	No	No
Jan-12	33.26	1.68	94.9	No	No	No	No
Feb-12	29.23	0.67	97.7	No	No	No	No
Mar-12	30.94	0.84	97.3	No	No	No	No
Apr-12	25.76	1.12	95.7	No	No	No	No
May-12	30.24	1.23	95.9	No	No	No	No
Jun-12	45.64	2.94	93.6	No	No	No	No
Jul-12	38.30	0.90	97.7	No	No	No	No
Aug-12	38.08	0.70	98.2	No	No	No	No
Sep-12	32.48	0.56	98.3	No	No	No	No
Oct-12	19.04	0.90	95.3	No	No	No	No

Attachment H - Brawley WWTP Influent, Effluent, and Net Ammonia Removal (%) ¹							
Month & Year	Avg Influent Ammonia (mg/L)	Avg Effluent Ammonia (mg/L)	Net Percent Removal	< 30 % Removal	< 10% Removal	< 5 % Removal	Essentially No Removal (< 2.5 %)
Nov-12	23.94	0.98	95.9	No	No	No	No
Dec-12	21.98	0.84	96.2	No	No	No	No

Attachment I - Dates for Brawley WWTP BOD, TSS, and Bacteria Violations								
BOD		TSS		Fecal Coliforms	Enterococci		E. Coli	
AML ¹	AWL ²	AML	AWL	Maximum	Maximum	Geometric Mean	Maximum	Geometric Mean
4/30/2010	3/3/2011	5/30/2012	5/7/2012	12/20/2010	5/10/2010	5/31/2010	11/14/2006	11/30/2006
5/31/2011	3/5/2011			5/18/2011	5/24/2010	12/31/2010	11/20/2006	5/10/2010
6/30/2011	3/7/2011			4/11/2012	12/13/2010	1/31/2011	11/28/2006	4/30/2011
7/31/2011	5/21/2011				12/20/2010	2/28/2011	12/4/2006	6/30/2011
	5/28/2011				1/24/2011	5/31/2011	9/17/2007	
	7/2/2011				1/31/2011		9/25/2007	
	7/2/2011				2/4/2011		9/30/2007	
					2/7/2011		2/21/2011	
					2/11/2011		2/28/2011	
					2/16/2011			
					3/4/2011			
					3/7/2011			
					3/14/2011			
					3/21/2011			
					3/30/2011			
					4/4/2011			
					4/6/2011			
					4/11/2011			
					4/18/2011			
					4/25/2011			
					5/2/2011			
					5/9/2011			
					5/16/2011			
					5/23/2011			
					5/30/2011			

¹ AML = Average Monthly Limit.

² AWL = Average Weekly Limit

Attachment J - Summary of City of Brawley WWTP Toxicity

Year	Date	Acute Toxicity?	Chronic Toxicity?	Percent of Time During Year with Acute Toxicity	Percent of Time During Year with Chronic Toxicity	Percent of Time with either Chronic or Acute Toxicity
2001	Jan-01	Yes	Yes	82%	55%	100%
	Feb-01	Yes	No			
	Mar-01	Yes	No			
	Apr-01	Yes	Yes			
	May-01	Yes	Yes			
	Jun-01	FTR	FTR			
	Jul-01	Yes	Yes			
	Aug-01	Yes	No			
	Sep-01	No	Yes			
	Oct-01	No	Yes			
	Nov-01	Yes	No			
	Dec-01	Yes	No			
2002	Jan-02	Yes	No	100%	0.75	100%
	Feb-02	Yes	No			
	Mar-02	Yes	Yes			
	Apr-02	Yes	No			
	May-02	Yes	Yes			
	Jun-02	Yes	Yes			
	Jul-02	Yes	Yes			
	Aug-02	Yes	Yes			
	Sep-02	Yes	Yes			
	Oct-02	Yes	Yes			
	Nov-02	Yes	Yes			
	Dec-02	Yes	Yes			
2003	Jan-03	Yes	Yes	92%	67%	100%
	Feb-03	Yes	Yes			
	Mar-03	Yes	Yes			
	Apr-03	Yes	Yes			
	May-03	Yes	Yes			
	Jun-03	Yes	Yes			
	Jul-03	Yes	Yes			
	Aug-03	Yes	No			
	Sep-03	Yes	No			
	Oct-03	No	No			
	Nov-03	Yes	Yes			
	Dec-03	Yes	No			

Attachment J - Summary of City of Brawley WWTP Toxicity

Year	Date	Acute Toxicity?	Chronic Toxicity?	Percent of Time During Year with Acute Toxicity	Percent of Time During Year with Chronic Toxicity	Percent of Time with either Chronic or Acute Toxicity
2004	Jan-04	Yes	No	67%	58%	67%
	Feb-04	Yes	Yes			
	Mar-04	Yes	Yes			
	Apr-04	Yes	Yes			
	May-04	Yes	Yes			
	Jun-04	Yes	Yes			
	Jul-04	Yes	Yes			
	Aug-04	No	No			
	Sep-04	No	No			
	Oct-04	No	No			
	Nov-04	No	No			
	Dec-04	Yes	Yes			
2005	Jan-05	Yes	Yes	58%	25%	58%
	Feb-05	Yes	No			
	Mar-05	Yes	No			
	Apr-05	Yes	Yes			
	May-05	No	No			
	Jun-05	No	No			
	Jul-05	No	No			
	Aug-05	No	No			
	Sep-05	Yes	Yes			
	Oct-05	No	No			
	Nov-05	Yes	No			
	Dec-05	Yes	No			
2006	Jan-06	Yes	No	45%	25%	45%
	Feb-06	Yes	No			
	Mar-06	Yes	Yes			
	Apr-06	Yes	Yes			
	May-06	FTR	FTR			
	Jun-06	No	No			
	Jul-06	No	No			
	Aug-06	No	No			
	Sep-06	No	No			
	Oct-06	No	No			
	Nov-06	No	No			
	Dec-06	Yes	Yes			

Attachment J - Summary of City of Brawley WWTP Toxicity

Year	Date	Acute Toxicity?	Chronic Toxicity?	Percent of Time During Year with Acute Toxicity	Percent of Time During Year with Chronic Toxicity	Percent of Time with either Chronic or Acute Toxicity
2007	Jan-07	Yes	Yes	100%	75%	100%
	Feb-07	Yes	Yes			
	Mar-07	Yes	Yes			
	Apr-07	Yes	Yes			
	May-07	Yes	Yes			
	Jun-07	Yes	Yes			
	Jul-07	Yes	Yes			
	Aug-07	Yes	No			
	Sep-07	Yes	No			
	Oct-07	Yes	Yes			
	Nov-07	Yes	Yes			
	Dec-07	Yes	No			
2008	Jan-08	Yes	No	83%	50%	92%
	Feb-08	yes	No			
	Mar-08	Yes	No			
	Apr-08	Yes	Yes			
	May-08	Yes	Yes			
	Jun-08	Yes	Yes			
	Jul-08	Yes	Yes			
	Aug-08	No	Yes			
	Sep-08	No	No			
	Oct-08	Yes	Yes			
	Nov-08	yes	No			
	Dec-08	Yes	No			
2009	Jan-09	Yes	Yes	75%	58%	75%
	Feb-09	Yes	Yes			
	Mar-09	Yes	Yes			
	Apr-09	No	No			
	May-09	Yes	No			
	Jun-09	Yes	Yes			
	Jul-09	Yes	Yes			
	Aug-09	No	No			
	Sep-09	Yes	Yes			
	Oct-09	No	No			
	Nov-09	Yes	Yes			
	Dec-09	Yes	No			

Attachment J - Summary of City of Brawley WWTP Toxicity

Year	Date	Acute Toxicity?	Chronic Toxicity?	Percent of Time During Year with Acute Toxicity	Percent of Time During Year with Chronic Toxicity	Percent of Time with either Chronic or Acute Toxicity
2010	Jan-10	Yes	No	92%	83%	92%
	Feb-10	Yes	Yes			
	Mar-10	Yes	Yes			
	Apr-10	Yes	Yes			
	May-10	Yes	Yes			
	Jun-10	No	No			
	Jul-10	Yes	Yes			
	Aug-10	Yes	Yes			
	Sep-10	Yes	Yes			
	Oct-10	Yes	Yes			
	Nov-10	Yes	Yes			
	Dec-10	Yes	Yes			
2011	Jan-11	Yes	Yes	58%	58%	58%
	Feb-11	Yes	yes			
	Mar-11	Yes	Yes			
	Apr-11	Yes	Yes			
	May-11	Yes	Yes			
	Jun-11	Yes	Yes			
	Jul-11	Yes	Yes			
	Aug-11	No	No			
	Sep-11	No	No			
	Oct-11	No	No			
	Nov-11	No	No			
	Dec-11	No	No			
2012	Jan-12	No	No	0%	0%	0%
	Feb-12	No	No			
	Mar-12	No	No			
	Apr-12	No	No			
	May-12	No	No			
	Jun-12	No	No			
	Jul-12	No	No			
	Aug-12	No	No			
	Sep-12	No	No			
	Oct-12	No	No			
	Nov-12	No	No			
	Dec-12	No	No			

Notes:
FTR = Failure to Report

ATTACHMENT K

WATER QUALITY ENFORCEMENT POLICY METHODOLOGY

Pursuant to CWC section 13385, subdivision (e), and section 13327, in determining the amount of any civil liability, the Regional Board is required to take into account the nature, circumstances, extent, and gravity of the violations, whether the dischargers are susceptible to cleanup or abatement, the degree of toxicity of the discharges, and, with respect to the violator, the ability to pay, the effect on its ability to continue its business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violations, and other matters that justice may require.

On November 17, 2009, the State Water Resources Control Board adopted Resolution 2009-0083 amending the Water Quality Enforcement Policy (Enforcement Policy). The Enforcement Policy was approved by the Office of Administrative Law and became effective on May 20, 2010. The Enforcement Policy establishes a methodology for assessing administrative civil liability. The use of this methodology addresses the factors that are required to be considered when imposing a civil liability as outlined in Water Code section 13385, subdivision (e), and section 13327.

An analysis of the Enforcement Policy methodology for the violations alleged in the ACL complaint is set forth below.

Step 1: Potential for Harm for Discharge Violations

The potential for harm for the discharge violations is 10, the maximum allowed under the Enforcement Policy. This potential for harm score is determined by the sum of Factors 1 through 3 below.

Factor 1: Harm or Potential Harm to Beneficial Uses:

After review and analysis of the alleged violations, the Prosecution Team has determined that the harm or potential harm to beneficial uses is major, which results in a score of **5.0**. The Water Quality Control Plan for the Colorado River Basin (hereinafter Basin Plan) designates the following beneficial uses of the New River:

- a. Fresh Water Replenishment of the Salton Sea (FRSH)
- b. Water Contact Recreation (REC I)
- c. Non-Contact Water Recreation (REC II)
- d. Warm Water Habitat (WARM)

e. Wildlife Habitat (WILD)

f. Preservation of Rare, Endangered or Threatened Species (RARE)

Section 303(d) of the Clean Water Act (CWA) requires States to develop and submit to the U.S. Environmental Protection Agency (USEPA) for approval a list of polluted waters or water quality limited (or impaired) segments, commonly referred to as the "303(d) List" or the "List of Impaired Waters." The entire stretch of the New River in the U.S. is listed in the State 303(d) List because, among other impairments, the New River is impaired by toxicity. On March 20, 2013, the Colorado River Basin Water Board revised its 2012 303(d) List, in relevant part, so that it also includes ammonia as an impairing pollutant. Based on the city of Brawley self-monitoring data submitted, the discharge from the city of Brawley's Wastewater Treatment Plant (WWTP) has contributed to the ammonia and toxicity impairments directly, downstream from and in the immediate vicinity of, the Brawley WWTP discharge outfall. National Beef California's (NBC's) slaughterhouse has been the major controllable source of ammonia and toxicity into the Brawley WWTP. It has discharged ammonia and toxic pollutants into the Brawley WWTP in concentrations and amounts that caused and/or contributed to the Brawley WWTP's effluent to be acutely toxic and exhibit chronic toxicity, which caused or contributed to violations of the city of Brawley's NPDES permit Effluent Limitations for ammonia and toxicity, and Receiving Water Limitations for toxicity.

In addition, NBC has contributed excessively high concentrations of Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS). Monitoring records show that as recently as 2012, the organic loading from the NBC slaughterhouse, based on BOD and TSS data, consumed even as much as 80 percent of the Brawley WWTP's treatment capacity, which caused or contributed to violations of the city of Brawley's NPDES permit Effluent Limitations for BOD, TSS, and bacteria.

Consequently, NBC has been the main source of ammonia, BOD, and TSS into the Brawley WWTP and has discharged these pollutants into the WWTP in concentrations and amounts (lbs/day) that had the reasonable potential to cause Pass Through and/or Interference with the Brawley WWTP that caused or contributed to violations of the city of Brawley's NPDES Permit Effluent Limitations for ammonia, toxicity, BOD, TSS, and bacteria, and Receiving Water Limitations for toxicity. Accordingly, the NBC discharge has contributed to the New River's ammonia and toxicity impairments.

Factor 2: Physical, Chemical, Biological or Thermal Characteristics of the Discharge:

As noted in Factor 1, above, NBC's discharge has been characterized by extremely high concentrations of ammonia, BOD and TSS. With respect to ammonia, ammonia can be highly toxic even at low concentrations. In this case, the monitoring data conclusively demonstrate that ammonia has been the main controllable source of chronic and acute toxicity (i.e., the City's bioassays have demonstrated adverse

effect on sensitive receptors, including fish). NBC has also discharged excessively high concentrations of BOD and TSS, including slug loads at times. Consequently, these high concentrations of ammonia, BOD, and TSS, at a minimum, had the reasonable potential to cause Pass Through and/or Interference with the Brawley WWTP, which caused or contributed to violations of the city of Brawley's NPDES Permit Effluent Limitations for ammonia, toxicity, TSS, BOD, and bacteria, and Receiving Water Limitations for toxicity. Consequently a factor of **4.0** is appropriate to use in this case.

Factor 3: Susceptibility to Cleanup or Abatement:

Because less than 50 percent of the discharge is susceptible to cleanup or abatement, a score of **1.0** is assigned for this factor.

Step 2: Assessment for Discharge Violations

Discharging in violation of the pretreatment requirements set forth in 40 CFR part 403 renders the requirements ineffective. The pretreatment requirements are in place in part to prevent Pass Through and/or Interference with the POTW, and to allow POTWs, like the city of Brawley's WWTP, to effectively treat wastewater that contains pollutants, such as ammonia, to ensure that they meet the POTW's NPDES permit Effluent Limitations and Receiving Water Limitations before they are discharged from the WWTP. In this matter, the Discharger's actions rendered those requirements ineffective in its essential functions. Pass Through and/or Interference occurred on numerous occasions essentially from when the slaughterhouse commenced operations in October 2001 through 2012.

Table 2 on page 15 of the Enforcement Policy contains a "Per Day Factor for Discharges." It is also based on a combination of the "Potential for Harm" and the "Deviation from Requirements." As noted above, the potential for harm here was significant due to the impact NBC's discharge had on the city of Brawley's noncompliance with its NPDES permit requirements. Thus, the Potential for Harm score of 10 remains appropriate to assign, and the deviation from requirements similarly remains "major." Therefore, the appropriate Per Day Factor to assign is **1.0**.

Step 3: Per Day Assessment for Non-Discharge Violations

This step in the penalty calculator is not applicable to this discharge because it addresses only non-discharge violations.

Initial Amount of Liability

For violation of the federal National Pretreatment Standards that prohibit an Industrial

User from introducing into a POTW any pollutants, which cause Pass Through or Interference, the Initial Liability Amounts for the violation calculated on a per day basis (pursuant to CWC section 13385(c)) are as follows:

Per Day Liability:

(Number Violation(s) x (Maximum Per Day Liability of \$10,000) =

375 x \$10,000 = \$3,750,000.00

Total Initial Liability Amount: \$3,750,000.00

Step 4: Adjustment Factors

Culpability:

The Discharger was aware that it was discharging pollutants to the city of Brawley's wastewater treatment plant (WWTP) that contained high levels of ammonia, which caused and/or contributed to toxicity, and other pollutants (i.e., BOD, TSS, bacteria) that caused and/or contributed to Pass Through and/or Interference with the city of Brawley's WWTP. This resulted in the city of Brawley's violating the requirements of its NPDES permit. The Discharger was informed by the city of Brawley of these violations and continued to operate without timely and effectively addressing these issues. Because these pretreatment issues began as soon as the Discharger's predecessor, Brawley Beef, LLC, commenced operations in October 2001, and continued through 2012 following the Discharger's acquisition of Brawley Beef in June 2006, the Discharger had actual or constructive knowledge for more than 10 years that its inadequately pretreated wastewaters were causing or contributing to Pass Through and/or Interference with the city of Brawley's WWTP. Therefore, the Discharger's failure to address its inadequately pretreated wastewaters to the Brawley WWTP weighs heavily against it.

Given these facts, the Prosecution Team has assigned a multiplier of **1.0**.

Cleanup and Cooperation:

While the Discharger has been responsive to the Colorado River Basin Water Board and its staff, the Discharger did not voluntarily cooperate in returning to compliance and ceasing discharges that caused and/or contributed to Pass Through and/or Interference with the city of Brawley's WWTP.

The Discharger cooperated with the Board with respect to the 13267 Order issued and met with Board staff regarding planned upgrades and Chapter 15 regulatory matters. It also appears that after 2009 the Discharger was at times responsive to the city of Brawley's citations for effluent violations due to the Discharger's

operations. It is the Prosecution Team's understanding that on several different occasions the plant halted operations to address compliance problems, including those that resulted in the violations set forth in the ACL Complaint. Although the Discharger was not proactive in its dealing with Pass Through and Interference violations, there has not been a complete absence of cooperation.

For these reasons, the Prosecution Team has assigned a multiplier of **1.0**.

History of Violations: There is no history of repeat violations by the Discharger. Therefore, a neutral multiplier of **1.0** is applied.

Step 5: Determination of Total Base Liability Amount

The Total Base Liability Amount is determined by multiplying the Total Initial Liability Amount by each of the adjustment factors from Step 4

(Total Initial Liability Amount) x (Culpability Multiplier) x (Cleanup and Cooperation Multiplier) x (History of Violations Multiplier) = Total Base Violation

(\$3,750,000.00) x 1.0 x 1.0 x 1.0 = **\$3,750,000.00**

Step 6: Ability to Pay

The Prosecution Team believes the Discharger has the ability to pay the proposed liability and continue to operate if it desired to do so.

Step 7: Other Factors as Justice May Require

The Prosecution Team has concluded that there are no other factors as justice may require that need to be considered at this time. Therefore, the Total Base Liability Amount is unchanged.

Step 8: Economic Benefit

See Attachment M.

Step 9: Maximum and Minimum Liability Amounts

See Findings 58-60 of the ACL Complaint and Attachment M.

Step 10: Final Liability Amount

See Penalty Calculator, Attachment L.

ATTACHMENT L

Discharger:		Violations
National Beef California, LP		13385
Discharge Violations	Days of Violation	375
	Assessed Discharge Volume, Gallons	0
	Statutory Maximum per Day	\$10,000
	Statutory Maximum per Gallon Discharged	\$10
	Potential for Harm Final Score	10
	Deviation from Requirement	Major
	Adjustment Factor	1.000
	Per Day Assessment	\$3,750,000
	Per Gallon Assessment	\$0
	Assessment for Discharge Violations	\$3,750,000
Non-Discharge Violations		0
		0
		0
		\$0
		0.0
		\$0
		0.00
		\$0
		\$0
		\$0
Initial Amount of Liability		\$3,750,000
Conduct Adjustment Factors	Culpability	1
	Cleanup and Cooperation	1.0
	History of Violations	1.0
Initial Base Liability Amount		\$3,750,000
Total Base Liability Amount		\$3,750,000
Economic Benefit		\$11,933,724.00
Final Liability Amount		\$3,750,000

Attachment M
National Beef California, LP, Owner/Operator, Wastewater Treatment Facility
City of Brawley, Imperial County

Compliance Action	One-Time Nondepreciable Expenditure		Annual Cost ²		Date of			Benefit of Non-Compliance
	Amount	Date ¹	Amount	Date ³	Non-Compliance	Compliance	Penalty Payment	
Avoided Construction of Anaerobic Pond 1 Replacement	\$3,817,500	3/1/2013	\$190,875	4/1/2014	6/2/2006	1/1/2013	6/19/2014	\$6,745,174
Avoided Installation of Aerobic Treatment Systems in Pond 2	\$1,096,513	3/1/2013	\$54,826	4/1/2014	6/2/2006	1/1/2013	6/19/2014	\$1,937,438
Avoided Construction of Temporary Pond 3C	\$1,840,000	3/1/2013	\$92,000	4/1/2014	6/2/2006	1/1/2013	6/19/2014	\$3,251,112
Avoided Installation of Clarifier	\$1,288,125	3/1/2013	\$64,406	4/1/2014	6/2/2006	1/1/2013	6/19/2014	\$2,275,999
Totals	\$8,042,138		\$402,107					\$11,933,724

Source: USEPA BEN Model:

Version 5.3.0

4/10/2014 16:11

C-Corporation w/ CA tax rates

Cost Index for Inflation:

ECI Employment Cost Index

Discount/Compound Rate:

7.3%

¹ Date of the cost estimate. National Beef Brawley Wastewater Project Costs - NBP, City & RWQCB, Updated 2/6/2014, Original National Beef Plan (March 2013).

² Operating and maintenance costs.

³ Date of the O&M cost estimates. Range of cost from Jose Angel, 4/2/2014.