

<b>ATTACHMENT "F"</b>				
City of Brawley Penalty Calculations Methodology				
<b>Discharger Name/ID:</b>	City of Brawley Municipal WWTP NPDES Permit CA0105015			
<b>Discharge Violations</b>	<b>Step 1</b>	Potential Harm Factor	n/a	
	<b>Step 2</b>	Per Gallon Factor Gallons Statutory / Adjusted Max per Gallon (\$) <b>Total</b>		
		Per Day Factor Days Statutory Max per Day <b>Total</b>		
<b>Non-Discharge Violations</b>	<b>Step 3</b>	Per Day Factor	0.7	
		Days	1474	
		Statutory Max per Day	\$5,000	
		<b>Total</b>	\$5,159,000	
<b>Initial Amount of the ACL</b>			<b>\$5,159,000</b>	
<b>Add'l Factors</b>	<b>Step 4</b>	Culpability	1.4	\$7,222,000
		Cleanup and Cooperation	1.1	\$7,944,860
		History of Violations	1.1	\$8,739,346
	<b>Step 5</b>	<b>Total Base Liability Amount</b>		<b>\$8,739,346</b>
	<b>Step 6</b>	Ability to Pay & to Continue in Business	1	<b>\$8,739,346</b>
	<b>Step 7</b>	Other Factors as Justice May Require	1	<b>\$8,739,346</b>
		Staff Costs	\$63,000	<b>\$8,739,346</b>
	<b>Step 8</b>	Economic Benefit	\$1,176,162	
	<b>Step 9</b>	Minimum Liability Amount (Economic Benefit + 10%)	\$1,293,778	
		Maximum Liability Amount	\$7,370,000	
	<b>Step 10</b>	<b>Final Liability Amount</b>		<b>\$7,370,000</b>