

California Regional Water Quality Control Board, Colorado River Basin  
Prosecution Team Evidence  
on the matter of  
Administrative Civil Liability Complaint R7-2014-0041  
Exhibit 14



# CITY OF BRAWLEY

PUBLIC WORK / CITY ENGINEER  
180 SOUTH WESTERN AVENUE  
BRAWLEY, CALIFORNIA  
92227  
PHONE (760) 344-5800  
FAX (760) 344-5612

August 13, 2003

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

Dear Mr. Larkin:

During the last month staff has completed the following:

The city's wastewater collection system continues to be monitored and sampled at specified locations where levels of ammonia have been elevated. After inspections and surveys, laboratory reports indicate that ammonia levels have dropped significantly and are at acceptable levels at this time. Businesses altered their operations and eliminated the high ammonia concentrations from being discharged into our wastewater collection system.

Brawley Beef ammonia levels were under the permitted level for approximately three weeks. However, Brawley Beef ammonia levels have increased in the last month to above the permitted level of 40ppm. City staff addressed their concerns with Brawley Beef's high ammonia discharge and the Operations Superintendent from Brawley Beef initiated additional testing of their waste treatment ponds. After increased lab analysis, the generation of ammonia appears to be emanating from the third pond.

Brawley Beef has begun to police their night operations to ensure no illegal discharges have occurred. In addition, it has been recommended that the third lagoon at the beef plant be aerated as pond two. Brawley Beef has indicated that they will address the suggestion and evaluate costs for the following: a) Implementation of aerators for pond three and b) the installation of piping required isolating pond two from pond three.

The city has a meeting scheduled for August 28, 2003, with Berryman and Henigar, a consulting firm hired by the city to study water rates, to discuss their recommendations on fees associated with the violations of our pretreatment program.

During the time frame when Brawley Beef was in compliance with the city's pretreatment ordinance, the city's wastewater plant ammonia levels dropped to 15ppm at the influent and 11ppm at the effluent.

The current ammonia level at the city's Wastewater Treatment Plant for the last month has averaged 30ppm at the influent and 28ppm at the effluent.

Should you have any questions regarding this correspondence, please contact me at (760) 344-5800 ext. 11.

Sincerely,

Ruben Mireles  
Superintendent of Operations

RM/sm

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