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ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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DAVE MARKLIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

JAMES H. DAVIS, Ph.D.  
Director  
Resource Protection Division

**Certified Mail – Return Receipt Requested**

March 9, 2012

Mr. Paul Risso, Manager  
New Mexico Water Service Company  
401 Horner Street  
Belen, NM 87002

**RE: Minor Non-Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, New Mexico Water Service Company, Rio Del Oro Wastewater Treatment Plant, NM0030414, February 21, 2012**

Dear Mr. Risso:

Enclosed, please find a copy of the report for the above referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA Region VI office in Dallas, Texas for their review. These inspections are used by the USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald  
US Environmental Protection Agency  
Allied Bank Tower  
Region VI Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Program Manager  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

I wish to thank you for the cooperation that was extended by your staff, Mr. Porfirio Baca, Operator, and Mr. Bobby Towle, Wastewater Operations Supervisor, while at this facility. If you have any questions concerning this inspection report, please feel free to contact me at the above address or by telephone at (505) 827-1041.

Sincerely,

*/s/ Sandra Gabaldón*

Sandra Gabaldón

Surface Water Quality Bureau

Point Source Regulation Section

Cc: Marcia Gail Adams, 6EN-AS, via email  
Stacy Bennett-Dwyer, 6EN-AS, via email  
Carol Peters-Wagnon, 6EN-WM, via email  
Sonia Hall and Hannah Branning, USEPA (6EN-WC) via e-mail  
Larry Giglio, 6W-QPP, via email  
Diana McDonald, 6EN-WM, via email  
District I, via e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type						
1	N	2	5	3	N	M	0	0	3	0	4	1	4	11	12	1	2	0	2	2	1	17	18	C	19	S	20	1
Remarks																												
P R I V A T E D O M E S T I C																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67						70						71		72		73 74 75 76 77 78 79 80												

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Rio Del Oro Wastewater Treatment Plant</b> Take I-25 South, exit 215, south on NM47. From junction 6 and NM47, turn left. Turn left onto Patricio then one mile to La Estrada. Continue past Tome Cemetery and turn left on dirt road and follow to WWTP. <b>VALENCIA COUNTY</b>		Entry Time /Date 0915 hours / 02-21-2012		Permit Effective Date April 1, 2010	
		Exit Time/Date 12:10 hours / 02-21-2012		Permit Expiration Date March 31, 2015	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Porfirio Baca, Operator (505) 864-2218 Bobby Towle, Wastewater Operations Supervisor, (505) 864-2281				Other Facility Data SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Paul Risso, Manager (505) 864-2218 / 864-8438 (fax) New Mexico Water Service Company 401 Horner Street Belen, New Mexico 87002				Contacted Yes <input type="checkbox"/> No <input type="checkbox"/> *	
				N. 34.72384 W. -106.70525 NMED DP #1569	

#### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

#### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- See checklist and further explanation for details

Name(s) and Signature(s) of Inspector(s) SANDRA GABALDON /s/ Sandra Gabaldon		Agency/Office/Telephone/Fax NMED/SWQB/505-827-1041/505-827-0160		Date March 9, 2012	
Signature of Management QA Reviewer RICHARD E. POWELL /s/ Richard E. Powell		Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798/505-827-0160		Date March 9, 2012	

## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

 Y  N  NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

 Y  N  NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

 Y  N  NA

4. ALL DISCHARGES ARE PERMITTED

 Y  N  NA

## SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

 S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

 Y  N  NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

 S  M  U  NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

 Y  N  NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

 Y  N  NA

c) ANALYTICAL METHODS AND TECHNIQUES.

 Y  N  NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

 Y  N  NA

e) DATES AND TIMES OF ANALYSES.

 Y  N  NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

 Y  N  NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

 S  M  U  NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.

 S  M  U  NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

 Y  N  NA

## SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

 S  M  U  NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.

 S  M  U  NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

 S  M  U  NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. Diesel Generator

 S  M  U  NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. Dial alarm system.

 S  M  U  NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE

 S  M  U  NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

 S  M  U  NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

 S  M  U  NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

 Y  N  NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

 Y  N  NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

 Y  N  NA

## SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?  Y  N  NA  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  Y  N  NA  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?  Y  N  NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  Y  N  NA  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?  Y  N  NA

## SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED no).  
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  Y  N  NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  Y  N  NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.  Y  N  NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.  Y  N  NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  Y  N  NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING.  Y  N  NA
- b) PROPER PRESERVATION TECHNIQUES USED.  Y  N  NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.  Y  N  NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?  Y  N  NA

## SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED YES)  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.  Y  N  NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.  Y  N  NA
4. CALIBRATION FREQUENCY ADEQUATE.  Y  N  NA  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.  Y  N  NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Facility is discharging to re-use only.  Y  N  NA
6. HEAD MEASURED AT PROPER LOCATION.  Y  N  NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.  Y  N  NA

## SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

**SECTION F - LABORATORY (CONT'D)**

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA

4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA

5. DUPLICATE SAMPLES ARE ANALYZED 10 % OF THE TIME FOR E. COLI . **E. coli is being duplicated. However, other parameters are not**  Y  N  NA

6. SPIKED SAMPLES ARE ANALYZED.      % OF THE TIME.  Y  N  NA

7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Wilkins Environmental

LAB ADDRESS 832 NW 67<sup>th</sup> Street, Oklahoma City, OK 73116

PARAMETERS PERFORMED Biomonitoring

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO.)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001							

RECEIVING WATER OBSERVATIONS The facility is currently sending all discharge flow to re-use at a city park.

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO.)  
 DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.  S  M  U  NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.  S  M  U  NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED     ).

1. SAMPLES OBTAINED THIS INSPECTION.  Y  N  NA

2. TYPE OF SAMPLE OBTAINED  
 GRAB      COMPOSITE SAMPLE      METHOD      FREQUENCY     

3. SAMPLES PRESERVED.  Y  N  NA

4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.  Y  N  NA

7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA



**RIO DEL ORO WWTP  
COMPLIANCE EVALUATION INSPECTION  
NPDES Permit No. NM0030414  
Date of Inspection: February 21, 2012**

**INTRODUCTION**

A compliance evaluation inspection (CEI) was conducted at the Rio del Oro WWTP on February 21, 2012 by Sandra Gabaldón of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a private domestic Wastewater Treatment Plant (WWTP) classified under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned NPDES permit number NM0030414. The facility design flow is 0.3 million gallons a day (MGD).

The Rio del Oro WWTP discharges into La Canada de La Loma de Arena thence to La Constancia Ditch, thence to the Rio Grande in segment 20.6.4.105 (NMAC State of New Mexico Standards for Interstate and Intrastate Surface Waters). Designated uses of Segment 20.6.4.105 are irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

The NMED performs a certain number of CEI's annually for the United States Environment Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representatives, observations made by the NMED inspector, and a review of records maintained by the permittee, commercial laboratory, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative further explanations section of this report.

The inspector arrived at the facility at 0915 hours and conducted an entrance interview with the on-site operator, Mr. Porfirio Baca. Mr. Baca called Mr. Bobby (Robert) Towle, Wastewater Operations Supervisor. The inspector showed her credentials to Mr. Baca and Mr. Towle and proceeded with the inspection of the facility. An exit meeting was held with Mr. Towle at the New Mexico Water Service Company office at approximately 1134 hours to 1210 hours. Ms. Gabaldón explained to Mr. Towle the preliminary findings of the inspection and requested records for review.

### **TREATMENT SCHEME:**

The Rio del Oro wastewater treatment facility is a membrane bioreactor (MBR).

Raw sewage enters one of two (2) automatic fine bar screens (one on-line; one standby) that are provided with a common conveyor/washer/compactor (CWC). The CWC removes organics from the screenings and automatically dumps the washed and compacted screenings into a dumpster that is emptied at a landfill.

The influent from the bar screen discharges into the pre-air basin to be mixed with the activated sludge (mixed liquor suspended solids). Not only are BOD and TSS removed in the pre-aeration basin, nitrogen is also removed with alternating periods of aeration (nitrification) and anoxic mixing (denitrification).

Two (2) submersible pumps continuously pump the mixed liquor from the pre-aeration basin into each of the two (2) separate bioreactors. Each reactor is equipped with four (4) submerged membrane units which have 200 flat plate filters in each unit. Facility effluent is withdrawn through the flat plate membranes (filtered) by permeate pumps (two in line; one standby), disinfected with ultraviolet light, and discharged to a holding basin for irrigation reuse. Two (2) UV disinfection units for bacterial control began on March 14, 2008.

The excess mixed liquor suspended solids in the bioreactors automatically recycles back to the pre-aeration basin through telescoping valves. Waste activated sludge is removed from both bioreactors daily and is discharged into the sludge holding tank. Sludge is removed weekly from the holding tank and taken to the surface disposal site.

Air is supplied to the pre-aeration and bioreactor basins with two (2) separate aeration systems. Two (2) aeration blowers are provided for each system (one on line; one standby). The MBR is monitored and controlled by a programmable logic controller (PLC) that also provided supervisory control and data acquisition for alarm notification. Operator control is provided through a human-machine interface that is simply a PC located in the admin/lab building. In the event of a failure of the PLC, the facility can also be operated manually.

### **SLUDGE MANAGEMENT:**

The facility pumps sludge from the aerobic digester into a septage truck which hold approximately 2,000 gallons. From here, the sludge is surface disposed at a dedicated site approximately 4 miles from the facility. The sludge is surface disposed and incorporated into the soil approximately four hours after application.

Compliance Evaluation Inspection  
Rio Del Oro WWTP  
NPDES Permit No. NM0030414  
Date of Inspection: February 21, 2012

**Further Explanations:**

Note: The sections are arranged according to the format of the enclosed EPA inspection checklist (Form 3560-3), rather than being ranked in order of importance.

**Section C – Operation and Maintenance – Overall rating of “Satisfactory”**

The permit requires in Part III, Section B.3:

*The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

**Findings** for Operation and Maintenance:

On the date of the inspection, the permittee did not have a written procedure for emergency treatment controls established. The permittee should have a emergency plan available for all operators to review and be familiar with in the event of such an emergency should occur.

**Section E – Flow Measurement – Overall Rating of “Marginal”**

**Permit Requirements** for Flow Measurement:

The Permit in Part III, Section C.6 states:

*Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy of reliability of measurements of the volume*

*of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from the true discharge rates throughout the range of expected discharge volumes.*

**Findings** for Flow Measurement:

The permittee provided the inspector with an annual calibration report; however, there were no records that the permittee periodically did calibration checks between the secondary and the primary device to insure that the measured flow was not more than 10% deviated from the true discharge. This is necessary to provide data for pollutant mass loading calculations and provide operating and performance data on the wastewater treatment plant. **This is a repeat finding.**

## **DISCHARGE MONITORING CALCULATION CHECK**

**August 2011**

**E. Coli**

Sample Dates:	08/03/2011 1	08/10/2011	08/17/2011	08/24/2011	08/31/2011	Data reported on DMR
E. coli (#100ml)	21.1	<1	1.0	<1	<1	
7-d Average	Highest weekly average = 21.1					21.1✓
30-day Average: Log of colonies per 100 mL Add all logs and divide by number of samples. Geometric Mean is antilog.	Log (21) + Log (1) + Log (1) + Log (1) + Log (1) = 1.322 / 5 = 0.2644  Geometric Mean = Antilog 0.2644 = 1.838					1.8✓

✓ = Match values reported on DMR as well as calculations made by inspector.

**BOD**

Sample Date:	Daily Flow (MGD)	BOD (mg/l)	Calculated Daily Load
08/03/2011	0.165400	2.0	(0.165400) (8.34) (2.0) = 2.76
08/10/2011	0.146700	<1.59	(0.146700) (8.34) (1.59) = <1.95
08/17/2011	0.144900	<1.56	(0.144900) (8.34) (1.56) = <1.89
Calculated Monthly Average (loading):	2.76 + 1.95 + 1.89 = < 2.2 lbs/d*		
Calculated Monthly Average (Conc.)	2.0 + 1.59 + 1.56 = 5.15/3 = < 1.72 mg/L*		
Reported on DMR	2.76 lbs/D (7-D Avg); *2.2 lbs/d (30-D Avg) 2.0 mg/L (7-D Avg); *1.72 mg/L (30-D Avg)		

\*Permittee reported 1.72. However, because some of the values are "less than" the permittee should report as a less than value on their DMR.

**TSS**

Sample Date:	Daily Flow (MGD)	TSS (mg/l)	Calculated Daily Load
08/03/2011	0.165400	ND (4.0)	(0.165400) (8.34) (4.0) = 5.52
08/10/2011	0.146700	ND (4.0)	(0.146700) (8.34) (4.0) = 4.89
08/17/2011	0.144900	ND (4.0)	(0.144900) (8.34) (4.0) = 4.83
Calculated Monthly Average (loading):	5.52 + 4.89 + 4.83 = 15.24 / 3 = 5.08 lbs/D✓		
Calculated Monthly Average (Conc.)	4.0 + 4.0 + 4.0 = 12.0 / 3 = 4.0 mg/L✓		
Reported on DMR	4.0 mg/L (7-D Avg); 4.0 mg/L (30-D Avg)✓ 5.52 lbs/D(7-D Avg); 5.09 lbs/D(30-D Avg)✓		

✓ = Match values reported on DMR as well as calculations made by inspector.