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## **Fact Sheet** **July 1, 2017**

City of Rehoboth Beach  
229 Rehoboth Avenue  
Rehoboth Beach, Delaware 19971

NPDES Permit No. DE 0020028  
Permit No. WPCC 3084E/74

The City of Rehoboth Beach has applied for reissuance of its National Pollutant Discharge Elimination System (NPDES) permit to discharge treated sanitary wastewater to the Rehoboth segment of the Lewes and Rehoboth Canal. Concurrently, the City has applied to cease said discharge and redirect the treated sanitary wastewater to the Atlantic Ocean through a new outfall to be completed no later than June 1, 2018.

### **Proposed Permit Changes**

1. Deleted effluent limits for average daily flow, in favor of a note stating, "A daily average discharge rate of 3.4 million gallons per day (mgd) was used in determining the effluent limitations for this outfall."
2. Revised effluent limitations and monitoring requirements for BOD<sub>5</sub> to comply with Section 7.7.3 of the current State of Delaware Regulations Governing the Control of Water Pollution (RGCWP).
3. Continued authorization to discharge effluent to the Rehoboth segment of the Lewes-Rehoboth Canal (Phase 1 – Outfall 001) from effective date of permit through completion of Ocean Outfall Project, but no later than May 31, 2018, in accordance with Consent Order No. 98C-12-023-THG, as amended January 8, 2015.
4. Authorized discharge of effluent to the Atlantic Ocean (Phase 2 – Outfall 002) beginning with completion of Ocean Outfall Project, but no later than June 1, 2018, in accordance with Consent Order No. 98C-12-023-THG, as amended January 8, 2015.
5. New Special Condition No. 9 outlining the biomonitoring requirements for Phase 2.
6. Added new Electronically Generated Discharge Monitoring Report (eDMR) requirements.
7. New Special Condition No. 14 requiring the permittee to properly operate and maintain all equipment necessary to maintain current treatment levels.
8. New Special Condition No. 15 requiring the permittee to demonstrate a minimum of 85% reduction in the raw waste TSS and BOD<sub>5</sub> concentrations on a monthly average basis prior to discharge.
9. New Special Condition No. 16 requiring the permittee to perform proper maintenance and inspection of the ocean outfall structure in accordance with applicable industry standards.

10. New Special Condition No. 17 requiring the permittee to install an emergency generator system.
11. New Special Condition No. 18 was added based on our review of 40 CFR Part 136 to ensure the use of EPA-approved analytical methods that are capable of detecting and measuring the pollutants at, or below, the applicable water quality criteria or permit limits.

## Facility Location

The facility is located on Bay Road, Rehoboth Beach, Sussex County, Delaware, as shown in the attached permit.

## Activity Description

The facility is a municipal wastewater treatment plant (WWTP) that receives wastewater from Rehoboth Beach and neighboring areas including North Shores, Henlopen Acres, and the Dewey Beach Sanitary District. No significant industrial wastes are discharged to this facility. The facility is designated as a **major** publicly owned treatment works (POTW) because the facility has a design flow of greater than one million gallons per day.

## Discharge Description

This WWTP currently has a single discharge (Outfall 001) to the Rehoboth segment of the Lewes-Rehoboth (L-R) Canal located at Latitude 38°42'36.0"N, Longitude 75°05'34.0"W. Outfall 001 to the L-R Canal is proposed to remain in use for Phase 1 of the permit. Phase 2 of the permit will commence following permitting and construction of the proposed Ocean Outfall (Outfall 002) to the Atlantic Ocean with an anticipated location of Latitude 38° 43.787' N, Longitude 75° 03.505' W.

## Receiving Stream Classification

The L-R Canal is a tidal salt water body. The designated uses for the L-R Canal are: industrial water supply; primary contact recreation; secondary contact recreation; and maintenance of fish, aquatic life, and wildlife. The designated protected uses of the ocean in the vicinity of the proposed discharge are industrial water supply; primary contact recreation; secondary contact recreation; propagation and maintenance of fish, aquatic life, and wildlife; and Waters of Exceptional or Ecological Significance (ERES).

In December of 1998, DNREC promulgated a Total Maximum Daily Load Regulation, which required the elimination of all point sources of nitrogen and phosphorus and called for significant reductions of nonpoint source loads of nutrients as well for the L-R Canal. Excess levels of nutrients cause algae blooms, low dissolved oxygen levels, fish kills, and the proliferation of algae that may be toxic to humans, fish, and other aquatic life.

The City of Rehoboth (the City) appealed DNREC's TMDL Regulation. The two parties negotiated a settlement agreement which was memorialized by a Consent Order (No. 98C-12-023-THG) approved by Superior Court in December, 2002, and amended in June, 2005. The current NPDES permit was issued October, 2005, which required the City to significantly reduce the amount of nitrogen and phosphorus being discharged into the L-R Canal by October, 2007. Additionally, the permit called for the eventual elimination of the discharge by December 31, 2014, consistent with the Consent Order.

As part of Delaware's Water Pollution Control Revolving Fund procedures, the City was required to prepare an Environmental Impact Statement (EIS). The EIS identifies potential wastewater treatment and disposal options and then explores the regulatory, technological, and financial aspects of the various alternatives. The EIS concluded that utilizing the existing wastewater treatment plant to produce a high quality effluent and disposing of the highly treated effluent via an ocean outfall was the best alternative.

Because working through the numerous alternatives and public input related to those alternatives took years, DNREC and the City needed to reach agreement on a new deadline for the elimination of the City's discharge. Rehoboth's Environmental Impact Statement also evaluated a number of alternatives involving land application of treated wastewater, including the use of public and private lands. However, the lack of agricultural lands in reasonable proximity to the City, lack of interest among landowners to partner with the City, and environmental considerations, led to the conclusion that an ocean outfall was the preferred alternative.

On January 5, 2015, DNREC Secretary David Small signed a Record of Decision (ROD) concurring with the conclusions contained in the EIS that an ocean outfall is the most environmentally and financially responsible alternative to the current discharge into the L-R Canal. This action allowed Rehoboth Beach to proceed with its request to borrow an estimated \$25 million from the State's Water Pollution Control Revolving Fund and move forward with plans to eliminate the largest single wastewater discharge to Delaware's Inland Bays. The decision brought to a close nearly 10 years of extensive studies and analyses, reports, public meetings, hearings, and public input and moves the project to the next phase of financing, permitting, final design and construction. The decision also included a requirement that the City evaluate its current storm water collection system that discharges to the ocean and identify improvements and associated costs that could reduce potential impacts to swimmers, surfers and other recreational users. Concurrent with the decision, on January 8, 2015 the City and DNREC filed and were granted an amended Consent Order by Sussex County Superior Court to require elimination of the current discharge to the L-R Canal by June 1, 2018.

## Statutory and Regulatory Basis

The Delaware Department of Natural Resources and Environmental Control (DNREC) proposes to reissue an NPDES permit to discharge the wastewater subject to certain effluent discharge limitations, monitoring requirements and other terms and conditions identified in the draft permit. Section 402 of the federal Clean Water Act, as amended, and 7 Del. C. Chapter 60 provide the authority for permit issuance. Federal and state regulations promulgated pursuant to these statutes are the regulatory bases for permit issuance.

## Bases for Proposed Effluent Limitations

DNREC has examined the application, recent discharge monitoring data, and related information. The Department proposes to reissue the facility's NPDES permit for a period not to exceed five (5) years, subject to the effluent discharge limitations and monitoring requirements shown in the attached permit.

**Flow:** The current permit includes a daily average effluent flow limitation based on the design flow of the treatment facilities. The proposed permit deletes the flow limitation for average daily flow in favor of a note stating, "A daily average discharge rate of 3.4 million gallons per day (MGD) was used in determining the effluent limitations for this outfall."

Monitoring frequency for flow is proposed to remain continuous for both the current discharge to the L-R Canal (Outfall 001) and the proposed outfall to the Atlantic Ocean (Outfall 002).

**pH:** Technology-based pH limits and once daily monitoring requirements have been retained from the current permit for both Outfall 001 and Outfall 002. These limits are based on Section 7.7.3 of the Regulations Governing the Control of Water Pollution (RGCWP).

**Total Residual Chlorine (TRC):** The current permit includes water quality-based TRC limits and a once daily monitoring requirement. The “none detectable” TRC effluent limitation and monitoring requirements have been retained for both Outfall 001 and Outfall 002.

**Dissolved Oxygen (DO):** The current permit includes a performance-based DO effluent limitation and a once daily monitoring requirement. The current effluent limitation requires that the DO concentration of the effluent shall not be less than 5.0 mg/L at any time. Section 4.5.2.2 of the State of Delaware Surface Water Quality Standards (SWQS) includes criteria for DO that are applicable outside approved regulatory mixing zones. These “in-stream” criteria include requirements that the daily average DO concentration shall not be less than 5.0 mg/L, and that the Instantaneous Minimum concentration shall not be less than 4.0 mg/L. The current performance-based effluent limitation is more stringent than the SWQS and, therefore protective of the in-stream criteria. Accordingly, the current effluent limitation and monitoring requirement have been retained for both Outfall 001 and Outfall 002.

**Enterococcus:** The current permit includes water quality based effluent limitations and monitoring requirements for enterococcus based on Section 11.6 of the State of Delaware SWQS, as amended, August 11, 1999. Section 4.5.7.1 of the current SWQS allows enterococcus limits of 35 colonies per 100 mL (Daily Average) and 104 colonies per 100 mL (Daily Maximum). Based on facility performance during the current permit term, the current enterococcus effluent limitation and three times weekly monitoring frequency have been retained for both Outfall 001 and Outfall 002.

**BOD<sub>5</sub>:** The current permit includes water quality based effluent limitations for BOD<sub>5</sub> that had been retained from the previous permit. Section 7.7.3 of the RGCWP requires BOD<sub>5</sub> effluent limitations of 15 mg/L daily average and 23 mg/L daily maximum for Phase 1. These effluent limitations are slightly more stringent than the current effluent limitations. Based on facility performance during the current permit term, no compliance issues are anticipated. As such, these technology-based effluent limitations have been implemented in the permit for Outfall 001. Sections 7.2.1 and 7.7.1 of the RGCWP allow for less stringent effluent limitations for surface water discharges to the Atlantic Ocean (Outfall 002). The applicable technology-based BOD<sub>5</sub> effluent limitations are 30 mg/L daily average and 45 mg/L daily maximum. However, based on facility performance, the more restrictive effluent limitations for BOD<sub>5</sub> from section 7.7.3 of the RGCWP have been retained for Phase 2. Monitoring requirements for BOD<sub>5</sub> have been retained from the current permit at three times weekly for both Outfall 001 and Outfall 002.

Additionally, based on the requirements of 40CFR§133.102(a)(3), the permittee must demonstrate a minimum of 85% reduction in the raw waste BOD<sub>5</sub> concentrations on a monthly average basis prior to discharge. This requirement has been added to the permit in Part III.A., Special Condition No.15.

**Total Suspended Solids (TSS):** The current permit includes effluent limitations based on Section 7.7.3 of the RGCWP. As discussed above for BOD<sub>5</sub>, the RGCWP allows for less stringent TSS effluent limitations for surface water discharges to the Atlantic Ocean. However, based on historical facility performance, the current technology-based TSS effluent limitations of 15 mg/L daily average and 23 mg/L daily maximum as well as the three times weekly monitoring requirement have been retained from the current permit for both Outfall 001 and Outfall 002.

Additionally, based on the requirements of 40CFR§133.102(a)(3), the permittee must demonstrate a minimum of 85% reduction in the raw waste TSS concentrations on a monthly average basis prior to discharge. This requirement has been added to the permit in Part III.A., Special Condition No.15.

**Total Nitrogen (TN) and Total Phosphorus (TP):** The current permit includes numeric effluent limitations and monitoring requirements for TN and TP as follows:

- For the first 24 months of the permit, the permittee was required to continue to meet the annual effluent limits from the previous permit. Specifically, the twelve-month moving cumulative discharge loads were not to exceed 32,427 lbs. and 7,077 lbs. for TN and TP, respectively.
- No later than 25 months following the permit effective date, the permittee was required to meet interim nutrient permit levels, which were a 25% reduction from the above levels. Specifically, the twelve-month moving cumulative discharge loads were not to exceed 24,300 lbs. and 5,308 lbs. for TN and TP, respectively.

Additionally, the permit called for the eventual elimination of the discharge to the L-R Canal by December 31, 2014, consistent with the earlier referenced Consent Order.

In order to secure funding to eliminate the discharge, the permittee was required to prepare an Environmental Impact Statement (EIS) to identify potential wastewater treatment and disposal options and explore the regulatory, technological, and financial aspects of the various alternatives. The EIS concluded that utilizing the existing wastewater treatment plant to produce a high quality effluent and disposing of the highly treated effluent via an ocean outfall was the best alternative.

On January 5, 2015, DNREC Secretary David Small signed a Record of Decision (ROD) concurring with the conclusions contained in the EIS that an ocean outfall is the most environmentally and financially responsible alternative to the current discharge into the L-R Canal. This action allowed Rehoboth Beach to proceed with its request to borrow an estimated \$25 million from the State's Water Pollution Control Revolving Fund and move forward with plans to eliminate the discharge to the L-R Canal. Concurrent with the decision, on January 8, 2015 the City and DNREC filed and were granted an amended Consent Order by Sussex County Superior Court to require elimination of the current discharge to the L-R Canal by June 1, 2018.

For Phase 1 in the proposed draft permit renewal, effluent limitations and monitoring requirements for TN and TP have been retained from the current permit for Outfall 001 to the L-R Canal. Specifically, the twelve-month cumulative loads are not to exceed 24,300 lbs. and 5,308 lbs. for TN and TP, respectively. Monitoring frequency is three times weekly.

However, regarding Phase 2 in the draft permit renewal, there are currently no numeric regulatory standards for nutrients from which to form a basis for effluent limitations for the proposed discharge to the Atlantic Ocean. The Atlantic Ocean is designated as ERES waters which prohibits degradation of water quality. The average effluent nutrient concentrations (July 2013 – June 2016) were 6.2 mg/L TN and 0.32 mg/L TP. Background nutrient concentrations in the Atlantic Ocean are 0.37 mg/L TN and 0.06 mg/L TP.<sup>1</sup> In order to reach background nutrient levels in the ocean, the effluent must undergo at least 1:17 dilution. The minimum worst case dilution based on CORMIX modeling is 1:82.<sup>2</sup> Consequently, the dilution provided by the ocean is more than adequate to reach background nutrient concentrations upon initial dilution and not degrade water quality.

Therefore, for the proposed Outfall 002 to the Atlantic Ocean, Phase 2 of the draft permit retains the three times weekly monitoring requirements for TN and TP from the current permit. However, since there is no regulatory basis for numeric effluent limitations for TN and TP to the Atlantic Ocean, the proposed permit does not include effluent limitations for nutrients. Instead, Special Condition No. 14 has been added, which requires the permittee to maintain current treatment including biological nutrient removal to ensure the same level of effluent treatment is maintained.

**Biomonitoring:** Special Condition No. 7 in the current permit requires chronic biomonitoring on an annual basis. The following table summarizes chronic toxicity monitoring results for the most recent three (3) years.

Chronic Toxicity Monitoring Results				
“No Observable Effect Concentrations” (“NOEC” as % effluent)				
	Survival		Reproduction or Growth	
Date	C. variegatus	M. bahia	C. variegatus	M. bahia
07/15/2013	100	50	100	50
09/10/2013	---	100	---	100
09/24/2013	---	100	---	100
12/11/2014	100	100	100	100
05/19/2015	100	25	100	25
07/08/2015	---	50	---	50

A NOEC of 100% indicates a passing result for this facility. A NOEC of less than 100% effluent requires the permittee to perform two (2) confirmation tests on the more sensitive species. A confirmed NOEC of less than 100% effluent would trigger the need for a plan to reduce effluent toxicity. As indicated in the above table, the NOEC for M. bahia was less than 100% effluent in the initial test in 2013. However, both confirmation tests for M. bahia resulted in a NOEC of 100% effluent. The following bioassay in 2014 resulted in NOECs of 100%. In 2015, the annual bioassay resulted in a NOEC of 25% for M. bahia and the confirmation test also resulted in a NOEC less than 100%. Based on these results in 2015, the permittee has submitted a Toxicity Reduction Evaluation (TRE) Plan as required in the current permit. During Phase 1 of the proposed permit, the current biomonitoring requirements are proposed to be retained in Special Condition No. 7.

Special Condition No. 8 in the current permit requires the permittee to notify the Department and initiate quarterly biomonitoring frequency in the event that an annual

<sup>1</sup> EIS Section 5.2 Nutrients, Table 5-2.

<sup>2</sup> EIS Section 6.6.8 Modeling Results, Table 6-9.

biomonitoring result and one or both of the confirmatory tests indicates a NOEC less than 100% effluent. This condition also allows the permittee to resume annual biomonitoring after successfully completing four (4) consecutive quarters of valid biomonitoring with written approval from the Department. Special Condition No. 8 has been retained from the current permit.

Upon completion of the Ocean Outfall Project (Phase 2), new biomonitoring requirements are proposed for Outfall 002. Special Condition No. 9 in the proposed permit requires chronic biomonitoring on an annual basis to be performed on a dilution series. When the effluent discharge through Outfall 002 commences to the Atlantic Ocean, biomonitoring shall be required on a dilution series based on the worst case dilution factor of 82:1 and the corresponding Instream Waste Concentration (IWC) of 1.2%. The chronic biomonitoring for Outfall 002 was evaluated under a NOEC based on the IWC for both lethal and sub lethal effects. The decision to change to this dilution series was based on the available dilution and a desire to more accurately evaluate whole effluent toxicity.

Special Condition No. 9 includes requirements for the facility to notify the Department and initiate quarterly biomonitoring of the effluent if the effluent fails an annual biomonitoring test for Outfall 002 and one or both of the required confirmatory tests. The facility is then allowed to resume annual biomonitoring frequency after successful completion of four consecutive quarters of valid biomonitoring with written approval from the Department.

## Special Conditions

**Special Condition No. 1** states that this permit supersedes NPDES Permit DE 0020028 and State Permit WPCC 3084D/74, issued on September 21, 2005, effective date October 1, 2005.

**Special Condition No. 2** outlines the pretreatment program requirements applicable to this facility.

**Special Condition No. 3** is a standard permit clause which provides for reopening the permit to address water quality concerns.

**Special Condition No. 4, 5, and 6** require proper disposal of sludge in accordance with State and Federal requirements.

**Special Condition No. 7** outlines the requirements for biomonitoring applicable to this facility for Outfall 001.

**Special Condition No 8** requires the facility to notify the Department and initiate quarterly biomonitoring of the effluent if the effluent fails an annual biomonitoring test for Outfall 001 and one or both of the required confirmatory tests. The facility is then allowed to resume annual biomonitoring frequency after successful completion of four consecutive quarters of valid biomonitoring with written approval from the Department.

**Special Condition No 9** outlines the requirements for biomonitoring applicable to this facility for Outfall 002. Condition also requires the facility to notify the Department and initiate quarterly biomonitoring of the effluent if the effluent fails an annual biomonitoring test for Outfall 002 and one or both of the required confirmatory tests. The facility is then allowed to resume annual

biomonitoring frequency after successful completion of four consecutive quarters of valid biomonitoring with written approval from the Department.

**Special Condition No. 10** outlines wastewater treatment plant operator licensing requirements for this facility.

**Special Condition No. 11** states requirements to meet the “none detectable” effluent limitation for total residual chlorine (TRC).

**Special Condition No. 12** requires the permittee to continue to implement and maintain a Storm Water Plan (SWP) to minimize the discharge of contaminated storm water from its facility.

**Special Condition No. 13** outlines the requirements to meet the moving 12-month cumulative average load effluent limitations for TN and TP.

**Special Condition No. 14** requires the permittee to properly operate and maintain all equipment necessary to maintain current treatment levels. Based on the most recent three (3) years of effluent data, current treatment has resulted in 6.2 mg/L average total nitrogen (TN), 20.5 mg/L maximum TN, 0.32 mg/L average total phosphorus (TP), and 1.8 mg/L maximum TP. The last 3 years of monthly average and maximum concentration data to TN and TP are included as Attachment A to this Fact Sheet.

**Special Condition No. 15** requires the permittee to demonstrate a minimum of 85% reduction in the raw waste TSS and BOD5 concentrations on a monthly average basis prior to discharge.

**Special Condition No. 16** requires the permittee to perform proper maintenance and inspection of the ocean outfall structure in accordance with applicable industry standards.

**Special Condition No. 17** requires the permittee to install an emergency generator system which is sufficient to maintain plant operations during a power outage as recommended in the Permittee’s Preliminary Engineering Report dated July 3, 2012 and in accordance with Sections 6.14.13 and 6.14.16 of the State of Delaware *Regulations Governing the Control of Water Pollution*.

**Special Condition No. 18** requires the permittee to use EPA-approved analytical methods that are capable of detecting and measuring the pollutants at, or below, the applicable water quality criteria or permit limits pursuant to 40 CFR Part 136.

## **Antidegradation Statement**

The proposed effluent limitations included in this NPDES permit comply with the applicable portions of the State of Delaware Surface Water Quality Standards, Section 5: Antidegradation and ERES Waters Policies.

## **Public Notice and Process for Reaching a Final Decision**

The public notice of the Department’s receipt of the application and of reaching the tentative determinations outlined herein was published in the Wilmington News Journal and the Delaware State News on **October 9, 2016**. Interested persons were invited to submit their written views on the draft permit and the tentative determinations made with respect to this NPDES permit application. The Department held a public hearing on this application on **November 15, 2016**, as the Department believed that this proposal would generate substantial public interest. Oral and written testimony during the public hearing and all written comments received by **4:30 pm**



on **December 2, 2016** were considered by the Department in preparing the final permit. A Technical Response Memorandum was written addressing the comments received. Based upon the public hearing record and subsequent Hearing Officer's Report, this permit was issued pursuant to Secretary's Order No. 2017-W-0014.

## **Permit Revisions Based on Comments Received**

As noted above, a Public Hearing was held on November 15, 2016. Nineteen (19) individuals presented oral comments at the public hearing. Six (6) of the public hearing speakers presented comments in favor of the ocean outfall and thirteen (13) were opposed to the ocean outfall. Based on the comments received during the public hearing and the public notice period, a Technical Response Memo was written and some minor permit changes were recommended. The changes made to the NPDES Permit and/or Fact Sheet based on the TRM recommendations are summarized below:

- Based on comments/questions from EPA, the fact sheet has been revised to clarify the basis and reasoning behind the biomonitoring special condition for the Outfall 002 discharge to the ocean.
- Based on comments/questions from EPA and the Permittee, Special Condition No. 9 has been revised to include language mirroring Special Condition No. 8 in the current permit, but will apply to Outfall 002. Special Condition No. 9 will require the facility to notify the Department and initiate quarterly biomonitoring if the effluent fails an annual biomonitoring test for Outfall 002 and one or both of the required confirmatory tests. The facility is then allowed to resume annual biomonitoring frequency after successful completion of four consecutive quarters of valid biomonitoring with written approval from the Department.
- Based on comments/questions from the Permittee, the final permit has been revised to be consistent with current practices and remove the reference to sampling prior to chlorination.
- Based on a question from the Permittee, Special Condition No. 15 has been revised to specify the minimum once monthly influent monitoring frequency for BOD5 and TSS. More frequent sampling is allowed and must be reported. Influent sampling for BOD5 and TSS has been added to the Monitoring Requirements in Parts I.B.1. and I.B.2. of the permit.

## **Department Contact for Additional Information:**

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Attachment A

Table 1: Nitrogen and Phosphorus Treatment Data (2013-2016)

Month	Total Nitrogen		Total Phosphorus	
	Monthly Ave.	Monthly Max.	Monthly Ave.	Monthly Max.
Jul-13	3.3	9.7	0.55	1.04
Aug-13	3.1	5.8	0.39	0.72
Sep-13	6.4	16.2	0.86	1.53
Oct-13	6.7	16.0	0.41	0.86
Nov-13	5.4	9.3	0.10	0.17
Dec-13	9.3	18.2	0.09	0.20
Jan-14	10.2	13.8	0.10	0.15
Feb-14	11.0	15.0	0.11	0.17
Mar-14	9.9	14.3	0.17	0.45
Apr-14	4.9	8.4	0.15	0.24
May-14	4.0	8.5	0.35	0.91
Jun-14	2.5	3.8	0.47	0.66
Jul-14	3.9	9.2	0.27	0.75
Aug-14	4.1	6.7	0.35	0.97
Sep-14	5.8	12.7	0.41	0.80
Oct-14	5.8	12.9	0.26	0.37
Nov-14	6.6	10.2	0.13	0.20
Dec-14	6.4	9.4	0.10	0.19
Jan-15	8.1	14.7	0.18	0.38
Feb-15	5.6	8.7	0.18	0.32
Mar-15	8.3	16.5	0.17	0.45
Apr-15	7.0	16.1	0.23	0.35
May-15	6.3	16.9	0.47	1.26
Jun-15	8.0	15.7	0.97	1.80
Jul-15	3.3	5.1	0.52	0.70
Aug-15	4.2	6.7	0.67	0.99
Sep-15	6.9	14.5	0.50	0.66
Oct-15	13.1	20.5	0.54	1.17
Nov-15	5.9	10.8	0.23	0.48
Dec-15	2.2	3.1	0.18	0.37
Jan-16	4.8	9.3	0.19	0.28
Feb-16	6.7	11.1	0.09	0.20
Mar-16	4.0	6.9	0.11	0.18
Apr-16	3.0	4.7	0.16	0.42
May-16	3.5	8.7	0.28	0.68
Jun-16	9.7	15.4	0.74	1.12
Ave.	6.2		0.32	
Min.	0.9		0.02	
Max.	20.5		1.80	
95th%ile	13.8		0.90	
99th%ile	16.5		1.24	