Pennsylvania Department of Environmental Protection

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0095851**
Facility Type	**Sewage**	APS ID	**1077819**
Major / Minor	**Minor**	Authorization ID	**1421269**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Roof Garden MHC LLC**	Facility Name	**Roof Garden Acres MHP STP**
Applicant Address	1199 Lancaster Avenue	Facility Address	116 Willow Lane
	Berwyn, PA 19312-1341		Somerset, PA 15501-6934
Applicant Contact	Nathan Jameson	Facility Contact	
Applicant Phone	(484) 289-2704	Facility Phone	
Client ID	374295	Site ID	244618
SIC Code	6515	Municipality	Somerset Township
SIC Description	Fin, Ins & Real Est - Mobile Home Site	County	Somerset
Date Published in PA Bulletin	May 17, 2025	EPA Waived?	Yes
First Comment Period End	June 17, 2025	If No, Reason	

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Sewage

Internal Review and Recommendations

The draft permit was published to PA Bulletin on May 17, 2025. The applicant transmitted a letter with comment received June 3, 2025. The comment will be included and addressed in this fact sheet addendum. The letter is included in Attachment 1. No other comments were received.

The response to these comments will include changes to the implementation of effluent limitations that necessitate a second draft to be published in the PA Bulletin. With the following comment addressed, issuance of the draft permit is recommended.

Comment Summary and Response

Summarized Comment
The applicant has requested to maintain the existing schedule for pH, DO, and TRC sampling, claiming the proposed frequency of daily is onerous due to increased cost.

Response

The request was considered based on appropriate DEP and EPA guidance, the specifics of the facility, and the best professional judgement of the application manager. Consideration of the request involved the following factors:

- DEP guidance for minimum monitoring frequency.
- Cost considerations and Environmental Justice.
- The basis of decisions for the previous authorization.
- Statistical Analysis and Compliance History.

Based on the stated factors and as will be described in detail, the request to reduce monitoring frequency for TRC and Dissolved Oxygen in final effluent limitations cannot be accommodated at this time based on existing data. pH monitoring frequency may qualify reduced based on past performance.

Approve	Return	Deny	Signatures	Date
x			John Price Jack Price / Environmental Engineering Specialist	June 25, 2025
x			Mahbuba Iasmin Mahbuba Iasmin, Ph.D., P.E./Environmental Engineer Manager	June 30, 2025

Internal Review and Recommendations

TRC and Dissolve Oxygen concentrations in the application are expected to change due to the addition of dechlorination equipment; this necessitates a new data set to develop a valid statistical conclusion for effluent performance. The final effluent monitoring frequency in the permit will remain, however the interim will be extended to two years to provide adequate effluent data for an analysis to justify performance-based reduction in monitoring. pH measurements are typically taken using a simple probe, and thus does not represent a substantial cost if TRC and DO frequency is not reduced. pH frequency will therefore be measured at the same frequency as the TRC and DO frequency. The applicant may submit an application for a permit amendment prior to implementation of the final effluent limitations to request reduction of the final frequency from daily to 3/week frequency based on performance of the facility with dechlorination.

DEP Standards for Minimum Frequency

Table 6-3 of the DEP Permit Writer's Manual specifies a minimum monitoring frequency of daily for these parameters.

The SOP for Sewage Permits IV.E.2 states the following:

"For pH, Dissolved Oxygen (DO) and Total Residual Chlorine (TRC), application managers will generally specify a monitoring frequency of "1/day," "daily when discharging," "1/shift" or "continuous." In general, less frequent monitoring may be established only when the permittee demonstrates that there will be no discharge on days where monitoring is not required. For example, a facility that is always closed on Sundays and does not discharge may receive a monitoring frequency of "6/week."

Note 8 to this reference also states:

"For facilities with PLC or SCADA systems per 25 Pa. Code § 302.1208 that are capable of monitoring these parameters and alerting operators of concerns, personnel do not necessarily need to be on-site to collect samples to comply with the permit."

DEP procedures therefore recommend the daily frequency remain. The parameters identified by the SOP for daily monitoring are well suited to a wide range of low-cost automated data collection options, and such parameters are useful for process control. The daily frequency of monitoring does not imply a requirement for increased operator attendance to meet the new monitoring frequency. Options for monitoring of these parameters include but are not limited to: meters with logging function, PLC/SCADA, or designation of an onsite employee (e.g. park supervisor, park maintenance staff, etc.) to take readings. The applicant is encouraged to explore cost-effective options.

DEP reserves the discretion to deviate from established guidance if circumstances warrant. The review of the request to deviate from established guidance will ensure that all applicable regulatory and statutory requirements are adequately addressed.

Information from Applicant and Environmental Justice Considerations

On the letter date, these comments were discussed with the applicant by phone call. The basis of the frequency was explained and improvements to the community were discussed, however no improvements related to the sewage plant were identified. (Note: a discussion of dechlorination improvements will follow in a later section). The applicant described the community as serving a lower income community.

A second call was made to the applicant was made on June 17, 2025. A message was left with a request for a call back. At the time of this fact sheet, no call back has been received.

DEP's Office of Environmental Justice has established methodology for determining Environmental Justice Areas. Methodology for determining this may be found in the document *Pennsylvania Environmental Justice Mapping and Screening Tool (PennEnviroScreen) Methodology Documentation 2023* (DEP Document No. 015-0501-003). The PennEnviroScreen tool was used to check if Roof Garden MHP can qualify based on the income of the community served.

While the Roof Garden MHP is not in an EJ Area, EJ Areas are based on a score that takes multiple environmental and population statistics, with the 80th percentile being considered the threshold for an Environmental Justice Area. Therefore, on the PennEnviroScreen tool, the following layers were used: *"Housing-Burdened Low-Income Households"* and *"Poverty"*. The layers show that the area is in the 3rd percentile for Housing-Burdened Low-Income Households, and in the 69th percentile for

Internal Review and Recommendations

poverty. The printout from the PennEnviroScreen Tool is included in Attachment 2. The EJ Area includes more communities than Roof Garden MHP, and the applicant is encouraged to submit information to DEP to support a reduction based on cost.

As of this date, there is not enough information to determine if a financial hardship will be incurred from the monitoring frequency, or the extent of such a hardship.

Basis for Reduction of the Monitoring Frequency in the Previous Authorization

The first draft of the previous authorization proposed a daily sampling frequency. In response to the draft, the applicant objected to the monitoring frequency and requested a 2/week sampling schedule. The previous application manager assigned a 3/week sampling schedule, with a notice to the applicant that the following authorization may be increased to 1/day and that cost of manpower and equipment should be considered during the permit term. The Fact Sheet Addendum from the previous authorization is included in Attachment 3.
The previous authorization gave the applicant a 3/week monitoring frequency on the basis that the applicant had insufficient time or opportunity to budget for increased costs and staffing to support daily sampling and that there were no compliance issues with the parameters in question. In addition to the 5-year permit term, the permit expired in 2022 and has been administratively continued. This has been an effective 7 years that the facility has had to consider the possibility of daily monitoring.

The applicant has installed dechlorination equipment to address TRC limits, The effectiveness of dechlorination processes requires development of procedures to establish the correct balance of chlorine contact time and dosage for disinfection, and dechlorination contact time and dosing to achieve TRC limits while mitigating the deleterious effects of dechlorination on Dissolved Oxygen. Monitoring of TRC and DO provides information for process control as well as achievement of effluent limitations. Compliance and plant performance will be discussed in the following section.

TRC limitations are determined using a TRC water quality model, the TRC_Calc spreadsheet. TRC_Calc requires a sampling frequency to calculate the average monthly limitations. Reduction of monitoring frequency necessarily results in more stringent average monthly limitations. A TRC water quality model does not appear to have been run in the previous authorization, and TBELs were used.

In sum: the most substantial reasoning to reduce monitoring frequency to 3/week in the previous authorization was to provide adequate time to budget for a potential daily monitoring requirement and due to adequate compliance history. The bases for the previous authorization to reduce monitoring frequency are less relevant to this current authorization.

Statistical Analysis and Compliance History

The long-term performance of the facility was studied to determine whether there is a statistical argument for reduction of monitoring. Two years of data from daily effluent reports was downloaded from WMS into a spreadsheet to calculate Long Term Average, Coefficients of Variance, and the 99% percentile concentration for a 12 samples per month. An analysis was run for pH, DO, and TRC. pH and DO were compared against the proposed limits. The statistical analyses were performed using the procedures for analyzing effluent variability in Chapter 5 of the Technical Support Document for Water Quality-Based Toxics control and Appendix E of that document.

TRC was subject to WQBEL limits, therefore a TRC_Calc spreadsheet was run using the Coefficient of Variation determined in the statistical analysis and at a monitoring frequency of 12 samples per month. The TRC_Calc returned an average monthly limit of 0.101 mg/L. The TRC_Calc spreadsheet is included in Attachment 4, and printout of the statistics spreadsheet is included with Attachment 5. The analysis results are summarized in the table on the following page:

	Dissolved Oxygen (min) (mg/L)	*pH (min) S.U.*	*pH (max) S.U.*	*TRC (max) (mg/L)*
# Samples	254	255	255	254

Internal Review and Recommendations

Long Term Average	6.34	7.76	7.76	0.42
Coefficient of Variation	0.07	0.01	0.01	0.18
99th Percentile Value	5.28	7.46	8.06	0.61
Permit Limit	5.0	6.0	8.0	0.101

The statistical analysis shows that at a monitoring frequency of 12 samples per month the 99th percentile for pH maximum is 8.06 and the 99th percentile for pH minimum is 7.46. At the proposed monitoring frequency, the facility is likely to comply with pH limitations at the proposed monitoring frequency. Similarly, the 99th percentile value for minimum DO concentration is 5.28 mg/L which is within the permit limitations. The statistical analysis shows the 99th percentile concentration for TRC is 0.61 mg/L at 12 samples per month. This value is above the concentration of 0.101 mg/L that would be required for a 12 samples per month monitoring frequency.

Based on the analyses, the facility can be expected to comply with pH and DO when monitored at a frequency of 12 samples per month, however TRC is not likely to meet the limit at 12 samples per month. It should be noted that the applicant has added tablet dechlorination equipment which will alter the future TRC performance of the facility. Tablet dechlorination can be detrimental to dissolved oxygen, therefore the DO performance in the future is also likely to change.

Attachment 1-Comment Letter

ARX
Roof Garden MHC, LLC

P.O. Box 535
BERWYN, PA 19312
(610) 429-0582

May 26th, 2025

VIA ELECTRONIC MAIL
www.dep.pa.gov
Attention to: John Price-Gedrites
Southwest Regional Office
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222

Re: Draft NPDES Permit- Sewage
Roof Garden Acres MHP STP
Application No. PA0095851
Authorization ID No. 1421269
Somerset Township, Somerset County

Dear Mr. Price-Gedrites:

I am writing on behalf of Roof Garden MHC, LLC ("RFG") to respond to the Department's recent request for the Permittee to increase the monitoring frequency of its wastewater treatment facility from three (3) days per week to seven (7) days per week. While the Permittee understands and supports the Department's mission to protect public health and the environment, we respectfully believe that this proposed change is both financially onerous and operationally excessive given the significant improvements which have been made to the treatment facility.

Since acquiring the Community in 2022, the Permittee has invested nearly $3 million into revitalizing the Community. This includes:

1. **Demolishing more than 40 derelict mobile homes**, eliminating a major source of water intrusion and system stress.
2. **Paving internal roadways** significantly improves community infrastructure.
3. **Bringing in over 30 brand new manufactured homes**, enhancing the quality of life for current and prospective residents.
4. **Maintaining affordable housing** by absorbing rising operational costs rather than passing them directly to residents.

These upgrades have not only improved the Community aesthetically and structurally but have also contributed to the enhanced performance of the treatment facility. The facility has experienced very few incidents since the implementation of improvements and those incidents

ROOF GARDEN MHC, LLC
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Berwyn, PA 19312
Office: (610) 429-0582

have been very minor. Simply stated, the improvements are working and as such, we believe that the proposed increased testing schedule is unwarranted.

If the proposed seven day per week monitoring schedule is required, it would double the operating costs of the facility. To remain financially solvent, the Permittee would have little choice but to increase rents or utility fees—costs that would ultimately fall on the very residents we are working hard to support. Many of our residents are on fixed incomes, and such increases could lead to economic displacement or even mortgage defaults. It remains our goal to provide high-quality, affordable housing to the Somerset Residents, which is something that is severely lacking.

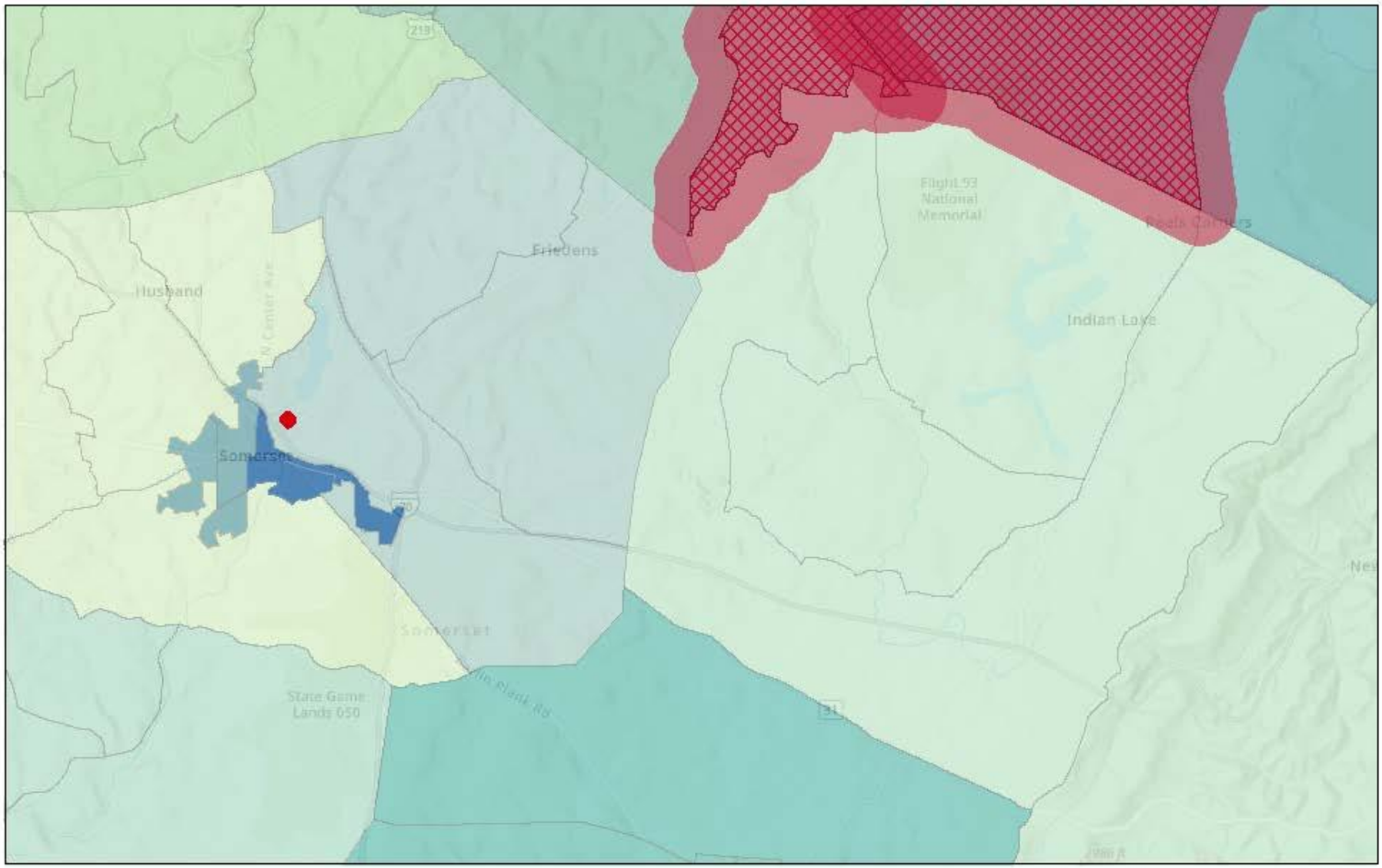
In closing, we ask for your understanding and compassion for the residents of the Roof Garden residents. We hope that the Department, like us, will prioritize their well-being and economic stability and maintain the three-day monitoring schedule.

Very truly yours,

Nathan W. Jameson
Authorized Signatory

Attachment 2-PennEnviroScreen Printout

Roof Garden MHP with EJ Layers



Attachment 3-Previous Authorization Fact Sheet Addendum

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET ADDENDUM

Application Type	**Renewal**	Application No.	**PA0095851**
Facility Type	**Sewage**	APS ID	**917413**
Major / Minor	**Minor**	Authorization ID	**1141282**

Applicant and Facility Information

Applicant Name	**High Top LLC**	Facility Name	**Roof Garden Acres MHP STP**
Applicant Address	PO Box 1180	Facility Address	116 Willow Lane
	Chambersburg, PA 17201-5180		Somerset, PA 15501
Applicant Contact	Tom Mongold	Facility Contact	Same
Applicant Phone	717-729-6290	Facility Phone	Same
Client ID	306577	Site ID	244618
SIC Code	6515	Municipality	Somerset Township
SIC Description	Fin, Ins & Real Est - Mobile Home Site Operators	County	Somerset
Date Published in PA Bulletin	June 24, 2017	EPA Waived?	Yes
Comment Period End Date	July 24, 2017	If No, Reason	

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Sewage

Internal Review and Recommendations

No comments were received during the draft stage. Comments were received during the 30-day appeal time of the final permit. The comments are:

In a letter dated September 5, 2017 and incorporated into this fact sheet below as a pdf, the permittee has objected to the 1/day sampling for pH, TRC, and D.O. Their objection is the increased cost and manpower to conduct such sampling. The permittee has requested that sampling for these parameters be reduced to 2 per week.

Department policies establish the framework with which DEP can exercise its administrative discretion with such requests. The Department reserves the discretion to deviate from SOP policy statement if circumstances warrant. The Permittee was not afforded the opportunity to budget for the increased costs and staffing that would be required by daily sampling. In addition, the Department's Compliance Report indicates no current compliance issues with this plant. The Department, as in other cases will reduce the sampling for pH, TRC and D.O. to 3 days per week for this permit cycle.

The applicant will be informed that at the next renewal in the year 2022, sampling frequency for these parameters may be increased to 1/day and that planning from a manpower cost and equipment standpoint should be considered prior to that renewal.

Approve	Return	Deny	Signatures	Date
X			Raymond E. Lattner / Environmental Permit Reviewer /S/	August 5, 2017 Revised Sept. 15, 2017
X			Donald J. Leone, P.E. / Environmental Engineer Manager /S/	August 7, 2017
X			Christopher Kriley, P.E. / Program Manager /S/	August 8, 2017

Attachment 4-TRC_Calc

Copy of TRC_CALC.xls

TRC EVALUATION

Input appropriate values in A3:A9 and D3:D9

0.0139	= Q stream (cfs)	0.18	= CV Daily
0.013	= Q discharge (MGD)	0.5	= CV Hourly
12	= no. samples	1	= AFC_Partial Mix Factor
0.3	= Chlorine Demand of Stream	1	= CFC_Partial Mix Factor
0	= Chlorine Demand of Discharge	15	= AFC_Criteria Compliance Time (min)
0.5	= BAT/BPJ Value	720	= CFC_Criteria Compliance Time (min)
0	= % Factor of Safety (FOS)		=Decay Coefficient (K)

Source	Reference	AFC Calculations	Reference	CFC Calculations
TRC	1.3.2.iii	WLA afc = 0.239	1.3.2.iii	WLA cfc = 0.226
PENTOXSD TRG	5.1a	LTAMULT afc = 0.373	5.1c	LTAMULT cfc = 0.815
PENTOXSD TRG	5.1b	LTA_afc= 0.089	5.1d	LTA_cfc = 0.184

Source		Effluent Limit Calculations	
PENTOXSD TRG	5.1f	AML MULT = 1.127	
PENTOXSD TRG	5.1g	AVG MON LIMIT (mg/l) = 0.101	AFC
		INST MAX LIMIT (mg/l) = 0.359	

WLA afc	**(.019/e(-k*AFC_tc)) + [(AFC_Yc*Qs*.019/Qd*e(-k*AFC_tc))...** **...+ Xd + (AFC_Yc*Qs*Xs/Qd)]*(1-FOS/100)**
LTAMULT afc	EXP((0.5*LN(cvh^2+1))-2.326*LN(cvh^2+1)^0.5)
LTA_afc	wla_afc*LTAMULT_afc
WLA_cfc	**(.011/e(-k*CFC_tc) + [(CFC_Yc*Qs*.011/Qd*e(-k*CFC_tc))...** **...+ Xd + (CFC_Yc*Qs*Xs/Qd)]*(1-FOS/100)**
LTAMULT_cfc	EXP((0.5*LN(cvd^2/no_samples+1))-2.326*LN(cvd^2/no_samples+1)^0.5)
LTA_cfc	wla_cfc*LTAMULT_cfc
AML MULT	EXP(2.326*LN((cvd^2/no_samples+1)^0.5)-0.5*LN(cvd^2/no_samples+1))
AVG MON LIMIT	MIN(BAT_BPJ,MIN(LTA_afc,LTA_cfc)*AML_MULT)
INST MAX LIMIT	**1.5*((av_mon_limit/AML_MULT)/LTAMULT_afc)**

Attachment 5-Statistics Spreadsheet

Facility:	Roof Garden MHP
NPDES #:	PA0025810
Outfall No:	001
n (Samples/Month):	12
Reviewer/Permit Engineer:	Jack Price

Parameter Name	DO (min)	pH (min)	pH (max)	TRC
No. Samples "k"	254	255	255	254
No. Non-Detects	0	0	0	0
Distribution	Normal	Normal	Normal	Normal
NORMAL	*From Table E-3. Normal distribution used when n>10*			
Est. Mean "μ_y"	1.8749457	2.050026	2.050026	-1.0295563
Est. Variance	0.0541063	0.0032622	0.0032622	0.3564674
LTA "E(x)"	6.3464305	7.768103	7.768103	0.42685
Variance "V(X)"	2.4951981	0.1978181	0.1978181	0.0780321
Est. CV	0.2488989	0.0572556	0.0572556	0.6544272
CV, n-day basis	0.0718509	0.0165283	0.0165283	0.1889169
99% n-day Monthly Average	5.2857817	7.4694602	8.0667458	0.6144167
LOGNORMAL	*Lognormal distribution used when n<10 AND when there are no Non-Detects*			
Log MEAN				
Log VAR.				
(LTA) [E(x)]				
Variance [V(x)]				
CV (raw)				
CV (n)				
Monthly Avg. (99%, n-day)				

Facility:	Roof Garden MHP
NPDES #:	PA0025810
Outfall No:	001
n (Samples/Month):	30
Reviewer/Permit Engineer:	Jack Price

Parameter Name	DO (min)	pH (min)	pH (max)	TRC
Units	mg/L	S.U.	S.U.	mg/L
Detection Limit				
Sample Date		When entering values below the detection limit, enter "ND" or use the < notation (eg. <0.02)		
2/1/2023	8.2	7.47	7.47	0.42
2/2/2023	8.1	7.42	7.42	0.32
2/3/2023	8.8	7.51	7.51	0.29
2/6/2023	9.2	7.43	7.43	0.37
2/8/2023	10.1	7.5	7.5	0.51
2/9/2023		7.61	7.61	
2/10/2023	9.6	7.56	7.56	0.32
2/13/2023	9.8	7.46	7.46	0.42
2/15/2023	8.7	7.42	7.42	0.28
2/17/2023	9.2	7.47	7.47	0.37
2/20/2023	8.1	7.32	7.32	0.41
2/22/2023	8.6	7.39	7.39	0.31
2/24/2023	9.1	7.44	7.44	0.28
2/27/2023	8.8	7.48	7.48	0.36
3/1/2023	7.9	7.42	7.42	0.44
3/3/2023	8.1	7.33	7.33	0.33
3/6/2023	8.6	7.4	7.4	0.21
3/7/2023	9.1	7.42	7.42	0.44
3/9/2023	8.7	7.33	7.33	0.51
3/13/2023	7	7.61	7.61	0.3
3/15/2023	7.6	7.63	7.63	0.44

3/17/2023	8	7.51	7.51	0.37
3/20/2023	8.4	7.57	7.57	0.33
3/22/2023	8.8	7.61	7.61	0.48
3/24/2023	9	7.65	7.65	0.3
3/27/2023	8.7	7.6	7.6	0.4
3/29/2023	8.1	7.63	7.63	0.47
3/31/2023	8.3	7.61	7.61	0.38
4/3/2023	7.9	7.41	7.41	0.44
4/5/2023	8.6	7.5	7.5	0.29
4/7/2023	8.5	7.4	7.4	0.41
4/10/2023	8.2	7.4	7.4	0.3
4/12/2023	7.8	7.4	7.4	0.46
4/15/2023	8.8	7.4	7.4	0.31
4/17/2023	8	7.4	7.4	0.43
4/19/2023	8.9	7.4	7.4	0.33
4/21/2023	9.2	7.5	7.5	0.49
4/24/2023	8.2	7.5	7.5	0.52
4/26/2023	9.1	7.4	7.4	0.39
4/28/2023	8.7	7.5	7.5	0.47
5/1/2023	8.1	7.4	7.4	0.33
5/2/2023	8.7	7.5	7.5	0.41
5/4/2023	7.9	7.5	7.5	0.31
5/8/2023	8.2	7.4	7.4	0.33
5/10/2023	9.2	7.3	7.3	0.49
5/12/2023	10.1	7.3	7.3	0.3
5/15/2023	8.1	7.3	7.3	0.35
5/17/2023	8.6	7.3	7.3	0.21
5/19/2023	9.1	7.4	7.4	0.44
5/22/2023	8.1	7.5	7.5	0.33
5/24/2023	8.6	7.5	7.5	0.55
5/26/2023	7.9	7.4	7.4	0.48
5/30/2023	6	7.5	7.5	0.26
5/31/2023	6	7.7	7.7	0.24

6/3/2023	6	7.5	7.5	0.1
6/5/2023	6.6	7.5	7.5	0.4
6/7/2023	7.2	7.4	7.4	0.5
6/9/2023	6	7.2	7.2	0.1
6/12/2023	8.1	7.2	7.2	0.6
6/14/2023	8.2	7.2	7.2	0.2
6/16/2023	9.1	7.3	7.3	0.5
6/19/2023	8.8	7.3	7.3	0.5
6/21/2023	9.6	7.4	7.4	0.4
6/26/2023	9.2	7.4	7.4	0.6
6/28/2023	9.7	7.4	7.4	0.3
6/29/2023	8.2	7.4	7.4	0.4
7/3/2023	5.9	7.9	7.9	0.4
7/5/2023	6.6	7.7	7.7	0.4
7/6/2023	6.2	7.6	7.6	0.5
7/10/2023	5.7	7.6	7.6	0.2
7/12/2023	6.9	7.5	7.5	0.6
7/14/2023	7.2	7.5	7.5	0.5
7/17/2023	6.6	7.3	7.3	0.4
7/18/2023	7.1	7.5	7.5	0.4
7/20/2023	8	7.5	7.5	0.5
7/24/2023	9.2	7.3	7.3	0.2
7/26/2023	8.4	7.3	7.3	0.7
7/28/2023	9.1	7.4	7.4	0.3
7/31/2023	8.8	7.4	7.4	0.4
9/1/2023	8.8	7.4	7.4	0.39
9/5/2023	8.6	7.3	7.3	0.47
9/6/2023	7.9	7.3	7.3	0.53
9/9/2023	8	7.2	7.2	0.5
9/11/2023	8.4	7.2	7.2	0.41
9/13/2023	7.8	7.3	7.3	0.4
9/15/2023	8.8	7.3	7.3	0.5
9/18/2023	7.9	7.2	7.2	0.4

9/20/2023	8.1	7.3	7.3	0.46
9/25/2023	8.8	7.3	7.3	0.44
9/27/2023	8.7	7.2	7.2	0.55
9/29/2023	8.1	7.2	7.2	0.47
11/1/2023	6	7.3	7.3	0.3
11/3/2023	6	7.3	7.3	0.4
11/6/2023	8	7.4	7.4	0.4
11/8/2023	8.7	7.3	7.3	0.4
11/9/2023	8.1	7.3	7.3	0.3
11/13/2023	7.7	7.4	7.4	0.4
11/15/2023	8.6	7.4	7.4	0.5
11/17/2023	8.1	7.3	7.3	0.4
11/20/2023	8.1	7.3	7.3	0.1
11/21/2023	8.9	7.4	7.4	0.6
11/22/2023	7.5	7.1	7.1	0.6
11/27/2023	8.1	8.6	8.6	0.4
11/29/2023	5.7	8.2	8.2	0.7
1/3/2024	5.5	7.5	7.5	0.4
1/8/2024	5	7.3	7.3	0.2
1/15/2024	6	7.7	7.7	0.2
1/16/2024	5.7	7.7	7.7	0.1
1/22/2024	6	7.6	7.6	0.5
1/24/2024	5.1	7.9	7.9	0.1
1/26/2024	5.5	7.5	7.5	0.2
1/29/2024	5.1	7.9	7.9	0.3
1/31/2024	5.1	7.6	7.6	0.1
3/4/2024	5	7.9	7.9	0.48
3/6/2024	5.2	7.7	7.7	0.6
3/8/2024	5	8.2	8.2	0.3
3/11/2024	5	8	8	0.3
3/13/2024	5	7.7	7.7	0.1
3/15/2024	5	7.7	7.7	0.26
3/18/2024	5	7.5	7.5	0.31

3/20/2024	5	7.3	7.3	0.3
3/22/2024	5	7.2	7.2	0.3
3/25/2024	5	7	7	0.27
3/28/2024	5	8.3	8.3	0.58
4/1/2024	5	7.4	7.4	0.6
4/3/2024	5	7	7	0.8
4/5/2024	5	7.3	7.3	0.1
4/8/2024	5	7.8	7.8	0.1
4/10/2024	5.4	8.1	8.1	0.1
4/12/2024	5	8.4	8.4	0.1
4/15/2024	5	8.1	8.1	0.21
4/17/2024	5	8	8	0.22
4/19/2024	5	7.7	7.7	0.25
4/22/2024	5	8.1	8.1	0.15
4/24/2024	5	8	8	0.14
4/26/2024	5	8.4	8.4	0.22
4/29/2024	5	8	8	0.2
7/1/2024	5	8.1	8.1	0.2
7/3/2024	5	8.7	8.7	0.4
7/5/2024	5	8.6	8.6	0.4
7/8/2024	5	8.4	8.4	0.2
7/10/2024	5	8.4	8.4	0.04
7/12/2024	5	8.1	8.1	1.4
7/15/2024	5	8.4	8.4	0.44
7/17/2024	5	8.4	8.4	1.5
7/19/2024	5	8.5	8.5	0.9
7/22/2024	5	8.6	8.6	0.9
7/24/2024	5	8.5	8.5	0.8
7/26/2024	5	8.3	8.3	0.7
7/29/2024	5	8.3	8.3	0.53
7/31/2024	5	8.4	8.4	1.5
8/2/2024	5.2	8.4	8.4	1.51
8/5/2024	5	8.5	8.5	0.74

8/7/2024	5	8.2	8.2	0.61
8/9/2024	5.3	7.9	7.9	1.2
8/12/2024	5.2	8	8	0.4
8/14/2024	5	8.3	8.3	0.51
8/16/2024	5	8.1	8.1	0.49
8/19/2024	5	8	8	0.44
8/22/2024	5.1	8.2	8.2	0.21
8/23/2024	5.1	8.2	8.2	0.22
8/26/2024	5	8.3	8.3	0.1
8/28/2024	5	8.3	8.3	0.3
8/30/2024	5.2	8.3	8.3	0.1
9/3/2024	5	8	8	0.4
9/5/2024	5	8.1	8.1	0.27
9/6/2024	5.1	8.2	8.2	0.29
9/9/2024	5	7.8	7.8	0.1
9/11/2024	5	7.7	7.7	0.1
9/13/2024	5	7.9	7.9	0.1
9/16/2024	5	7.6	7.6	0.1
9/18/2024	5.1	8	8	1.5
9/20/2024	5.7	8.1	8.1	1.2
9/23/2024	5.5	8.6	8.6	0.93
9/25/2024	5.1	8.5	8.5	0.87
9/27/2024	5	8.2	8.2	0.71
9/30/2024	5	8.6	8.6	0.62
10/2/2024	5	8.6	8.6	1.55
10/4/2024	5.1	8.5	8.5	1.57
10/7/2024	5	8.4	8.4	0.92
10/9/2024	5.2	8.4	8.4	0.81
10/11/2024	5	8.2	8.2	0.68
10/14/2024	5	8.8	8.8	0.56
10/16/2024	5	8.6	8.6	0.56
10/18/2024	5	8.5	8.5	0.49
10/21/2024	5	8.3	8.3	0.33

10/23/2024	5.7	8.1	8.1	0.59
10/25/2024	5	8.1	8.1	0.57
10/28/2024	5	8.5	8.5	0.17
10/30/2024	5.2	8.3	8.3	0.28
11/1/2024	5	8	8	0.29
11/4/2024	5.1	8.5	8.5	0.36
11/6/2024	5	8.1	8.1	0.6
11/8/2024	5	8.8	8.8	0.43
11/11/2024	5	8.6	8.6	0.4
11/13/2024	5	8.1	8.1	0.48
11/15/2024	5	8	8	0.39
11/18/2024	5	8.4	8.4	0.38
11/20/2024	5	8.6	8.6	0.56
11/22/2024	5.2	8.8	8.8	0.69
11/25/2024	5	8.7	8.7	0.44
11/27/2024	5	8.8	8.8	0.49
11/29/2024	5	8.6	8.6	0.41
12/2/2024	5.1	7.9	7.9	0.38
12/4/2024	5	7.8	7.8	0.4
12/6/2024	5	7.1	7.1	0.47
12/9/2024	5	7	7	0.2
12/11/2024	5	7.2	7.2	0.25
12/13/2024	5	7	7	0.23
12/16/2024	6.9	7.5	7.5	0.39
12/18/2024	6.8	8	8	0.58
12/20/2024	7	7.9	7.9	0.44
12/22/2024	7.1	8.2	8.2	0.48
12/26/2024	6.3	8	8	0.2
12/27/2024	7	8.3	8.3	0.31
12/30/2024	6.7	7.9	7.9	0.4
1/2/2025	7.1	8.2	8.2	0.34
1/3/2025	7	8.1	8.1	0.2
1/6/2025	7	8	8	0.2

1/8/2025	7.2	7.9	7.9	0.31
1/10/2025	7	7.8	7.8	0.2
1/13/2025	7	8	8	0.1
1/15/2025	7	7.9	7.9	0.45
1/17/2025	7.1	8	8	0.49
1/20/2025	7	7.5	7.5	0.15
1/22/2025	7	8	8	0.22
1/24/2025	7.2	8	8	0.11
1/27/2025	7	7.7	7.7	0.1
1/29/2025	7.3	7.9	7.9	0.11
1/31/2025	7	7.9	7.9	0.22
2/3/2025	7.5	7.7	7.7	0.48
2/5/2025	7	7.7	7.7	0.39
2/7/2025	7.3	7.6	7.6	0.08
2/10/2025	7	7.7	7.7	0.47
2/12/2025	7.9	7.1	7.1	0.46
2/14/2025	7.5	7.1	7.1	0.39
2/17/2025	7.7	8.1	8.1	0.48
2/19/2025	7.5	8	8	0.45
2/21/2025	7	8	8	0.48
2/24/2025	7.1	7.5	7.5	0.2
2/26/2025	7	7.7	7.7	0.39
2/28/2025	7.2	7.6	7.6	0.47
3/3/2025	6.4	8.9	8.9	0.47
3/5/2025	7	8.1	8.1	0.34
3/7/2025	7.2	8	8	0.28
3/10/2025	7.5	8.3	8.3	0.45
3/12/2025	6.8	7.9	7.9	0.31
3/14/2025	7.1	8.2	8.2	0.39
3/17/2025	6.9	7.8	7.8	0.42
3/19/2025	7.2	8	8	0.48
3/21/2025	7	7.7	7.7	0.49
3/24/2025	7.9	7.7	7.7	0.28

3/26/2025	7.1	7.8	7.8	0.5
3/28/2025	7	7.9	7.9	0.43
45747	7.2	7.6	7.6	0.44