

LANCE R. LEFLEUR
DIRECTOR



Alabama Department of Environmental Management
adem.alabama.gov

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ROBERT J. BENTLEY
GOVERNOR

SEP 16 2013

CERTIFIED MAIL 91 7199 9991 7030 3430 4280
RETURN RECEIPT REQUESTED

Mr. Hans-Juergen Obermaier
Operations Manager
Kronospan, LLC
1 Kronospan Way
Eastaboga, Alabama 36260

RE: Consent Order No. 13-145-CWP
NPDES Permit IU350801146
Kronospan, LLC
Talladega County (121)

Dear Mr. Obermaier:

Please find the enclosed ADEM Consent Order No. 13-145-CWP which requires you to take certain actions at Kronospan, LLC in Eastaboga, AL in regard to alleged violations of the Alabama Water Pollution Control Act. This Consent Order has been issued with the consent of Kronospan, LLC.

Sincerely,

A handwritten signature in black ink that reads "Glenda L. Dean".

Glenda L. Dean, Chief
Water Division

GLD/kbj

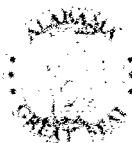
File: ECO/13-145-CWP

Enclosure

cc: Tom Johnston/ADEM, Office of General Counsel
James Wright/ADEM, Office of General Counsel
Daphne Smart/ADEM, Industrial Municipal Branch/Water Division
Scott Ramsey/ADEM, Industrial Municipal Branch/Water Division
Latoya Hall/ADEM, Industrial Municipal Branch/Water Division

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
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Decatur Branch
2715 Sendin Road, S.W.
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Mobile Branch
2204 Penimeter Road
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4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)

**ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

IN THE MATTER OF:)
)
Kronospan, LLC)
1 Kronospan Way)
Eastaboga, Talladega County AL)
)
SID PERMIT IU 35-08-01146)

CONSENT ORDER NO. 13-145-CWP

PREAMBLE

This Special Order by Consent is made and entered into by the Alabama Department of Environmental Management (hereinafter “the Department”) and Kronospan, LLC (hereinafter the “Permittee”) pursuant to the provisions of the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-16 (2006 Rplc. Vol.), the Alabama Water Pollution Control Act (hereinafter “AWPCA”), Ala. Code §§ 22-22-1 to 22-22-14 (2006 Rplc. Vol.), and the regulations promulgated pursuant thereto, and § 402 of the Federal Water Pollution Control Act, 33 U.S.C. § 1342.

STIPULATIONS

1. The Permittee operates a medium density fiberboard facility located on 1 Kronospan Way, Eastaboga, Talladega County, Alabama.
2. The Department is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 through 22-22A-16 (2006 Rplc. Vol.).
3. Pursuant to Ala. Code § 22-22A-4(n) (2006 Rplc. Vol.), the Department is the state agency responsible for the promulgation and enforcement of water pollution control regulations in accordance with the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 to 1387. In addition,

the Department is authorized to administer and enforce the provisions of the AWPCA, Ala. Code §§ 22-22-1 through 22-22-14 (2006 Rplc. Vol.).

4. ADEM Admin. Code r. 335-6-5-.04(2) states that no significant industrial user shall introduce pollutants into a publicly owned treatment works (hereinafter "POTW") without having first obtained a valid SID Permit from the Department.

5. The Permittee is a "Significant Industrial User" as defined in ADEM Admin. Code r. 335-6-5-.02(00). Based on information received at the Department, the Permittee began trial runs at the facility in Fall 2007 and began discharging full production wastewater to the POTW in February 2008. This unpermitted discharge was in violation of ADEM Admin Code r. 335-6-5-.04(2) from the date aforementioned until the SID Permit became effective on July 1, 2012.

6. The Department issued State Indirect Discharge (hereinafter "SID") Permit Number IU 35-08-01146 (hereinafter the "Permit") to the Permittee on June 29, 2012 (effective July 1, 2012), establishing limits on the discharge of pollutants from a point source, designated therein as Outfall DSN001, from the facility to the City of Oxford Waste Water Treatment Facility (hereinafter the "WWTP"). The WWTP is a POTW as defined in ADEM Admin. Code r. 335-6-5-.02(jj). The Permit requires that the Permittee monitor its discharges and submit periodic Discharge Monitoring Reports (hereinafter "DMRs") to the Department describing the results of the monitoring. The Permit also requires that the Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Permittee to achieve compliance with the conditions of the Permit.

7. On January 15, 2008, the Permittee submitted a SID Permit application to the Department. On February 2, 2008, the Department informed the Permittee that additional fees were necessary to process the SID Permit application. On February 8, 2008, the Permittee remitted a payment to the Department. On March 28, 2008, the Department informed the Permittee that the

additional payment sent on February 8, 2008, was insufficient and requested additional fees to process the application. On May 15, 2008, the Department sent a letter to the Permittee informing them that their SID Permit application was incomplete and required the Permittee to submit an updated application. A complete application for issuance of an SID Permit was received at the Department on June 9, 2008, and a draft permit was sent to the Permittee and the POTW on October 22, 2009. In a letter to the Department dated November 19, 2009, the POTW requested limits on several parameters based on analytical data it had collected. The Department requested copies of the data collected to use as technical justification for the limits; however, the POTW did not provide the requested data. On October 6, 2011, the Department sent a revised draft which included limits for Temperature and Total Suspended Solids (hereinafter "TSS") based on the Department's Best Professional Judgment. On April 4, 2012, the Department requested a denial or acceptance letter from the POTW. The POTW acceptance letter, if received, was to include those limitations acceptable to the POTW. On April 5, 2012, the Department received comments from the POTW on the October 2011 revised draft permit. The POTW's comments requested additional parameters to be included in the draft permit for monitoring. These parameters were added, and the revised draft permit was sent to the Permittee and the POTW on May 2, 2012. No comments were received, and thus the May 2012 revised draft permit was finalized and issued on June 29, 2012 (effective July 1, 2012).

8. Part I.A. of the Permit states that flow shall be measured using a totalizer. During an inspection conducted by the Department on August 8, 2012 and a joint inspection on November 14 and 15, 2012, with the Environmental Protection Agency, it was noted that the Permittee did not have equipment for measuring flow in violation of Part I.A. of the Permit.

9. Part I.E.1. of the Permit requires that DMRs be submitted to the Department no later than the 28th day of the month following the monitoring period, and should be completed in full. A

review of the DMRs available to the Department indicates that the Permittee submitted DMRs for the months of July 2012 through January 2013 such that they were not received by the 28th day of the month following the monitoring period, in violation of Part I.E.1. of the Permit. The July 2012 through December 2012 DMRs were received by the Department on February 11, 2013, and the January 2013 DMR was received by the Department on March 18, 2013.

10. Part I.A. of the Permit requires that Temperature, Biochemical Oxygen Demand (hereinafter “BOD”), pH, TSS, Oil & Grease, Ammonia, Total Phosphorus, Color, Flow, Formaldehyde, and Chemical Oxygen Demand (hereinafter “COD”) be sampled and reported in accordance with the permit for Outfall DSNS011. Based on a review of DMRs and non-compliance forms available to the Department, the Permittee failed to sample its wastewater discharged from Outfall DSNS011 (from July 2012 through October 2012) in violation of Part I.A. of the Permit.

11. Part I.A. of the Permit requires that BOD, TSS, COD, and Formaldehyde be monitored weekly for outfall DSNS011. A review of all available data to the Department indicates that the Permittee has failed to monitor these parameters (for the monitoring period of November 2012) in accordance with its Permit.

12. The DMRs and facility data logs submitted to the Department by the Permittee indicate that the Permittee has discharged pollutants in violation of the limitations established in the Permit. The violations which occurred are listed in Attachment 1.

13. Part I.G.1. of the Permit states that a written report prepared by an engineer registered and authorized to practice in Alabama describing the steps to be taken to reduce levels of formaldehyde in the effluent must be submitted to the Department for review such that the report is received within forty-five days from the effective date of the permit. The Permittee must begin implementation of the steps included in the report upon submittal. This report was due to the

Department on August 15, 2012; however the report was not received by the Department until February 11, 2013, in violation of Part I.G.1 of the Permit.

14. Part I.G.1. of the Permit states that the Permittee is required to monitor formaldehyde on a weekly basis and report the results to the Department on the monthly DMRs. During a site visit conducted by the Department on November 15, 2012, it was noted that the Permittee could not produce records indicating the weekly sampling of formaldehyde and this data has not been submitted on DMRs from the period July 1, 2012 through December 3, 2012, in violation of Part I.G.1. of the Permit.

15. On December 13, 2012, the Department issued a Notice of Violation (hereinafter "NOV") to the Permittee which required a response within thirty days of its receipt. The Department's records indicate that the NOV was received by the Permittee on December 17, 2012, resulting in a due date of January 16, 2013; however, the response was not received by the Department until February 11, 2013.

16. Part I.B.I of the Permit states "the permittee shall not discharge or, in any manner, introduce into the publicly owned treatment works any pollutant(s) which, alone or in conjunction with a discharge or discharges from other sources, causes pass through or interference or in any other manner adversely impacts the operation or performance of the treatment works, to include the method of sludge disposal in use by the publicly owned treatment works."

17. The POTW submitted an Engineering Report dated June 19, 2012, which indicated the Permittee's discharge contributed to violations of the POTW's NPDES permit, in violation of Part I.B.I of the Permit.

18. The current limits for TSS in the Permit are based on Best Professional Judgment. The Permittee has stated that the pretreatment system appears to be able to consistently meet the limit only if substantial amounts of chemicals are added to the system, and the Permittee has

reported that this imposes a recurring cost that is not economically sustainable over the long term. The Department has issued Unilateral Order 13-118-WP to the Oxford Water Works and Sewer Board that, among other things, directs the Board to submit a POTW Pretreatment Plan that contains sufficient information that the Department may utilize in developing enforceable Local Limits. Prior to the adoption of such Local Limits, the Department will accept and consider public comments, including those from the Permittee, regarding the proposed limits included in Oxford's Pretreatment Plan.

19. The Code of Federal Regulations (CFR) 40 Part 403.6 states "Dilution is prohibited as substitute for treatment. Except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a Discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement."

20. During a site visit to the facility, Department personnel observed water being added to the discharge which Department personnel understood was dilution water which was being utilized to meet the temperature limits in the Permit. Department personnel also understood that Kronospan had begun purchasing additional water to reduce the temperature of the effluent to avoid seal issues at the lift station. Dilution water to meet applicable limitations is a violation of 40 CFR 403.6.

21. The Permittee consents to abide by the terms of the following Consent Order.

22. The Department has agreed to the terms of this Consent Order in an effort to resolve the violations cited herein without the unwarranted expenditure of State resources in further prosecuting the above violations. The Department has determined that the terms contemplated in this Consent Order are in the best interests of the citizens of Alabama.

PERMITTEE'S CONTENTIONS

23. Permittee generally acknowledges and accepts the foregoing stipulations, including particularly those in paragraph 7 regarding the lengthy process associated with the submission, review and issuance of the permit. In summary, this process commenced on or about January 15, 2008, with the submission of an initial application and proceeded over the course of the next several years through two draft permits before a third draft permit was issued and subsequently finalized on June 29, 2012.

24. The facility being operated by the Permittee is a relatively new facility with construction commencing in 2005.

25. During planning for the facility and prior to commencement of construction, the facility was the target of industrial recruiters seeking to secure the facility at alternative locations in Anniston and Oxford, Alabama, as well as elsewhere in the Southeast.

26. In August, 2007, after review of a laboratory analysis of the Permittee's anticipated wastewater content, the City of Oxford advised the Permittee that the Oxford POTW had the capability to treat the facility's wastewaters. There was no indication of any need for any pre-treatment of the wastewaters prior to their discharge to the City's POTW through sanitary sewer system.

27. There is no specified treatment technology required by State or federal regulation for the type of wastewater Kronospan discharges when it is directed to a POTW. However, since operations began, Kronospan has pretreated its industrial waste stream through the use of a screw separator and settlement pit. In addition, in 2010, a bow screen was added to further pre-treat wastewaters. All of this was put in place before any permit was issued by the Department.

28. The assertion in Paragraph 5 regarding the initial and full production and the consequent discharges of wastewaters containing pollutants is not correct according to Kronospan's water consumption records. The company's water bills generally reflect thirty-day usage from approximately the 15th day of one month to the middle of the following month. For the periods in question, those records indicate that no water was consumed from October 16, 2007 through November 16, 2007. Consumption from November 16 through December 16, 2007 and for the next month through January 16, 2008, reflects use of 29,500 gallons and 30,200 gallons respectively. Water consumption increased markedly after mid-January, 2008, with consumption of 185,000 gallons for the period ending February 16, 2008. Consumption then moved to 824,900 for the period between March 16 and April 16. Kronospan did not produce its first fiberboard until February, 2008, during production testing. Prior to that, during the "Fall of 2007", water consumption had been limited to testing of systems and equipment. As the consumption records reflect, full production with its corresponding water use did not commence until after the middle of March, 2008.

29. In January, 2008, while the facility was under construction, but prior to the commencement of operation, the Permittee submitted an SID permit application. This initial application did not contemplate any additional pre-treatment at the Permittee's facility prior to discharge to the POTW.

30. The Department issued its first draft permit, as indicated above in paragraph 7, in October, 2009. That draft did not propose to require any additional pre-treatment at the Permittee's facility other than what was needed to comply with 40 CFR 403.5.

31. The Department issued a second draft permit in October, 2011.

32. After several requests from the Department over the years, in April, 2012, the City of Oxford submitted comments indicating that certain pre-treatment parameters should be included in any permit issued to the Permittee.

33. Thereafter, the Department revised the draft permit to require additional pre-treatment at the facility. This revision, as indicated in paragraph 7, was made on May 2, 2012, and the final permit was issued on June 29 of that year.

34. The requirement for additional pretreatment at the facility was not anticipated by the Permittee and the parameters that were ultimately imposed by the permit necessarily required the development of an additional pre-treatment unit at the facility including the required planning, design, fabrication, construction and installation.

35. Planning for an additional pre-treatment unit began shortly after the permit was issued, and the unit has now been installed and is operational. The unit is achieving compliance with Permit limits, but, particularly with respect to the TSS limit, the monthly cost of chemicals to meet the 600 mg/L limit is extraordinary and unsustainable if the facility is to operate profitably.

36. The Permittee has been required to invest approximately \$1,000,000 in this process in an effort to develop and install an additional pre-treatment facility. It is also contrary to representations made by the City of Oxford during the recruitment of the industry.

37. After review of the permit issued in June, 2012, the Permittee has concerns about its ability to meet the limit imposed for TSS set out therein. The Permittee understands that there are few, if any, similar facilities having indirect discharge permits, and thus none with which to compare TSS limits. Thus, as noted in the Stipulations section, the limits are based on “best professional judgment”.

38. In previous exchanges with the Oxford POTW, the Permittee has been advised that the POTW could accept a TSS load that is considerably higher than the limit currently imposed by the permit.

39. The Permittee also has concerns about the appropriate method for handling upset conditions at the facility and the possible interpretation of the permit to require that we attempt to correct the condition while the facility is not operating.

40. The Permittee is aware that the Department has recently requested from the Oxford POTW a Pretreatment Plan for the Department to develop Local Limits in accordance with ADEM Admin. Code r. 335-6-5-.03. It is the Permittee's understanding that such Plan should include justifications for any limits, including those as noted above of concern to the Permittee. This analysis could reasonably be expected to allow an increase in TSS limits and other limits in the SID Permit.

41. In an effort to explore compliance concerns with the Department and with the prospect of the imposition of local limits that may affect the SID permit, the Permittee intends to provide information to the Department which would support a modification of the permit to increase the TSS levels and options to address the temperature limits as well as seeking clarification of operation during upset conditions, and further, to participate in the process of establishing local limits to the extent possible.

42. The Permittee installed a flow monitoring system in June 2013.

43. Kronospan has not diluted its discharge for the purpose of meeting temperature limits. Instead, and prior to discharge, Kronospan mixes water from our refining process with water used to cool our process equipment. The water from the refining process (our primary process) contains solids and receives pretreatment. The other water is used to cool the motors of our process equipment. While this is non-contact cooling, when the cooling water warms, it must

be discharged and replaced so that the motors and equipment can maintain a desired operating temperature. This water is then discharged through the sewer system along with other waters used in our production process. We do not take water directly from the fresh water outlet and add it to our waste waters for any purpose whatsoever.

ORDER

The Department has carefully considered the facts available to it as well as the need for timely and effective enforcement and the Department believes that the following conditions are appropriate to address the violations cited herein. Therefore, the Department and the Permittee agree to enter into this ORDER with the following terms and conditions:

A. On June 10, 2013, the Department received an Engineering Report dated June 3, 2013. The Permittee agrees to prepare and submit detailed Quarterly Progress Reports to the Department describing the Permittee's progress towards achieving compliance with the terms of the Order. The Progress Reports should be submitted so that they are received by the Department not later than ninety days after the date of issuance of this Consent Order and continuing every ninety days thereafter that the Permittee's performance obligations under this Consent Order remain incomplete. In addition, the Permittee shall submit a written notice of noncompliance with each applicable imposed requirement. The notice of noncompliance shall be submitted so that it is received by the Department no later than fourteen days following each applicable due date contained in this Consent Order. Notices of noncompliance shall state the cause of noncompliance and the corrective action taken and shall also describe the Permittee's ability to comply with any remaining requirements of this Consent Order.

B. No later than sixty days after the establishment of local limits for the receiving

POTW, the Permittee shall submit to the Department an engineering report including a schedule of compliance as to when the Permittee will comply with the applicable local limits for TSS. Until such limits are established and the Permit is modified to reflect the local requirements, the Permittee must properly operate and maintain its treatment system such that TSS levels in the discharge are minimized.

C. No later than December 1, 2013, the Permittee shall fully comply with the permit limitation for Temperature without the use of non-process water for dilution and/or without the use of increased process water for dilution as required by 40 CFR 403.6.

D. The Permittee shall also comply with all other items, conditions, and limitations of its Permit immediately upon the effective date of this Order.

E. The parties agree that this Consent Order shall apply to and be binding upon both parties, their directors, officers, and all persons or entities acting under or for them. Each signatory to this Consent Order certifies that he or she is fully authorized by the party he or she represents to enter into the terms and conditions of this Consent Order, to execute the Consent Order on behalf of the party represented, and to legally bind such party.

F. The Permittee agrees that it is not relieved from any liability if it fails to comply with any provision of this Consent Order.

G. For purposes of this Consent Order only, the Permittee agrees that the Department may properly bring an action to compel compliance with the terms and conditions contained herein in the Circuit Court of Montgomery County. The Permittee also agrees that in any action brought by the Department to compel compliance with the terms of this Agreement, the Permittee shall be limited to the defenses of *Force Majeure*, compliance with this Agreement and physical impossibility. A *Force Majeure* is defined as any event arising from causes that are not foreseeable and are beyond the reasonable control of the Permittee, including its contractors and consultants,

which could not be overcome by due diligence (i.e., causes which could have been overcome or avoided by the exercise of due diligence will not be considered to have been beyond the reasonable control of the Permittee) and which delays or prevents performance by a date required by the Consent Order. Events such as unanticipated or increased costs of performance, changed economic circumstances, normal precipitation events, or failure to obtain federal, state, or local permits shall not constitute *Force Majeure*. Any request for a modification of a deadline must be accompanied by the reasons (including documentation) for each extension and the proposed extension time. This information shall be submitted to the Department a minimum of ten working days prior to the original anticipated completion date. If the Department, after review of the extension request, finds the work was delayed because of conditions beyond the control and without the fault of the Permittee, the Department may extend the time as justified by the circumstances. The Department may also grant any other additional time extension as justified by the circumstances, but it is not obligated to do so.

H. The Department and the Permittee agree that this Consent Order shall be considered final and effective immediately upon signature of all parties. This Consent Order shall not be appealable, and the Permittee does hereby waive any hearing on the terms and conditions of same.

I. The Department and the Permittee agree that this Consent Order shall not affect the Permittee's obligation to comply with any Federal, State, or local laws or regulations.

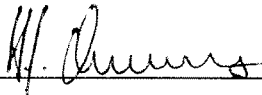
J. The Department and the Permittee agree that, should any provision of this Consent Order be declared by a court of competent jurisdiction or the Environmental Management Commission to be inconsistent with Federal or State law and therefore unenforceable, the remaining provisions hereof shall remain in full force and effect.

K. The Department and the Permittee agree that any modifications of this Consent Order must be agreed to in writing signed by both parties.

L. The Department and the Permittee agree that, except as otherwise set forth herein, this Consent Order is not and shall not be interpreted to be a permit or modification of an existing permit under Federal, State or local law, and shall not be construed to waive or relieve the Permittee of its obligations to comply in the future with any permit.

Executed in duplicate, with each part being an original.

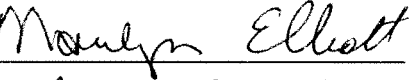
Kronospan, LLC

By: 

Its: OPERATIONS DIRECTOR

Date: 03 SEPT 2013

**Alabama Department of
Environmental Management**

By: 

Its: Deputy Director

Date: SEP 16 2013

Kronospan LLC – SID 35-08-01146

Attachment 1

Date	Type	Parameter	Units	Result Reported	Limit
November 2012	Daily Maximum	TSS	mg/l	1728	600
December 5, 2012	Daily Maximum	TSS	mg/l	740	600
December 10, 2012	Daily Maximum	TSS	mg/l	970	600
December 17, 2012	Daily Maximum	TSS	mg/l	1310	600
January 2, 2013	Daily Maximum	TSS	mg/l	5500	600
January 7, 2013	Daily Maximum	TSS	mg/l	4700	600
January 14, 2013	Daily Maximum	TSS	mg/l	1560	600
January 21, 2013	Daily Maximum	TSS	mg/l	2880	600
January 28, 2013	Daily Maximum	TSS	mg/l	970	600
February 4, 2013	Daily Maximum	TSS	mg/l	3110	600
February 11, 2013	Daily Maximum	TSS	mg/l	4910	600
February 18, 2013	Daily Maximum	TSS	mg/l	4340	600
February 25, 2013	Daily Maximum	TSS	mg/l	4360	600
March 4, 2013	Daily Maximum	TSS	mg/l	970	600
March 11, 2013	Daily Maximum	TSS	mg/l	5820	600
March 18, 2013	Daily Maximum	TSS	mg/l	5420	600
March 25, 2013	Daily Maximum	TSS	mg/l	5360	600
April 1, 2013	Daily Maximum	TSS	mg/l	2720	600
April 8, 2013	Daily Maximum	TSS	mg/l	7420	600
April 15, 2013	Daily Maximum	TSS	mg/l	1230	600
April 22, 2013	Daily Maximum	TSS	mg/l	2330	600
April 29, 2013	Daily Maximum	TSS	mg/l	2000	600
May 6, 2013	Daily Maximum	TSS	mg/l	980	600
May 13, 2013	Daily Maximum	TSS	mg/l	633	600
May 20, 2013	Daily Maximum	TSS	mg/l	760	600
May 28, 2013	Daily Maximum	TSS	mg/l	408	600
June 17, 2013	Daily Maximum	TSS	mg/l	1880	600
December 2012	Daily Maximum	Oil and Grease	mg/l	314	150
January 2013	Daily Maximum	Oil and Grease	mg/l	1060	150
February 2013	Daily Maximum	Oil and Grease	mg/l	1180	150
March 2013	Daily Maximum	Oil and Grease	mg/l	420	150
April 2013	Daily Maximum	Oil and Grease	mg/l	1230	150
November 1, 2012	Daily Maximum	Temperature	F	150	110
November 2, 2012	Daily Maximum	Temperature	F	150	110
November 3, 2012	Daily Maximum	Temperature	F	143	110
November 4, 2012	Daily Maximum	Temperature	F	148	110
November 5, 2012	Daily Maximum	Temperature	F	150	110
November 6, 2012	Daily Maximum	Temperature	F	152	110
November 7, 2012	Daily Maximum	Temperature	F	151	110

November 8, 2012	Daily Maximum	Temperature	F	144	110
November 9, 2012	Daily Maximum	Temperature	F	142	110
November 10, 2012	Daily Maximum	Temperature	F	141	110
November 11, 2012	Daily Maximum	Temperature	F	143	110
November 12, 2012	Daily Maximum	Temperature	F	143	110
November 13, 2012	Daily Maximum	Temperature	F	145	110
November 14, 2012	Daily Maximum	Temperature	F	150	110
November 15, 2012	Daily Maximum	Temperature	F	148	110
November 16, 2012	Daily Maximum	Temperature	F	149	110
November 17, 2012	Daily Maximum	Temperature	F	150	110
November 18, 2012	Daily Maximum	Temperature	F	149	110
November 19, 2012	Daily Maximum	Temperature	F	148	110
November 20, 2012	Daily Maximum	Temperature	F	144	110
November 21, 2012	Daily Maximum	Temperature	F	134	110
November 22, 2012	Daily Maximum	Temperature	F	136	110
November 23, 2012	Daily Maximum	Temperature	F	133	110
November 24, 2012	Daily Maximum	Temperature	F	134	110
November 25, 2012	Daily Maximum	Temperature	F	143	110
November 26, 2012	Daily Maximum	Temperature	F	142	110
November 27, 2012	Daily Maximum	Temperature	F	142	110
November 28, 2012	Daily Maximum	Temperature	F	142	110
November 29, 2012	Daily Maximum	Temperature	F	146	110
November 30, 2012	Daily Maximum	Temperature	F	147	110
December 1, 2012	Daily Maximum	Temperature	F	148	110
December 2, 2012	Daily Maximum	Temperature	F	148	110
December 3, 2012	Daily Maximum	Temperature	F	148	110
December 4, 2012	Daily Maximum	Temperature	F	146	110
December 5, 2012	Daily Maximum	Temperature	F	144	110
December 17, 2012	Daily Maximum	Temperature	F	150	110
December 18, 2012	Daily Maximum	Temperature	F	148	110
December 19, 2012	Daily Maximum	Temperature	F	148	110
December 20, 2012	Daily Maximum	Temperature	F	144	110
December 21, 2012	Daily Maximum	Temperature	F	134	110
December 22, 2012	Daily Maximum	Temperature	F	137	110
December 23, 2012	Daily Maximum	Temperature	F	133	110
December 24, 2012	Daily Maximum	Temperature	F	135	110
December 25, 2012	Daily Maximum	Temperature	F	142	110
December 26, 2012	Daily Maximum	Temperature	F	140	110
December 27, 2012	Daily Maximum	Temperature	F	145	110
December 28, 2012	Daily Maximum	Temperature	F	145	110
December 29, 2012	Daily Maximum	Temperature	F	146	110
December 30, 2012	Daily Maximum	Temperature	F	149	110
December 31, 2012	Daily Maximum	Temperature	F	150	110
January 1, 2013	Daily Maximum	Temperature	F	121	110
January 2, 2013	Daily Maximum	Temperature	F	141	110
January 3, 2013	Daily Maximum	Temperature	F	143	110
January 4, 2013	Daily Maximum	Temperature	F	143	110

January 5, 2013	Daily Maximum	Temperature	F	138	110
January 6, 2013	Daily Maximum	Temperature	F	143	110
January 7, 2013	Daily Maximum	Temperature	F	138	110
January 8, 2013	Daily Maximum	Temperature	F	136	110
January 9, 2013	Daily Maximum	Temperature	F	136	110
January 10, 2013	Daily Maximum	Temperature	F	142	110
January 11, 2013	Daily Maximum	Temperature	F	148	110
January 12, 2013	Daily Maximum	Temperature	F	142	110
January 13, 2013	Daily Maximum	Temperature	F	132	110
January 14, 2013	Daily Maximum	Temperature	F	144	110
January 15, 2013	Daily Maximum	Temperature	F	130	110
January 16, 2013	Daily Maximum	Temperature	F	130	110
January 17, 2013	Daily Maximum	Temperature	F	129	110
January 18, 2013	Daily Maximum	Temperature	F	129	110
January 19, 2013	Daily Maximum	Temperature	F	131	110
January 20, 2013	Daily Maximum	Temperature	F	130	110
January 21, 2013	Daily Maximum	Temperature	F	129	110
January 22, 2013	Daily Maximum	Temperature	F	144	110
January 23, 2013	Daily Maximum	Temperature	F	146	110
January 24, 2013	Daily Maximum	Temperature	F	149	110
January 25, 2013	Daily Maximum	Temperature	F	146	110
January 26, 2013	Daily Maximum	Temperature	F	142	110
January 27, 2013	Daily Maximum	Temperature	F	129	110
January 28, 2013	Daily Maximum	Temperature	F	151	110
January 29, 2013	Daily Maximum	Temperature	F	150	110
January 30, 2013	Daily Maximum	Temperature	F	132	110
January 31, 2013	Daily Maximum	Temperature	F	134	110
February 1, 2013	Daily Maximum	Temperature	F	159	110
February 2, 2013	Daily Maximum	Temperature	F	158	110
February 3, 2013	Daily Maximum	Temperature	F	159	110
February 4, 2013	Daily Maximum	Temperature	F	158	110
February 5, 2013	Daily Maximum	Temperature	F	160	110
February 6, 2013	Daily Maximum	Temperature	F	161	110
February 7, 2013	Daily Maximum	Temperature	F	163	110
February 8, 2013	Daily Maximum	Temperature	F	160	110
February 9, 2013	Daily Maximum	Temperature	F	159	110
February 10, 2013	Daily Maximum	Temperature	F	159	110
February 11, 2013	Daily Maximum	Temperature	F	160	110
February 12, 2013	Daily Maximum	Temperature	F	159	110
February 13, 2013	Daily Maximum	Temperature	F	152	110
February 14, 2013	Daily Maximum	Temperature	F	143	110
February 15, 2013	Daily Maximum	Temperature	F	151	110
February 16, 2013	Daily Maximum	Temperature	F	154	110
February 17, 2013	Daily Maximum	Temperature	F	155	110
February 18, 2013	Daily Maximum	Temperature	F	158	110
February 19, 2013	Daily Maximum	Temperature	F	157	110
February 20, 2013	Daily Maximum	Temperature	F	156	110

February 21, 2013	Daily Maximum	Temperature	F	148	110
February 22, 2013	Daily Maximum	Temperature	F	161	110
February 23, 2013	Daily Maximum	Temperature	F	158	110
February 24, 2013	Daily Maximum	Temperature	F	157	110
February 25, 2013	Daily Maximum	Temperature	F	155	110
February 26, 2013	Daily Maximum	Temperature	F	149	110
February 27, 2013	Daily Maximum	Temperature	F	147	110
February 28, 2013	Daily Maximum	Temperature	F	138	110
March 1, 2013	Daily Maximum	Temperature	F	160	110
March 2, 2013	Daily Maximum	Temperature	F	131	110
March 3, 2013	Daily Maximum	Temperature	F	132	110
March 4, 2013	Daily Maximum	Temperature	F	132	110
March 5, 2013	Daily Maximum	Temperature	F	138	110
March 6, 2013	Daily Maximum	Temperature	F	146	110
March 7, 2013	Daily Maximum	Temperature	F	148	110
March 8, 2013	Daily Maximum	Temperature	F	136	110
March 9, 2013	Daily Maximum	Temperature	F	136	110
March 10, 2013	Daily Maximum	Temperature	F	141	110
March 11, 2013	Daily Maximum	Temperature	F	148	110
March 12, 2013	Daily Maximum	Temperature	F	142	110
March 13, 2013	Daily Maximum	Temperature	F	132	110
March 14, 2013	Daily Maximum	Temperature	F	143	110
March 15, 2013	Daily Maximum	Temperature	F	137	110
March 16, 2013	Daily Maximum	Temperature	F	129	110
March 17, 2013	Daily Maximum	Temperature	F	129	110
March 18, 2013	Daily Maximum	Temperature	F	129	110
March 19, 2013	Daily Maximum	Temperature	F	117	110
March 20, 2013	Daily Maximum	Temperature	F	121	110
March 21, 2013	Daily Maximum	Temperature	F	120	110
March 22, 2013	Daily Maximum	Temperature	F	124	110
March 23, 2013	Daily Maximum	Temperature	F	125	110
March 24, 2013	Daily Maximum	Temperature	F	121	110
March 25, 2013	Daily Maximum	Temperature	F	119	110
March 26, 2013	Daily Maximum	Temperature	F	115	110
March 27, 2013	Daily Maximum	Temperature	F	113	110
March 28, 2013	Daily Maximum	Temperature	F	113	110
March 29, 2013	Daily Maximum	Temperature	F	120	110
March 30, 2013	Daily Maximum	Temperature	F	119	110
March 31, 2013	Daily Maximum	Temperature	F	122	110
April 1, 2013	Daily Maximum	Temperature	F	122	110
April 2, 2013	Daily Maximum	Temperature	F	119	110
April 3, 2013	Daily Maximum	Temperature	F	125	110
April 4, 2013	Daily Maximum	Temperature	F	114	110
April 5, 2013	Daily Maximum	Temperature	F	116	110
April 6, 2013	Daily Maximum	Temperature	F	117	110
April 7, 2013	Daily Maximum	Temperature	F	121	110
April 8, 2013	Daily Maximum	Temperature	F	120	110

April 9, 2013	Daily Maximum	Temperature	F	124	110
April 10, 2013	Daily Maximum	Temperature	F	122	110
April 11, 2013	Daily Maximum	Temperature	F	124	110
April 12, 2013	Daily Maximum	Temperature	F	125	110
April 13, 2013	Daily Maximum	Temperature	F	123	110
April 14, 2013	Daily Maximum	Temperature	F	123	110
April 15, 2013	Daily Maximum	Temperature	F	118	110
April 16, 2013	Daily Maximum	Temperature	F	117	110
April 17, 2013	Daily Maximum	Temperature	F	115	110
April 18, 2013	Daily Maximum	Temperature	F	118	110
April 19, 2013	Daily Maximum	Temperature	F	118	110
April 20, 2013	Daily Maximum	Temperature	F	121	110
April 21, 2013	Daily Maximum	Temperature	F	121	110
April 22, 2013	Daily Maximum	Temperature	F	118	110
April 23, 2013	Daily Maximum	Temperature	F	123	110
April 24, 2013	Daily Maximum	Temperature	F	123	110
April 25, 2013	Daily Maximum	Temperature	F	121	110
April 26, 2013	Daily Maximum	Temperature	F	125	110
April 27, 2013	Daily Maximum	Temperature	F	122	110
April 28, 2013	Daily Maximum	Temperature	F	126	110
April 29, 2013	Daily Maximum	Temperature	F	127	110
April 30, 2013	Daily Maximum	Temperature	F	120	110
May 1, 2013	Daily Maximum	Temperature	F	115	110
May 2, 2013	Daily Maximum	Temperature	F	123	110
May 3, 2013	Daily Maximum	Temperature	F	125	110
May 4, 2013	Daily Maximum	Temperature	F	132	110
May 5, 2013	Daily Maximum	Temperature	F	121	110
May 6, 2013	Daily Maximum	Temperature	F	116	110
May 11, 2013	Daily Maximum	Temperature	F	114	110
May 12, 2013	Daily Maximum	Temperature	F	112	110
May 16, 2013	Daily Maximum	Temperature	F	111	110
May 17, 2013	Daily Maximum	Temperature	F	112	110
May 18, 2013	Daily Maximum	Temperature	F	118	110
May 19, 2013	Daily Maximum	Temperature	F	114	110
May 20, 2013	Daily Maximum	Temperature	F	117	110
May 21, 2013	Daily Maximum	Temperature	F	117	110
May 22, 2013	Daily Maximum	Temperature	F	113	110
May 23, 2013	Daily Maximum	Temperature	F	112	110
May 24, 2013	Daily Maximum	Temperature	F	111	110
May 26, 2013	Daily Maximum	Temperature	F	114	110
May 30, 2013	Daily Maximum	Temperature	F	115	110
May 31, 2013	Daily Maximum	Temperature	F	112	110
June 1, 2013	Daily Maximum	Temperature	F	113	110
June 2, 2013	Daily Maximum	Temperature	F	116	110
June 3, 2013	Daily Maximum	Temperature	F	113	110
June 4, 2013	Daily Maximum	Temperature	F	113	110
June 6, 2013	Daily Maximum	Temperature	F	136	110

June 7, 2013	Daily Maximum	Temperature	F	125	110
June 10, 2013	Daily Maximum	Temperature	F	129	110
June 13, 2013	Daily Maximum	Temperature	F	120	110
June 14, 2013	Daily Maximum	Temperature	F	132	110
June 15, 2013	Daily Maximum	Temperature	F	120	110
June 16, 2013	Daily Maximum	Temperature	F	119	110
June 17, 2013	Daily Maximum	Temperature	F	119	110
June 18, 2013	Daily Maximum	Temperature	F	124	110
June 19, 2013	Daily Maximum	Temperature	F	127	110
June 20, 2013	Daily Maximum	Temperature	F	127	110
June 21, 2013	Daily Maximum	Temperature	F	127	110
June 22, 2013	Daily Maximum	Temperature	F	125	110
June 23, 2013	Daily Maximum	Temperature	F	124	110
June 24, 2013	Daily Maximum	Temperature	F	117	110
June 25, 2013	Daily Maximum	Temperature	F	120	110
June 26, 2013	Daily Maximum	Temperature	F	122	110
June 27, 2013	Daily Maximum	Temperature	F	120	110
July 1, 2013	Daily Maximum	Temperature	F	121	110
July 8, 2013	Daily Maximum	Temperature	F	120	110
July 20, 2013	Daily Maximum	Temperature	F	114	110