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Technical Memorandum

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Technical Memorandum

Subject: Port Angeles Mixing Analyses, pH 12 Addendum

Date: October 8, 2024

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Section 1: Overview

This technical memorandum provides the results of supplemental model analyses prepared for Ebb Carbon and Project Macoma to assess discharges of pH 12 (12 standard units [s.u.]) under limited Scientific Operations. Previous Scientific Operations scenarios were modeled at pH 13.5 (13.5 s.u.). The analyses contained in this addendum applied the same dilution (UM3) and water chemistry (OLI Studio) modeling methodology and ambient water quality values.

The subsequent sections summarize scenario characteristics, dilution model results, and pH water quality analyses for Scientific Operations discharging at pH 12. In addition, water quality analyses include an evaluation of model sensitivity with respect to varying ambient pH values within Port Angeles Harbor.

The results of this analysis demonstrate that the mixed pH of Port Angeles Harbor waters and Project Macoma Ebb Carbon effluent at pH 12 is predicted to reach near ambient conditions, ≤ 0.1 pH change, within approximately 1 meter from the proposed diffuser discharge for nearly all ambient pH conditions. At low pH ambient conditions (pH = 7.5), the mixed pH achieves near ambient conditions within approximately 5 meters.

Section 2: Effluent Scenario Characteristics

Dilution and water chemistry modeling herein were prepared for Scientific Operations at pH = 12, shown in Table 1.

Table 1. Effluent Flow and Water Quality Summary						
Scenario	Frequency	Duration	Discharge Flow (L/hr)	Temperature (deg C)	Density (kg/m ³)	pH (s.u.)
Scientific Operations						
Alkaline product only (12.0 pH)	A few times per month	Single ebb tidal cycle	5,900	30.0	996.4	12.0

deg C = degrees Celsius

L/hr = liters per hour

kg/m³ = kilogram per cubic meter

Section 3: Dilution Model Results

All dilution model analyses herein assume maximum stratification conditions, which yield a lower predicted dilution for Scientific Operations at pH 12 as compared to minimum stratification conditions. As shown in Figure 1, the buoyant effluent plume is predicted to rise to the water surface approximately 4 meters (13 feet) laterally from the multi-port diffuser at the assumed 50th percentile current speeds. The UM3 model terminates at the point the effluent plume surfaces marking the completion of nearfield mixing. Additional farfield dilution occurs within the mixing zone but at a much lower magnitude. Consistent with previous analyses, the model results herein conservatively do not account for farfield mixing.

Scientific Operations, pH 12.0 - 5 cm/s Ambient

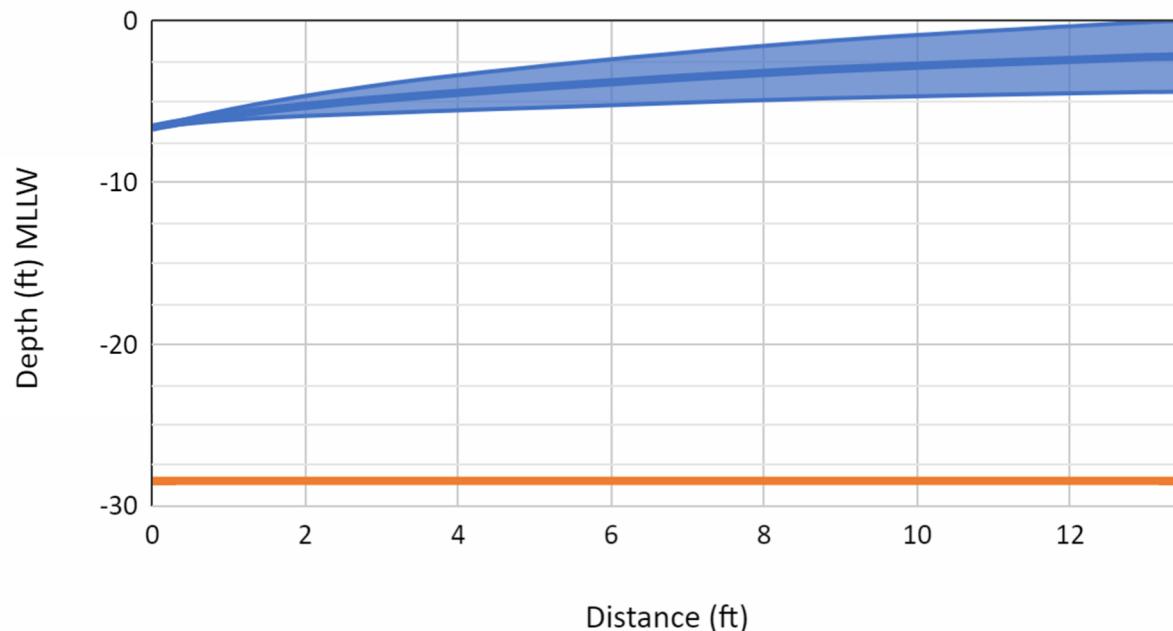


Figure 1. Predicted plume location. Plot shows the centerline and diameter of plume as a function of depth (blue) in reference to the surface and seafloor (orange) at mean lower low water (MLLW).

Dilution model results for Scientific Operations at pH 12 are summarized in Table 2 below. Minimum acute and nearfield dilutions assume 10th percentile and 50th percentile ambient current speeds, respectively. UM3 model input/output data are provided in Attachment A.

Table 2. Dilution Model Results Summary

Scenario	Minimum Acute Dilution ^a	Minimum Nearfield Dilution ^b	Nearfield Mixing Distance (m)	Effluent Plume Centerline Depth (m)
Scientific operations, alkaline product only (pH = 12.0)	175:1	860:1	4.1	Surface

^a Minimum acute dilution reported at the effluent plume centerline.

^b Minimum nearfield dilution reported as the flux average dilution of the effluent plume.

Section 4: Water Quality Analyses

The OLI model was used to predict mixed pH at the predicted minimum nearfield dilution for Scientific Operations (pH 12). pH water quality analysis results for Scientific Operations (pH 12) are summarized in Table 3. Consistent with previous analyses, the water quality analyses account for tidal reflux and use a nearfield dilution equal to half of the model predicted dilution. This assumption is potentially too conservative as operation of Scientific Operations is likely to be for limited durations and constrained to ebb tidal conditions where tidal reflux is not significant. OLI model outputs are provided in Attachment B.

Table 3. pH Water Quality Analyses Summary

Scenario	Chronic Dilution ^a	Effluent pH	Mixed pH ^b	pH Change
Scientific operations, alkaline product only (pH = 12.0)	430:1	12.0	7.9	0.1

^a Minimum nearfield dilution divided by two to account for tidal reflux.

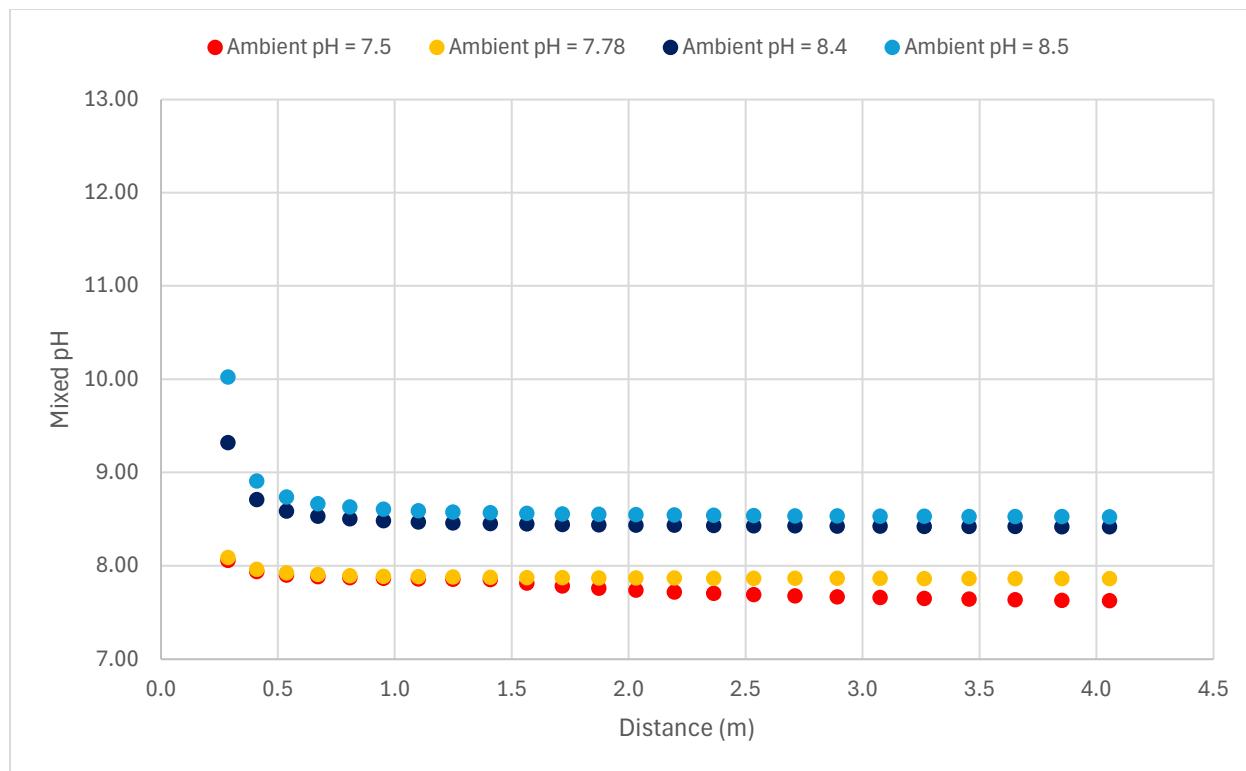
^b OLI model runs assume an ambient pH of 7.78.

Section 5: Scientific Operations (pH 12) Conclusions

As reported in Table 3, the nearfield mixing conditions, which occur within 13 feet of discharge results in a pH change of 0.1 s.u. Therefore, the conditions requiring a National Pollutant Discharge Elimination System Tier 2 determination are not applicable as the anticipated pH change is less than 0.1 s.u. at the point of compliance (chronic mixing zone 200.7 feet from the point of discharge), especially in consideration of the conservative, and potentially not applicable, reflux assumptions.

Section 6: Ambient pH Condition Sensitivity Analysis

In addition to the Scientific Operations (pH 12) evaluation, the UM3 and OLI models were used to evaluate the sensitivity of mixed pH results to Port Angeles Harbor under a range of ambient pH conditions. The sensitivity range was applied between 7.5 and 8.5 s.u. at chronic dilution conditions (current speed = 0.5 centimeters per second) and accounting for tidal reflux. Figure 2 provides predicted mixed pH with distance from the discharge for ambient harbor pH equal to 7.5, 7.78 (consistent with the base case), 8.4, and 8.5. Table 4 provides specific distances at which the mixed pH reaches near ambient conditions, less than ≤ 0.1 pH change, both with and without accounting for tidal reflux. As shown in Figure 2 and Table 4, mixed pH rapidly decreases to near ambient conditions within approximately 1 meter for all conditions except at an ambient pH of 7.5. At low pH ambient conditions, the mixed pH achieves near ambient conditions within approximately 5 meters, or less, if eliminating the conservative tidal reflux assumption.

**Figure 2. Ambient pH sensitivity analysis results****Table 4. Ambient pH Sensitivity Analysis Summary**

	Distance at which mixed pH reaches ≤ 0.1 pH change from ambient pH			
	Ambient pH = 7.5	Ambient pH = 7.78	Ambient pH = 8.4	Ambient pH = 8.5
With tidal reflux: chronic dilution = 430:1	4.1 ^a	1.2	0.8	1.1
Without tidal reflux: chronic dilution = 860:1	2.2	0.7	0.5	0.6

Section 7: Supporting Ambient Scenario Conclusions

The mixed pH of Port Angeles Harbor waters and Project Macoma discharge at Scientific Operations (pH 12) condition is predicted to reach near ambient conditions, ≤ 0.1 pH change, within approximately 1 meter from the proposed diffuser discharge for nearly all ambient pH conditions. At low pH ambient conditions (pH = 7.5), the mixed pH achieves near ambient conditions within approximately 5 meters.

Attachment A: Dilution Model Input/Output

Brown AND Caldwell :

Scientific Operations – Alkaline Product Only (pH = 12)

Acute Conditions

Ambient Table:

Depth	Amb-cur m	Amb-dir m/s	Amb-sal deg	Amb-tem psu	Amb-pol C	Decay kg/kg	Far-spd s-1	Far-dir m/s	Disprsn deg	Density m0.67/s2	Density sigma-T
0.0	0.020	90.00	30.95	11.20	0.0	0.0	-	-	0.0003	23.61783	
3.000	0.020	90.00	31.17	10.35	0.0	0.0	-	-	0.0003	23.93386	
6.000	0.020	90.00	31.16	9.690	0.0	0.0	-	-	0.0003	24.03388	
9.000	0.020	90.00	31.68	9.440	0.0	0.0	-	-	0.0003	24.47871	
12.00	0.020	90.00	31.76	9.340	0.0	0.0	-	-	0.0003	24.55686	
15.00	0.020	90.00	31.87	9.220	0.0	0.0	-	-	0.0003	24.66148	

Diffuser table:

P-dia	Ver	angl	H-Angle	SourceX	SourceY	Ports	Spacing	MZ-dis	Isopth	P-depth	Ttl-flo	Eff-den	Temp	Polutnt
(in)	(deg)	(deg)	(m)	(m)	(m)	(")	(ft)	(ft)	(concent)	(m)	(m3/s)	(kg/m3)	(C)	(%)
0.5000	45.000	90.000	0.0	0.0	25.000	2.0000	200.00	0.0	2.0000	1.64E-3	996.40	30.000	100.00	

Simulation:

Froude No:	8.844; Strat No:	4.89E-5; Spcg No:	48.00; k:	25.89; eff den (sigmaT)	-3.600000; eff vel	0.518;				
Step	Depth (m)	Amb-cur (cm/s)	P-dia (in)	Polutnt (%)	Dilutn (")	CL-diln (m)	x-posn (m)	y-posn (m)	Time (s)	Iso dia (m)
0	2.000	2.000	0.500	100.0	1.000	1.000	0.0	0.0	0.0	0.0
50	1.962	2.000	1.289	36.77	2.720	1.360	0.000	0.0375	0.184	0.03274
100	1.868	2.000	2.920	13.74	7.276	3.638	0.000	0.119	1.086	0.07418
150	1.682	2.000	5.801	5.118	19.54	9.770	0.000	0.240	3.640	0.1473
200	1.371	2.000	10.97	1.903	52.55	26.28	0.000	0.407	9.189	0.2787
250	0.895	2.000	20.75	0.707	141.4	70.71	0.000	0.679	20.59	0.5271
262	0.753	2.000	24.27	0.558	179.3	89.67	0.000	0.771	24.77	0.6165; merging;
288	0.322	2.000	35.09	0.334	299.4	169.2	0.000	1.095	39.88	0.8913; matched energy radii;
290	0.286	2.000	36.10	0.323	309.7	177.2	0.000	1.125	41.32	0.9169; surface;

Horiz plane projections in effluent direction: radius(m): 0.0; CL(m): 1.1249

Lmz(m): 1.1249

forced entrain 1 318.5 1.714 0.917 0.642

Rate sec-1 0.0 dy-1 0.0 kt: 0.0 Amb Sal 30.9723

Chronic Conditions

Ambient Table:

Depth	Amb-cur m	Amb-dir m/s	Amb-sal deg	Amb-tem psu	Amb-pol C	Decay kg/kg	Far-spd s-1	Far-dir m/s	Disprsn deg	Density m0.67/s2	Density sigma-T
0.0	0.050	90.00	30.95	11.20	0.0	0.0	-	-	0.0003	23.61783	
3.000	0.050	90.00	31.17	10.35	0.0	0.0	-	-	0.0003	23.93386	
6.000	0.050	90.00	31.16	9.690	0.0	0.0	-	-	0.0003	24.03388	
9.000	0.050	90.00	31.68	9.440	0.0	0.0	-	-	0.0003	24.47871	
12.00	0.050	90.00	31.76	9.340	0.0	0.0	-	-	0.0003	24.55686	
15.00	0.050	90.00	31.87	9.220	0.0	0.0	-	-	0.0003	24.66148	

Diffuser table:

P-dia	Ver	angl	H-Angle	SourceX	SourceY	Ports	Spacing	MZ-dis	Isopth	P-depth	Ttl-flo	Eff-den	Temp	Polutnt
(in)	(deg)	(deg)	(m)	(m)	(m)	(")	(ft)	(ft)	(concent)	(m)	(m3/s)	(kg/m3)	(C)	(%)
0.5000	45.000	90.000	0.0	0.0	25.000	2.0000	200.00	0.0	2.0000	1.64E-3	996.40	30.000	100.00	

Simulation:

Froude No:	8.844; Strat No:	4.89E-5; Spcg No:	48.00; k:	10.36; eff den (sigmaT)	-3.600000; eff vel	0.518;				
Step	Depth (m)	Amb-cur (cm/s)	P-dia (in)	Polutnt (%)	Dilutn (")	CL-diln (m)	x-posn (m)	y-posn (m)	Time (s)	Iso dia (m)
0	2.000	5.000	0.500	100.0	1.000	1.000	0.0	0.0	0.0	0.0127;
50	1.965	5.000	1.250	36.84	2.714	1.357	0.000	0.0367	0.166	0.03176;
100	1.906	5.000	2.790	13.77	7.262	3.631	0.000	0.106	0.761	0.07086;
150	1.821	5.000	5.568	5.128	19.50	9.751	0.000	0.217	2.246	0.1414;
200	1.701	5.000	10.24	1.907	52.45	26.22	0.000	0.404	5.404	0.2601;
250	1.527	5.000	17.89	0.709	141.1	70.57	0.000	0.754	11.93	0.4543;
278	1.393	5.000	24.12	0.407	245.7	122.8	0.000	1.087	18.38	0.6126; merging;
300	1.232	5.000	30.75	0.263	379.8	204.3	0.000	1.558	27.62	0.7809;
326	0.915	5.000	42.23	0.157	635.6	392.3	0.000	2.662	49.45	1.0727; trap level;
350	0.674	5.000	51.84	0.118	845.9	563.7	0.000	3.962	75.23	1.3166;
353	0.658	5.000	52.54	0.116	860.3	573.5	0.000	4.103	78.03	1.3344; surface;

Horiz plane projections in effluent direction: radius(m): 0.0; CL(m): 4.1027

Lmz(m): 4.1027

forced entrain 1 623.5 1.342 1.334 0.994

Rate sec-1 0.0 dy-1 0.0 kt: 0.0 Amb Sal 30.9986

Attachment B: Chemistry Model Output

Brown AND Caldwell :

B-1

Alkaline Product at pH of 12.0, PoPA WQ pH is at 7.78										
Ratio	Volume PoPA L/hr	Total Volume L/hr	pH	Temperature °C	TDS mg/L	Density kg/m³	Cl(-1) mg/L			
0	1.0E+05	5.90E+05	8.09	3.38	32.101	1.024	17.464			
18.6	1.10E+05	2.16E+05	7.96	8.83	32.969	1.025	17.920			
37.3	2.20E+05	2.26E+05	7.96	8.83	32.969	1.025	17.920			
55.9	3.30E+05	3.36E+05	7.92	8.64	32.268	1.025	18.077			
74.6	4.40E+05	4.46E+05	7.91	8.54	33.419	1.025	18.157			
93.2	5.50E+05	5.56E+05	7.90	8.48	33.511	1.025	18.205			
112	6.60E+05	6.66E+05	7.89	8.45	33.572	1.025	18.237			
131	7.70E+05	7.76E+05	7.88	8.42	33.616	1.025	18.260			
149	8.80E+05	8.86E+05	7.88	8.40	33.649	1.025	18.278			
168	9.90E+05	9.96E+05	7.88	8.38	33.675	1.025	18.291			
186	1.10E+06	1.11E+06	7.87	8.37	33.696	1.025	18.302			
203	1.20E+06	1.21E+06	7.87	8.36	33.711	1.025	18.310			
220	1.30E+06	1.31E+06	7.87	8.35	33.724	1.026	18.317			
237	1.40E+06	1.41E+06	7.87	8.34	33.735	1.026	18.323			
254	1.50E+06	1.51E+06	7.87	8.34	33.745	1.026	18.328			
271	1.60E+06	1.61E+06	7.87	8.33	33.754	1.026	18.333			
288	1.70E+06	1.71E+06	7.87	8.33	33.761	1.026	18.336			
305	1.80E+06	1.81E+06	7.87	8.32	33.768	1.026	18.340			
322	1.90E+06	1.91E+06	7.87	8.32	33.774	1.026	18.343			
339	2.00E+06	2.01E+06	7.86	8.32	33.779	1.026	18.346			
356	2.10E+06	2.11E+06	7.86	8.32	33.784	1.026	18.349			
373	2.20E+06	2.21E+06	8.21	8.32	33.789	1.026	18.351			
390	2.30E+06	2.31E+06	7.86	8.31	33.793	1.026	18.353			
407	2.40E+06	2.41E+06	7.86	8.30	33.796	1.026	18.355			
424	2.50E+06	2.51E+06	7.86	8.30	33.809	1.026	18.357			
441	2.60E+06	2.61E+06	7.86	8.30	33.803	1.026	18.358			
458	2.70E+06	2.71E+06	7.86	8.30	33.806	1.026	18.360			
475	2.80E+06	2.81E+06	7.86	8.30	33.809	1.026	18.361			
492	2.90E+06	2.91E+06	7.86	8.29	33.811	1.026	18.363			
508	3.00E+06	3.01E+06	7.86	8.29	33.813	1.026	18.364			
525	3.10E+06	3.11E+06	7.86	8.29	33.816	1.026	18.365			
533	3.50E+06	3.51E+06	7.86	8.29	33.823	1.026	18.369			
814	4.80E+06	4.81E+06	7.86	8.28	33.839	1.026	18.377			
1.034	6.10E+06	6.11E+06	7.86	8.27	33.848	1.026	18.382			
1.254	7.40E+06	7.41E+06	7.86	8.27	33.854	1.026	18.385			
1.475	8.70E+06	8.71E+06	7.86	8.27	33.858	1.026	18.388			
1.695	1.00E+07	1.00E+07	7.86	8.26	33.861	1.026	18.389			

Alkaline Product at pH of 12.0, PoPA WQ pH is at 7.5										
Ratio	Volume PoPA L/hr	Total Volume L/hr	pH	Temperature °C	TDS mg/L	Density kg/m³	Cl(-1) mg/L			
0	1.10E+05	1.16E+05	8.06	9.38	32.114	1.024	17.468			
18.6	1.10E+05	2.26E+05	7.94	8.83	32.982	1.025	17.924			
37.3	2.20E+05	2.26E+05	7.94	8.83	32.982	1.025	17.924			
55.9	3.30E+05	3.36E+05	7.92	8.64	33.281	1.025	18.081			
74.6	4.40E+05	4.46E+05	7.91	8.54	33.439	1.025	18.161			
93.2	5.50E+05	5.56E+05	7.87	8.49	33.524	1.025	18.209			
112	6.60E+05	6.66E+05	7.87	8.45	33.586	1.025	18.241			
131	7.70E+05	7.76E+05	7.86	8.42	33.630	1.025	18.264			
149	8.80E+05	8.86E+05	7.86	8.40	33.663	1.025	18.281			
168	9.90E+05	9.96E+05	7.85	8.38	33.688	1.025	18.295			
186	1.10E+06	1.11E+06	7.85	8.37	33.708	1.025	18.306			
203	1.20E+06	1.21E+06	7.85	8.36	33.722	1.025	18.314			
220	1.30E+06	1.31E+06	7.85	8.35	33.735	1.026	18.321			
237	1.40E+06	1.41E+06	7.74	8.34	33.745	1.026	18.327			
254	1.50E+06	1.51E+06	7.72	8.34	33.754	1.026	18.332			
271	1.60E+06	1.61E+06	7.70	8.33	33.762	1.026	18.336			
288	1.70E+06	1.71E+06	7.69	8.33	33.769	1.026	18.340			
305	1.80E+06	1.81E+06	7.68	8.32	33.776	1.026	18.344			
322	1.90E+06	1.91E+06	7.67	8.32	33.781	1.026	18.347			
339	2.00E+06	2.01E+06	7.66	8.32	33.786	1.026	18.350			
356	2.10E+06	2.11E+06	7.65	8.32	33.791	1.026	18.353			
373	2.20E+06	2.21E+06	7.64	8.31	33.795	1.026	18.355			
390	2.30E+06	2.31E+06	7.64	8.31	33.799	1.026	18.357			
407	2.40E+06	2.41E+06	7.63	8.30	33.802	1.026	18.359			
424	2.50E+06	2.51E+06	7.62	8.30	33.806	1.026	18.361			
441	2.60E+06	2.61E+06	7.62	8.30	33.808	1.026	18.362			
458	2.70E+06	2.71E+06	7.61	8.30	33.811	1.026	18.364			
475	2.80E+06	2.81E+06	7.61	8.30	33.814	1.026	18.365			
492	2.90E+06	2.91E+06	7.61	8.30	33.816	1.026	18.366			
508	3.00E+06	3.01E+06	7.60	8.29	33.818	1.026	18.368			
525	3.10E+06	3.11E+06	7.60	8.29	33.820	1.026	18.369			
533	3.50E+06	3.51E+06	7.59	8.29	33.827	1.026	18.373			
814	4.80E+06	4.81E+06	7.56	8.28	33.842	1.026	18.381			
1.034	6.10E+06	6.11E+06	7.54	8.27	33.851	1.026	18.386			
1.254	7.40E+06	7.41E+06	7.54	8.27	33.856	1.026	18.389			
1.475	8.70E+06	8.71E+06	7.53	8.27	33.860	1.026	18.391			
1.695	1.00E+07	1.00E+07	7.53	8.26	33.863	1.026	18.393			

Alkaline Product at pH of 12.0, PoPA WO pH is at 8.4										
Ratio	Volume PoPA L/hr	Total Volume L/hr	pH	Temperature °C	TDS mg/L	Density kg/m³	Cl(-1) mg/L			
0	1.10E+05	1.16E+05	9.32	9.38	31.986	1.024	17.464			
18.6	1.10E+05	2.26E+05	8.71	8.83	32.847	1.025	17.920			
37.3	2.20E+05	2.26E+05	8.71	8.83	32.847	1.025	17.920			
55.9	3.30E+05	3.36E+05	8.59	8.64	33.146	1.025	18.077			
74.6	4.40E+05	4.46E+05	8.54	8.54	33.297	1.025	18.157			
93.2	5.50E+05	5.56E+05	8.50	8.48	33.389	1.025	18.205			
112	6.60E+05	6.66E+05	8.48	8.45	33.450	1.025	18.237			
131	7.70E+05	7.76E+05	8.47	8.42	33.494	1.025	18.260			
149	8.80E+05	8.86E+05	8.46	8.40	33.527	1.025	18.278			
168	9.90E+05	9.96E+05	8.45	8.38	33.553	1.025	18.291			
186	1.10E+06	1.11E+06	8.45	8.37	33.573	1.025	18.302			
203	1.20E+06	1.21E+06	8.44	8.36	33.589	1.025	18.310			
220	1.30E+06	1.31E+06	8.44	8.35	33.602	1.025	18.317			
237	1.40E+06	1.41E+06	8.44	8.34	33.613	1.026	18.323			
254	1.50E+06	1.51E+06	8.43	8.34	33.623	1.026	18.328			
271	1.60E+06	1.61E+06	8.43	8.33	33.631	1.026	18.333			
288	1.70E+06	1.71E+06	8.43	8.33	33.639	1.026	18.336			
305	1.80E+06	1.81E+06	8.43	8.32	33.645	1.026	18.340			
322	1.90E+06	1.91E+06	8.43	8.32	33.651	1.026	18.343			
339	2.00E+06	2.01E+06	8.42	8.32	33.657	1.026	18.346			
356	2.10E+06	2.11E+06	8.42	8.32	33.663	1.026	18.349			
373	2.20E+06	2.21E+06	8.41	8.31	33.668	1.026	18.351			
390	2.30E+06	2.31E+06	8.42	8.31						