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EMISSIONS TEST REPORT

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Title

NSPS EMISSION TEST REPORT FOR A LANDFILL GAS-TO- ENERGY IC ENGINE GENERATOR SET

Report Date

October 3, 2016

Test Date(s)

September 7, 2016

Facility Information				
Name	Waste Management of Michigan, Inc.			
	Northern Oaks Recycling and Disposal Facility			
Street Address	513 County Farm Rd			
City, County	Harrison, Clare			
SRN	N6010			

Renewable Operating Permit No.:	MI-ROP-N6010-2013
Facility Permit Information	

Emission Unit ID	Description	Serial #
EUICENGINE1	CAT G3520C IC Engine	GZJ00666

Testing Contractor					
Company	Derenzo Environmental Services				
Mailing Address	39395 Schoolcraft Road Livonia, MI 48150				
Phone	(734) 464-3880				
Project No.	1601044				





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

OCT 0 5 2016

RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

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EQP 5736 (Rev 11-04)

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Waste	Management of Michiga	an Inc. (N	orthern Oaks)		County Clare
Source Address 513	N. County Farm Road			City	Harrison
AQD Source ID (SRN)	N6010	ROP No.	MI-ROP-N6010- 2013		ROP Section No.
Please check the appropr					
Annual Compliance	Certification (Pursuant to	Rule 213(4)	(c))		. "
1. During the entir	e reporting period, this source of which is identified and inc				nditions contained in the ROP, each d to determine compliance is/are the
term and condition deviation report(s).	of which is identified and in	ncluded by th mine compliar	is reference, EXCEPT nce for each term and	for the	onditions contained in the ROP, each deviations identified on the enclosed in is the method specified in the ROP,
Semi-Annual (or M	ore Frequent) Report Certi	fication (Pu	suant to Rule 213/3\	(c))	
·		incation (i di	suant to Rule 210(5)	(0))	
☐ 1. During the entition	,			ng requir	ements in the ROP were met and no
	se requirements or any othe				nents in the ROP were met and no the deviations identified on the
○ Other Report Certif	ication				
Reporting period (pro Additional monitoring			quired by the ROP are		d as described:
IC engine-EUIC	ENGINE1. The testing	was condu	cted in accordance	e with	the Test Plan
dated July 28,	2016 and MI-ROP-N603	10-2013.	The facility was	operat	ed in compliance
with the permi	t conditions or at th	he maximum	routine operatin	ıg cond	itions.
	nformation and belief forme true, accurate and complete		nable inquiry, the stat	ements	and information in this report and the
Terry Nichols			District Manager	:	989-539-6111
Name of Responsible Q	ficial (print or type)		Title		Phone Number
Kenny flin	kol				10-3-16
Signature of Responsible	Official				Date

* Photocopy this form as needed,

NSPS EMISSION TEST REPORT FOR A LANDFILL GAS-TO- ENERGY RICE GENERATOR SET

WASTE MANAGEMENT OF MICHIGAN NORTHERN OAKS RECYCLING AND DISPOSAL FACILITY

1.0 INTRODUCTION

Waste Management of Michigan, Inc. (WMI) operates one (1) Caterpillar (CAT®) Model No. G3520C gas-fired reciprocating internal combustion engine (RICE) electricity generator set at the Northern Oaks Recycling and Disposal Facility (RDF) in Harrison, Clare County, Michigan. The treated landfill gas (LFG) fueled RICE generator set is identified as emission unit EUICENGINE1 in Renewable Operating Permit (ROP) MI-ROP-N6010-2013 issued by the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD).

Pursuant to the requirements of the federal Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR Part 60 Subpart JJJJ) §60.4243(a)(2)(ii), WMI is required to perform testing for specific regulated air pollutant emissions exhausted from the RICE within 180 days of startup and every 8760 operating hours or three years, whichever comes first.

EUICENGINE1 was most recently tested on September 9, 2015. Since that time the engine has been replaced with an identical unit as part of the facility's routine maintenance practices as indicated in the written notice submitted to MDEQ-AQD on July 14, 2016. The replacement engine commenced operation on July 22, 2016.

The performance testing for emission unit EUICENGINE1 was conducted on September 7, 2016 by Derenzo Environmental Services (DES), an environmental consulting and testing company in Livonia, Michigan. Daniel Wilson and Jason Logan of DES performed the testing. Keith Hayes of WMI assisted with process coordination and operating parameter data acquisition. MDEQ-AQD representatives Jeremy Howe and Gina McCann were on site to witness the test event.

The compliance demonstration consisted of triplicate, one-hour test runs for the determination of nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compound (VOC, as non-methane hydrocarbons) mass emission rates. The exhaust gas sampling and analysis was performed using procedures specified in the Test Protocol dated July 28, 2016, and approved by the MDEQ-AQD on August 12, 2016.

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Questions regarding this emission test report should be directed to:

Jason Logan
Environmental Consultant
Derenzo Environmental Services

39395 Schoolcraft Road Livonia, MI 48150 (734) 464-3880 Ms. Debora L. Johnston Environmental Engineer

Waste Management of Michigan, Inc.

Northern Oaks Landfill 513 County Farm Road Harrison, MI 48625 (989) 308-6967

Report Certification

This test report was prepared by Derenzo Environmental Services based on field sampling data collected by DES. Facility process data was collected and provided by WMI employees or representatives.

This test report has been reviewed by WMI representatives and approved for submittal to the MDEQ-AQD.

I certify that the testing was conducted in accordance with the approved test plan unless otherwise specified in this report. I believe the information provided in this report and its attachments are true, accurate, and complete.

Report Prepared By:

Daniel Wilson

Environmental Consultant

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Derenzo Environmental Services

Reviewed By:

Robert L. Harvey, P.E.

General Manager

Derenzo Environmental Services

2.0 <u>SUMMARY OF RESULTS</u>

Emission testing was performed on September 7, 2016 on one (1) LFG-fueled RICE-generator set (identified as EUICENGINE1) to determine exhaust gas concentrations of NOx, CO and VOC. Exhaust gas velocity, moisture, oxygen (O₂) content, and carbon dioxide (CO₂) content was determined for each test period to calculate pollutant mass emission rates.

The testing was performed while the RICE-generator set operated at normal base load conditions (i.e., within 10% of peak electricity output, 1,600 kW). Test results and applicable emission limits are provided in the following table. The test results demonstrate compliance with emission limits specified in 40 CFR Part 60, Subpart JJJJ and MI-ROP-N6010-2013.

2.1 Summary of measured air pollutant emission rates and permitted limits

Pollutant	Results for EUICENGINE1 (g/bhp-hr)	Emission Limits (g/bhp-hr)
NOx	0.69	1.50 g/bhp (ROP-N6010-2013) 2.0 g/bhp-hr (NSPS JJJJ)
СО	2.65	4.15 g/bhp (ROP-N6010-2013) 5.0 g/bhp-hr (NSPS JJJJ)
VOC	0.07	1.0 g/bhp (ROP-N6010-2013) 1.0 g/bhp-hr (NSPS JJJJ)

3.0 SOURCE AND SAMPLING LOCATION DESCRIPTION

3.1 General Process Description

Landfill gas (LFG) is produced in the Northern Oaks RDF from the anaerobic decomposition of disposed waste materials. The LFG is collected from active landfill cells using a system of wells that are connected to a central header (gas collection system). The collected LFG is treated and used as fuel for the CAT® Model No.G3520C RICE-generator set that produces electricity for transfer to the local utility.

3.2 Rated Capacities, Type and Quantity of Raw Materials Used

The Caterpillar (CAT®) G3520C engine is a spark ignition, lean-burn, reciprocating internal combustion engine fueled by treated LFG. The RICE-generator set has an engine power rating of 2,233 hp at 100% load and a generator power rating of 1,600 kW. The CAT G3520C RICE was tested while operating at baseload conditions, within 10% of the maximum electricity generation

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rate of 1,600 kW. Fuel consumption is regulated to maintain the required heat input rate to support engine operations and is dependent on the fuel heat value (methane content).

3.3 Emission Control System Description

The CAT® G3520C RICE uses an electronic air-to-fuel ratio controller to fire lean fuel mixtures and produce low combustion by-product emissions. Emissions from the combustion of LFG are released uncontrolled into the ambient air through a stack connected to the RICE exhaust manifold and noise control system (noise muffler).

3.4 Sampling Locations (USEPA Method 1)

The exhaust stack sampling port for the Model G3520C RICE satisfied the USEPA Method 1 criteria for a representative sample location. The inner diameter of the engine exhaust stack is 15.5 inches at the sampling location. Each stack is equipped with two (2) sample ports, opposed 90°, that provide a sampling location 36 inches (2.3 duct diameters) downstream and 92 inches (5.9 duct diameters) upstream from any flow disturbance.

Velocity pressure traverse locations for the sampling points were determined in accordance with USEPA Method 1 for the engine exhaust.

Figure 1 presents the performance test sampling and measurement locations.

4.0 SAMPLING AND ANALYTICAL PROCEDURES

A test protocol for the compliance testing was prepared by DES and reviewed by the MDEQ-AQD. This section provides a summary of the sampling and analytical procedures that were used during the test and presented in the test plan.

Appendix A provides a copy of the MDEQ-AQD test protocol approval letter.

4.1 Exhaust Gas Velocity and Flowrate Determination (USEPA Method 2)

RICE exhaust stack gas velocities and volumetric flow rates were determined using USEPA Method 2 during each 60-minute test period. An S-type Pitot tube connected to a red-oil manometer was used to determine velocity pressure. Gas temperature was measured using a K-type thermocouple mounted to the Pitot tube. The Pitot tube and connective tubing were leak-checked to verify the integrity of the measurement system.

Exhaust gas velocity pressure and temperature were measured before and after each one-hour sampling period in accordance with USEPA Method 2.

4.2 Exhaust Gas Molecular Weight Determination (USEPA Method 3A)

CO₂ and O₂ content in the RICE exhaust was measured continuously throughout each one-hour test period in accordance with USEPA Method 3A. The CO₂ content of the exhaust was monitored using a non-dispersive infrared (NDIR) gas analyzer. The O₂ content of the exhaust was monitored using a gas analyzer that utilizes a Paramagnetic sensor.

During each one-hour sampling period, a continuous sample of the RICE exhaust gas stream was extracted from the stack using a stainless steel probe connected to a Teflon® heated sample line. The sampled gas was conditioned by removing moisture prior to being introduced to the analyzer; therefore, measurement of O₂ and CO₂ concentrations correspond to standard dry gas conditions. The instrument was calibrated using appropriate calibration gases to determine accuracy and system bias (described in Section 5.0 of this document).

Figure 2 presents a diagram of the instrument analyzer sampling train.

4.3 Exhaust Gas Moisture Content Determinations (Method 4)

Moisture content of the RICE exhaust gas was determined in accordance with USEPA Method 4 using a chilled impinger sampling train. Exhaust gas moisture content measurements were performed concurrently with the instrumental analyzer sampling periods. At the conclusion of each sampling period the moisture gain in the impingers was determined gravimetrically by weighing each impinger to determine net weight gain.

Figure 3 presents a schematic of the moisture sampling train.

4.4 NOx and CO Concentration Measurements (USEPA Method 7E and 10)

NOx and CO pollutant concentrations in the RICE exhaust were determined using a chemiluminescence NOx analyzer and NDIR CO analyzer.

Three (3) one-hour sampling periods were performed for the RICE exhaust testing. Throughout each one-hour test period, a continuous sample of the engine exhaust gas was extracted from the stack using the Teflon® heated sample line and gas conditioning system described in Section 4.2 of this document, and delivered to the instrumental analyzers. Instrument response for each analyzer was recorded on a data logging system that monitored the analog output of the instrumental analyzers continuously and logged data as one-minute averages. Prior to, and at the conclusion of each test, the instruments were calibrated using appropriate upscale calibration and zero gas to determine analyzer calibration error and system bias.

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4.5 VOC Concentration Measurements (USEPA Method 25A and ALT 096)

VOC emission rate was determined by measuring the nonmethane hydrocarbon (NMHC) concentration in the RICE exhaust gas. NMHC pollutant concentration was determined using a Thermo Environmental Instruments (TEI) Model 55i Methane / Nonmethane hydrocarbon analyzer. The TEI 55i analyzer contains an internal gas chromatograph column that separates methane from non-methane components and has been approved by the USEPA for measuring VOC relative to 40 CFR Part 60 Subpart JJJJ compliance test demonstrations (Alternative Test Method 096 or ALT-096). The concentration of NMHC in the sampled gas stream, after separation from methane, is determined relative to a propane standard using a flame ionization detector in accordance with USEPA Method 25A.

Samples of the exhaust gas were delivered directly to the instrumental analyzer using the Teflon® heated sample line to prevent condensation. The sample to the NHMC analyzer was not conditioned to remove moisture. Therefore, VOC measurements correspond to standard conditions with no moisture correction (wet basis).

The instrumental analyzer was calibrated using certified propane concentrations in hydrocarbonfree air to demonstrate detector linearity and determine calibration drift and zero drift error.

5.0 QA/QC ACTIVITIES

5.1 Flow Measurement

Prior to arriving onsite, the instruments used during the source test to measure exhaust gas properties and velocity (barometer, pyrometer, and Pitot tube) were calibrated to specifications in the sampling methods.

The absence of cyclonic flow for each sampling location was verified using an S-type Pitot tube and oil manometer. The Pitot tube was positioned at each of the velocity traverse points with the planes of the face openings of the Pitot tube perpendicular to the stack cross-sectional plane. The Pitot tube was then rotated to determine the null angle (rotational angle as measured from the perpendicular, or reference, position at which the differential pressure is equal to zero).

5.2 NOx Converter Efficiency Test

The NO_2 – NO conversion efficiency of the TEI Model 42C instrumental analyzer was verified prior to the commencement of the performance tests. The instrument analyzer NO_2 – NO converter uses a catalyst at high temperatures to convert the NO_2 to NO for measurement. A USEPA Protocol 1 certified NO_2 calibration gas was used to verify the efficiency of the NO_2 – NO converter.

The $NO_2 - NO$ conversion efficiency test satisfied the USEPA Method 7E criteria (the calculated $NO_2 - NO$ conversion efficiency is greater than or equal to 90%).

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5.3 Calibration Gas Divider Field Validation

A STEC Model SGD-710C 10-step gas divider was used to obtain appropriate calibration span gases. The ten-step STEC gas divider was NIST certified (within the last 12 months) with a primary flow standard in accordance with Method 205. When cut with an appropriate zero gas, the ten-step STEC gas divider delivered calibration gas values ranging from 0% to 100% (in 10% step increments) of the USEPA Protocol 1 calibration gas that was introduced into the system. The field evaluation procedures presented in Section 3.2 of Method 205 were followed prior to use of gas divider. The field evaluation yielded no errors greater than 2% of the triplicate measured average and no errors greater than 2% from the expected values.

5.4 Sampling System Response Time Determination

The response time of the sampling system was determined prior to the compliance test program by introducing upscale gas and zero gas, in series, into the sampling system using a tee connection at the base of the sample probe. The elapsed time for the analyzer to display a reading of 95% of the expected concentration was determined using a stopwatch.

Sampling periods did not commence until the sampling probe had been in place for at least twice the system response time.

5.5 Instrumental Analyzer Interference Check

The instrumental analyzers used to measure NOx, CO, O₂ and CO₂ have had an interference response test performed prior to their use in the field, pursuant to the interference response test procedures specified in USEPA Method 7E. The appropriate interference test gases (i.e. gases that would be encountered in the exhaust gas stream) were introduced into each analyzer, separately and as a mixture with the analyte that each analyzer is designed to measure. All of analyzers exhibited a composite deviation of less than 2.5% of the span for all measured interferent gases. No major analytical components of the analyzers have been replaced since performing the original interference tests.

5.6 Instrument Calibration and System Bias Checks

At the beginning of each field test day, initial three-point instrument calibrations were performed for the NOx, CO, CO₂ and O₂ analyzers by injecting calibration gas directly into the inlet sample port for each instrument. System bias checks were performed prior to and at the conclusion of each sampling period by introducing the upscale calibration gas and zero gas into the sampling system (at the base of the stainless steel sampling probe prior to the particulate filter and Teflon® heated sample line) and determining the instrument response against the initial instrument calibration readings.

At the beginning of each test day, appropriate high-range, mid-range, and low-range span gases followed by a zero gas were introduced to the NMHC analyzer, in series at a tee connection,

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which is installed between the sample probe and the particulate filter, through a poppet check valve. After each one hour test period, mid-range and zero gases were re-introduced in series at the tee connection in the sampling system to check against the method's performance specifications for calibration drift and zero drift error.

The instruments were calibrated with USEPA Protocol 1 certified concentrations of CO₂, O₂, NOx, and CO in nitrogen and zeroed using hydrocarbon free nitrogen. The NMHC (VOC) instrument was calibrated with USEPA Protocol 1 certified concentrations of propane in air and zeroed using hydrocarbon-free air. A STEC Model SGD-710C ten-step gas divider was used to obtain intermediate calibration gas concentrations as needed.

5.7 Determination of Exhaust Gas Stratification

A stratification test for the RICE exhaust stack gas was performed as part of the first test period. The stainless steel sample probe was positioned at sample points correlating to 16.7, 50.0 (centroid) and 83.3% of the stack diameter. Pollutant concentration data were recorded at each sample point for a minimum of twice the maximum system response time.

The recorded data for the RICE exhaust stack gas indicate that the measured CO, CO₂ and O₂ concentrations did not vary by more than 5% of the mean across the stack diameter. Therefore, the stack gas was considered to be unstratified and the compliance test sampling was performed at a single sampling location within the engine exhaust stack.

5.8 Meter Box Calibrations

The dry gas meter sampling console used for moisture testing was calibrated prior to and after the testing program. This calibration uses the critical orifice calibration technique presented in USEPA Method 5. The metering console calibration exhibited no data outside the acceptable ranges presented in USEPA Method 5.

The digital pyrometer in the metering console was calibrated using a NIST traceable Omega® Model CL 23A temperature calibrator.

Appendix E presents test equipment quality assurance data ($NO_2 - NO$ conversion efficiency test data, instrument calibration and system bias check records, calibration gas certifications, interference test results, meter box calibration records, and Pitot tube calibration records).

6.0 TEST RESULTS AND DISCUSSION

6.1 Purpose and Objectives of the Tests

Renewable Operating Permit MI-ROP-N6010-2013 and 40 CFR 60.4243(b)(2)(ii) [40 CFR Part 60 Subpart JJJJ] specify that owners and operators of new stationary spark-ignited engines with a power rating greater than 500 horsepower must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

EUICENGINE1 was most recently tested on September 9, 2015. Since that time the engine has been replaced with an identical unit as part of the facility's routine maintenance practices as indicated in the written notice submitted to MDEQ-AQD on July 14, 2016. The replacement engine commenced operation on July 22, 2016. The engine run-hour meter at the beginning of Test No. 1 indicated 1,051 hours.

6.2 Operating Conditions During the Compliance Test

The LFG-fueled RICE was operated at an electricity generation rate of slightly over 1,600 kW during the compliance test periods.

Engine output (bhp) cannot be measured directly. Therefore, it is calculated based on the recorded electricity output, the generator efficiency (96.1%), and the unit conversion factor for kW to horsepower (0.7457 kW/hp). The following equation was used to calculate average engine horsepower for each test period based on a linear relationship between engine output and electricity generator output:

Engine output (bhp) = Electricity output (kW) / (0.96) / (0.7457 kW/hp)

In addition to electricity generation rate, the following process operating data were monitored and recorded during each test run at 15-minute intervals:

- LFG fuel flow rate to EUICENGINE1 (scfm)
- LFG fuel flow to Leachate Evaporator (scfm)
- LFG fuel flow to Flare (scfm)
- LFG methane content (%CH₄)

Fuel flow data were recorded using the permanently-installed fuel flow meters installed and operated by WMI. LFG methane content was measured and recorded by the on-site gas chromatograph.

Appendix B provides process data collected during the compliance test periods.

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6.3 Air Pollutant Sampling Results

The LFG-fueled RICE exhaust was monitored for three (3) one-hour test periods, during which the NOx, CO, VOC, O₂, and CO₂ concentrations were measured using instrumental analyzers. The measured pollutant concentrations were adjusted based on instrument calibrations performed prior to and following each test period (drift and bias corrected pursuant to equations in specified in the USEPA reference test methods).

Exhaust gas moisture content was determined by gravimetric analysis of the weight gain in chilled impingers in accordance with USEPA Method 4. Exhaust gas velocity was measured prior to and following each one hour test period. The calculated exhaust gas volumetric flowrate (average of the pre-test and post-test measurements) was used to calculate NOx, CO and VOC mass emission rates based on the measured pollutant concentrations (parts per million by volume).

Table 6.1 presents measured exhaust gas conditions and calculated air pollutant emission rates for each one hour test period.

Appendix C provides computer calculated and field data sheets for the RICE test periods.

Appendix D provides raw instrumental analyzer response data for each test period.

6.4 Variations from Normal Sampling Procedures or Operating Conditions

The compliance tests for all pollutants were performed in accordance with the Test Protocol dated July 28, 2016; the USEPA ALT-096 Approval Letter dated August 13, 2015, and the specified USEPA test methods.

Instrument calibrations and sampling period results satisfied the quality assurance verifications required by USEPA Methods 3A, 7E, 10, and ALT 096. No variations from the normal operating conditions of the RICE occurred during the testing program.

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Table 6.1 Measured exhaust gas conditions and air pollutant emission rates for the CAT® G3520C LFG-fueled engine, EUICENGINE1

1	2	3	
09/07/16	09/07/16	09/07/16	Test
9:30-10:30	11:00-12:00	12:30-13:30	Avg.
1 622	1.618	1617	1,619
	•	•	2,259
•		·	521
			51.2
			466
			45
277	289	294	287
11.5	11.5	11.4	11.5
			7.65
13.9	13.8	13.5	13.7
908	907	907	907
			4,770
4,135	4,108	4,112	4,119
116	117	118	117
3.43	3.43	3.46	3.44
0.69	0.69	0.70	0.69
	•••		1.50
730	733	737	733
13.2	13.1	13.2	13.2
2.64	2.64	2.66	2.65
			4.15
12.0	10.1	10.5	10.8
0.39	0.33	0.34	0.35
0.08	0.07	0.07	0.07 1.0
	09/07/16 9:30-10:30 1,622 2,264 525 51.1 465 34 277 11.5 7.64 13.9 908 4,799 4,135 116 3.43 0.69	09/07/16 09/07/16 9:30-10:30 11:00-12:00 1,622 1,618 2,264 2,258 525 520 51.1 51.3 465 467 34 54 277 289 11.5 7.64 13.9 13.8 908 907 4,799 4,757 4,135 4,108 116 117 3.43 3.43 0.69 0.69 730 733 13.2 13.1 2.64 2.64	09/07/16 09/07/16 09/07/16 9:30-10:30 11:00-12:00 12:30-13:30 1,622 1,618 1,617 2,264 2,258 2,256 525 520 519 51.1 51.3 51.3 465 467 467 34 54 46 277 289 294 11.5 11.5 11.4 7.64 7.65 7.66 13.9 13.8 13.5 908 907 907 4,799 4,757 4,754 4,135 4,108 4,112 116 117 118 3.43 3.43 3.46 0.69 0.69 0.70 730 733 737 13.2 13.1 13.2 2.64 2.64 2.66





