

Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit

REVIEW REPORT

Emerald Forest Products, Plant #1

Permit No. 202528

1. General Background Information

Emerald Forest Products (EFP), Plant #1 operates a veneer-drying and plywood production facility in Eugene, Oregon. The facility was constructed in 1953. EFP operates saws, hogs, and other wood-processing equipment, two (2) steam-heated veneer dryers, one (1) gas-fired veneer dryer, and five (5) plywood presses. The facility uses a pneumatic transfer system consisting of a cyclone and two baghouses to control hogged material and sawdust. Material passing through the cyclone is transferred to two (2) target boxes, from which material is loaded onto trucks and shipped off site. The facility uses a Burley scrubber to control PM emissions from the steam-heated veneer dryers and a Burley scrubber to control PM emissions from the gas-fired veneer dryer. In 2003 the amount of veneer dried at the facility was about 4,000,000 square feet (3/8" basis) and the amount of plywood produced was about 268,000,000 square feet (3/8" basis). The average hourly plywood production for 1998 was greater than 25,000 square feet per hour (3/8" basis), and the maximum hourly design rate for the plywood presses is about 40,000 square feet per hour (3/8" basis). The facility operates one (1) gas- or diesel-fired boiler, which was installed in 1994.

2. Reasons for Permit Action

The facility operates a process listed in Table 1, Part B of LRAPA Rule 37, and is therefore required to obtain a permit. The facility's permit expired on March 31, 2009. The primary reason for the permit issuance is to renew the expired permit.

As part of the prior renewal, the most recent emission factors for veneer dryers and plywood presses were applied for emissions estimations. Based on use of these emission factors, the potential to emit (PTE) for Hazardous Air Pollutants (HAPs) exceeds the major source thresholds for both the single HAP limit (10 tons/year) and combination of HAPs (25 tons/year). The emission estimations also shows that the facility is potentially a major source for VOCs as the estimated PTE from the facility exceeded 100 tons per year for VOC.

However, based on recordkeeping maintained by EFP, actual emissions have not exceeded a Title V threshold. The emission factors used to re-determine the PTE for many of the HAPs and VOCs were taken from LRAPA general permit emission factors. The emission factors were primarily developed by NCASI and use the highest emission factor for each type of wood species. Since, according to the application, the facility dries a hodgepodge of wood species (including approximately 60% fir, 28% whitewoods, 6% pine, and 5% hardwoods), the use of conservative factors is justified.

The permit was changed from a synthetic minor ACDP to Standard ACDP during 2009 to reflect the new permit classification type under LRAPA's rules. This renewal maintains the federally enforceable limits on the potential to emit in order to ensure that the facility does not become a major source without first obtaining a Title V permit.

3. Enforcement History

Following is a summary of the enforcement activity related to the facility.

In December of 2001, EFP notified LRAPA that, due to the cost differential of their natural gas contract compared to diesel fuel, they would need to re-evaluate their permit limits. Because they were burning

diesel in the boiler at the time and would exceed the permit limit in late January of 2002, EFP and LRAPA signed SFO 02-2346 to allow EFP to continue burning diesel oil during the period of time EFPs permit was being modified.

4. Performance Test Results

On March 4, 1994, EFP tested NO_x emissions to verify emission factors from the natural gas-fired boiler. The results were: 67 ppm_v, 2.4 lb/hr, and 0.10 lb/MMBtu.

The Veneer Dryer at Plant No.1 was tested on October 3, 2000 to verify emission factors for PM/ PM₁₀ and VOC. The results showed that emissions from VOC (as total gaseous organic compounds) were 0.30 lb/M square feet (3/8" basis) and PM/PM₁₀ emissions were 0.194 lb/M square feet (3/8" basis). The dryer was drying approximately 9,520 square feet per hour on a 3/8" basis during the testing. PM and PM₁₀ amounts are assumed to be equal as per ODEQ guidance which states that all PM is PM₁₀ from veneer dryers with scrubbers.

The facility tested one of the plywood presses for three different HAPs on February 28, 2006. The totals of Formaldehyde, Methanol and Phenol were 0.0007 lbs/MSF 3/8" basis, 0.018 lbs/MSF 3/8" basis, and non-detect, respectively.

5. Plant Site Emission Limits (PSELs)

Baseline Emission Rate (BER)

The baseline emissions for the facility were established during a previous permitting action but were revised for this previous renewal to reflect emission estimates based upon the most current emission factors. They have not been revised for this renewal. The factor to estimate PM from hog fueled boilers was updated and the baseline emission rate was lowered based upon this use of the updated factor. The VOC baseline emission rate was also updated to account for the more recent (2002) emission factors for veneer dryers to be consistent with revised use of factors.

Pollutant	Baseline Emission Rate (tons/year)
PM	121
PM ₁₀	85
SO ₂	2.5
NO _x	55
CO	527
VOC	177

Proposed Plant Site Emission Limits

The PSELs in the permit will be set at the Generic PSEL level in accordance with LRAPA Title 42. The projected emissions from the facility are contained in the attached emission calculation sheets.

To qualify for synthetic minor status, EFP requested that the annual PSEL for VOC be set at one ton minus the 100 ton per year major source threshold. The annual PSELs for PM, and PM₁₀ were changed from the values in the previous permit to reflect the values determined in the October 3, 2000 source test (which results in a decrease in the pollutants). The annual PSEL for SO₂ was set at baseline plus 39 tons (41 tons) to allow use of #2 fuel oil but to avoid major new source review. The following table summarizes the annual (12-month rolling) PSELs. All values have been rounded to the next highest whole ton.

Source	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Single HAP	Total HAP
Total	49	48	41	39	99	99	9	24

The BERs (Baseline Emission Rates), netting baseline, and previous and proposed PSEL are shown below.

Pollutant	Baseline Emission Rate (ton/yr)	Netting Baseline (ton/yr)	Plant Site Emission Limit (PSEL)		
			Previous PSEL (ton/yr)	Proposed PSEL (ton/yr)	Unassigned Emissions*
PM	121	121	49	49	72
PM ₁₀	85	85	48	48	72
SO ₂	3	3	41	41	0
NO _x	55	55	29	39	16
CO	527	527	12	99	428
VOC	177	177	99	99	78

*Unassigned emissions are established with this renewal and shall expire July 1, 2010 in accordance with LRAPA 42-0045. Upon expiration the unassigned emissions are reduced to no more than the SER for each pollutant in LRAPA Title 12, Table 2.

6. Other Emission Limitations

In addition to LRAPA's general process weight rule, LRAPA 33-060(3)(B) limits particulate matter emissions from veneer and plywood production to one (1) pound per 1000 square feet of veneer or plywood (excluding veneer dryers, fuel-burning equipment, and refuse-burning equipment). The PM emissions from the source are far below this limit.

The permit includes general visible emissions limitations for the facility in addition to specific visible emission limitations for veneer dryers. The permit includes the LRAPA 32-015 and 32-030 general grain-loading limitations (0.2 gr/dscf) for the facility in addition to a specific grain-loading limitation for new combustion sources (0.1 gr/dscf).

7. Hazardous Air Pollutants

The projected HAP emissions from the facility are contained in the attached emission calculation sheets. Based on a combination of ODEQ General Permit Emission factors, source test data, and NCASI bulletin #768, the facility has the potential to become a major source for HAPs. The permit contains limits on single and total HAPs and requires monthly calculations on HAPs to ensure compliance with the HAP PSEL. There are no additional federal requirements for HAP limits that apply to this facility.

Pollutant	Potential Emissions (tons/yr)	Projected Actual Emissions (tons/yr)
Acetaldehyde	10.43	3.8
Acrolein	1.43	1.6
Formaldehyde	3.93	1.4
Methanol	9.41	4.9
Phenol	1.59	0.5
Propionaldehyde	15.51	4.7
TOTAL HAPs	42.31	16.9

8. Typically Achievable Control Technology (TACT)

LRAPA Title 32-008 requires an existing emission unit at a facility to meet TACT if the emissions unit has emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutant or five (5) tons per year of particulate, the emissions unit is not subject to the emissions standards under LRAPA Title 32, Title 33, Title 39, or Title 46 for the pollutants emitted, and the facility is required to have a permit. Because the veneer dryers, plywood presses and supporting pneumatic transfer system equipment are subject to the requirements in LRAPA 33-060(3)(B) and because the boiler is subject to the requirements in LRAPA 32-030, there are no emission units subject to TACT.

9. New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

Because the proposed increases above baseline rates for all regulated pollutants are below the Significant Emission Rates (SERs) in LRAPA Title 38, the facility is not subject to LRAPA's New Source Review (NSR) requirements.

10. New Source Performance Standards (NSPS)

Because the boiler's rated capacity is between 10 MM BTU/hr and 100 MM BTU/hr (42.8 MM BTU/hour) and was constructed after June 9, 1989 (1994), the boiler is subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60 Subparts A and Dc), including, but not limited to, record keeping of fuel usage and annual reporting.

As stated in the NSPS and LRAPA 32-065(2)(B), the sulfur content in the fuel oil may not exceed 0.5% by weight. The facility is allowed to demonstrate compliance with this rule by fuel supplier certification.

11. Continuous Compliance

To ensure compliance with the 12-month rolling PSELs, and as required by the NSPS, the facility is required to keep a record of the production, material throughput, and gas and oil usage for a period of two (2) years. The facility is also required to perform monthly calculations and submit annual reports.

The PM emissions from the unpaved haul roads are not included in the PSEL demonstration for the source since the emissions are only 1% of the total annual PM PSEL. The PM and PM₁₀ continuous compliance calculations assume a constant amount is emitted by the pneumatic transfer system. Since the totals of PM and PM₁₀ from the system are relatively small (0.8 and 0.4 tons/year, respectively), this assumption is reasonable for continuous compliance PSEL calculations.

12. Reporting Requirements

As required by the NSPS Subpart Dc for fuel supplier certification, the facility shall submit quarterly reports of the use of No.2 oil for quarters when No. 2 oil is used. By February 15th of each year the facility is required to submit an annual report showing the calculations for compliance with the PSELs.

13. Public Notice

The draft permit was on public notice from July 1, 2010 to August 4, 2010. No written comments were submitted during the 35-day comment period.

Appendix A - Emission Factors

Boiler

Pollutants	Diesel	
	Emission Factors	Units
SO2	71	lb/1000gal
NOx	20	lb/1000gal
CO	5	lb/1000gal
PM	3.3	lb/1000gal
PM10	1.3	lb/1000gal
NMTOC	0.2	lb/1000gal

Pollutants	Natural Gas	
	Emission Factors	Units
SO2	1.7	lb/1E6CF
NOx	100	lb/1E6CF
CO	84	lb/1E6CF
PM/PM10	2.5	lb/1E6CF
VOC	5.5	lb/1E6CF

Steam-Heated Dryer (2 Total)

Heated Zone Pollutants	Emission Factor	
PM/PM10	0.560	lb/1000 square feet, 3/8" basis
VOC	1.8	lb/1000 square feet, 3/8" basis
Acetaldehyde	0.022	lb/1000 square feet, 3/8" basis
Acrolein	0.001	lb/1000 square feet, 3/8" basis
Formaldehyde	0.07	lb/1000 square feet, 3/8" basis
Methanol	0.120	lb/1000 square feet, 3/8" basis
Phenol	0.003	lb/1000 square feet, 3/8" basis
Propionaldehyde	ND	lb/1000 square feet, 3/8" basis

Cooling Zone Pollutants	Emission Factor	
VOC	1.800	lb/1000 square feet, 3/8" basis
Acetaldehyde	0.017	lb/1000 square feet, 3/8" basis
Acrolein	0.001	lb/1000 square feet, 3/8" basis
Formaldehyde	0.014	lb/1000 square feet, 3/8" basis
Methanol	0.039	lb/1000 square feet, 3/8" basis
Phenol	0.003	lb/1000 square feet, 3/8" basis
Propionaldehyde	0.002	lb/1000 square feet, 3/8" basis

Fugitive Pollutants	Emission Factor	
VOC	0.06	lb/1000 square feet, 3/8" basis
Acetaldehyde	0.005	lb/1000 square feet, 3/8" basis
Formaldehyde	0.001	lb/1000 square feet, 3/8" basis
Methanol	0.01	lb/1000 square feet, 3/8" basis
Phenol	0.006	lb/1000 square feet, 3/8" basis

Gas-Fired Veneer Dryers (1 Total)

	Emission Factor	
PM/PM10	0.29	lb/1000 square feet, 3/8" basis
NOx	0.12	lb/1000 square feet, 3/8" basis
CO	0.02	lb/1000 square feet, 3/8" basis
VOC	0.47	lb/1000 square feet, 3/8" basis
Methanol	0.014	lb/1000 square feet, 3/8" basis
Formaldehyde	0.026	lb/1000 square feet, 3/8" basis

Heated Zone Pollutants	Emission Factor	
VOC	used test result	
Acetaldehyde	0.062	lb/1000 square feet, 3/8" basis
Acrolein	0.012	lb/1000 square feet, 3/8" basis
Phenol	0.006	lb/1000 square feet, 3/8" basis
Propionaldehyde	0.2300	lb/1000 square feet, 3/8" basis

Cooling Zone Pollutants	Emission Factor	
VOC	used test result	
Acetaldehyde	0.062	lb/1000 square feet, 3/8" basis
Acrolein	0.009	lb/1000 square feet, 3/8" basis
Phenol	0.006	lb/1000 square feet, 3/8" basis
Propionaldehyde	ND	lb/1000 square feet, 3/8" basis

Fugitive Pollutants	Emission Factor	
VOC	0.046	lb/1000 square feet, 3/8" basis
Acetaldehyde	0.003	lb/1000 square feet, 3/8" basis
Formaldehyde	0.002	lb/1000 square feet, 3/8" basis
Methanol	0.006	lb/1000 square feet, 3/8" basis
Phenol	0.01	lb/1000 square feet, 3/8" basis

Plywood Presses

Pollutant	Emission Factor	Factor Units
VOC	0.085	lb/MSF
Acetaldehyde	0.007	lb/MSF
Acrolein	0.009	lb/MSF
Formaldehyde	0.00124	lb/MSF
Phenol	0.000	lb/MSF
Methanol	0.023	lb/MSF
Propionaldehyde	0.002	lb/MSF

Pneumatic Transfer System

Cyclone/Baghouses	Annual	Daily	Emission	Annual	Annual	
	Throughput (BDT)	Throughput (BDT)	Factor (lbs PM10/BDT)	PM Emissions (tons)	PM/PM10 Ratio	Annual PM10 Emissions (tons)
	1.56E+04	4.50E+01	1.00E-02	7.75E-03	1.00E+00	7.75E-03

Target Box	Annual	Daily	Emission	Annual	Annual	
	Throughput (BDT)	Throughput (BDT)	Factor (lbs PM10/BDT)	PM Emissions (tons)	PM/PM10 Ratio	Annual PM10 Emissions (tons)
	1.56E+04	4.50E+01	1.00E-01	7.75E-01	5.00E-01	3.88E-01

Total Emissions	TOTAL PSELE			0.8	0.4	
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Formulas
 Annual Emissions = Annual Cyclone Throughput x Emission Factor x ton/2000 lbs
 Annual PM10 Emissions = Annual Emissions x PM/PM10 Ratio
 Note
 Emission factors and PM/PM10 ratio from DEQ Permitting and Inspection Manual (11/93).

Boiler (42.87 MM BTU/hr)

Pollutants	Diesel	Emission Factors	Units
	SO2	71	lb/1000gal
NOx	20	lb/1000gal	
CO	5	lb/1000gal	
PM	3.3	lb/1000gal	
PM10	1.3	lb/1000gal	
VOC	0.2	lb/1000gal	

Pollutants	Natural Gas	Emission Factors	Units
	SO2	1.7	lb/MBTU
NOx	100	lb/MBTU	
CO	64	lb/MBTU	
PM/PM10	2.5	lb/MBTU	
VOC	5.5	lb/MBTU	

Pollutant	2004 Actual	2004 Actual
	Annual Emissions (tons/yr)	Annual Emissions (tons/yr)
SO2	41.0	14.9
NOx	20.5	0.2
CO	10.4	0.0
TSP	2.1	0.8
PM10	1.0	1.0
VOC	0.8	0.0

Annual Emissions Based on 1,150,000 gals diesel 176 MMCF/yr Natural Gas

Veneer Dryers

Steam-Heated Dryer (2 Total)

Maximum Throughput	5.5	Mscft 3/8"/hr	
Maximum Throughput	48180.0	Mscft 3/8"/hr	at 8760 hours/year
Actual 2004 Throughput	16608.0	Mscft 3/8"/hr	

Heated Zone Pollutants	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
PM/PM10	0.560	13.5	4.7	DEQ General ACDP
VOC	1.8	43.4	14.9	DEQ General ACDP
Acetaldehyde	0.022	0.5	0.2	DEQ General ACDP
Acrolein	0.001	0.0	0.0	DEQ General ACDP
Formaldehyde	0.07	1.7	0.8	DEQ General ACDP
Methanol	0.120	2.9	1.0	DEQ General ACDP
Phenol	0.003	0.1	0.0	DEQ General ACDP
Propionaldehyde	ND			DEQ General ACDP

Cooling Zone Pollutants	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
VOC	1.8	43.4	14.9	DEQ General ACDP
Acetaldehyde	0.017	0.4	0.1	DEQ General ACDP
Acrolein	0.001	0.0	0.0	DEQ General ACDP
Formaldehyde	0.014	0.3	0.1	DEQ General ACDP
Methanol	0.038	0.9	0.3	DEQ General ACDP
Phenol	0.003	0.1	0.0	DEQ General ACDP
Propionaldehyde	0.002	0.0	0.0	DEQ General ACDP

Fugitive Pollutants	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
VOC	0.08	1.4	0.5	DEQ General ACDP
Acetaldehyde	0.005	0.1	0.0	DEQ General ACDP
Formaldehyde	0.001	0.0	0.0	DEQ General ACDP
Methanol	0.01	0.2	0.1	DEQ General ACDP
Phenol	0.005	0.1	0.0	DEQ General ACDP

Gas-Fired Veneer Dryers (1 Total)

Maximum Throughput	15.0	Mscft 3/8"/hr	
Maximum Throughput	151,420.0	Mscft 3/8"/hr	at 8760 hours/year
Actual 2004 Throughput	36,628.0	Mscft 3/8"/hr	

Heated Zone Pollutants	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
PM/PM10	0.20	16.1	5.0	DEQ General ACDP
NOx	0.12	7.9	2.3	DEQ General ACDP
CO	0.02	1.3	0.4	DEQ General ACDP
VOC	0.47	30.9	9.1	Emerald No.3 Nov.2003 Test
Methanol	0.014	0.8	0.2	Emerald No.3 Nov.2003 Test
Formaldehyde	0.028	1.7	0.5	Emerald No.3 Nov.2003 Test

Heated Zone Pollutants	used test result	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
VOC		0.062	4.1	1.2
Acetaldehyde		0.012	0.8	0.2
Acrolein		0.006	0.4	0.1
Propionaldehyde		0.200	15.1	4.4

Cooling Zone Pollutants	used test result	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
VOC		0.062	4.1	1.2
Acetaldehyde		0.009	0.6	0.2
Acrolein		0.006	0.4	0.1
Propionaldehyde		ND		

Fugitive Pollutants	used test result	Emission Factor (lb/1000 scfm)	PTE Annual Emissions (tons/yr)	2004 Actual Emissions (tons/yr)
VOC		0.046	3.0	0.9
Acetaldehyde		0.003	0.2	0.1
Formaldehyde		0.002	0.1	0.0
Methanol		0.006	0.4	0.1
Phenol		0.01	0.7	0.2

Formulas
 Annual Emissions = Maximum Throughput (scfm) x Emission Factor x ton/2000 lbs

Notes
 Emission factors are from DEQ General ACDP for steam-heated and gas-heated veneer dryers, except for gas-heated veneer PM/PM10 and VOC.
 PM/PM10 and heating/cooling section VOC factors for the gas-heated dryers are from the source test performed on October 3, 2000 and are the average from 3 runs.
 The VOC emission factor from the testing on the gas-fired dryer has been multiplied by 1.22 to convert from as-carbon to its propane.
 PM10 emissions for veneer dryers equal to PM emissions [DEQ Permitting and Inspection Manual (11/93)].

Plywood Presses

2003 Plywood Production	287,817,000.0	scfm (3/8")	
Maximum Hourly Plywood Production	43,000.0	scfm (3/8")	from ACDP application based on 8760 hours operation
Maximum Plywood Production	300,400,000.0	scfm (3/8")	

Pollutant	Emission Factor (lb/ASF)	Factor Units	2003 Annual Emissions (tons/yr)	Potential Annual Emissions (tons/yr)
VOC	0.085	lb/ASF	11.44	14.99
Acetaldehyde	0.007	lb/ASF	0.84	1.23
Acrolein	0.009	lb/ASF	1.21	1.58
Formaldehyde	0.001	lb/ASF	0.17	0.22
Phenol	0.000	lb/ASF	0.00	0.00
Methanol	0.023	lb/ASF	3.05	4.03
Propionaldehyde	0.002	lb/ASF	0.27	0.35

Formulas
 Resin Usage Factor = Plywood Production (scfm) / Resin Throughput (lb/yr)
 Maximum Resin Throughput = Maximum Plywood Production x Resin Usage Factor
 Projected Annual Emissions = Throughput x Emission Factor x ton/2000 lbs
 Potential Annual Emissions = Maximum Throughput x Emission Factor x ton/2000 lbs

Total Plant Site Emission Limits	Potential Annual Emissions (tons/yr)	Actual Annual Emissions (tons/yr)
PM	18.6	11.0
PM10	27.4	11.0
SO2	41.0	14.9
NOx	20.5	20.5
CO	10.4	10.4
VOC	17.7	16.4
Acetaldehyde	10.4	7.8
Acrolein	1.3	1.2
Formaldehyde	1.7	1.0
Methanol	4.1	4.9
Phenol	1.0	0.0
Propionaldehyde	15.1	4.7
TOTAL HAPs	42.35	16.9

Baseline

Veneer Throughput = 84,000 MSF 3/8" basis
Steam-heated

	Emission Factor (lb/1000 sqft)	Annual Emissions (tons/yr)
PM/PM10	1.01	42.4
NOx	0.00	0.0
CO	0.00	0.0
Heated Zone VOC	1.80	75.6
Cooling Zone VOC	1.80	75.6
Fugitive VOC	0.06	2.5
Total VOC		153.7

Wood-fired Boiler 45,000 lbs steam per hour
 7,800 hours per year

	Emission Factor lb/ 1000lb steam	Annual Emissions tons/year
PM	0.4	70.2
PM10	0.2	35.1
SO2	0.014	2.5
NOx	0.31	54.4
CO	3	526.5
VOC	0.13	22.8

Actual steam produced from previous permit
 Emission factors from ODEQ General Permt

2 cyclones = 1.2 tons/year PM
 0.6 tons/year PM10

2 Baghouses= 6.8 tons/year PM/PM10

Pollutant	Tons/year
PM	120.6
PM10	84.9
SO2	2.5
NOx	54.4
CO	526.5
VOC	176.5

Source Test Summary

Emerald Forest Products Plant #1 2006 Source Test (Avg. + 1SD)

		Plywood Production	Formaldehyde (lb/Msf plywood)	Methanol lb/Msf plywood	Phenol lb/Msf plywood
		lb/Msf			
2/28/2006	Run 1	9	0.001	0.021	0.0000
	Run 2	9	0.00100	0.021	0.0000
	Run 3	9	0	0.013	0.0000
Average of 3 Runs (2006)			0.0007	0.018	-
Maximum			0.00100	0.021	0.0000
One standard deviation			0.00058	0.005	0.00000
Ave + 1 SD			0.00124	0.023	-

Notes: