

Report for Periodic Monitoring of Emissions to Atmosphere

Part 1: **Executive Summary**

Permit Number: **EPR07/09**

Operator: **Todd Engineering**

Installation: **Rugeley**

Emission Point: **Spraybooth**

Monitoring Date: **5th April 2013**



Contract Reference: **FTBS 25470**

Operator: **Todd Engineering**

Address: **Gregory Works
Armitage Road
Rugeley
Staffs
WS15 1PW**

Monitoring Organisation: **RPS Consultants**

Address: **Noble House, Capital Drive, Linford Wood,
Milton Keynes, MK14 6QP**

Report Date: **25th April 2013**

Report Approved By: **Carl Redgrove**

Position: **Senior Consultant**

MCERTS Registration Number: **MM 03 173**

MCERTS Certification Level: **2**

Technical Endorsements: **TE1, TE2, TE3, TE4**

Signature:

A handwritten signature of 'Carl Redgrove' enclosed in a rectangular box.

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Monitoring Objectives

At the request of Adam Turner of Todd Engineering Ltd, RPS Consultants conducted stack emission monitoring at the Todd Engineering Ltd in April 2013.

The monitoring programme at this installation was carried out to provide data on emissions to atmosphere for comparison with the limits specified in the air emission criteria for this site.

The following tables detail the parameters requested for monitoring at each emission point and the actual monitoring conducted.

Table 1.1

| Parameters Requested to be Monitored | Emission Point |
|---|-----------------------|
| | Spraybooth |
| Volatile Organic Compounds | |
| Total Particulate Matter | |
| Specific Requirements | Normal |

Notes:

✓ *Represents pollutants sampled*

Monitoring Results

Table 2.1 Monitoring results for the Spraybooth, Carried out on 5th April 2013

| Substance Monitored | Emission Limit Value | Periodic Monitoring Result | Units | Uncertainty (Expressed expanded k=2) | Reference Conditions 273K, 101.3kPa | Sampling Date | Sampling Times | Monitoring Reference Method | Accreditation Status | Operating Status |
|--|----------------------|----------------------------|-------------------|--------------------------------------|-------------------------------------|---------------|----------------|-----------------------------|----------------------|------------------|
| Total Particulate Matter | 10 | 0.71 | mg/m ³ | +/- 0.27 | 273K, 101.3kPa, Dry | 05/04/2013 | 12:10 - 13:02 | BS EN 13284-1:2002 | MCERTS | Normal |
| Volatile Organic Compounds (as Carbon) | 100 | 2.6 | mg/m ³ | +/- 1.6 | 273K, 101.3kPa, Dry | 05/04/2013 | 12:10 - 13:04 | BS EN 13526 | MCERTS | Normal |

Operating Information

Table 3.1 Operating conditions during the monitoring of the Spraybooth emission point, carried out on 5th April 2013

| Parameter | Result |
|--|---|
| Sample Date | 05/04/2013 |
| Process Type | Batch |
| Process Duration | ~ 1 Hour |
| If 'Batch', was monitoring carried out over the whole batch? | Yes |
| Abatement/Operational? | EU2/EU3 Glass Fibre-Synthetic/ Operational |
| Spraybooth Model | Spartan 2000 Series |

| Comparison of Operator CEM and Periodic Monitoring Results | | |
|--|-----------------------------------|--|
| Substance | CEMs Results (mg/m ³) | Periodic Monitoring Results (mg/m ³) |
| No CEMS Installed/Data Available | | |

Monitoring Deviations

Table 4.1 Monitoring Deviations for Spraybooth Emission Point

| Pollutant | Substance Deviations | Monitoring Deviations | Other Relevant Issues |
|---|-----------------------------|------------------------------|------------------------------|
| Total Particulate Matter & Volatile Organic Compounds | None | None | None |

Report for Periodic Monitoring of Emissions to Atmosphere

Part 2: Supporting Information

Permit Number: **EPR07/09**

Operator: **Todd Engineering**

Installation: **Rugeley**

Emission Point: **Spraybooth**

Monitoring Date: **5th April 2013**



Contract Reference: **FTBS 25470**

Operator: **Todd Engineering**

Address: **Gregory Works
Armitage Road
Rugeley
Staffs
WS151PW**

Monitoring Organisation: **RPS Consultants**

Address: **Noble House, Capital Drive, Linford Wood,
Milton Keynes, MK14 6QP**

Report Date: **18th April 2013**

Report Approved By: **Carl Redgrove**

Position: **Senior Consultant**

MCERTS Registration Number: **MM 03 173**

MCERTS Certification Level: **2**

Technical Endorsements: **TE1, TE2, TE3, TE4**

Signature:

A handwritten signature in black ink, appearing to read 'Carl Redgrove'.

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APPENDIX 1: General Information

Monitoring Organisation Staff Details

Table 5.1 Sampling Personnel

| Sampling Personnel | Position | MCERTS Level | Technical Endorsements & Expiries | MCERTS Registration Number |
|--------------------|------------|--------------|--|----------------------------|
| Richard Carter | Consultant | Level 2 | TE1 – 13/06/13 TE2 – 03/12/13 TE3 – 03/12/14 TE4 – 18/03/15 | MM 07 861 |
| James Beechey | Technician | Level 1 | TE1 – 12/02/18 | MM 11 1144 |

Table 5.2 Report Author

| Report Author | Position | MCERTS Level | Technical Endorsements & Expiries | MCERTS Registration Number |
|---------------|------------|--------------|-----------------------------------|----------------------------|
| James Beechey | Technician | Level 1 | TE1 – 12/02/18 | MM 11 1144 |

Table 5.3 Report Reviewer

| Report Reviewer | Position | MCERTS Level | Technical Endorsements & Expiries | MCERTS Registration Number |
|-----------------|-------------------|--------------|--|----------------------------|
| Carl Redgrove | Senior Consultant | Level 2 | TE1 – 01/10/14 TE2 – 09/03/15 TE3 – 11/03/16 TE4 – 11/03/16 | MM 07 861 |

Monitoring Organisation Method Details

Table 6.1 Monitoring Methods

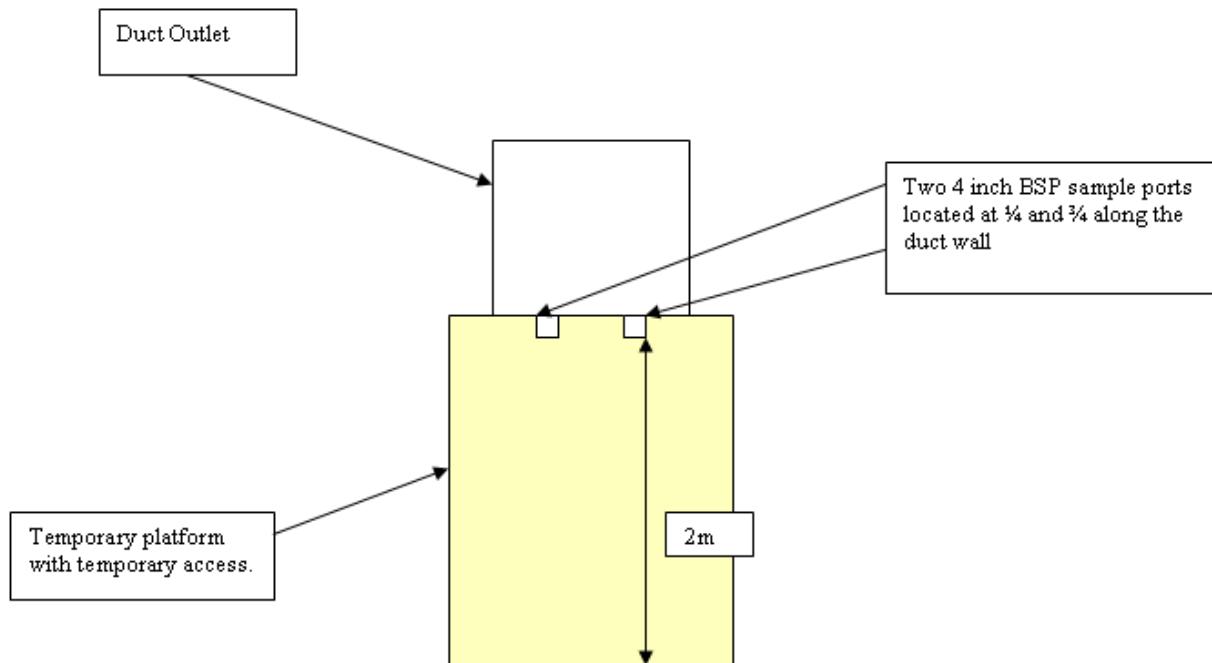
| Emission Parameter | Standard Method | Monitoring Procedure No. | Monitoring Accreditation | Analysis | Analysis Procedure No. | Analytical Laboratory | Analysis Accreditation |
|--|--------------------|--------------------------|--------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Practical Considerations Prior to Monitoring | N/A | RPSCE/1/1 | UKAS | N/A | N/A | N/A | N/A |
| Gas Flows | BS-EN 13284-1:2001 | RPSCE/1/2 | MCERTS | N/A | N/A | N/A | N/A |
| Gas Temperatures | BS-EN 13284-1:2001 | RPSCE/1/2 | MCERTS | N/A | N/A | N/A | N/A |
| Low Concentration Total Particulate Matter | BS EN 13284-1:2002 | RPSCE/1/7c | MCERTS | Gravimetric | D9 | RPS Laboratories | UKAS |
| TOCs at high concentrations | BS EN 13526 | RPSCE/1/4c | MCERTS | Flame Ionisation Detector | N/A | N/A | N/A |

Table 7.1 – Checklist Used

| Equipment Checklist Used | File Location Address |
|--------------------------|----------------------------------|
| FTBS25470 Checklist | FTBS25470 Electronic & Work File |

**APPENDIX 2:
Spraybooth Sampling, Analysis & Uncertainty Data**

Sampling Point Diagram



Company Name: Todd Engineering
Site Ref: Rugeley

Date: 05/04/13
Run: TPM

Sampling Point Ref: SB 1
Project Ref: FTBS25470

| | |
|------------------------------|-------|
| Stack Width (m) | 0.90 |
| Stack Depth (m) | 0.86 |
| Stack Area (m ²) | 0.774 |

Stack Static press mm H₂O: 24.2

| Traverse Point No. | Port A | | | Port B | | |
|--------------------|--------------------------|----------|---------------|--------------------------|----------|---------------|
| | Δ p, mm H ₂ O | Root Δ p | Stack Temp °C | Δ p, mm H ₂ O | Root Δ p | Stack Temp °C |
| 1 | 7.2 | 2.683 | 12 | 4.2 | 2.049 | 12 |
| 2 | 5.6 | 2.366 | 12 | 1.6 | 1.265 | 12 |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |
| 8 | | | | | | |
| 9 | | | | | | |
| 10 | | | | | | |
| Minimum | 5.6 | 2.366 | 12 | 1.6 | 1.265 | 12 |
| Maximum | 7.2 | 2.683 | 12 | 4.2 | 2.049 | 12 |
| Mean | 6.4 | 2.525 | 12.0 | 2.9 | 1.657 | 12.0 |
| Sum | 12.8 | 5.050 | 24 | 5.8 | 3.314 | 24 |
| Total Sum | | | | | | |

| | |
|---------------------|---------|
| Max. pitot press. = | 7.2 |
| Min. pitot press. = | 1.6 |
| Ratio Max:Min = | 4.5 : 1 |

| Gas Data | |
|-------------------|------|
| Oxygen % | 21.0 |
| CO ₂ % | 0.04 |
| CO % | |

| Oxygen Correction | |
|---------------------------------------|---|
| Required Correction Value | 0 |
| Actual Oxygen Factor | 1 |
| Enter 0 if correction is not required | |

| BS EN 13284-1 & M1 Sample Point Requirements | | Requirement Met? |
|--|--|------------------|
| Duct gas Flow angle with regard to duct access <15°? | | Y |
| Duct Gas Flow Negative Velocity: Not Permitted | | Y |
| Duct Gas Flow: Ratio of max to min velocity <3:1? | | Y |
| Working Area > 5m ² ? | | N |
| Handrails with removable chains / self closing gates across the top of the ladder? | | N |
| Handrails (approx 0.5 and 1.0 m high) and vertical baseboards (approx 0.25m high)? | | Y |
| Scaffold Built to 'Heavy Duty' Scaffolding Rating or at least 2.5kN/m ² loading | | Y |
| Handrails not restricting access to ports? | | Y |
| Room opposite sampling port equal or greater than the length of the sampling probe plus 1 metre? | | N |
| Sufficient Power (Waterproof 110V BS4343 Standard) close or on the platform? | | Y |

Company Name: Todd Engineering
Site Ref: Rugeley
Sampling Point Ref: SB 1
Date: 05/04/13
Run TPM
Project Ref: FTBS25470

In-stack Filter? Y Bar. Press mm Hg
Outstack Filter? N Cp
Operators Bws%

K Factor
Dn used
Nozzle No.

Meter Correction (Y)

Ambient Temp.
Start Time
Stop Time

Leak Rate (in / %)
Leak Rate (start / %)
Box/Probe setting

Sample Filter Weights

| | Reference | Laboratory | Increase, mg |
|----------------|-----------|------------|--------------|
| Filter | 95549 | RPS | 0.24 |
| Probe Washings | 30002231 | RPS | 0.5 |

Sample Filter Blank Weighings

| | Reference | Laboratory | Increase, mg |
|------------|-----------|------------|--------------|
| Filter | 95548 | RPS | 0.04 |
| Probe Wash | 30002230 | RPS | 0.5 |

Impinger Weights

| Weights | Initial | Final | Increase, g |
|------------|---------|-------|-------------|
| Impinger 1 | | | 0.0 |
| Impinger 2 | | | 0.0 |
| Impinger 3 | | | 0.0 |
| Impinger 4 | | | 0.0 |
| Impinger 5 | | | 0.0 |
| Silica Gel | | | 0.0 |
| | Total | | 0.0 |

| Sample Point | Clock Time min | Pitot Δp , mm H ₂ O | Stack Temp., °C | Orifice ΔH , mm H ₂ O | | Gas Meter Reading m ³ | Temp at Gas Meter Outlet °C | Condenser Temp., °C | Filter Box Temp °C | Probe Temp °C | Pump Vacuum Inches Hg | Impinger Stem Temp. °C | Root Δp |
|--------------|-------------------|---|--------------------|--|--------|-------------------------------------|-----------------------------------|---------------------------|--------------------------|---------------------|-----------------------------|------------------------------|-----------------|
| | | | | Desired | Actual | | | | | | | | |
| | 0 | 5.4 | 12 | 52.0 | 52.0 | 1168311 | 14 | N/A | N/A | 7 | 10 | 2.324 | |
| | 6.25 | 4.8 | 12 | 46.3 | 46.3 | | 15 | N/A | N/A | 7 | 11 | 2.191 | |
| | 12.5 | 5.0 | 12 | 48.2 | 48.2 | | 16 | N/A | N/A | 7 | 12 | 2.236 | |
| | 18.75 | 5.0 | 12 | 48.2 | 48.2 | | 17 | N/A | N/A | 7 | 14 | 2.236 | |
| Endpoint | 25 | | | | | | | | | | | | |
| | 0 | 5.0 | 12 | 48.2 | 48.2 | 1169441.8 | 19 | N/A | N/A | 7 | 16 | 2.236 | |
| | 6.25 | 5.0 | 12 | 48.2 | 48.2 | | 20 | N/A | N/A | 7 | 17 | 2.236 | |
| | 12.5 | 5.0 | 12 | 48.2 | 48.2 | | 21 | N/A | N/A | 7 | 17 | 2.236 | |
| | 18.75 | 5.0 | 12 | 48.2 | 48.2 | | 21 | N/A | N/A | 7 | 17 | 2.236 | |
| Endpoint | 25 | | | | | | | | | | | | |
| | 50.00 | 5.0 | 12.0 | 48.4 | 48.4 | 1.131 | 17.9 | #DIV/0! | #DIV/0! | #DIV/0! | 7.0 | 14.3 | 2.2 |

Company Name: Todd Engineering
Site Ref: Rugeley
Project Ref: FTBS25470

Date: 05/04/13

| Sampling Point Ref: SB 1 | Run: TPM |
|--|-------------|
| Meter Volume Sampled, acm | 1.131 |
| Sample Run Start Time | 12:10 |
| Sample Run End Time | 13:02 |
| Total Actual Sampling Time, min | 50.0 |
| Barometric Pressure, mm Hg | 755.00 |
| Stack Pressure, mm Hg | 756.78 |
| Average Stack Temp, °C | 12.0 |
| Meter Volume at STP, scm | 1.038 |
| Stack Moisture Content, % | 0.0 |
| Average Stack Velocity, m/sec | 7.377 |
| Stack Flow Rate, scms dry,STP | 5.443 |
| Nozzle Diameter, mm | 7.98 |
| % Isokinetic Variation | 98.1 |
| Total Mass of Particulate, mg | 0.7 |
| Percentage of Total Particulate Collected on Filter | 32.4 |
| Stack Particulate Concentration, mg/m³ | 0.7 |
| Particulate Mass rate, kg/hour | 0.014 |
| Emission Limit value | 10 |

| Sample Train Blank Results | |
|---|-----|
| Sample Blank Particulate Concentration, mg/m ³ | 0.5 |
| Total Weight Gain, mg (Sample Train Blank) | 0.5 |
| Blank Result Less than 10% of Limit Value | Y |

Uncertainty Calculation for Total Particulate Matter to BS EN 13284-1

Determined Concentration **0.7** mg/m³ (at Reference Cond.)

Measured Values

| | | |
|-------------------------|---------|----------------|
| Sampled Volume | 1.1308 | m ³ |
| Sampled gas Temperature | 280.876 | K |
| Sampled gas Pressure | 100.90 | kPa |
| Sampled gas Humidity | 0 | % by volume |
| Oxygen content | 21 | % by volume |
| Mass | 0.74 | mg |

| | | |
|------------------|------|----|
| Leak | 0.00 | % |
| Uncollected Mass | 0 | mg |

Standard Uncertainties for Measured Values

| | | |
|-------------------------|------------|----------------|
| Sampled Volume | 0.001 | m ³ |
| Sampled gas Temperature | 2 | K |
| Sampled gas Pressure | 1 | kPa |
| Sampled gas Humidity | 1 | % by volume |
| Oxygen content | 0.1 | % by volume |
| Mass | 0.14152393 | mg |

| Uncertainty Calculation for Volume Correction | | | Uncertainty Calculation for Oxygen Correction | | |
|---|-----------------------|-------------------------|---|--------|-------------------------|
| Volume Correction Factor | 0.935 | Sensitivity Coefficient | Oxygen Correction Factor | 1.0000 | Uncertainty Coefficient |
| Sampled gas Temperature | 0.0032 | 0.0084 | Oxygen Measurement | N/A | N/A |
| Sampled gas Pressure | 0.0093 | 0.0093 | | | |
| Sampled gas Humidity | 0.0093 | 0.0093 | | | |
| | Sqrt(Uv) ² | 0.0148 | | | |
| | Total Uv | 0.017 | | | |
| | | | Total Uo | N/A | |

Uncertainty Contributions (itemised)

| | Value | Sensitivity coefficient | Uncertainty Contribution | |
|-------------------|-------------------------|-------------------------|--------------------------|---------|
| | | | Concentration | % |
| Volume Correction | 1.038 m ³ | 0.68 | 0.01 mg.m ⁻³ | 1.60 % |
| Mass (weighing) | 0.74 mg | 0.96 | 0.14 mg.m ⁻³ | 19.12 % |
| Oxygen Correction | N/A | 0.00 | 0.00 mg.m ⁻³ | 0.00 % |
| System Leak | 0.00 mg.m ⁻² | 1.00 | 0.00 mg.m ⁻³ | 0.00 % |
| Uncollected Mass | 0.00 mg | 0.96 | 0.00 mg.m ⁻³ | 0.00 % |
| | | Total Uncertainty | 0.14 mg.m ⁻³ | |

Uncertainty Result (Uncertainty has been expanded with a coverage factor of 2 (K=2))

Expanded Uncertainty = **0.27** mg.m⁻³

=> **38.38** % of Result

=> **0.00** % of ELV

Company Name: Todd Eng
Site Ref: Rugeley
Stack Ref: SB 1

Date: 05/04/13
Run: VOC

| | VOC (as Carbon) ppm | VOC (as Carbon) mg/m ³ | VOC (as Carbon) kg/h | VOC (as Toluene) mg/m ³ | VOC (as Toluene) kg/h | Oxygen % |
|----------------------------|------------------------|--------------------------------------|-------------------------|---------------------------------------|--------------------------|-------------|
| Average | #DIV/0! | 2.62 | 0.05 | 2.87 | 0.05 | #DIV/0! |
| Max | 0.00 | 21.69 | 0.39 | 23.75 | 0.43 | 0.00 |
| Min | 0.00 | -0.16 | 0.00 | -0.18 | 0.00 | 0.00 |
| Emission Limit | | | | | | |
| Moisture, % | 2.0 | | | | | |
| Oxygen Reference, % | 0.0 | | | | | |

Stack Gas Volume Flow Rate, m³/s (scms Dry) O₂ Corrected 4.988806023

ISO 14956 Calculation Sheet - TOC (BS EN 13526)

| | |
|--|-------------|
| Studied Concentration (mg/m ³ as C) | 2.617707975 |
| Range of Instrument (mg/m ³ as C) | 161 |

| Sampling Parameters to be met | Requirement Met? |
|--|------------------|
| Response Time < 60s | Yes |
| Operating Temperature (5 - 45°C) | Yes |
| Atmospheric pressure (700 - 1240 mbar) | Yes |
| Relative Humidity (10 - 90%, non condensing) | Yes |
| Altitude (< 2000 m) | Yes |
| Zero Drift 2% of FS | Yes |
| Span Drift 4% of FS | Yes |

| Selected Performance Characteristic | Value of Performance Characteristic | | | Operating Conditions compared to calibration condition | | |
|-------------------------------------|-------------------------------------|-----------|-----------------------------|--|-------------------------------------|-----------------------------|
| | % | Numerical | Units | Required | Variable due to sampling conditions | Units |
| Deviation from Linearity | 1 | 0.01 | % FS | 0.01 | 1 | % FS |
| Repeatability Standard Deviation | 1 | 0.01 | % FS | 0.01 | 1 | % FS |
| 3 Hour Drift | 2 | 0.02 | % | 0.02 | 1 | % |
| Atmospheric Pressure Dependence | 0.1 | 0.001 | % kPa | 0.001 | 1 | % kPa |
| Temperature Dependence | 0.2 | 0.002 | %K | 0.002 | 1 | %K |
| Sum Interference | 2 | 0.02 | % | 0.02 | 2 | % |
| Voltage Supply | 0.1 | 0.001 | %V | 0.001 | 1 | %V |
| Uncertainty of Calibration Gas | 2 | 0.02 | % | 0.02 | 1 | % |
| Moisture Effect | 1 | 0.01 | %Vol H ₂ O Error | 0.01 | 2 | %Vol H ₂ O Error |
| Loss in sample line (Leaks) | 2 | 0.02 | % | 0.02 | 2 | % |

| Measurement Performance related to stationary conditions | | | | | | | |
|--|------------------------------|-------------------------------|------------------------|-------|------------------------|----------------|-------|
| Performance Characteristic | Uncertainty Quantity | Value of Uncertainty Quantity | | | At Sampling Conditions | | |
| | | At Calibration Conditions | At Sampling Conditions | Units | U | U ² | |
| Deviation from Linearity | U _{FL} | | | | | | |
| Repeatability Standard Deviation | U _R | | | | | | |
| 3 Hour Drift | U _{drift} | | | | | | |
| Atmospheric Pressure Dependence | U _{Atmos} | | | | | | |
| Temperature Dependence | U _{Temp} | | | | | | |
| Sum Interference | U _{Interference} | | | | | | |
| Voltage Supply | U _{Voltage} | | | | | | |
| Uncertainty of Calibration Gas | U _{Calibration gas} | | | | | | |
| Loss in sample line (Leaks) | U _{Losses, leak} | | | | | | |
| | | Sum | 1.752 | 2.696 | Sum | 1.754 | 2.596 |

| | | |
|---|-------------|---------------------|
| Measurement Uncertainty at U_{tot} | 2.617707975 | mg/m ³ C |
| $U_{\text{tot}}^{(k)}$ | 1.612 | mg/m ³ C |
| $U_{\text{tot}}^{(k)}$ | 61.572 | % |
| Pass | No | |

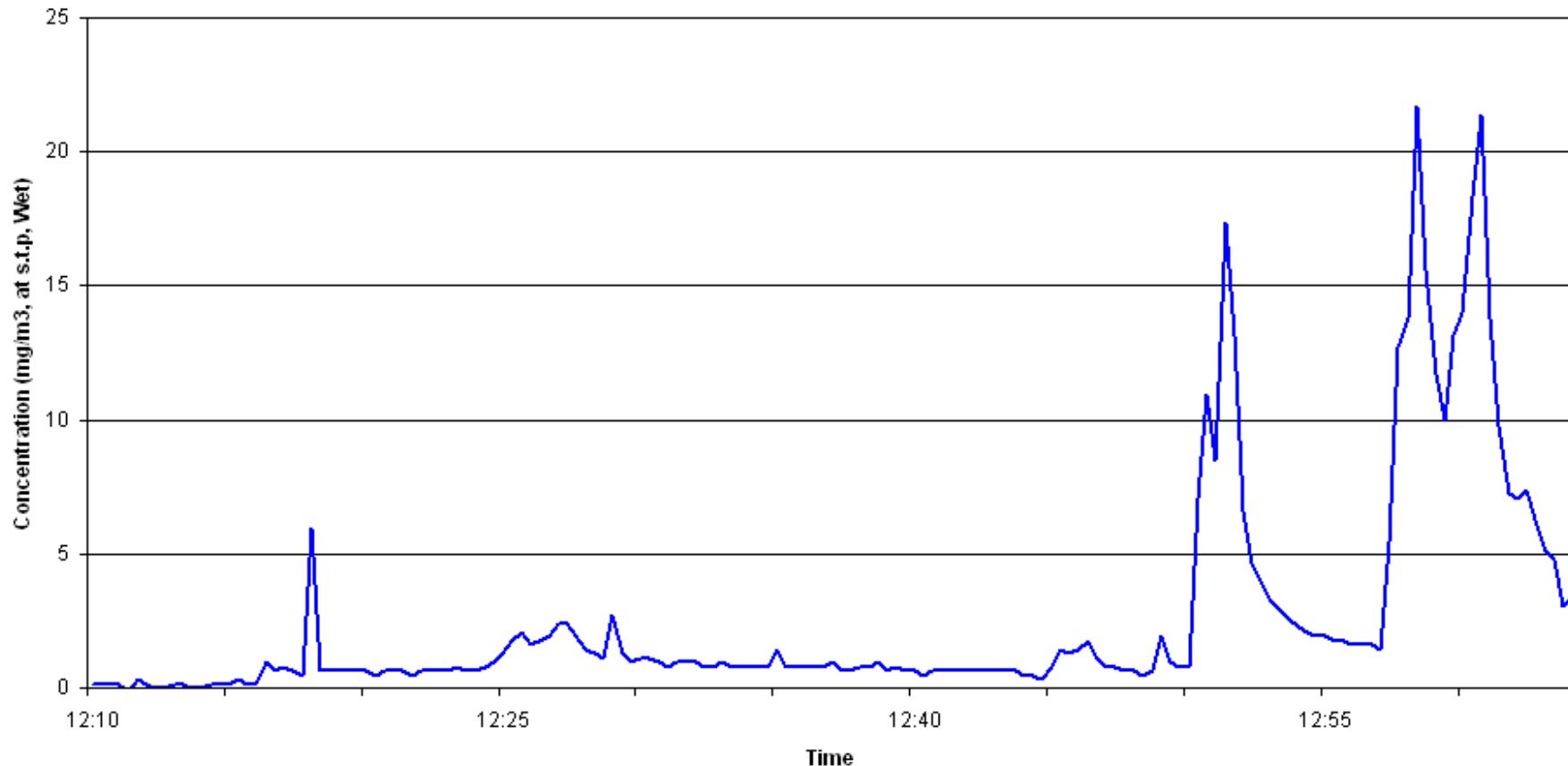
BS EN 13526:2001 Performance Requirements

| Performance Characteristic | Minimum Performance Requirement |
|----------------------------|--|
| Detection Limit | 5% of the emission limit value |
| Response Time | less than 1 minute |
| Linearity Deviation | permissible deviation 5% of emission limit |
| Response Factors | Permissible range |
| Methane | 0.9 to 1.2 |
| Aliphatic Hydrocarbons | 0.9 to 1.1 |
| Aromatic Hydrocarbons | 0.8 to 1.1 |
| Aliphatic alcohols | 0.7 to 1.0 |
| Esters | 0.7 to 1.0 |
| Ketones | 0.7 to 1.0 |
| Organic Acids | 0.5 to 1.0 |
| Oxygen Effect | permissible deviation 5% of emission limit |

For more details on the above figures see BS EN 13526:2001.

Note: U_{int} is the percentage of the ELV value allowed for the uncertainty. In other words, if the ELV is 50 mg/m³, the U_{int} allowed is 15 mg/m³

**TOC Emissions Profile from the Spraybooth on 5th April 2013 at Todd Engineering Ltd,
Rugeley, for Todd Engineering, Rugeley .**





Test Certificate

Date 17/04/2013

| | | | |
|--------|---|-----------------|------------|
| Client | RPS Milton Keynes HSED Noble House Capital Drive Linford Wood Milton Keynes MK14 6QP | Order No. | FTBS 25470 |
| | | Certificate No. | WK13-2190 |
| | | Issue No. | 1 |

| | | | |
|-------------|---------------------------------|---------------|-------------------|
| Contact | James Beechey | Date Received | 10/04/2013 |
| Description | 2 filters & 2 solutions for TPM | Technique | Gravimetric Stack |

| Sample No. | 740079 | 095548 | Method |
|--------------------------|----------|----------|--------|
| Total particulate matter | <0.04 mg | | D9(U) |
| Sample No. | 740080 | 30002230 | Method |
| Total particulate matter | <0.5 mg | | D9(U) |
| Sample No. | 740081 | 095549 | Method |
| Total particulate matter | 0.24 mg | | D9(U) |
| Sample No. | 740082 | 30002231 | Method |
| Total particulate matter | <0.5 mg | | D9(U) |

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