



Skamol Rødding
Fasanvej 7
7860 Spøttrup

21. februar 2024

Påbud vedr. ændring i asbestkontrol – Skamol Rødding, Fasanvej 7, 7860 Spøttrup

Skive Kommune meddeler hermed påbud efter miljøbeskyttelseslovens § 42 stk. 1¹ om ændring i asbestkontrollen på Skamols vermikulitfabrik i Rødding beliggende på adressen Fasanvej 7, 7860 Spøttrup.

Ordlyden af påbuddet fremgår længere nede i dette brev.

Baggrund

Skamol Rødding har den 5. december 2023 fremsendt ønske om ændring i virksomhedens asbestkontrol.

Skamol ønsker at ændre den måde, hvormed asbestkontrollen af deres vermikulit foregår i dag. Den eksisterende asbestkontrol er bundet på en stram logistisk styring og desuden involverer unødvendigt mange aktører, der øger risikoen for menneskelige fejl. Dette kan i yderste konsekvens medføre risiko for, at vermikulit med indhold af asbest ved en fejl bliver aflæsset på fabrikken i Rødding. Derudover er Skamol blevet opkøbt Etex-group, der ligeledes anvender vermikulit på deres fabrikker, og som har en udvidet og detaljeret tilgang til asbestkontrol. Skamol ønsker derfor at ændre deres asbestkontrol, så den kommer til at følge Etex-groups procedure, ETEX PROC-012 (ver. 4) "*Vermiculite Acceptance Scheme and Supplier Qualification*" som fremgår af bilag 2.

Virksomheden har en miljøgodkendelse fra 2009, hvori der er fastsat vilkår til asbestkontrol, som virksomheden ønsker ændret. Miljøgodkendelsen er meddelt til listepunkt B 204 "Virksomheder, der fremstiller bygningselementer af overvejende mineralske råmaterialer med en produktion på mere end 10 tons pr dag i gennemsnit på årsbasis". Listepunktet er sidenhen udgået af godkendelsesbekendtgørelsen², miljøgodkendelsen bevarer dog fortsat sin gyldighed så længe virksomheden fortsætter uændret jf. godkendelsesbekendtgørelsens § 71, hvorfor miljøgodkendelsen fra 2009 stadig er gældende.

Da virksomheden ikke længere er godkendelsespligtig jf. godkendelsesbekendtgørelsen § 3 stk. 2, er virksomheden ikke omfattet af kravet om miljøgodkendelse af udvidelser og ændringer, og skal således ikke ansøge om godkendelse gennem Byg og Miljø (BOM). Skamol har derfor fremsendt deres ønske om ændring i asbestkontrollen på mail til Skive Kommune. En beskrivelse af de ønskede ændringer fremgår af bilag 4.

¹ Bekendtgørelse af lov om miljøbeskyttelse, LBK nr. 48 af 12/01/2024

² Bekendtgørelse om godkendelse af listevirksomhed, BEK nr. 1083 af 09/08/2023

Af det fremsendte fremgår det, at Skamol Rødding fortsat vil følge HSG248 proceduren fra HSE til lysmikroskopiering af vermiculit, og at de ligeledes fortsat har nultolerance overfor vermiculitsendinger med asbest. Med den nye procedure vil der desuden være fokus på at få godkendt eller afvist materialet før det sendes mod modtagerlandet, og der vil være krav om, at prøvetager er uafhængig.

Bilag 3 indeholder en forkortet dansk oversættelse af ETEX-groups procedure for asbest kontrol, som Skamol fremadrettet ønsker at anvende.

I virksomhedens eksisterende godkendelse fra 2009 fremgår det af vilkår 2.18, hvordan asbestkontrollen hidtil har skulle foregå:

2.18 Asbestindholdet i al modtaget vermiculit skal være under påvisningsniveauet (0,1 % w/w).

Der skal foretages følgende egenkontrol:

- ved modtagelse af hele skibsladninger:

- *En repræsentativ prøveleverance (forprøve) på 200 kg for hver leverance bestående af 10 individuelt pakkede delprøver à 20 kg (coaster afskibning) udtages repræsentativt for partiet af leverandøren forud for partiets afsejling og fremsendes med luftfragt til Skamol til godkendelse. Foreløbig godkendelse eller afvisning af hele sendingen sker på grundlag af følgende undersøgelse.*
- *En 2 kg prøve sammensættes ud af de 10 individuelle 20 kg delprøver. Af disse 2 kg udtages 15 g's prøver til mikroskopering i henhold til HSE dokument HSG 248 asbest: Analytikerens vejledning til prøvetagning, analyse og clearing procedurer. Dette udføres af en procesekspert.*

Leveringskontrol:

Der udtages 10 delprøver på hver ca. 1 kg fordelt over leverancen, når skibet losses. Disse testes efter den samme procedure som forprøven.

- ved modtagelse i skibscontainere:

- *Som stikprøvekontrol udtages en 2 kg prøve af den første container modtaget i lige måneder. Prøven undersøges for eventuelt indhold af asbest som beskrevet ovenfor.*

Påbud om ændring

Skive Kommune påbyder på baggrund af ovenstående at Skamol Rødding fremadrettet overholder følgende vilkår for asbest kontrol.

1. *Asbestindholdet i al modtaget vermiculit skal være under påvisningsniveauet (0,1 % w/w).*

Egenkontrol

2. *Der skal foretages rutinekontrol for asbest på de partier vermiculit, der ønskes modtaget af Skamol.*

3. *Prøveudtagningen til rutinekontrollen og analysen heraf skal foretages af uafhængige prøveudtagere og laboratorier med stærke kompetencer inden for asbestanalyse.*
4. *Antallet af prøver (primær prøver), der udtages til kontrol, skal følge en risikobaseret tilgang ud fra leverandørens inspektionsniveau, se tabel 1. Leverandørens inspektionsniveau afgøres ud fra beskrivelsen og kriterierne angivet i bilag 1.*

<i>Leverandører Inspektionsniveau</i>	<i>Antal prøver (primær prøver)</i>
<i>Høj</i>	<i>44</i>
<i>Moderat-høj</i>	<i>30</i>
<i>Moderat</i>	<i>18</i>
<i>Moderat-lav</i>	<i>10</i>
<i>Lav</i>	<i>7</i>

Tabel 1: Antal prøver der skal tages fra et parti vermikulit ud fra leverandørens inspektionsniveau

5. *Prøveudtagningen skal følge vejledningen i ASTM D75/D75-4 (sektion 5.3.3.3) for små aggregater.*
6. *Til prøveudtagningen skal et prøveudtagingsrør på ca. 2 m langt ($\varnothing = 30$ mm) anvendes.*
7. *En primær prøve skal sammensættes af 5 delprøver fra henholdsvis lagerbunke eller big bag og blandes til én primær prøve.*

De primære prøver skal neddeles med en prøvespiltter indtil to prøver på 50 g er opnået, hvorefter den ene prøve sendes til rutinekontrol ved laboratoriet, der skal forestå analysen for asbest. Den anden prøve gemmes i én måned i tilfælde af, at den sendte prøve ikke når frem til laboratoriet.

8. *Såfremt der ikke er detekteret asbest i samtlige primær prøver fra partiet (dvs. der er 100 % negative resultater), kan partiet godkendes og modtages af Skamol. Detekteres asbest i en af prøverne fra partiet, skal hele partiet afvises.*

Med meddelelse af påbuddet bortfalder vilkår 2.18 i virksomhedens miljøgodkendelse af 2009.

Hvis virksomheden på et senere tidspunkt foretager ændringer drifts- og eller bygningsmæssigt, vil tilsynsmyndigheden vurdere, hvorvidt virksomhedens miljøgodkendelse fra 2009 fortsat er dækkende for virksomhedens aktiviteter.

Lovhjemmel

Varslingen om at meddele påbud om ændring af asbestkontrol sker efter miljøbeskyttelseslovens § 42 stk. 1 hvori det fremgår at:

"Hvis erhvervsvirksomheder, herunder private eller offentlige bygge- og anlægsarbejder, eller faste anlæg til energiproduktion, som ikke er optaget på den i § 35 nævnte liste, medfører uhygiejniske forhold eller

væsentlig forurening, herunder affaldsfrembringelse, kan tilsynsmyndigheden give påbud om, at forureningen skal nedbringes, herunder påbud om gennemførelse af bestemte foranstaltninger.”

Brugerbetaling

Sagsbehandlingen af påbuddet efter § 42 i miljøbeskyttelsesloven er omfattet af brugerbetalingsbekendtgørelsen. Brugerbetalingen afregnes direkte efter det timeforbrug myndigheden har anvendt i forbindelse med udarbejdelse af kvitteringen. Miljøstyrelsen har i 2024 fastsat timetaksten til 468,96 kr. Brugerbetalingen opkræves én gang årligt i november måned.

Klagevejledning

Påbuddet kan påklages til Miljø- og Fødevareklagenævnet, jf. Miljøbeskyttelseslovens¹ § 91.

Klagefristen er fire uger fra den dag, afgørelsen eller beslutningen er meddelt. Er afgørelsen eller beslutningen offentligt bekendtgjort, regnes klagefristen dog altid fra bekendtgørelsen, jf. Miljøbeskyttelseslovens¹ § 93.

Klage til Miljø- og Fødevareklagenævnet indgives skriftligt til Skive Kommune ved anvendelse af digital selvbetjening. En klage anses for indgivet, når den er tilgængelig for myndigheden. Myndigheden skal, hvis den vil fastholde afgørelsen, snarest og som udgangspunkt ikke senere end 3 uger efter klagefristens udløb videresende klagen til Miljø- og Fødevareklagenævnet jf. Miljøbeskyttelseslovens¹ § 94.

En klage har opsættende virkning for et påbud eller forbud, medmindre Miljø- og Fødevareklagenævnet bestemmer andet, jf. Miljøbeskyttelseslovens¹ § 95.

Jf. Miljøbeskyttelseslovens¹ § 98, kan kommunalbestyrelsens og ministerens afgørelser påklages af

1. afgørelsens adressat og
2. enhver, der har en individuel, væsentlig interesse i sagens udfald.
3. Lokale foreninger og organisationer, der har beskyttelse af natur og miljø som hovedformål, kan påklage afgørelser, som foreningen eller organisationen har ønsket underretning om, jf. § 76, stk. 1. Lokale foreninger og organisationer, der efter deres formål varetager væsentlige rekreative interesser, kan påklage afgørelser, som foreningen eller organisationen har ønsket underretning om, jf. § 76, stk. 1, når afgørelsen berører sådanne interesser og klagen har til formål at varetage natur- og miljøbeskyttelse.
4. Landsdækkende foreninger og organisationer, der efter deres vedtægter har beskyttelse af natur og miljø som hovedformål, kan påklage afgørelser efter bestemmelserne i kapitel 3-5 og 9 a.
5. Landsdækkende foreninger og organisationer, der efter deres vedtægter har til formål at varetage væsentlige rekreative interesser, kan påklage afgørelser efter bestemmelserne i kapitel 3-5 og 9 a, når afgørelsen berører sådanne interesser, og klagen har til formål at varetage natur- og miljøbeskyttelse.

Søgsmål

Jf. Miljøbeskyttelseslovens¹ § 101 skal søgsmål til prøvelse af afgørelser efter loven eller de regler, der fastsættes i medfør af loven, være anlagt inden 6 måneder efter, at afgørelsen eller beslutningen er meddelt.

Aktindsigt

Virksomheden har i henhold til miljøbeskyttelseslovens¹ § 75 stk. 1 adgang til at se de dokumenter, der ligger til grund for påbuddet (aktindsigt).

Bemærkninger til sagen

Varsling af påbuddet har været i partshøring hos virksomheden i perioden fra 11. januar 2024 til 23. februar 2024.

Af virksomhedens bemærkninger til det varslede påbud, der er vedlagt som bilag 5, fremgår det, at virksomheden ønsker, at ordlyden af påbuddets vilkår 3 ændres, så der ikke er krav om, at prøveudtagere og laboratorier skal være akkrediterede. Begrundelsen herfor er, at vermikulitråvarer ofte kommer fra egne af verden, hvor akkrediterede prøveudtagere ikke er til rådighed, derudover er virksomhedens erfaring, at akkrediterede asbestlaboratorier er specialister i analyse af asbest i byggeaffald, men ikke i analyse af asbest i vermikulitråvarer. Virksomheden ønsker således at kunne anvende eksterne laboratorier med stærke kompetencer i asbestkontrol som har erfaring med i asbestkontrol i vermikulit, selvom disse ikke er akkrediterede. Desuden har Skamol og Etex Group, der ejer Skamol, deres egne asbestlaboratorier med stærke kompetencer inden for asbestanalyser. Virksomheden ønsker fortsat at kunne bruge Skamols og Etex Groups egne laboratorier til at foretage den rutinemæssige kontrol af asbest og godkendelse af varepartier til virksomheden i tilfælde af mange prøver eller ændringer i det eksterne asbestlaboratories kapacitet. Ovenstående er således tilrettet i påbuddet, idet Skive Kommune med baggrund i virksomhedens begrundelse for ændringen, ikke finder det nødvendigt at fastholde krav om akkrediterede prøveudtagere og laboratorier.

Virksomheden har derudover haft bemærkninger til bilag 1 vedrørende leverandørernes indplacering på inspektionsniveau. Virksomheden mente at proceduren, der fremgik af det varslede påbud, var meget geologisk specifik for de kriterier, der ligger til grund for sandsynligheden for urenheder, hvilket kunne komme til at fastlåse virksomheden fremadrettet. Virksomheden ønsker derfor, at faktorerne for sandsynligheden for urenheder beskrives mere overordnet i bilaget om leverandørernes indplacering på inspektionsniveau. Ved at fjerne underpunkterne, således at de geologiske faktorer og leverandørers kvalitetssikring ikke fremgår direkte af beskrivelsen, vil små detaljeændringer ikke kræve yderligere sagsbehandling fra kommunen. Skive kommune har valgt at imødekomme ændringerne, da beskrivelse af leverandørernes indplacering på inspektionsniveau i bilag 1, er oplyst af virksomheden selv, og udelukkende skal bruges til beskrive, hvordan antallet af prøver, der udtages til kontrol skal afgøres. Der er således fortsat fastsat vilkår i påbuddet om, at antallet af prøver skal følge en risikobaseret tilgang, og det kun beskrivelsen af de faktorerne, der ligger til grund for antallet af prøver udtaget til kontrol, der gøres mere overordnet ved at fjerne de specifikke underpunkter. Det er Skive Kommunes vurdering, at ændringen ikke vil have nogen miljømæssig betydning.

Spørgsmål

Er der spørgsmål til det fremsendte, er du velkommen til at kontakte undertegnede på tlf. 20 71 11 65 eller mail julo@skivekommune.dk.

Med venlig hilsen



Julie Aae Lorentsen
Miljømedarbejder

Bilagsoversigt

Bilag 1 – Beskrivelse af leverandørers indplacering på inspektionsniveau

Bilag 2 - Ønsket procedure for asbestkontrol - ETEX PROC-012 (ver. 4) "*Vermiculite Acceptance Scheme and Supplier Qualification*"

Bilag 3 - Forkortet dansk oversættelse af rutinekontrol efter asbest fra ETEX PROC -012 (ver. 4)

Bilag 4 - Anmodning om ændringer i asbestkontrol

Bilag 5 - Virksomheds bemærkninger til varsling af påbuddet

Bilag 1 – Beskrivelse af leverandørers indplacering på inspektionsniveau

Inspektionsniveauet for de enkelte leverandører er baseret på hvor mange point (score fra 0 til 1) de opnår. En høj score er negativt, dvs. der er høj risiko for urenheder.

Der er to hovedfaktorer, som afgør inspektionsniveauet. Den ene er en score for sandsynlighed for urenheder (Contamination Likelihood score range) og den anden er en score for Datakvalitet (Data Quality score range).

Nedenunder er et udsnit af tabel 1 fra Etex-groups procedure for asbestkontrol ETEX PROC-012 (ver. 4) "*Vermiculite Acceptance Scheme and Supplier Qualification*" som viser sammenhængen mellem scoren og inspektionsniveauet.

Supplier Inspection Levels	Contamination Likelihood score range	Data Quality Score range	Sampling size per lot
High	[0,45-1[[0-1[44
Moderate-high	[0-0,45[[0-0,4[30
Moderate	[0-0,35[[0,4-0,6[18
Moderate-low	[0-0,38[[0,6-0,7[10
Low	[0-0,15[[0,7-1[7

Table 1 - Matrix sampling intensity regimes

A) Sandsynlighed for urenheder

Fem faktorer har indflydelse på scoren for Sandsynlighed for urenheder.

1. Råvarens iboende sandsynlighed for urenheder.
2. Graveområdets geologiske beskaffenhed.
3. Leverdørens processer og kvalitetssikring.
4. Mængden af urenheder i feltprøver udtaget fra graveområdet.
5. Kvalitetsdata fra Skamol/Etex's kvalitetskontrol.

For punkt 4 og 5 bruges data fra indeværende år og helt op til 10 år tilbage.

B) Datakvalitet

En faktor, der beskriver hvor meget af ovenstående data, der er tilgængeligt. Faktoren er med til at beskrive hvor troværdig ovenstående data er.

Vermiculite Acceptance Scheme and Supplier Qualification

Document prepared by Global EHS



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1 PURPOSE

As stipulated in the Etex Environmental Health and Safety Policy, Etex commits to a clean, healthy and safe working environment for every person working at and for Etex.

The objective of this Global EHS procedure PROC-012 is to prevent any contamination of vermiculite raw material supplied to Etex by naturally-occurring asbestos (NOA) due to mining environment.

The procedure establishes a strict quality management framework with risk-based control measures, regular internal review of the data and with the involvement of external competent service providers to ensure independency in the execution of the procedure.

2 SCOPE OF WORK

The quality management of vermiculite raw material is addressed at two levels: the qualification of suppliers and the quality control of the product. Additionally, the evaluation of contamination risks is subject to a regular review process by a cross functional team involving mainly Etex Purchasing, ITC and Global EHS.

2.1 Supplier Qualification

The qualification process aims at compiling evidence that the supplied vermiculite meets the Etex requirements and that the mine sourcing the commodity is reliable in terms of contamination risks. The qualification relies on product and field sampling results, geological expertise and assessment of the supplier's management system.

2.2 Product Quality Control

Once a supplier is qualified, the routine quality control process takes on the ordered vermiculite lots. The control consists of a risk-based sampling plan followed by analysis by high performance lab qualified for the analysis of NOA in vermiculite.

Vermiculite lots are accepted by Etex and delivered to manufacturing sites only when sample analysis yields 100% negative results (hereafter, 'favourable' results) with regard to the presence of NOA fibres.

2.3 Supplier Assessment

Both qualification and quality control processes follow an iterative approach in which analytical and management data is collected through time (long-term supplier partnership) and space (geographic locations of vermiculite sources). The data is assessed with regard to NOA contamination likelihood of the mineral product of each supplier (here after the 'Contamination Likelihood Matrix'), in order to determine a sampling plan for each supplier.

3 DEFINITIONS

Contractor	Independent third party in charge of taking product samples at the vermiculite production site or at the facility where product is quarantined.
Expert	Independent (external) expert geologist appointed by Etex ITC.
Field Sample	A geological sample taken during the field survey. The Expert interprets the significance of the field sample analysis in a dedicated geological report.
ITC	The Etex Innovation & Technology Centre located at Kuiermansstraat 1, B-1880 Kapelle-op-den-Bos, Belgium.
Lab	An external, independent analytical laboratory that is qualified for analysis of NOA in vermiculite matrices. Etex considers the following lab as competent for the vermiculite analysis : IOM, located at Research Avenue North, Riccarton, Edinburgh, EH14 4AP, UK. This lab follows a validated a method based on the HSG 248 ¹ guide and the NIOSH 9002 ² method. In this custom method, asbestos fibre identification and measurement is done through the use of polarised light microscopy (PLM) with dispersion staining. The claimed detection limit of the method for the analysis of asbestos fibres in a vermiculite matrix is 10 ppm (0.001 % weight/weight) (hereafter, the 'IOM Method').
NOA	Naturally-occurring asbestos.
Product Sample	A sample from vermiculite raw material delivered for Etex for qualification and quality control purposes.
Purchasing	Etex Luxembourg SA located at 163 rue du Kiem, 8030 Strassen, Luxembourg. Purchasing is represented by the vermiculite category buyer.
Supplier	The company, or business unit, that supplies vermiculite from a specific, unique orebody or group of geologically-affiliated orebodies.
Vermiculite	Hydrous phyllosilicate mineral forms as an alteration product of biotite or phlogopite, by weathering or hydrothermal action.
Vermiculite Sampling Plan Teams site	An Etex platform dedicated for the record management of sample analysis of vermiculite and qualification certificates of suppliers. The access to the platform must be granted at the minimum to the leadership representatives of ITC, to Global EHS and the vermiculite category buyer. A Teams site is a hub used at Etex for team collaboration with Microsoft 365 software.

4 ROLES & RESPONSABILITIES

Global EHS is responsible for the management review and the monitoring of the implementation of this procedure. Purchasing and ITC are responsible and accountable for the implementation of this procedure. The last available version of this document shall govern.

¹ HSG 248 "The analysts' guide for sampling analysis and clearance procedures", an authoritative guide for asbestos analysts in the UK.

² NIOSH 9002: ASBESTOS (bulk) by PLM, a reference method in the US.

5 SUPPLIER QUALIFICATION PROCESS

The workflow of the Supplier Qualification process is in the Annexe 1 and includes a total of 11 steps (Q1 to Q11) described hereafter.

Q1 - Product Samples Request

Purchasing will request to the supplier candidate a delivery of 2 representative Product Samples of minimum 500 g each to be sent to ITC. Purchasing will inform ITC for the reception of the samples.

Q2 - Supplier Product Sampling

Unless agreed differently by Global EHS and ITC, the supplier candidate will order an independent contractor to sample the vermiculite (finished product) and to send it to Purchasing.

Q3 - Product Sample PLM Analysis

One of the Product Samples will be sent by ITC to the Lab for NOA-contamination analysis following the IOM Method. Once the analysis is completed, the Lab will send the report via email to both ITC and Purchasing.

ITC is responsible to compile the analytical result into an overview file ('Vermiculite Analysis Overview') saved in the Vermiculite Sampling Plan Teams site.

Q4 - Alignment

ITC and Purchasing will review the Lab report.

If the result is favourable (i.e., no NOA fibres detected in any of the samples), the qualification process can be pursued to the step Q5. Conversely, if result is unfavourable, the supplier qualification procedure ends.

Q5 - Product Sample SEM Analysis

The other Product Sample will be analysed by ITC for a secondary assessment of potential NOA contamination following an in-house, sensitive analysis method (hereafter, the 'ITC Method' described in the Annexe 2) using a scanning electron microscope (SEM). Following the analysis, ITC will issue a report.

ITC is responsible to compile the analytical result into the Vermiculite Analysis Overview.

Q6 - Alignment

ITC and Purchasing will review and discuss the ITC report.

If the result is favourable, the qualification process can be pursued to the step Q7. Conversely, if result is unfavourable, the supplier qualification procedure ends.

Q7 - Field Survey and Sampling

A dedicated team of experts will perform a field survey at the mine and the processing plant of the candidate supplier according to a protocol described in the Annexe 3. The team will include at least the vermiculite category buyer of Purchasing and one external Expert appointed by ITC.

The Expert will take Field Samples that aid in the assessment of the NOA-contamination likelihood. The Field Samples shall be taken efficiently, and with great care, according to a well-defined sampling method detailed in the Annexe 6.

Special attention will be paid to identifying and evaluating mitigation measures with regard to NOA-contamination taken by the supplier.

Following the field survey, Expert team will issue a geological report to ITC, as well as a joint-report on the visit and/or 'minutes' about each of the sites that were investigated.

Q8 - Field Samples PLM Analysis

The Field Samples will be sent by Purchasing to the Lab for NOA-contamination analysis following the IOM Method. Once the analysis is completed, the Lab will send the report via email to both ITC and Purchasing.

ITC is responsible to compile the analytical result into the Vermiculite Analysis Overview.

Q9 - Alignment

ITC and Purchasing will review and discuss the Lab report.

If the results are favourable, the qualification process can be pursued to the step Q10. Conversely, if result is unfavourable, the supplier qualification procedure ends.

Q10 - Field Samples PAM and SEM Analysis

The remaining (duplicate) Field Samples will be analysed by ITC for:

- The identification and relative quantification of minerals which have the potential to take an asbestiform habit (PAM) (e.g., tremolite-actinolite, serpentine); and
- The identification of NOA-contamination following the ITC Method.

Q11 - Alignment

The leadership representatives of ITC, Purchasing, Global EHS and Legal will review and discuss the conclusions from all the reports delivered during the qualification process.

If the evaluation is positive, the qualification process can be pursued to the step Q12. Conversely, if evaluation is negative, the supplier qualification procedure ends.

Q12 - Qualification Certificate



Following a successful qualification process, ITC and Global EHS will jointly issue a certificate for the candidate supplier. The template for the certificate is available in the Annexe 4.

Global EHS is responsible to keep up-to-date the certificates in the Vermiculite Sampling Plan Teams site. The access to the certificates shall be granted to ITC teammates involved in vermiculite SEM analysis.

Q13 - Final Agreement

Purchasing will be in charge of the negotiation with the supplier candidate to reach a final agreement meeting the following contractual requirements:

1. Use and maintenance of a performant quality management system;
2. Quarantine procedure to ensure that vermiculite is reserved for Etex and stored separately until quality control testing is completed;
3. The Incoterms for deliveries to the country of use should ensure that the goods remain at the risk and responsibility of the supplier in the harbour so that additional tests can be done if necessary/required. This means that Delivered at Terminal (DAT) shall be used (based on Incoterms 2010):
 - a. Upon arrival in the country of consumption, the goods will be placed under customs transit until transfer of the property;

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- b. The transfer of the property will only be executed once the outcome of the samples analysis by external Lab is favourable;
- c. In case any nonconformity is found, the goods will remain the property of the supplier and all costs for customs, warehousing, transport and return will be the supplier's responsibility.

6 QUALITY CONTROL PROCESS

The workflow associated to the Quality Control process is available in the Annexe 5 and includes a total of 6 steps (C1 to C5) described hereafter.

This process relies on the Sampling Acceptance Scheme further detailed in the Annexe 6. In a nutshell, the acceptance criteria to release a lot of vermiculite to Etex production sites is that no naturally occurring asbestos (NOA) contamination is detected from all samples taken from that lot. A NOA Contamination Likelihood Matrix is used to determine a risk-based number of samples to be taken per lot.

C1 - Product Delivery Request

Purchasing will request from the qualified supplier a delivery of vermiculite and will specify the number of samples to be taken from the lot of finished product.

C2 - Product Sampling

The samples must be taken by the Contractor approved by Purchasing. The Contractor shall be independent from the supplier. The product sampling must be executed according to the guidelines of the Annexe 6 to ensure representativity of the analytical results.

The sampling can be performed either at the production plant of the supplier or at the harbour of destination with the shipment at the risk and expense of the supplier. In both scenarios, the vermiculite product must be quarantined and stored tamper-free in a dedicated location. The materials remain the property of the supplier until Etex accepts the lot following a successful quality control process.

The primary samples will be split into two equal secondary samples, one for Etex and one for the supplier. The latter is to be archived by the supplier and can be used in case of any dispute (counter analysis).

The Contractor is in charge to implement a robust traceability system of the product samples with a unique reference linked to the sampling date, the sampling location and the material batch reference.

C3 - Product Sample PLM Analysis

The product samples will be sent by the Contractor to the Lab for NOA-contamination analysis following the IOM Method. Once the analysis is completed, the Lab will send the report via email to both ITC and Purchasing.

ITC is responsible to compile the analytical result into the Vermiculite Analysis Overview.

C4 – Sampling Acceptance

If the results are favourable (i.e., no NOA fibres detected in any of the samples), Purchasing releases the lot for delivery to Etex sites of destination. Purchasing is responsible to save a copy of the Lab report into the Etex SAP system, as an attachment to the Purchase Order of the lot tested.

Conversely, if NOA fibre is detected in at least one sample, the lot is rejected and the quality process moves to the step C5.

C5 – Warning Conditions

A counter analysis can be requested by Purchasing for further investigation. The leadership representatives of ITC and Purchasing will discuss the Lab report.

The impact of the unfavourable testing result must be assessed according to the warning conditions. Warning conditions are four situations identified by Purchasing or ITC that require a close follow-up. A level of priority is associated to each warning conditions. The levels ‘Medium’ and ‘High’ should be discussed within best delays in the Suppliers Review (R2).

Warning Conditions	Priority
Following product testing by the external Lab, one sample result is unfavourable (NOA detected) from 1 vermiculite lot.	Low
Following product testing by the external Lab, more than one sample result is unfavourable (NOA detected) from a vermiculite lot.	Medium
Following product testing by the external Lab, more than 2 successive vermiculite lots are rejected from a source of supply (mine).	High
Publicly available information about a qualified supplier that experienced NOA contamination from sold vermiculite with other customers than Etex.	High

7 SUPPLIER REVIEW PROCESS

The workflow of the Supplier Review process is embedded in the Quality Control Process of the Annexe 5 (steps R1 to R2).

R1 - Contamination Likelihood Matrix Update

Every 6 months at minimum, the Expert will re-assess of the scorings of the suppliers and update the Contamination Likelihood Matrix of the Acceptance Sampling scheme (Annexe 6).

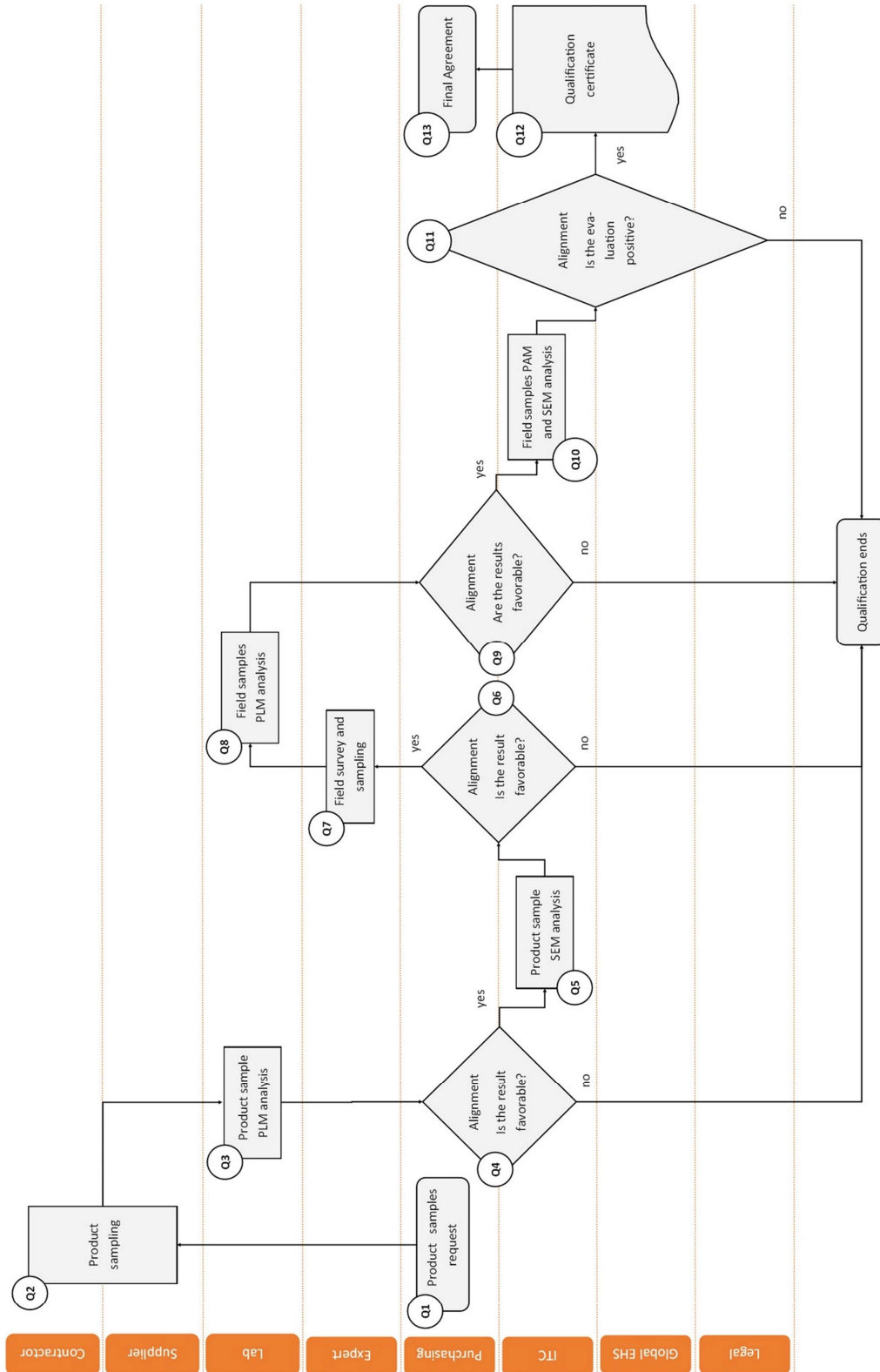
The expert will rely on the last version of the Vermiculite Analysis Overview, the Lab reports and last information on the supplier’s mitigation measures implemented at the vermiculite production site. The updated matrix will be saved in the ‘Vermiculite Sampling Plan’ Teams site.

R2 - Suppliers Review

An alignment meeting with the leadership representatives of Purchasing, ITC, Global EHS and Legal will be organised in 2 circumstances for discussing the sampling plan of qualified suppliers and their qualification status:

1. Periodically, after each update of the Contamination Likelihood Matrix (step R1); or
2. Upon request, when medium and high priority warning conditions are experienced (step C5 of the Quality Control Process). The meeting shall take place prior to any new vermiculite delivery from flagged supplier.

ANNEXE 1 - SUPPLIER QUALIFICATION WORKFLOW



ANNEXE 2 – ITC METHOD

The ITC Method is an in-house, sensitive analysis method that consists of gravimetric matrix reduction by acidification ('dissolution') step in order to enriching asbestos fibres potentially present a sample. The insoluble residue is then analysed with both x-ray diffraction (X-RD) and Scanning Electron Microscopy & Energy Dispersive X-Ray Spectroscopy (SEM-EDX) techniques.

Although this method is qualitative in nature, is not formally validated and does not allow for definitive asbestos identification, experience suggests that it might be more sensitive for identifying very low concentrations of potential NOA-fibres than the industry-standard method used by the external Lab. It is therefore applied as an additional, qualitative, in-house monitoring tool for potential very low-level NOA contamination issues and for benchmarking of individual suppliers.

1. Dissolution

- a. Weigh approximately 2 g of vermiculite sample as received and transfer to a 400 ml glass beaker with magnetic stirrer bar (sub-sample weight = 'A').
- b. Add 200 ml of boiling H₂O and 30 ml of HNO₃ 65%.
- c. Leave for 10 minutes on hotplate.
- d. Filter onto a pre-weighed 110 mm cellulose nitrate filter (Schleicher & Schuell) using glass filtration apparatus (filter weight = 'B').
- e. Wash the filter with 200 ml of boiling Na₂CO₃ 5% solution heated in a nickel recipient.
- f. Immediately, neutralise the filter with diluted HNO₃ (10ml of HNO₃ 65% + 20 ml of H₂O).
- g. Rinse the filter with warm H₂O.
- h. Transfer filter to a petri dish and leave to dry on a hotplate (105°C).
- i. Reweight (weight = 'C') to get the insoluble residue recovery fraction: $\frac{(C-B)}{A} \times 100 \%$

2. X-Ray Diffraction

Make a suspension of the insoluble residue in alcohol. Apply this suspension to the XRD sample holder and dry. Record the XRD spectrum, range = 5 - 60° 2θ.

The detection limit for amphibole with XRD is 0.1 wt %.

3. SEM-EDX

Mount a portion of the insoluble residue onto a SEM stub using double-sided carbon adhesive tabs and apply a gold coating.

Check for the presence of asbestiform fibres, collect their EDX spectra and compare with reference spectra. The scanning time per sample is set to 15 minutes.

The positive identification of asbestiform fibres can only be performed with SEM-EDX analysis.

ANNEXE 3 – FIELD SURVEY PROTOCOL

The objective of the Field Survey is to gather on-site information about the geological, mineralogical, structural and dimensional characteristics of the orebody, the technical specifications of the mining and processing operation, and to take Field Samples that aid in the assessment of the NOA-contamination likelihood.

1. Data collection

The scope of work includes the mine, the vermiculite processing plant and the storage area(s). The data will be based on site observations, documents, interviews and sampling. Special attention will be paid to following issues:

1. Geology factors
 - Relative amount of Fe-Mg ("mafic") minerals;
 - Relative amount of high temperature events;
 - Relative intensity of deformation;
 - Relative intensity of late-stage hydrothermal alteration.
2. Mitigation factors
 - Use of selective mining;
 - Performance of NOA monitoring (sampling strategy, sampling method, testing method, analytical detection limit, frequency of testing, laboratory qualifications, etc.);
 - If existing technology, performance of NOA filtering;
3. Operations
 - Mining and production process description;
 - Quality management system in place;
 - Quality control system in place to test the product specifications (degree of exfoliation, non-exfoliated fraction, sizing, etc).
4. Quarantine requirements

Process and storage area(s) for vermiculite product to be quarantined until quality control testing confirms the absence of NOA above analytical detection limit.

2. Field Sampling

In addition to data collection, field sampling by the independent expert geologist is performed in order to investigate the potential for NOA-contamination of the mined orebody. It utilises a 'worst-case'-scenario approach, i.e., samples are taken from geological features/units with the highest intrinsic potential for NOA-occurrence (faults, lithological contacts, alteration zones, etc).

The samples shall be taken aligned with bulk sampling practices described in the Annexe 6 under the sampling plan.

A set of field samples will be sent for analysis by the expert team to the Lab for PLM analysis and the other set will be sent to ITC laboratory for SEM analysis and PAM³ analysis.

³ Identification and relative quantification of minerals which have the potential to take an asbestiform habit (PAM) e.g., tremolite-actinolite, serpentine.

ANNEXE 4 – QUALIFICATION CERTIFICATE

Vermiculite Supplier Qualification Certificate

Supplier Information	
Name	
Address	
Mine(s) location(s)	
Email	
Phone	

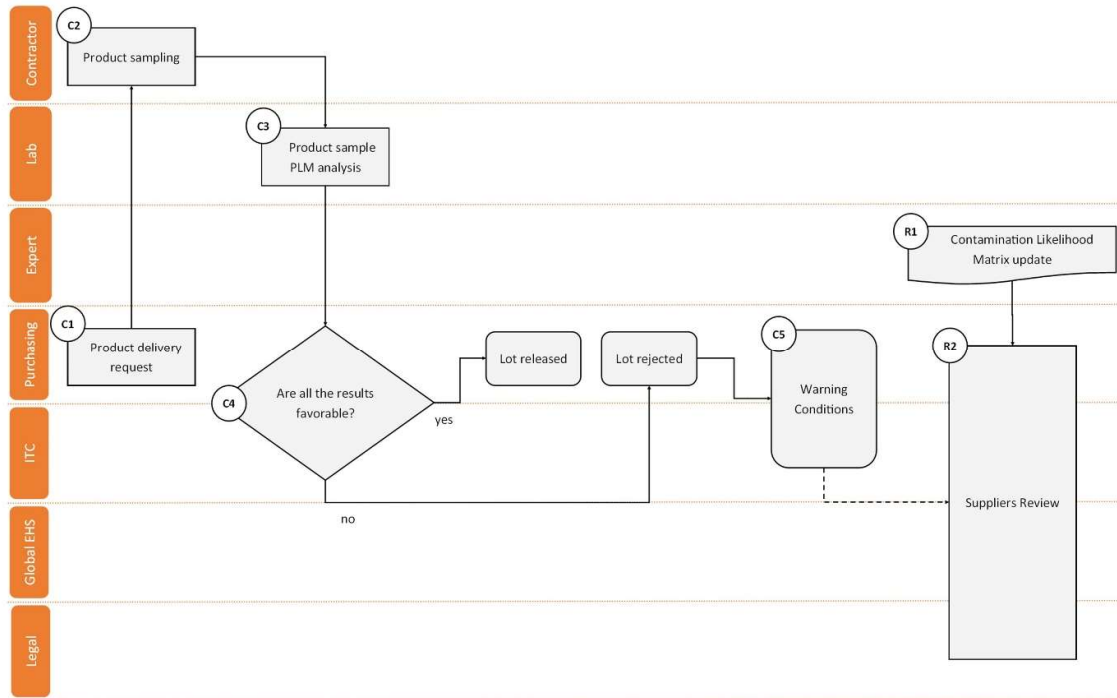
Approval		
<p>Based on available information collected during the qualification process set by the Etex procedure PROC-012 version 4.0, Etex ITC and Etex Global EHS senior leaders supports the (re)qualification* of the above-mentioned supplier and the final negotiation phase to be coordinated by Etex Purchasing.</p>		
	ITC	Global EHS
Name		
Date		
Signature		

*Note: The qualification status remains valid unless unforeseen situations that trigger disqualification. In such circumstances, the present certificate must be withdrawn and archived.

Appendixes to attach

- 1. Lab report of the product samples
- 2. ITC report of the product samples
- 3. Lab report of the field samples
- 4. ITC report of the field samples
- 5. Supplier's Relative Contamination Likelihood and Data Quality scores

ANNEXE 5 – QUALITY CONTROL WORKFLOW



ANNEXE 6 – SAMPLING ACCEPTANCE SCHEME

INTRODUCTION

The Sampling Acceptance Scheme provides a rational framework for controlling that the vermiculite raw materials lots delivered to Etex meet expected health & safety standards.

The scheme relies on the 'Theory of Acceptance Sampling for Attributes', a statistical method to determine the number of samples to be taken from a lot to accept or reject it.

The criteria to release a lot of vermiculite to Etex production sites is that no naturally occurring asbestos (NOA) contamination is detected from all samples taken from that lot.

The Sampling Acceptance Scheme is a 3-steps approach relying on a relative scoring (1) for each supplier of vermiculite, calculated by an independent expert. A contamination likelihood matrix (2) determines to which sampling intensity regime a supplier belongs according to its scores. The sampling plan (3) associated to a supplier is executed by an independent service provider, following the guidelines described in this annex.



Figure 1 - Sampling Acceptance Scheme approach

I. SUPPLIERS SCORING

For the evaluation of the likelihood of contamination with NOA, the mineral product from each supplier is characterised by 3 parameters, i.e., the contamination likelihood score, the data quality score and a warning level.

- **Relative Contamination Likelihood Score**

A relative number between 0 and 1 that allows to compare and rank different suppliers. The higher the score, the more likely it is that asbestos fibres are present in the ore. The contamination likelihood does compare the risk between suppliers, not an absolute risk of contamination.

Five factors are used to calculate the score:

1. The intrinsic likelihood for asbestos fibres contamination due to the nature of the raw material.
2. The geological factor including 4 parameters: the relative amount of Fe-Mg ("mafic") minerals, the relative amount of high temperature events, the relative intensity of deformation and the relative intensity of late-stage hydrothermal alteration.
3. The supplier mitigation measures taken by the supplier at the operational level to mitigate the risk of supplying a contaminated product. This includes the use of selective mining, the performance of NOA filtering and the performance of NOA monitoring.
4. The field samples taken during mine survey of the Supplier Qualification Process, analysed with the ITC Method (internal lab) and the IOM Method (external lab) to identify the relative amount of possible asbestiform minerals (PAM), the relative amount of asbestos fibres and the relative amount of suspicious fibres.
5. The product samples taken during the Quality Control Process, analysed with the ITC Method (internal lab) and the IOM Method (external lab) to identify the relative amount of asbestos fibres and the relative amount of suspicious fibres.

The field sample and the product samples factors are calculated from the last 10 years analysis results.

- **Data Quality Score**

A number between 0 (very poor data quality) and 1 (very high data quality) that allows to assess the significance of the contamination likelihood score in terms of the available data. Typically, the reliability of the contamination likelihood score increases with growing number of samples analysed (i.e., higher statistical significance).

- **Warning Level**

From "low" to "high" to flag unfavourable sampling results and outrank other parameters of the contamination likelihood score.

II. CONTAMINATION LIKELIHOOD MATRIX

The Contamination Likelihood Matrix⁴ is a 2 dimensions graph, plotting the suppliers according to their relative contamination likelihood score (vertical axis) and their data quality score (horizontal axis).

The matrix is divided into five supplier inspection levels, or sampling intensity regime, which define the number of samples to be taken per lot of supplied vermiculite: low, moderate-low, moderate, moderate-high and high. The boundaries of the inspection levels and the associated sampling size per lot are provided in the table below.

It is worth noting that the sampling size is irrelevant of the lot size and that for the protection level defined by Etex, the best possible scored suppliers have a minimum sampling size of seven.

⁴ Further details on the scores calculation, the rating system, the assumptions and the probabilistic approach is available upon request to Global EHS.

Supplier Inspection Levels	Contamination Likelihood score range	Data Quality Score range	Sampling size per lot
High	[0,45-1[[0-1[44
Moderate-high	[0-0,45[[0-0,4[30
Moderate	[0-0,35[[0,4-0,6[18
Moderate-low	[0-0,38[[0,6-0,7[10
Low	[0-0,15[[0,7-1[7

Table 1 - Matrix sampling intensity regimes

III. SAMPLING PLAN

Applying best sampling practices is crucial for having representative measurements and reducing sampling error on the final analytical value. Purchasing is responsible to instruct the Contractor on the sampling requirements according to the following scheme.

- **Sampling method**

The sampling of vermiculite should be executed aligned with the guidelines set by the American ASTM D75/D75-14 standard for fine aggregates (section 5.3.3.3).

If the vermiculite is tested after transportation from the production site, the lot must be unloaded from containers prior to the sampling.

A sampling tube of approximately 2 meters by 30 mm diameter will be inserted horizontally by the Contractor to take samples of material.

- a. **Sampling from stockpile**

In the case of stockpile, the outer layer of vermiculite shall be removed to sample the material beneath. The height of the stockpile will be divided by the number of samples to be taken, equally spaced on the vertical axis, starting at least 1 meter above the ground level. For each sample, the Contractor will randomly take 5 increments from a layer of the stockpile. The 5 increments taken will be intensively mixed to create one (primary) sample.

- b. **Sampling from Big Bags**

In the case of Big Bags (BBs), the sampling tube will be inserted horizontally in 5 random parts of the big bag (the sampling unit) to create a 5-increments composite sample. The 5 increments taken will be intensively mixed to create one (primary) sample. The process is repeated for each primary sample to be taken.

- **Sample size**

1. In the case of routine quality control process, the number of primary samples to be taken will be determined from the latest update of the Contamination Likelihood Matrix and the supplier's sampling intensity level in which it belongs (e.g., 7, 10, 18, 30 or 44);

2. For representativity purposes, it is expected that the nominal primary sample weight should be of 0.5 kg for micron grade, 1 kg for superfine grade and 2.5 kg for fine grade.
3. The primary sample will be split by the Contractor (using a dedicated splitting device such as a riffle or, even better, rotary splitter) into equal secondary samples from which one of 50 g will be sent to Lab for PLM analysis and another one of 50 g will be kept by the Contractor as a witness sample for at least 1 month.

- **Sample labelling**

Every sample will be labelled following to a robust traceability system. The minimum information shall identify the followings:

- Production site origin;
- Date of sampling;
- Purchase Order reference (for Product Samples);
- Sampling location (for Product Samples taken from a quarantine location after transport);
- Big bag's reference (for samples taken from big bags).

The Lab report and the ITC report shall keep consistency with the above labelling information.

- **Sample preparation**

In order to achieve detection limit of 10 ppm NOA using PLM analysis (IOM Method), the grain size distribution should be identical to the IOM standard. It is therefore required to reach top grain size of 100 μm to 200 μm following a methodical comminution (successive pulverisation and sample splitting).

Procedure for asbestkontrol

Denne procedure er en forkortet dansk oversættelse af proceduren ETEX PROC-012 (ver. 4) med titlen *Vermiculite Acceptance Scheme and Supplier Qualification*. Dokumentet dækker både kvalificering af nye leverandører af vermiculit og rutinekontrol efter asbest i vermiculit. Her er kun medtaget den del som omhandler rutinekontrol efter asbest i vermiculit fra godkendte leverandører.

Formål

Denne procedure udgør en risikobaseret kvalitetsstyring, som evalueres internt på jævnlig basis. Kontrollen involverer eksterne leverandører i asbestanalyse til at sikre uafhængighed i udførelsen af kvalitetskontrollen.

Proceduren

- Rutinekontrol udføres på et parti vermiculit, som stammer fra godkendte leverandører.
- Rutineanalysen udføres af laboratorie med kompetencer indenfor asbestanalyse.
- Et parti vermiculit godkendes hvis der 100% negative resultater, dvs. hvis der ikke er detekteret asbest i samtlige prøver.
- Lysmikroskopi og HSG248 proceduren anvendes til rutineanalyse.

Antal prøver

Antallet af prøver som udtages til test, følger en risikobaseret tilgang. Det er *Inspektionsniveauet* for hver enkelte leverandør afgør hvor mange prøver der skal udtages til test for de enkelte partier. Inspektionsniveauet er bestemt ud fra kvantitative data såvel som leverandørens kvalitetsstyring og minens geologiske beskaffenhed.

Leverandører Inspektionsniveau	Antal primær prøver
Høj	44
Moderat-høj	30
Moderat	18
Moderat-lav	10
Lav	7

Prøveudtagning

- Uafhængig tredje-part, som er kompetent i prøveudtagelse, skal udtage prøver.
- Prøveudtagelse af vermiculit skal følge vejledningen i ASTM D75/D75-4 (sektion 5.3.3.3) for små aggregater.
- Et prøveudtagningsrør på ca. 2 m langt ($\varnothing = 30$ mm) anvendes til prøveudtagning.

Procedure for udtagelse fra lagerbunke/big bag:

1. Fem (5) delprøver udtages og blandes til at opnå 1 primær prøve.
2. Trin #1 gentages indtil det ønskede antal primære prøver er opnået (se tabel ovenover).
3. De primære prøver neddeles med prøvesplitter indtil to prøver på 50 g er opnået.
4. Den ene prøve sendes til rutinekontrol hos asbestlaboratoriet.

Rasmus Rosenlund Petersen
R&D specialist

Ændring af procedure for asbestkontrol

**Skamol A/S – Vermikulit-fabrikken
Borgen 2B, Rødning
7860 Spøttrup**

Formål

Skamol ønsker at ændre den måde hvormed asbestkontrollen foregår i dag. Asbestkontrollen er bundet op på en meget stram logistisk styring og den involverer unødvendigt mange aktører. En del af kontrollen skal udføres når det allerede er ankommet i Danmark (Rødning værket, ekstern lager eller ved havnen), hvilket udgør en unødvendig risiko for Skamol's medarbejdere og eksterne samarbejdspartnere. Testproceduren kræver at laboratoriet er i højt beredskab for at aflevere omgående resultater, at logistik- og indkøbsafdelingen løbende skaffer testprøver omgående, koordinere afviste/godkendte sendinger og at modtageren (Rødning værket, ekstern lager eller havnen) forstår og er klar til at håndtere sendinger – også hvis sendingen afvises. Dette giver anledning til mange menneskelige fejlkilder. I yderste konsekvens, er der en risiko for at vermikulit, som er forurenset med asbest, bliver aflæst ved en fejl.

Den nye beskrivelse søger at lave en grundigere asbestkontrol tidligere i processen, så vi undgår ovenstående fejlkilder. Dermed foreligger godkendelsen af forsendelsen også tidligere i processen.

Skamol ønsker ikke at modtage vermikulit, som indeholder nogen former for asbest. Skamol har nul-tolerance overfor asbest og der vil fremover stadig gælde nul-tolerance overfor asbest.

Bibeholdes

- Der anvendes forsat lysmikroskopi til asbestanalyse og samme procedure (HSG248) bliver forsat fulgt.
- Positive resultater diskvalificerer vermikulit sendinger (nul-tolerance).

Væsentligste ændringer

- Den nye procedure har mere fokus på at få godkendt/afvist materialet før det er på vej mod modtagerlandet.
- Der er krav om at prøveudtager er uafhængig.
- Antallet af test afhænger af graveområdets beskaffenhed (høj eller lav chance for asbest), leverandørens systemer for kvalitetskontrol og -styring og historik på testresultater.
- Antallet af test er mere omfattende (7 til 44 test per sending afhængig af ovenstående parametre).
- Der kan anvendes supplerende analyser (f.eks. røntgen diffraktion) og mere nøjagtige analyser (elektronmikroskopi).
- IOM laboratoriet i Edinburgh (ekstern laboratorie) foretager standard asbestanalyse (jvf. HSG248) og evt. supplerende analyser. IOM er akkrediteret og har lang erfaring med asbestanalyse af vermikulit og har bl.a. været med til at udvikle metoder til asbestanalyse.

Procedure

- Asbestkontrollen er beskrevet i ETEX PROC-012 (ver. 4).

Rasmus Rosenlund Petersen

R&D Specialist
Skamol Group
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Bemærkninger til "Varsling om påbud vedr. ændring i asbestkontrol"

Ændringsforslag og begrundelse

1. Side 3, punkt 3 står der følgende: "Prøveudtagningen til rutinekontrollen og analysen heraf skal foretages af uafhængige akkrediterede prøveudtagere og laboratorier med kompetence inden for asbestanalyse."

Ændringsforslag: "Prøveudtagningen til rutinekontrollen og analysen heraf skal foretages af uafhængige **akkrediterede** prøveudtager og **af** laboratorier med **stærke** kompetencer inden for asbestanalyse."

Begrundelse: Vi ønsker at undlade brugen af "akkrediterede" ifb. med 1) prøveudtager og 2) laboratorie.

1) Vermikulit råvarer kommer ofte fra egne af verden hvor akkrediteret prøveudtager måske ikke er til rådighed. Vi ønsker derfor at have muligheden for at bruge prøveudtager, som ikke er akkrediteret. Der tilstræbes dog altid efter at bruge anerkendte og akkrediteret prøveudtager.

2) Vores erfaring med asbestlaboratorier, som er akkrediteret, er at akkreditering sikrer en høj standard for asbestanalyse af byggematerialer men ikke af vermiculit råvarer. Der er os bekendt ingen laboratorier, som er akkrediteret indenfor asbestanalyser af vermiculit råvarer. Desuden har Skamol/ETEX sine egne asbestlaboratorier med stærke kompetencer indenfor asbestanalyser, som vi ønsker stadig skal være i stand til at udføre rutinekontrol og godkende varepartier. Det kan f.eks. være nødvendigt i tilfælde af høje belastninger (mange prøver) eller hvis der er ændringer i et asbestlaboratories kapacitet. IOM asbestlaboratorie i Edinburgh er i dag vores foretrukne eksterne leverandør til rutinekontrol. IOM et anerkendt asbestlaboratorie har en lang historik bag sig indenfor asbestanalyser.

2. Bilag 1

Ændringsforslag: Vi ønsker at ændre beskrivelsen i bilag 1 til en mere enklere fremstilling.

Ændringerne kan ses i vedhæftet fil "Bilag 1 - Beskrivelse af leverandørernes indplacering".

Ændringer er markeret med rødt.

Begrundelse: Den nuværende beskrivelse indeholder meget specifikke punkter ift. geologi mm. Disse punkter kan ændre sig i en evt. revideret version. For at undgå at skulle søge ny godkendelse pga. detaljeændringer, ændres beskrivelsen er de enkelte faktorer til et mere overordnet niveau.

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