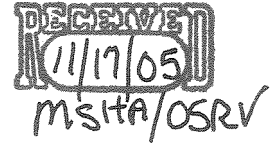




November 17, 2005



Ms. Rebecca J. Smith  
Mine Safety & Health Administration  
Office of Standards, Regulations  
and Variances  
1100 Wilson Boulevard, Suite 2350  
Arlington, VA 22209-3939

**RE: Correction of Inaccurate Statements  
Made by Dr. Castleman at the October  
20, 2005 Hearing on Asbestos Exposure  
Limits**

Dear Ms. Smith:

Dr. Castleman made inaccurate allegations concerning Virginia Vermiculite's, LLC (VVL) operations and data. I am herewith responding to Dr. Castleman's statements.

**1. Dr. Castleman Alleges That MSHA Air Sampling Followed "Poor Methodology" and [Consequently] Yielded Negative Results**

There is no evidence that poor MSHA air sampling results in improper "negative findings" either in the past or currently. In fact, the Office of Inspector General's (OIG) report 2E-06-620-0002 (March 22, 2001) offers no scientific support for the assertion that historic MSHA methodologies were not sufficient to detect fibers at VVL or the other 40 operations tested for the OIG report. In fact none of the tests using a proposed alternate methodology (TEM) showed higher readings than the MSHA methodology.

**2. Dr. Castleman's Allegation That Workers at This Site Were Reported as Having Asbestos Exposure Five Years Ago is False if it Implies Any Exposure Standard was Violated.**

Dr. Castleman does not reference who reported the alleged exposures, what the alleged exposures were, or what level he considers an exposure. The U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry report entitled "Toxicology Profile for Asbestos" (updated September 2001) states that "asbestos minerals are widespread in the environment" and "low levels of asbestos that present little, if any, risk to your health can be detected in almost any air sample". Dr. Castleman should have provided the supporting information for this allegation. In fact the below-listed data contradict Dr. Castleman's allegation:

- The historic and current MSHA tests using MSHA methodology shows MSHA compliance at VVL.

- Further in March 2000, VVL employed OSHA’s monitoring methodology using an independent EPA/OSHA certified asbestos consultant to conduct a “negative exposure assessment” pursuant to OSHA’s 29 CFR Part 1926.1101(f) to determine if any VVL worker was exposed above OSHA’s regulatory levels. No employees were exposed. These tests utilized the levels and methodology now being proposed by MSHA in the subject regulation.
- In the same series of tests above, VVL conducted area tests to determine if the mining activities caused any violation/impact pursuant to EPA’s NESHAP (40 CFR 61 Subpart M) regulations with respect to ambient air pollution. No asbestos impact was found.
- EPA in December 2000 tested nearby homes, waste piles, along roads, and “representative” dust and road samples for asbestos. These results were non-detect for asbestos.
- VVL conducts routine air sampling of its workers using independent certified labs to analyze the results. VVL tests show compliance with both current MSHA and OSHA asbestos exposure regulations. VVL tests its mined raw pre-processed ore, its finished ore that is sold to vermiculite users and its rejected rock streams for asbestos using a method that can detect as little as 0.001% of asbestos. All samples have been non-detectable. These results through the first quarter of 2002 were reported to MSHA in Appendix 1 of John Stamberg’s testimony on June 20, 2002, for this regulation.<sup>1</sup> Subsequent results (2Q02 to 2Q2005) are in Appendix A of this submission.

### 3. Dr. Castleman’s Allegation That “This” Was Well Known to Top Officials at MSHA

Dr. Castleman may be referring to top level MSHA officials releasing or leaking premature and inaccurate results to the Seattle Post Intelligencer in August/September 2000. In this incident, inaccurate information was released by an MSHA official. This issue was discussed in John Stamberg’s June 20, 2002 testimony report on this regulation.<sup>1</sup>

VVL had world-recognized asbestos analysis expert, John Addison, look into the leaked information. He was told that the results were negative when analyzed by OSHA’s Dr. Dan Crane using the accepted OSHA procedure. This procedure is identical to the one stipulated in this rulemaking. At that point in time, and for many years prior to this date, Dr. Crane’s OSHA lab was analyzing all MSHA samples for asbestos. Dr. Crane also informed Mr. Addison that these leaked and inaccurate results were obtained as a result of specific and improper instructions from a high ranking MSHA official. The MSHA official required the application of counting procedures that were in clear violation of accepted scientific protocols. Celeste Montforton, then an MSHA official, was known to have visited Dr. Crane at his lab in this period.

---

<sup>1</sup> Stamberg, John B. P.E., “Testimony Pursuant to Mine Safety and Health Administration on ‘Advanced Notice of Proposed Rulemaking for Measuring and Controlling Asbestos Exposure’” prepared for the Public Meeting at the Holiday Inn, Charlottesville, VA (June 20, 2002).

If you have any questions or need any more data or reports concerning this matter please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ned K. Gumble".

Ned K. Gumble  
General Manager

Enclosures

## **Appendix A**

# **ASBESTOS TEST RESULTS (2nd Qtr 2002 to Present)**

If you have any questions or need any more data or reports concerning this matter please feel free to contact me. Attached is a copy of my Virginia asbestos licenses as an Asbestos Inspector and Asbestos Management Planner.

Sincerely,



John B. Stamberg, P.E.

Vice President

*Energy Ventures Analysis Inc.*

*11/15/05*

Enclosures

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION  
COMMONWEALTH OF VIRGINIA

3600 West Broad Street, Richmond, VA 23230  
Telephone: 1 (804) 367-8500

EXPIRES ON  
01-31-2006

NUMBER  
3303 000548

VIRGINIA ASBESTOS LICENSE  
INSPECTOR LICENSE

JOHN STAMBERG

PO BOX 379  
BARNESVILLE, MD 20838



*Louise F. Ware*

Louise F. Ware, Director

ALTERATION OF THIS DOCUMENT, USE AFTER EXPIRATION, OR USE BY PERSONS OR FIRMS OTHER THAN THOSE NAMED MAY RESULT IN CRIMINAL PROSECUTION UNDER THE CODE OF VIRGINIA

(SEE REVERSE SIDE FOR NAME AND/OR ADDRESS CHANGE)

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION  
COMMONWEALTH OF VIRGINIA

3600 West Broad Street, Richmond, VA 23230  
Telephone: 1 (804) 367-8500

EXPIRES ON  
01-31-2006

NUMBER  
3304 000346

VIRGINIA ASBESTOS LICENSE  
MANAGEMENT PLANNER LICENSE

JOHN STAMBERG

PO BOX 379  
BARNESVILLE, MD 20838



*Louise F. Ware*

Louise F. Ware, Director

ALTERATION OF THIS DOCUMENT, USE AFTER EXPIRATION, OR USE BY PERSONS OR FIRMS OTHER THAN THOSE NAMED MAY RESULT IN CRIMINAL PROSECUTION UNDER THE CODE OF VIRGINIA

(SEE REVERSE SIDE FOR NAME AND/OR ADDRESS CHANGE)

## **Appendix A**

# **ASBESTOS TEST RESULTS (2nd Qtr 2002 to Present)**



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 N. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 06345-2

**Requested By:** John B. Stamberg

**Date Samples Rec'd:** 01/11/05 **Project No:** 610

**Date of Analysis:** 01/11/05 **Date of Issue:** 03/11/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R27638		VERMICULITE SAMPLE VVL - QT3 - 345 - 2005  <i>VVL 3rd Quarter Product 2005</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD





**CERTIFICATE OF ANALYSIS  
ASBESTOS IDENTIFICATION IN BULK MATERIAL**

by Ventures Analysis Inc, 1901 N. Moore Street,  
1200, Arlington, Virginia, 22209-1706

**Contract No.** 06345-1

3. Stamberg

**Project No:** 610

'05

**Date of Issue:** 03/11/05

'05

has been analysed qualitatively for asbestos by polarised light and dispersion  
microscopy in accordance with Health and Safety Executive in HSG248. The results are given below:

Sample Details	Asbestos Type(s) Present
<b>MICULITE SAMPLE</b> - QT3 - F - 2005  <i>1VL</i> <i>3d Quarter</i> <i>T-feed</i> <i>2005</i>	NONE DETECTED

responsibility only for results obtained from samples as received. No responsibility is  
to be taken for any loss or damage that may have arisen during sampling or transportation of samples by external clients.

*see Clerk*

ork  
ology Section Manager

*Sheet 1 of 1*

**ANALYSIS  
OF BULK MATERIAL**

street,

**Contract No.** 06345-5

**Project No:** 610

**Date of Issue:** 03/11/05

has been analysed qualitatively for asbestos by polarised light and dispersion  
microscopy in accordance with Health and Safety Executive in HSG248. The results are given below:

Asbestos Type(s) Present
NONE DETECTED

responsibility only for results obtained from samples as received. No responsibility is  
to be taken for any loss or damage that may have arisen during sampling or transportation of samples by external clients.

*Sheet 1 of 1*



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 N. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 06345-6

**Requested By:** John B. Stamberg **Project No:** 610

**Date Samples Rec'd:** 01/11/05 **Date of Issue:** 03/11/05

**Date of Analysis:** 01/11/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R27642		VERMICULITE SAMPLE VVL - QT3 - TRL/STG - 2005	NONE DETECTED
		VVL Large & Small Tumbler Rock 3rd Quarter 2005	
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	05712-5
<b>Requested By:</b>	John B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	04/08/05	<b>Date of Issue:</b>	08/08/05
<b>Date of Analysis:</b>	04/08/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R24669		VERMICULITE SAMPLE VVL-QT2-F-2005	NONE DETECTED
		VVL 2nd Quarter Feed 2005	
<b>No. of Samples: ONE</b>			

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 05712-6

**Requested By:** John B. Stamberg

**Date Samples Rec'd:** 04/08/05 **Project No:** 610

**Date of Analysis:** 04/08/05 **Date of Issue:** 08/08/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R24670		VERMICULITE SAMPLE VVL-QT2-345-2005  <i>VVL</i> <i>2nd Quarter</i> <i>Product</i>  <i>2005</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 N. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 06345-7

**Requested By:** John B. Stamberg **Project No:** 610

**Date Samples Rec'd:** 01/11/05 **Date of Issue:** 03/11/05

**Date of Analysis:** 01/11/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R27643		VERMICULITE SAMPLE VVL - QT1 - F - 2005R  VVL 1st Quarter Feed	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 05712-2

**Requested By:** John B. Stamberg

**Date Samples Rec'd:** 04/08/05 **Project No:** 610

**Date of Analysis:** 04/08/05 **Date of Issue:** 08/08/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R24666		VERMICULITE SAMPLE VVL-QT1-345-2005  <i>VVL 1st Quarter Product 2005</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	05712-10
<b>Requested By:</b>	John B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	04/08/05	<b>Date of Issue:</b>	08/08/05
<b>Date of Analysis:</b>	04/08/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R24674		VERMICULITE SAMPLE VVL-QT1-RS-2005  VVL Roller Screen Rock  1st Quarter 2005	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *S Jane Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	05712-9
<b>Requested By:</b>	John B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	04/08/05	<b>Date of Issue:</b>	08/08/05
<b>Date of Analysis:</b>	04/08/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R24673		<b>VERMICULITE SAMPLE</b> VVL-QT1-TRL-2005  <i>VVL</i> <i>Tumbler Rock Large</i>  <i>1st Quarter 2005</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

version 5 may05 LSTD





**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 05712-11

**Requested By:** John B. Stamberg **Project No:** 610

**Date Samples Rec'd:** 04/08/05 **Date of Issue:** 08/08/05

**Date of Analysis:** 04/08/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in HSG248. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R24675		VERMICULITE SAMPLE VVL-QT1-STR-2005  VVL Small Tumbler Rock (~4 mesh)  1st Quarter 2005	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

Sheet 1 of 1

version 5 may05 LSTD

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	04291-5
<b>Requested By:</b>	J.B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	16/02/05	<b>Date of Issue:</b>	17/02/05
<b>Date of Analysis:</b>	17/02/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17588		<p><b>VERMICULITE SAMPLE</b></p> <p>VVL-OT4-F-2004</p> <p><i>VVL feed 4<sup>th</sup> Quarter 2004</i></p>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 04291-6

**Requested By:** J.B. Stamberg **Project No:** 610

**Date Samples Rec'd:** 16/02/05 **Date of Issue:** 17/02/05

**Date of Analysis:** 17/02/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17589		<p><b>VERMICULITE SAMPLE</b> VVL-QT4-345-2004</p> <p><i>VVL product 4<sup>th</sup> Quarter 2004</i></p>	NONE DETECTED
<b>No. of Samples: ONE</b>			

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 04291-10

**Requested By:** J.B. Stamberg **Project No:** 610

**Date Samples Rec'd:** 16/02/05 **Date of Issue:** 17/02/05

**Date of Analysis:** 17/02/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17593		<p><b>VERMICULITE SAMPLE</b> VVL-QT4-RS-2004</p> <p>VVL Roller Screen Rock 4th Quarter 2004</p>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	04291-9
<b>Requested By:</b>	J.B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	16/02/05	<b>Date of Issue:</b>	17/02/05
<b>Date of Analysis:</b>	17/02/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17592		<p><b>VERMICULITE SAMPLE</b> VVL-OT4-TRL-2004</p> <p><i>VVL Tumbler Rock Large (1/2 x 4 mesh) 4<sup>th</sup> Quarter 2004</i></p>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 04291-11

**Requested By:** J.B. Stamberg **Project No:** 610

**Date Samples Rec'd:** 16/02/05 **Date of Issue:** 17/02/05

**Date of Analysis:** 17/02/05

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17594		<b>VERMICULITE SAMPLE</b> VVL-OT4-STR-2004  <i>VVL</i>  <i>Small Tumbler Rock (-4 mesh)</i>  <i>4<sup>th</sup> Quarter 2004</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	04291-1
<b>Requested By:</b>	J.B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	16/02/05	<b>Date of Issue:</b>	17/02/05
<b>Date of Analysis:</b>	17/02/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17584		<b>VERMICULITE SAMPLE</b> VVL-QT3-F-2004  <i>VVL feed 3rd Quarter 2004</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS

### FIBRE IDENTIFICATION IN BULK MATERIAL

<b>Client Details:</b>	Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706	<b>Contract No.</b>	04291-2
<b>Requested By:</b>	J.B. Stamberg	<b>Project No:</b>	610
<b>Date Samples Rec'd:</b>	16/02/05	<b>Date of Issue:</b>	17/02/05
<b>Date of Analysis:</b>	17/02/05		

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R17585		<p>VERMICULITE SAMPLE</p> <p>VVL-QT3-345-2004</p> <p><i>VVL</i></p> <p><i>product 3<sup>rd</sup> Quarter 2004</i></p>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Mineralogy Section Manager

*Sheet 1 of 1*



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 02448-1

**Requested By:** John B Stamberg P.E

**Date Samples Rec'd:** 02/08/04 **Project No:** 610

**Date of Analysis:** 14/08/04 **Date of Issue:** 19/08/04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R8917	VVL-QT2-F 2004	VERMICULITE  <i>VVL Plant Feed Composite</i>  <i>2 Q Quarter 2004</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Senior Scientific Technician

*Sheet 1 of 1*

**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 02448-2

**Requested By:** John B Stamberg P.E

**Date Samples Rec'd:** 02/08/04 **Project No:** 610

**Date of Analysis:** 14/08/04 **Date of Issue:** 19/08/04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R8918	VVL-QT2-345-2004	VERMICULITE  <i>VVL Product Composite 2<sup>nd</sup> Quarter 2004</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Senior Scientific Technician

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 02178-1

**Requested By:** John B Stamberg PE **Project No:** 610

**Date Samples Rec'd:** 30.06.04 **Date of Issue:** 12.07.04

**Date of Analysis:** 08.07.04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R7469	1	VERMICULITE VVL-QTI-F-2004  <i>VVL Plant Feed Composite</i>  <i>1<sup>st</sup> Quarter 2004</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Authorised by: *Steve Clark*

S Clark  
Senior Scientific Technician

Sheet 1 of 1

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street,  
Suite 1200, Arlington, Virginia, 22209-1706      **Contract No.** 02178-2

**Requested By:** John B Stamberg PE

**Date Samples Rec'd:** 30.06.04      **Project No:** 610

**Date of Analysis:** 08.07.04      **Date of Issue:** 12.07.04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R7470	2	VERMICULITE VVL-QTI-345-2004  <i>VVL Product Composite 1st Quarter 2004</i>	NONE DETECTED
<b>No. of Samples:</b>		<b>ONE</b>	

IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Authorised by:** *Steve Clark*

S Clark  
Senior Scientific Technician

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706 **Contract No.** 01206-03

**Requested By:** John B Stamberg

**Date Samples Rec'd:** 09/02/04 **Project No:** 610

**Date of Analysis:** 23/02/04 **Date of Issue:** 25/02/04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R2800	03	VERMICULITE SAMPLE NO. VVL-4QT-F-2003  <i>VVL Plant Feed Composites 4th Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			


IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed By:**



T Södergren  
Scientific Technician

**Authorised by:**



C McGonagle  
Chemist

• Research Park North, Riccarton, Edinburgh, EH14 4AP, Scotland, UK (Registered Office)  
Tel (44) 0870 850 5131 Fax (44) 0870 850 5132 E-mail iom@iomhq.org.uk

Registered in Scotland No. SC205670

**Sheet 1 of 1**

IOM Consulting Limited is a private company limited by shares and is a wholly owned subsidiary of the Institute of Occupational Medicine which is a recognised charity limited by guarantee registered in Scotland No. 123972  
Multi-disciplinary specialists in Occupational & Environmental Health and Hygiene • Research • Consultancy • Analysis • Training

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706      **Contract No.** 01206-04

**Requested By:** John B Stamberg

**Date Samples Rec'd:** 09/02/04      **Project No:** 610

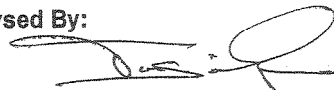
**Date of Analysis:** 23/02/04      **Date of Issue:** 25/02/04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R2801	04	VERMICULITE SAMPLE NO. VVL-4QT-345-2003  <i>VVL Product Composite 4<sup>th</sup> Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

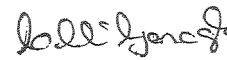
IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed By:**



T Södergren  
Scientific Technician

**Authorised by:**



C McGonagle  
Chemist

• Research Park North, Riccarton, Edinburgh, EH14 4AP, Scotland, UK (Registered Office)  
Tel (44) 0870 850 5131 Fax (44) 0870 850 5132 E-mail lom@lomhq.org.uk

Registered in Scotland No. SC205670

**Sheet 1 of 1**

IOM Consulting Limited is a private company limited by shares and is a wholly owned subsidiary of the Institute of Occupational Medicine which is a recognised charity limited by guarantee registered in Scotland No. 123972  
Multi-disciplinary specialists in Occupational & Environmental Health and Hygiene • Research • Consultancy • Analysis • Training

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706      **Contract No.** 01206-01

**Requested By:** John B Stamberg

**Date Samples Rec'd:** 09/02/04      **Project No:** 610


**Date of Analysis:** 23/02/04      **Date of Issue:** 25/02/04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R2798	01	VERMICULITE SAMPLE NO. VWL-3QT-F-2003  <i>VVL Plant Feed Composite 3<sup>rd</sup> Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			


IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed By:**



T Södergren  
Scientific Technician

**Authorised by:**



C McGonagle  
Chemist

• Research Park North, Riccarton, Edinburgh, EH14 4AP, Scotland, UK (Registered Office)  
Tel (44) 0870 850 5131 Fax (44) 0870 850 5132 E-mail iom@iomhq.org.uk

Registered in Scotland No. SC205670

**Sheet 1 of 1**

IOM Consulting Limited is a private company limited by shares and is a wholly owned subsidiary of the Institute of Occupational Medicine which is a recognised charity limited by guarantee registered in Scotland No. 123972  
Multi-disciplinary specialists in Occupational & Environmental Health and Hygiene • Research • Consultancy • Analysis • Training

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200, Arlington, Virginia, 22209-1706      **Contract No.** 01206-02

**Requested By:** John B Stamberg

**Date Samples Rec'd:** 09/02/04      **Project No:** 610


**Date of Analysis:** 23/02/04      **Date of Issue:** 25/02/04

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
R2799	02	VERMICULITE SAMPLE NO. VVL-3QT-345-2003  <i>VVL Product Campaign 3<sup>rd</sup> Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			


IOM Consulting accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed By:**



T Södergren  
Scientific Technician

**Authorised by:**



C McGonagle  
Chemist

• Research Park North, Riccarton, Edinburgh, EH14 4AP, Scotland, UK (Registered Office)  
• Tel (44) 0870 850 5131 Fax (44) 0870 850 5132 E-mail iom@iomhq.org.uk

Registered in Scotland No. SC205670

IOM Consulting Limited is a private company limited by shares and is a wholly owned subsidiary of the Institute of Occupational Medicine which is a recognised charity limited by guarantee registered in Scotland No. 123972  
Multi-disciplinary specialists in Occupational & Environmental Health and Hygiene • Research • Consultancy • Analysis • Training

**Sheet 1 of 1**



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 n. Moore Street, Suite 1200,  
Arlington, Virginia, 22209-1706  
**Requested By:** John B. Stamberg

**Contract No:** 00328-1

**Project No:** 610

**Date Samples Received:** 12.8.03

**Date of Issue:** 25.8.03

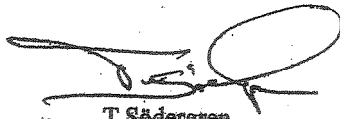
**Date of Analysis:** 15.8.03

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E28959	VVL-QT2-F-2003	VERMICULITE SAMPLE  <i>VVL Plant Feed Composite 2nd Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			


The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**



**T Södergren**  
Scientific Technician

**Authorised by:**



**S Clark**  
Senior Scientific Technician

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

Client Details: Energy Ventures Analysis Inc, 1901 N. Moore Street, Suite 1200,  
Arlington, Virginia, 22209-1706

Contract No: 00328-2

Requested By: John B. Stamberg

Project No: 610

Date Samples Received: 12.8.03

Date of Issue: 25.8.03

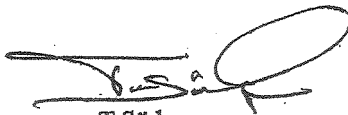
Date of Analysis: 15.8.03

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E28960	VVL-QT2-345-2003	VERMICULITE SAMPLE  <i>VVL Product Composite 2<sup>nd</sup> Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			


The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Analysed by:



T Södergren  
Scientific Technician

Authorised by:



S Clark  
Senior Scientific Technician

*Sheet 1 of 1*

**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis Inc, 1901 N. Moore Street, Suite 1200,  
Arlington, Virginia 22209/1706, U.S.A

**Contract No:** 452G-1

**Requested By:** John B. Stamberg

**Project No:** 161

**Date Samples Received:** 04.7.03

**Date of Issue:** 17.7.03

**Date of Analysis:** 14.7.03

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E27767	VV6-QTI-F-2003	VERMICULITE SAMPLE  <i>VVL Plant Feed Composite</i>  <i>1st Quarter 2003</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**

*A. Hamer*

A Hamer  
Scientific Technician

**Authorised by:**

*Steve Clark*

S Clark  
Senior Scientific Technician

*Sheet 1 of 1*



CERTIFICATE OF ANALYSIS
FIBRE IDENTIFICATION IN BULK MATERIAL

Client Details: Energy Ventures Analysis Inc, 1901 N. Moore Street, Suite 1200, Arlington, Virginia 2209-1706, U.S.A.

Contract No: 450G-2

Requested By: John B. Stamberg

Project No: 161

Date Samples Received: 04.7.03

Date of Issue: 17.7.03

Date of Analysis: 14.7.03

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

Table with 4 columns: IOM No., Clients Sample No., Sample Details, Asbestos Type(s) Present. Row 1: E27768, VVL-QTI-345-2003, VERMICULITE SAMPLE, NONE DETECTED. Includes handwritten note: VVL Product Composite 1st Quarter 2003. Footer: No. of Samples: ONE

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

Analysed by:

A. Hamer
A Hamer
Scientific Technician

Authorised by:

Steve Clark
S Clark
Senior Scientific Technician

Sheet 1 of 1



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis INC, 1901 N. Moore Street, Suite 1200  
Arlington, Virginia 22209 – 1706 USA  
**Requested By:** John B Stamberg

**Contract No:** 962M  
**Project No:** 161

**Date Samples Received:** 30.1.03

**Date of Issue:** 10.2.03

**Date of Analysis:** 3.2.03

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E23628	-	VERMICULITE VVL – QT4-F-2002  <i>VVL Plant Feed Composite 4th Quarter 2002</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**

*A. Hamer*  
A Hamer  
Scientific Technician

**Authorised by:**

*Carol McIntosh*  
C McIntosh  
Laboratory Manager

*Sheet 1 of 1*



**CERTIFICATE OF ANALYSIS  
FIBRE IDENTIFICATION IN BULK MATERIAL**

**Client Details:** Energy Ventures Analysis INC, 1901 N. Moore Street, Suite 1200  
Arlington, Virginia 22209 – 1706 USA  
**Requested By:** John B Stamberg

**Contract No:** 962M-1

**Project No:** 161

**Date Samples Received:** 30.1.03

**Date of Issue:** 10.2.03

**Date of Analysis:** 3.2.03

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E23629	-	VERMICULITE VVL-QT4-345-2002  <i>VVL Product Composite 4th Quarter 2002</i>	NONE DETECTED
<b>No. of Samples: ONE</b>			

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**

*A. Hamer*  
A Hamer  
Scientific Technician

**Authorised by:**

*Carol McIntosh*  
C McIntosh  
Laboratory Manager

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis, 1901 North Moore Street, Suite 1200,  
Arlington, Virginia 22209-1706, USA

**Contract No:** 946F

**Requested By:** John B Stamberg

**Project No:** 161

**Date Samples Received:** 16.11.02

**Date of Issue:** 25.11.02

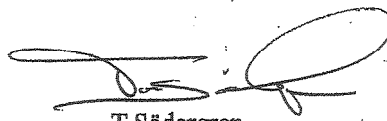
**Date of Analysis:** 20.11.02

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E21336	1	<p><i>VERMICULITE SAMPLE:</i></p> <p>VVL-QT3-F-2002</p> <p><i>VVL Plant Feed Composite 3rd Quarter 2002</i></p>	NONE DETECTED
<b>No. of Samples: ONE</b>			

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**



T Södergren  
Scientific Technician

**Authorised by:**



Carol McIntosh  
C McIntosh  
Laboratory Manager

*Sheet 1 of 4*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis, 1901 North Moore Street, Suite 1200,  
Arlington, Virginia 22209-1706, USA

**Contract No:** 946F

**Requested By:** John B Stamberg

**Project No:** 161

**Date Samples Received:** 16.11.02

**Date of Issue:** 25.11.02

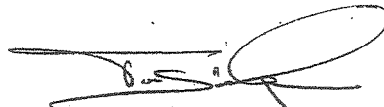
**Date of Analysis:** 20.11.02

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E21337	2	<p><i>VERMICULITE SAMPLE:</i></p> <p>VVL-QT3-345-2002</p> <p><i>VVL Product Compost</i> <i>3rd Quarter 2002</i></p>	NONE DETECTED
<b>No. of Samples: ONE</b>			

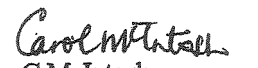
The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**



**T Södergren**  
Scientific Technician

**Authorised by:**



**C McIntosh**  
Laboratory Manager

*Sheet 2 of 4*



## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc., 1901 North Moore Street, Suite 1200,  
Arlington, Virginia, 2209-1706

**Contract No:** 936X

**Requested By:** John B Stamberg, P.E

**Project No:** 161

**Date Samples Received:** 14.10.02

**Date of Issue:** 05.11.02

**Date of Analysis:** 31.10.02

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E20534	1	<p><i>VERMICULITE SAMPLES:</i></p> <p>VVL - QT2 - F - 2002</p> <p><i>VVL Plant Feed Composite</i></p> <p><i>2<sup>nd</sup> Quarter 2002</i></p>	NONE DETECTED
<b>No. of Samples: ONE</b>			

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**

*A Cameron*  
A Cameron  
Scientific Technician

**Authorised by:**

*Carol McIntosh*  
C McIntosh  
Laboratory Manager

*Sheet 1 of 1*

## CERTIFICATE OF ANALYSIS FIBRE IDENTIFICATION IN BULK MATERIAL

**Client Details:** Energy Ventures Analysis Inc., 1901 North Moore Street, Suite 1200,  
Arlington, Virginia, 2209-1706

**Contract No:** 936X-1

**Requested By:** John B Stamberg, P.E

**Project No:** 161

**Date Samples Received:** 14.10.02

**Date of Issue:** 05.11.02

**Date of Analysis:** 31.10.02

The samples detailed below have been analysed qualitatively for asbestos by polarised light and dispersion staining as described by the Health and Safety Executive in MDHS 77. The results are given below:

IOM No.	Clients Sample No.	Sample Details	Asbestos Type(s) Present
E20535	2	<p><i>VERMICULITE SAMPLES:</i></p> <p>VVL - QT2 - 345 - 2002</p> <p><i>VVL Powdered Composite</i> <i>2<sup>nd</sup> Quarter 2002</i></p>	NONE DETECTED
<b>No. of Samples: ONE</b>			

The Institute of Occupational Medicine accepts responsibility only for results obtained from samples as received. No responsibility is accepted for errors, which may have arisen during sampling or transportation of samples by external clients.

**Analysed by:**

*A Cameron*  
A Cameron  
Scientific Technician

**Authorised by:**

*C McIntosh*  
C McIntosh  
Laboratory Manager

*Sheet 1 of 1*