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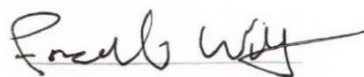
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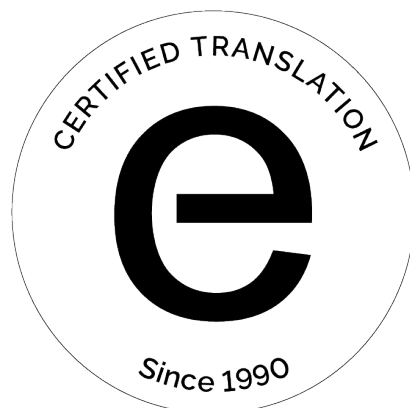
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**12 July 2022**

**Addendum to the environmental permit - facility for mercury  
purification of items**

Case number: GEO-2021-04617  
Document number: 6770892

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<u>Company name:</u>	Modern American Recycling Services, Europe A/S
<u>Company list designation:</u>	K210 (Ship recycling)
<u>Location of the company:</u>	Sandholm 60, DK-9900 Frederikshavn
<u>Plot No.:</u>	507ch, Frederikshavn Bygrunde
<u>Company's CVR No.:</u>	39610922
<u>Company's P No.:</u>	1026708466 (sandholm 60) 1023664530 (sandholm 55H)
<u>Operations Manager:</u>	Kim Thygesen
<u>Supervisory authority:</u>	Frederikshavn Municipality

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## 1. The municipality's decision and conditions

An addendum to the environmental permit for Modern American Recycling Services, Europe A/S at Sandholm 60 on plot no. 507ch, Frederikshavn Bygrunde is hereby notified.

The mercury purification facility will be established in the building at Sandholm 55G. This addendum extends the previously environmentally approved area. The company's area is then as shown in Annex A. The authorisation is valid from today and is granted under a number of conditions.

The conditions are considered to ensure that the activity applied for can be carried out on the site without causing pollution incompatible with the sensitivity and quality of the surroundings.

### Use of the authorisation

1. If the environmental permit for the mercury purification facility is not used by 1 July 2024, this part of the environmental permit will lapse.
2. The authorisation for the operation of the mercury purification facility is subject to the continuous availability of a NORM permit from the National Institute of Radiation Protection (SIS). Frederikshavn Municipality must be informed in case of changes.
3. The permit for the mercury purification facility expires at the latest when operation has been suspended for 3 years.
4. Conditions in the environmental permit dated 9 March 2018 apply to the whole establishment and hence also to the activity around the mercury purification facility unless otherwise stated in the conditions below.

### Set up and operation

5. The activity shall be set up and operated in accordance with the requirements of the permit and the information provided, including information provided by the applicant.
6. The wastewater and air filters for the mercury purification facility shall be operated, serviced and maintained in accordance with the supplier's instructions so that normal purification efficiency is maintained on an ongoing basis.

Before the mercury purification facility is put into operation, the following must be submitted

- an updated EHS-PRO-349 procedure to Frederikshavn Municipality.  
The procedure shall be updated with the processes for the operation and maintenance of the mercury purification facility.
- a sewerage plan and a map showing the location of air discharge.

### Air pollution

7. The company's discharge from the mercury purification facility shall be dimensioned in such a way that the B-value indicated in Table 1 can be met.  
Discharge where the

calculated dispersion factor (see Air Guideline<sup>1</sup>) is less than 250 m<sup>3</sup>/s, must be at least 1 metre above the roof and must be upwards.

Parameter	Main group/class	Mass flow limit (g/h)	Emission limit value (mg/Nm <sup>3</sup> )	B value (mg/m <sup>3</sup> )	Measurement method <sup>3)</sup>
Dust in general	2/-	≤0.5	300	0.08 <sup>2)</sup>	MEL-02
		>0.5 and ≤5	50		
		>5	10		
Mercury <sup>1)</sup>	2/I	1	0.1	0.0001	MEL-8b

**Table 1:** Air limit values

- 1) A small part of the emission may occur on the gas phase, but is counted as dust (see the Air Guideline)
- 2) Applies to the part of the dust smaller than 10 µm in diameter
- 3) See the website for the Danish Environmental Protection Agency's Reference Laboratory for measuring emissions to the air.

If the mass flow limits are exceeded, the emission limit values shall be complied with. If the mass flow limit is not exceeded, no emission limit value applies. The B values must be complied with irrespective of mass flow limits and emission limit values.

8. The operator shall, within 6 months after the facility has been put into operation, carry out a performance check including an OML calculation (see condition 14) to demonstrate compliance with the relevant emission limit values set out in Table 1. Thereafter, the supervisory authority may require further performance monitoring to be carried out, but no more than once a year.
9. Documentation in accordance with condition 8 shall be received by the supervisory authority in written form within 3 months of the request.
10. Measurements and calculations in accordance with the above conditions must be carried out by a company accredited by DANAK (or equivalent accreditation body) for the specific measurements.
11. The documentation shall contain information on all relevant aspects of air emission measurements, see the Air Guideline or the regulations in force from time to time adopted by the Danish Environmental Protection Agency. The above documentation shall include the results of all individual measurements and calculations.
12. Performance checks and associated calculations shall be carried out in accordance with the Air Guideline and the methods given in Table 1. Measurements shall be made under representative operating conditions (maximum normal operation). As a general rule, at least 3 measurements per substance of 1 hour each shall be made on each discharge.

<sup>1</sup> The Danish Environmental Protection Agency Guideline No. 2 of 2001 Air Guideline - Limitation of air pollution from companies

13. Measurement conditions and scope may be deviated from only with the prior agreement of the supervisory authority.
14. Compliance with the B value must be documented by an OML calculation, see the Air Guideline. The maximum hourly emission shall be used in the calculations to check compliance with the B value.
15. The mass flow limits are considered to be met when each of the measured/calculated values averaged over 7 hours is less than or equal to the values in Table 1.
16. The emission limit values shall be complied with if each of the measured/calculated maximum hourly values is less than or equal to the limit values set out in Table 1.
17. The B value is considered to be met when the maximum found in an OML calculation of monthly 99% fractions for a one-year calculation period is less than or equal to the B value for the substance in Table 1.
18. The location and layout of the measurement site must comply with the Air Guideline.

#### **Self-monitoring**

19. Condition 55 (on the content of the operational log) of the environmental permit of 9 March 2018 is supplemented by the following:
  - Inspection and maintenance of the wastewater and air filters for the mercury purification facility.

#### **Revised annexes**

20. The following annexes to the environmental permit dated 9 March 2018 are amended by this decision. The amended annexes are set out at the back of the decision.

Annex A	Layout drawing
Annex C	The company's location and types of noise zones
Annex D	Annual waste quantities and maximum stockpiles

#### **Collateral**

21. Condition 77 of the environmental permit of 9 March 2018 now reads as follows:

Collateral shall be established in accordance with this decision by 1 September 2022. The company must submit documentation to Frederikshavn Municipality before this date.

This decision sets the collateral at DKK 3.16 million in accordance with the maximum stockpiles of waste types set out in Annex D.

The collateral may take the form of a bank guarantee, a surety bond or the deposit of cash in a blocked account at a financial institution.

The company must submit a recalculation of the collateral at least once every 4 years. This can form the basis for Frederikshavn Municipality's adjustment of the collateral. The next calculation must be submitted by 1 July 2026.

## 2. Background to the authorisation

Frederikshavn Municipality has received an application for an addendum to the environmental permit for Modern American Recycling Services, Europe A/S.

Niras, on behalf of Modern American Recycling Services, Europe A/S, submitted an application on 7 September 2021 for the establishment of a permanent mercury purification facility. The facility is to be established in a new building, to be located on the site where the building at Sandholm 55G was located. The company also has access to approximately 2,400 m<sup>2</sup> of storage buildings located immediately northwest of the mercury purification facility. In these buildings there will be storage of items of value, which are dismantled as part of the company's processes. Clean items can also be stored in areas outside the buildings. No waste, etc., is stored.

The company's area authorised for environmental purposes is hence extended and, in view of this, amendments are required to the map annexes to the existing environmental permit (Annexes A and C). Furthermore, a revision of the environmental permit's Annex D: Annual waste quantities and maximum stockpiles is requested, which entails a modification of the collateral.

Niras submitted additional information on 30 September 2021, 25 November 2021, 11 January 2022, 9 February 2022 and 22 March 2022.

The following description is extracted from the application material. The description is divided into *Permanent facility for mercury purification* and *Revision of Annex D: Annual waste quantities and maximum stockpiles*.

### 2.1 Permanent facility for mercury purification

During the recycling of platforms, mercury-containing coatings may be found on the inside of pipes and tanks. The examination of the recycling item prior to the start of the recycling process will determine whether mercury is present and, if so, where and in what concentrations.

Items with mercury-containing coatings must be cleaned before the metal can be broken down further.

Similarly, coatings in pipes and tanks may contain NORM. Such coatings must also be removed before the metal can be handed over for machining. Coatings containing NORM are cleaned by high pressure cleaning on the item itself in a closed system. Water used for this treatment is subsequently filtered to separate NORM and recirculated to the system.

The company wishes to establish an onshore coating removal facility where the coating has been found to contain mercury. This coating may also contain NORM.

The handling of NORM must be approved by the Danish Health Authority, the National Institute of Radiation Protection (SIS), which issues a separate permit.

The facility is targeted at mercury purification based on the studies carried out by MARS/Semco Maritime A/S, which show that mercury may be present in pipes, tanks, etc. Due to their size, these elements could not be cleaned on the scrap yard using the mobile facility, which is why the establishment of a permanent facility is requested.

The mercury removal will be located in a new 400 m<sup>2</sup> hall adjacent to the company's existing buildings. The steel hall will be placed on an existing paved area. A sealed covering is established in the hall. This will be done by pouring new concrete in the hall with an incline towards the grate and drainage. A membrane is installed on the sides to ensure that no leakage can occur to the surroundings.

Items contaminated with mercury-containing coatings are identified during the initial examination. The coatings are cleaned by means of UHP - Ultra High Pressure. During the purification process, a mobile water purification system is stored in a container on the site outside the hall.

The wastewater from the treatment process is first treated in a carbon filter before being discharged via the public sewage system to the treatment plant at Saltebakken. A connection permit has been applied for.

The building is fitted with ventilation. The ventilated air, which may contain mercury and dust, is purified in air filters before passing through a carbon filter and discharged 1 metre above the roof of the building to the surroundings.

The used filter materials from air and wastewater treatment are handled as hazardous waste. The maximum amount of mercury-containing waste in the form of coatings and filter material will not exceed 50 tonnes/year and the maximum stockpile at the facility will not exceed 10 tonnes. Filter material and wastewater will amount to a maximum of 500 - 1,000 m<sup>3</sup>/year depending on the operations.



Pipes and tanks that need to be cleaned of mercury-containing coatings will either be driven directly to the hall for cleaning or sealed and stored until the cleaning can be carried out. The seal ensures that no leaching can occur from the item. As a rule, sealed items are stored in the hall.

After handling and cleaning of the items, a report will be available explaining the process and disposal of mercury-containing filtrate.

To ensure traceability and correct and safe handling of contaminated items, the work is carried out in close collaboration with, among others, Semco Maritime A/S that has extensive experience in handling contaminated items.

If during the purification process, faults occur on the filter systems, the process will stop and only resume when the faults have been corrected.

The purification process will be covered by MARS procedure EHS-PRO-349, which will be updated to include processes in the permanent facility and conditions in the addendum permit.

#### Wastewater filter

Wastewater is treated in a Simacarb carbon cartridge filter CFCKV3P- 1445F. The carbon filter is replaced regularly according to the MARS EHS procedure so that efficiency is maintained.

An analysis of mercury in wastewater has been submitted, showing that the concentration is below the detection limit of <0.05 µg/l.

#### Air filters

A ventilation system is installed to purify the air in the hall. The door is kept closed during work. The ventilation system ensures a negative pressure in the hall.

The air discharge will be fitted with a pre-filter (particle filter/envelope filter) and a subsequent active filter (cartridge filter). Prefiltration (particle filtration) will be at least of class F7 according to EN779. The pre-filter is inserted to protect the downstream active carbon filter, which is unable to filter particles. The filter system ensures that overall >99% of mercury in the discharged air is filtered out. It is therefore estimated that the discharge from the hall will comply with B values at the boundary and beyond by a good margin.

Measuring stations shall be established to allow air emission measurements and OML calculations to be made to demonstrate compliance with the B value for mercury.

The filters will be regularly maintained and replaced according to the supplier's instructions. This will be included in the company's updated procedures. The correct and efficient functioning of the filter systems is an integral part of the company's traceability protocol.

### Waste

Air and wastewater filters that will eventually contain retained mercury will be handled as hazardous waste.

## **2.2 Revision of Annex D: Annual waste quantities and maximum stockpiles**

The company has applied for changes to Annex D of the environmental permit, which specifies the annual quantities of waste produced and maximum stockpiles at the company.

This is based on the experience gained since the start of operations.

The company also requests that the EAK codes in Annex D be deleted and that the Annex be considered as a positive list. This approach makes waste management more appropriate, as the company is not challenged on EWC codes that are not in Annex D.

The collateral has been recalculated to take account of the changes in the maximum stocks. The calculation has been carried out in present value DKK and shows that it is necessary to increase the collateral from DKK 2.36 million to DKK 3.16 million.

## **2.3 Environmental assessment and justification of the conditions set**

The municipality's reasons for granting the authorisation in relation to the Authorisation Order's <sup>2</sup>Chapter 10 on "Decision on authorisation" are described in this section.

The majority of the conditions in this environmental permit have been drawn up in accordance with the Danish Environmental Protection Agency's guidelines on air pollution. The basic approach is based on the authorisation order.

In the company's existing environmental permit dated 9 March 2018, part of the relevant environmental conditions for the specific project around the mercury purification facility are already regulated. Among other things, the following conditions can be mentioned:

- Storage of waste, including hazardous waste (conditions 27-36)
- Protection of soil, groundwater and receiving waters (conditions 37-48)
- Self-monitoring (conditions 49-55)

It is mainly conditions relating to air pollution, changes in waste storage and collateral that are relevant in the specific case. Furthermore, the map material needs to be updated, as the company's environmentally approved area is being extended, and Annexes A and C are therefore being revised.

### Use of the authorisation

Conditions 1 and 3 are general conditions for the use of the environmental permit.

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<sup>2</sup> Ministry of Environment of Denmark Order No. 2080 of 15 November 2021 on the approval of listed companies.

The background to condition 2 is that the handling of NORM is carried out by the National Institute of Radiation Protection (SIS) and it is therefore a prerequisite that the necessary authorisation from SIS is obtained before operations can commence.

Condition 4 clarifies that conditions in the existing environmental permit also apply to the application unless otherwise stated in the other conditions.

#### Set up and operation

Condition 5 is a general condition that sets out the conditions of the permit.

Condition 6 ensures that filters are operated, serviced and maintained so as to function as intended. The "EHS-PRO-349 Mercury Awareness" procedure will be updated with how to operate and maintain the mercury purification facility. Frederikshavn Municipality wishes to see this, which is also formulated in condition 6.

In condition 6 it is formulated that drawings of the air discharge and sewer system are submitted. These drawings are not available at this stage as the systems have not been designed in detail.

#### Air pollution

It is stated in the application material that the exhaust air volume from the hall is expected to be 6,500 m<sup>3</sup>/h. The discharge is expected to be 1 metre above roof. The facility has not been finally dimensioned, which is why condition 7 lays down requirements that take account of the fact that the discharge height, discharge diameter and mass flow are not yet known. The applicant has indicated that the air will contain dust and mercury, therefore mass flow limit, emission limit and B value have been set for these pollutant parameters.

Condition 8 requires the submission of a performance check and an OML calculation demonstrating compliance with the air limit values for dust and mercury. It is Frederikshavn Municipality's assessment that dust filters with subsequent carbon filters ensure compliance.

Conditions 9-18 are requirements related to the execution and reporting of the performance check.

#### Protection of soil, groundwater and receiving waters

The area where the company is located is not in areas of special drinking water interest or in the catchment area of a waterworks. There is therefore no potential for impact on groundwater interests in the area.

A sealed covering is established in the hall. This will be done by pouring new concrete in the hall with an incline towards the grate and drainage. A membrane is installed on the sides to ensure that no leakage can occur to the surroundings.

Pipes and tanks that need to be cleaned of mercury-containing coatings will either be driven directly to the hall for cleaning or sealed and stored until the cleaning can

be carried out. The seal ensures that no leaching can occur from the item. As a rule, sealed items are stored in the hall.

The area is designated in the municipal plan as an area at risk of flooding. It is the assessment of Frederikshavn Municipality that the fact that the building is secured against leakage also means that polluting materials are stored so that no discharge can occur to the harbour basin in the event of possible flooding of the area.

#### Wastewater

A connection permit has been applied for to discharge wastewater from the mercury purification facility into the public wastewater system. This permit shall be granted separately.

An analysis of mercury in wastewater has been submitted, showing that the concentration is below the detection limit of <0.05 µg/l. In the connection permit, it is expected that, see the guideline on the connection of industrial wastewater to public sewage systems, to be set a limit value of 3 µg/l.

#### Self-monitoring

In condition 19, the company's condition 55 with requirements for the content of the operating record is supplemented with this information:

- Inspection and maintenance of the wastewater and air filters for the mercury purification facility.

The company already records relevant information on waste fractions stored and removed. Frederikshavn Municipality may therefore at any time request information on the amount of stored and removed waste fractions containing mercury.

#### Revised annexes

Condition 20 lists the annexes that are amended by this decision. Annex A: Layout drawing and Annex C: The company's location and types of area affected by noise have changed as a result of the extension of the company's site to include the hall for the mercury purification facility, buildings to the north-west for the storage of reusable materials and external areas to the east.

Annex D Annual waste quantities and maximum stockpiles have been amended in accordance with the company's request for increased quantities.

	<b>Quantity/year (tonnes)</b>	<b>Max. Quantity (tonnes)</b>
Total hazardous waste:		
Originally:	8,360.1	536.8
changed to:	14,206.0	1,061.7
Not hazardous waste in total:	7,030	153
Originally:		
changed to:	7,030	270

**Table 2:** Requested changes in annual waste quantities and maximum stockpiles.

A maximum of 50,000 tonnes of scrap will be stored on the sites, previously this amount was 20,000 tonnes.

The company has requested that the EWC codes for the different types of waste be removed from Annex D. Frederikshavn Municipality can state that there is no requirement in the Authorisation Order or in the Standard Condition Order <sup>3</sup> that the application or environmental permit must contain EAK codes.

The Standard Condition Order states the relevant list items (e.g. K203, K206 and K212) that the company must provide information on waste fractions. It is clarified that *by "waste fractions", it means the waste fractions into which the waste is received and the waste fractions which the company operates internally for management purposes.* It is the permitting authority that determines which waste fractions are to be regulated with a maximum stockpile, if there is an environmental justification for this.

EAK codes are typically used in positive lists associated with disposal facilities.

Frederikshavn Municipality accepts the company's request that the EAK codes be removed from Annex D. There is a requirement for maximum stored quantities for the sake of the correct assessment of the size of the collateral at all times.

#### Collateral

The recalculation of the collateral following the changes in the maximum amounts has led to an increase of the collateral from DKK 2.36 million to DKK 3.16 million.

This means that condition 77 of the existing environmental permit must be amended. In the existing environmental permit, the wording of the condition is as follows:

77. Collateral shall be established in accordance with this decision before the company is put into operation.

The collateral shall be set at DKK 2.36 million in accordance with the maximum quantities of types of waste set out in Annex D.

The collateral may take the form of a bank guarantee, a surety bond or the deposit of cash in a blocked account at a financial institution.

The company must submit a recalculation of the collateral at least once every 4 years. This can form the basis for Frederikshavn Municipality's adjustment of the collateral. The first calculation shall be submitted by 1 March 2022.

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<sup>3</sup> Ministry of Environment of Denmark Order No. 2079 of 15 November 2021 on standard conditions for the approval of listed companies

Condition 21 contains a change to the amount of the collateral and requirements for when the next recalculation must be submitted.

The recalculation of the collateral is also in fulfilment of the requirement to submit a recalculation of the collateral every 4 years, see condition 77.

#### Nature

There is a protected beach meadow approximately 650 metres to the northwest. The facility is not considered to affect protected species or habitats, as according to the notification, environmentally hazardous substances will be handled in accordance with existing rules in order to safeguard the surrounding environment.

Approximately 900 metres north-east of the site is Habitat Area SAC4, Bird Protection Area SPA11 and Ramsar Area 8. The demarcation of these is coincident. In addition, there is a national conservation area approximately 900 metres east of the site. The above protections are intended to protect the nature around Hirsholmene.

On the designation basis of the Natura 2000 site are the following species: Heath Fritillary (*Euphydryas aurinia*), Squid (*Lampetra planeri*), Sea Fritillary (*Petromyzon marinus*), Otter (*Lutra lutra*), Grey Seal (*Halichoerus grypus*), Spotted Seal (*Phoca vitulina*) and Harbour Porpoise (*Phocaena phocaena*). The project is not considered to affect these species. Porpoise is considered to be the only relevant Annex IV species in the area. The facility is not considered to affect the conditions for porpoise, as the facility does not affect the amount of food available.

No Red List species are expected to be present around the facility

#### itself Best Available Technique (BAT)

The Danish Environmental Protection Agency has not developed standard conditions for the activity/activities of the company. The assessment of BAT is based on Annex 5 (Criteria for the determination of BAT) of the Order on the approval of listed companies.

The described purification method, which has been developed in collaboration with Semco Maritime A/S, is considered to be the best technology for mercury cleaning of offshore items that are recycled and handled at the company. The method is already used in the mobile solution and for handling the company's NORM contaminated items.

## **2.4 Planning conditions**

The facility is located on land covered by District Plan FRE.H.14.08.02 Expansion of the Port of Frederikshavn. The district plan describes that the new port will be expanded to accommodate, among other things, facilities for the recycling of large ships and possibly also offshore installations, as well as for the expansion of the already existing recycling and dismantling industry. District plan provision 3.3 states that companies in company classes 4-7 may be established, specifically mentioning the recycling of offshore installations.

The facility is hence in conformity with the existing district plan.

### **3. Relationship to the law**

#### **3.1 Legal basis**

Under Section 33 of the Environmental Protection Act, companies, facilities or equipment included in the list of so-called listed companies referred to in Section 35 may not be built or commenced until approval has been granted. Listed companies shall also not be extended or altered in construction or operation in such a way as to cause increased pollution until the extension or alteration has been approved.

The provisions are contained in Consolidation Act No. 100 of 19 January 2022 on environmental protection and in Order No. 2080 of 15 November 2021 on the approval of listed companies (the Authorisation Order).

Frederikshavn Municipality has placed the company under the following list item:

#### **K210 Ship recycling**

The activity concerning the purification of items for mercury has been assessed by Frederikshavn Municipality to be an expansion of the company requiring environmental approval.

There are no standard conditions for list item K210.

#### **3.2 Previous announced decisions**

The following decision was previously notified to the company:

- Environmental permit for the recycling ships, platforms and oil rigs, dated 9 March 2018

This is still valid.

#### **3.3 Publicity and consultation of the interested parties**

The draft decision was sent for consultation to the applicant and the other parties on 31 May 2022.

The Port of Frederikshavn stated on 16 June 2022 that it had no comments on the draft.

The applicant submitted comments on 29 June 2022. The comments have led to minor changes in the decision.

### **3.4 Reassessment**

When 8 years have elapsed from the granting of an authorisation, the supervisory authority may review the authorisation.

### **3.5 Legal protection**

In the case of new conditions, the company's period of legal protection shall be 8 years from the date of granting of this environmental permit. If the environmental permit is appealed, the period of legal protection does not expire until 8 years after the final decision of the appeal authority.

Once the legal protection period has expired, the permit remains valid, but the supervisory authority may amend the conditions of the environmental permit by means of an injunction.

During the period of legal protection, the supervisory authority cannot - as a general rule - issue injunctions or prohibitions to the company. However, the supervisory authority must review the authorisation and, if necessary, issue an injunction or prohibition if:

- 1). new information on the harmful effects of the pollution has become available,
- 2). the pollution gives rise to harmful effects on the environment which could not have been foreseen when the permit was granted,
- 3). the contamination goes beyond that for which the permit was granted,
- 4). significant changes in best available techniques allow significant emission reductions without entailing disproportionate costs,
- 5). the use of other techniques is required for reasons of operational safety - in relation to the process or activity; or
- 6). new information has become available on the safety situation in establishments subject to rules laid down pursuant to the Risk Order.

The municipality may, in exceptional cases, revoke an authorisation or impose special conditions in an existing authorisation, including conditions on the provision of collateral.

### **3.6 Right of access to documents**

Access to the authorisation file and to the results of the company's self-monitoring held by the supervisory authority is granted. Access to documents, and the restrictions on access to documents, follow from the rules in the Public Access Act, the Administrative Procedure Act and the Act on Access to Environmental Information.



### 3.7 Publication and appeal procedure

The decision, which has been notified in accordance with the rules of the Environmental Protection Act, will be published by announcement on the municipality's website ([www.frederikshavn.dk](http://www.frederikshavn.dk)) and on the Digital Environmental Administration (<https://dma.mst.dk>) on **14 July 2022**.

According to the rules of the Environmental Protection Act, the decision can be appealed to the Environmental and Food Appeals Board by the applicant, by certain specified authorities and interest groups and by anyone who has an individual, substantial interest in the outcome of the case.

If you wish to appeal against this decision, you can appeal to the Environmental and Food Appeals Board. You appeal through the Appeals Portal, which you can log into via this link: <https://kpo.naevneneshus.dk>. You can also log in via [borger.dk](http://borger.dk) (as a citizen) or via [virk.dk](http://virk.dk) (as a company or association). You log in to the Appeals Portal with your NEM ID. The appeal is sent through the Appeals Portal to the authority that took the decision. An appeal is filed when it is available to the authority in the Appeals Portal. You have to pay a fee of DKK 900 when you appeal.

Companies and organisations must pay a fee of DKK 1,800. You pay the fee by a payment card in the Appeals Portal. The fee will be refunded if you win all or part of your appeal.

As a rule, the Environmental and Food Appeals Board must reject an appeal that is not submitted through the Appeals Portal unless there are special reasons for doing so. If you wish to be exempted from using the Appeals Portal, you must send a reasoned request to the authority that has taken a decision in the case. The authority will then forward the request to the Environmental and Food Appeals Board, which will decide whether your request can be granted.

The appeal period is 4 weeks from the public announcement of the authorisation and expires at midnight on **11 August 2022**.

Under Section 96 of the Environmental Protection Act, an appeal against an authorisation does not have suspensive effect unless the Minister decides otherwise. The use of the authorisation shall be at the sole responsibility of the applicant and shall not restrict the right of the appeal body to amend or revoke the decision appealed against.

According to Section 101 of the Environmental Protection Act, an action to challenge the decision under the Act must be brought before the courts within 6 months of the announcement of the decision.

Yours sincerely,

Jette Brønnum

Helle Müller

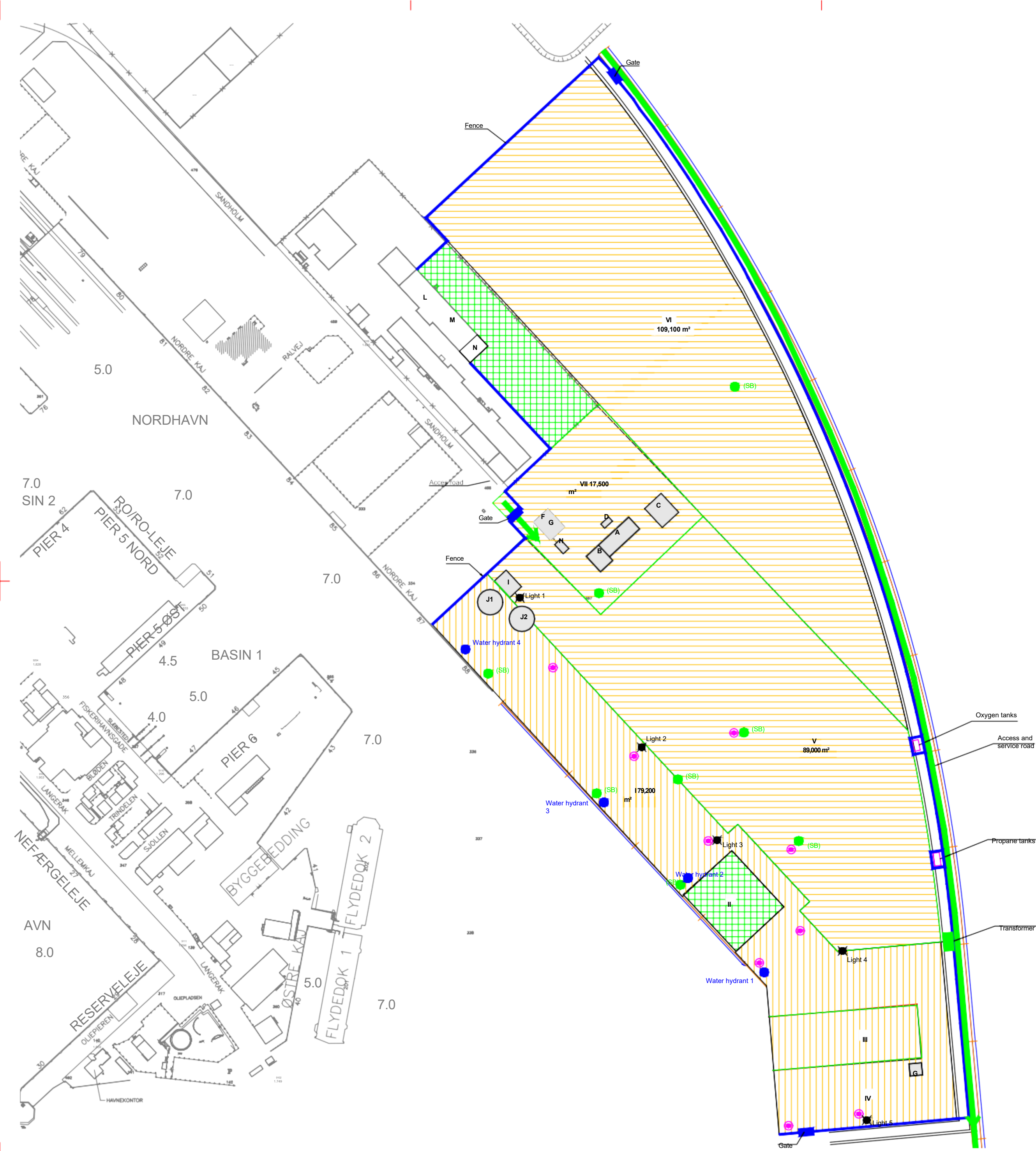
**Copy sent to:**

The Danish Patient Safety Authority, Supervision and Advisory North  
([tnord@stps.dk](mailto:tnord@stps.dk))

The Danish Society for Nature Conversation ([dnfrederikshavn-sager@dn.dk](mailto:dnfrederikshavn-sager@dn.dk))

Birdlife Denmark (DOF) ([frederikshavn@dof.dk](mailto:frederikshavn@dof.dk) and [natur@dof.dk](mailto:natur@dof.dk))

The Danish Outdoor Council, head office ([fr@friluftsraadet.dk](mailto:fr@friluftsraadet.dk))

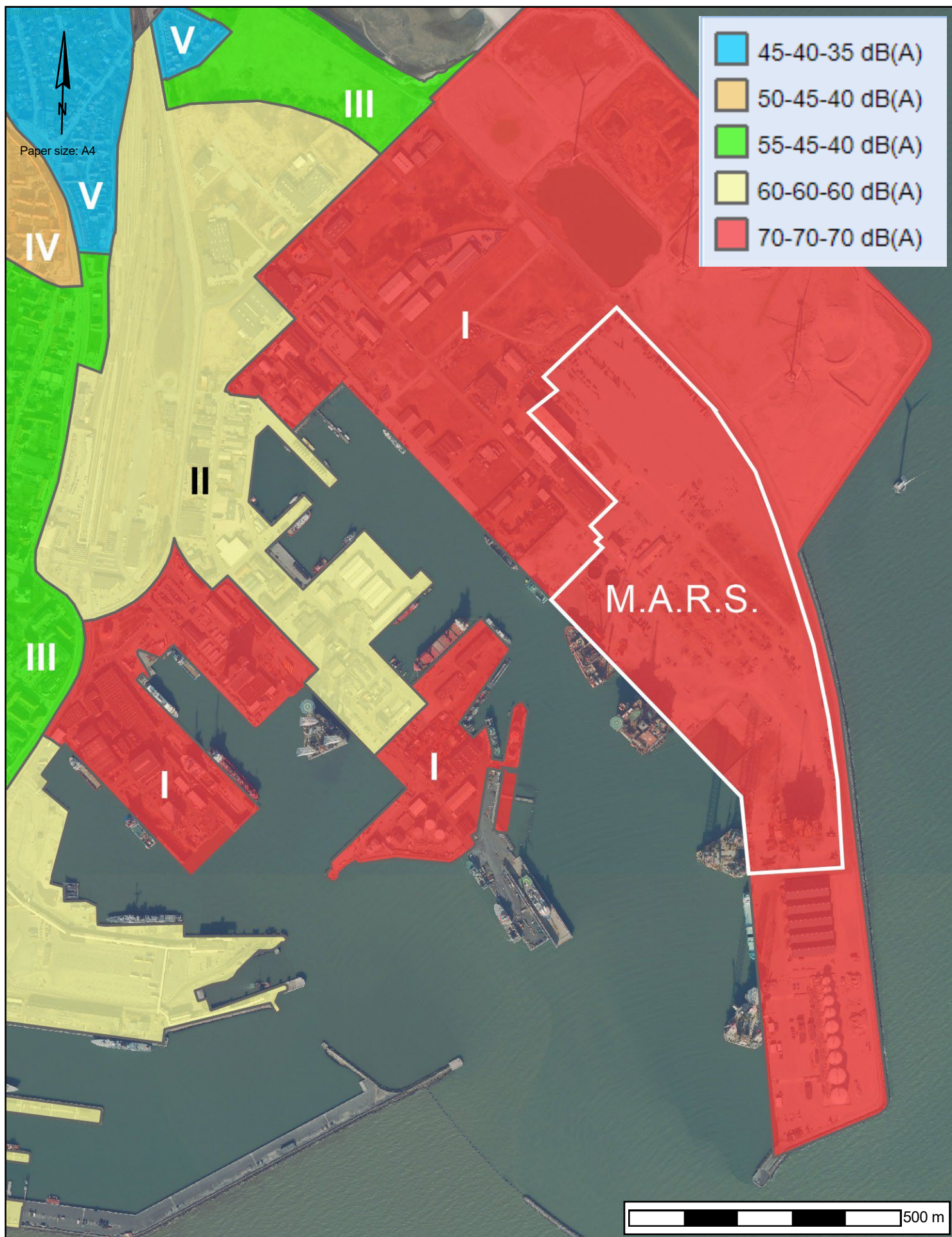


- Signatures:**
- Fence
  - Gate
  - Access road
  - Building
  - Crushed rock surface including HDPE, membrane, Load off area
  - Crushed rock surface including HDPE, membrane, hinterland
  - Concrete/asphalt surface
  - Manifold O<sub>2</sub> / propane
  - Switchboard (SB)
  - Water hydrant 1-4
  - Light mast 1-5

- Areas**
- I Load in/off area
  - II Ship ramp sloping area
  - III Skidding area
  - IV Heavy module offload area
  - V Scrapping area, hinterland
  - VI Storage area
  - VII Waste, warehouse area

- Buildings**
- A Warehouse, 1468 m<sup>2</sup>
  - B Warehouse, 457 m<sup>2</sup>
  - C Waste storage, outdoor, 30\*30 m
  - D Fuel storage,
  - F Gatekeeper
  - G Crew facility, sanitary, canteen
  - H Office Building, sanitary, canteen
  - I Surface water pretreatment facility
  - J Buffer tank, surface water
  - L Warehouse, 1500 m<sup>2</sup>
  - M Office, 900 m<sup>2</sup>
  - N Hg cleaning, 400 m<sup>2</sup>





### Annex C

The company's location and noise area types

Time: 30-05-2022 13:55:42

Printed by: Jette Brønnum Scale: 1:9000

Maps and data are indicative and cannot be used as documentation

## Annex D Annual waste quantities and maximum stockpiles

Type of waste	Type of waste	Quantity /year (tonnes)	Max. Quantity (tonnes)	Waste treatment plant	Reuse potential
<b>Hazardous waste - fractions (Fortum)</b>					
Drilling muds and other drilling waste	Drilling muds and drilling waste containing oil	200	50	Nyborg	Reused
	Waste drilling muds and drilling waste containing oil	200	30	Nyborg	Reused
	Drilling muds and other water-based drilling waste containing dangerous substances	200	50	Pallet tank - Nyborg	Disposal/treatment/reprocessing
	Drilling muds and other water-based drilling waste containing hazardous substances	120	30	Nyborg	Disposal/treatment/reprocessing
Waste oil	Hydrocarbons, fats and oils	500	50	Barrels / Pallet tank - Nyborg	Reused
	Hydrocarbons, oil residues (slop oil)	2000		Barrels / Pallet tank - Nyborg	Reused
Contaminated coatings	NORM	100	50	10 m <sup>3</sup> container-Temporary storage	Disposal
Chemicals	Discarded organic chemicals consisting of or containing hazardous substances	50	30	Pallet tank/Barrels - Nyborg	Disposal
Process Chemicals - Waste organic solvents, refrigerants and foam/aerosol propellants	Methanol	10	2	Nyborg	Reused
	Solvents	10	2	Nyborg	Disposal
	Rust inhibitors	10	2	Nyborg	Disposal
	H <sub>2</sub> S removal	10	2	Nyborg	Disposal
	Coating inhibitors	10	2	Nyborg	Disposal
	CIP acid	10	2	Nyborg	Disposal
	Glycol, TEG	50	50	Grenå	Disposal
	Other discarded chemicals	10	2	Nyborg	Disposal
Oils and fuels	Aqueous film forming foam (AFFF)	50	10	Nyborg	Disposal
	Waste oil, hydraulic oil, reusable	300	50	Barrels or Pallet Tank -Århus	Reused
	Oil emulsions	10	10	Nyborg	Reused/treatment/reprocessing
	Wastes consisting of, containing or contaminated with heavy fuel or condensate	50	10	Århus	Disposal
	Oil waste, not reusable	50	10	Århus	Disposal
	Waste oils and hydraulic oils, reusable	500	50	Århus	Reused
	Oil and fat waste	10	10	Nyborg	Disposal
	Oil contaminated waste	50	10	Nyborg	Disposal
Radioactive sources	Fuel oil and diesel oil	800	150	Nyborg	Disposal
	Smoke detectors	1	1	Container	Disposal - Return to supplier/Risø
Hazardous fibres	Asbestos	400	50	Landfill	Disposal
Building materials containing dangerous substances	Phthalates	200	10	10 m <sup>3</sup> container - Nyborg	Disposal
	Chlorinated paraffin	50	10	Nyborg	Disposal
	pFOS	100	30	Pallet tank / bulk container -Nyborg	Disposal

	Flame retardants	200	10	10 m <sup>3</sup> container - Nyborg	Disposal
	CFC, HCFC gases (refrigerants)	10	2	Pallet tank or container -Nyborg	Disposal
	CFC, HCFC in insulation materials	50	5	Nyborg	Disposal
	Halon	100	5	Safe handling - Pallet tank or stand for gas cylinders	Disposal
	Jointing compound, PCB	100	50	Kumla	Disposal
	Substances that may be contaminated with PCBs, isocyanates, heavy metals, asbestos, etc.	600	20	Metal tank - Nyborg	Disposal
	Impregnated wood	200	20	10 m <sup>3</sup> container	Disposal
Paint	Solvent based paints without PCB	600	20	Metal 1 m <sup>3</sup> or 10 m <sup>3</sup> container No requirement for ADR classification - Nyborg	Disposal
WEE	Fluorescent tubes	10	1	WEEE container - Kumla	Disposal
Heavy metals	Anodes	3000	50	Stena	Disposal
	Light sources/fittings (Hg)	0.5	0.1	RQR	Disposal
	Light sources, tubes	9	1	RQR	Disposal
	Switches (Hg)	0.5	0.1	RQR	Disposal
	Mercury - solid waste, light sources/tubes	5	0.5		Disposal
	Mercury in coatings	50	10	Solids packed according to regulations, sludge in barrels - Kumla/RQR	Disposal
	Lead-acid batteries	200	50	Boliden	Disposal
	NiCd batteries	10	2	Boliden	Disposal
	Contaminated wash/rinse water	3000	50	Pallet tank / bulk container - Aarhus	Disposal
<b>Total hazardous waste</b>	<b>Sum of the above</b>	<b>14,206.0</b>	<b>1,061.7</b>		
<b>Non-hazardous waste (MARS)</b>					
Sewage sludge from surface water treatment/processing plants (heavy metals, metals, oil, etc.)	Metals, heavy metals, oils, etc.	Approx. 6000	50	Sludge tank/ container 20-50 m <sup>3</sup> - Nyborg	Recycled / disposed of
Other, non-hazardous waste	Glass	200	50	Storage, on site	Reused
	Wood	500	50	Storage, on site	Incinerated / Recycled
	Tyres	20	10	Storage, on site	Reused
	Plastic	200	50	Storage / container on site	Reused
	Cables (not oil filled)	100	50	Storage / container on site	Reused
Electronic / electrical waste	Discarded equipment and parts removed from discarded equipment, transformers, etc.- No PCB fraction/No WEE	10	10	Container on the site	Reused
	<b>Sum of the above</b>	<b>7,030</b>	<b>270</b>		
A maximum of 50,000 tonnes of scrap metal will be stored on the site in bunkers with a maximum height of 10 m.					