MOORS OVENBOUW BV
alles op het gebied van vuurvast

Julianastraat 49
5087 BA Diessen
tel +31 (0)13 504 25 03
fax +31 (0)13 504 25 08
K.v.K. 18034808
internet www.moorsovenbouw.nl
e-mail info@moorsovenbouw.nl

Introduction

The company Moors Ovenbouw b.v., based in the Netherlands, is active in refractory installation for more than 25 years. We are a medium sized company in our industry and we have been active in projects Worldwide, like: Indonesia, USA, Peru, Taiwan, Russia, etc.

I have been working for the company since the beginning and have been involved in the management of this company over the last 15 years. However, when I joined the company after my study on the Technical University I purposely started my career with on the job training to get experience with the material and constructions. After several years of getting practical experience installing materials I worked on the engineering making the preparation of the work calculations and drawings.

The reason for this letter is to raise my concerns on the SVHC listing of RCF fiber materials and the intention of the ECHA to evaluate the future use of these products.

Why our reaction?

We have a lot of experience with working with refractory ceramic fiber (RCF). We believe that RCF is a excellent product with distinctive competences in the furnaces of our customers. Without the use of RCF in these furnaces the durability or maintenance costs would go up dramatically, not to forget that RCF in some applications cannot be substituted by alternatives.

The theoretic approach reports which we read, made by people in small chambers and laboratories about the RCF, give us the impression of that they do not relate to the real situation which we face during installation We want to advice these people to go and see in the practice also, because otherwise it is impossible to formulate the right conclusions.

Working with RCF

20 years ago we were working with the RCF in a primitive way; we did not use the right protection and clothing. But now, we have a long experience and we think we are working in a very professional way with these products. The manufacturers of RCF have, about 15 years ago, made a website for information about RCF; www.ecfia.org. . From that time, we are using the 'ECFIA' as the guideline for working with RCF fibers.

The most important rules which we use in our company are:
1. Only well trained people are working with RCF. The people have to be instructed very good, so they know what RCF is and what could be the potential risks of not taking protective measures.
2. Use alternative materials if possible.
3. Try to create ventilation and keep the dust concentration as low as possible.
4. Use a high density of blanket, so the dust will be less.
5. Use the right protection for the lungs and body.

MOORS OVENBOUW BV
alles op het gebied van vuurvast

Julianastraat 49
5087 BA Diessen
tel +31 (0)13 504 25 03
fax +31 (0)13 504 25 08
K.v.K. 18034808
internet www.moorsovenbouw.nl
e-mail info@moorsovenbouw.nl

Every year/ two year we are monitoring our jobs/ people for the concentration values of the fibers. In our well organized workplace we are reaching the 0.2 until 0.4 fibers/ml where the maximum in Holland is 0,5 f/ml, but we target to become better as part of a continues development program. When we have of job/ project were the installation is done on site, were the ventilation is worse, the concentration will be higher.
In this case we use special units named 'Proflow' for the necessary protection.

As a guideline we always use P3 dust mask when we work with RCF (this is also the case when we use the 'safe 'alternatives). When we are using these 5 basic rules at every job, we are convinced that we are handling RCF fibers in a responsible and safe manner, minimizing the health and safety risks.

Alternatives

We agree that the market has to search for alternatives, so called Alkaline Earth Silicate Fibers (AES). About 20 years ago the first usable materials was introduced. The product range of these materials are expanding and the products are improving, but still cannot substitute the use of RCF fibers in some applications.
All the alternatives have problems with:
1. Contact with water, the materials becoming very soft and weak after contact with water. So you get problems in chimney and after-burn installations with an open flame. The rain will damage the structure of the fiber blanket and the problems begin.
2. In furnaces with a heating up schedule of more than 50 C/ hour. The material is losing his strength.
3. Installations who will go above (also when it is occasionally) 1300 C. The shrinkage is enormous.
4. The material is useless in installation with a airstream above 15 m/s Because the material is much softer then RCF.
5. The material cannot be used in installations with a reducing atmosphere.

So when possible, we use the alternative blanket for example Superwool by Morgan Thermal Ceramics or Insulfrax by Unifrax. But like we mentioned above, in a lot of installations it is impossible to use these materials. The manufacturers give the impression that these products can substitute RCF fiber in all applications but in reality you have to be very careful to use the alternatives. We have installed the alternative blanket in several installations but after 2 or three years we changed it back into RCF because the material was not good enough.

The last remark we want to make is that our people prefer to work with RCF than with the alternatives, because the RCF is much tighter and the alternative are producing during installation more dust.

MOORS OVENBOUW BV
alles op het gebied van vuurvast

Julianastraat 49
5087 BA Diessen
tel +31 (0)13 504 25 03
fax +31 (0)13 504 25 08
K.v.K. 18034808
internet www.moorsovenbouw.nl
e-mail info@moorsovenbouw.nl

Our practical advice

Some countries have lowered the concentration limits of RCF fibers already to 0.1 fiber/ml. This is a theoretical rule, but impossible to monitor. We think that it is more important is to emphasize on the 5 practical rules mentioned above.

It is important to lower the concentration as far as possible but the situation has to be (stay) workable and we think, with these rules, it is the only way to keep the problems with the RCF as small as possible.

Conclusion

I am not a chemist or a doctor and therefore cannot judge the health and safety risks for RCF fibers, but I am writing this letter to express my concern against any proposal to increase the application measures (or even potential ban) for RCF. I am confident that on the long term, when we keep searching for good and practical improvements, we will come to an acceptable situation for the environment and for the people. But in the main time we have to keep a common sense approach to the market for RCF fibers. **My advice is: KEEP IT SAVE AND PRACTICAL !!**
When we only lower the concentration limit or the use of RCF will be forbidden (what is the most easy way), we get problems because the current alternatives are not good enough for a lot of applications.

I hope we have given you some extra useful information, when you have questions or remarks do not hesitate to contact me and we hope you will come to 'practical and healthy 'approach for the use of RCF fibers in the future.

with kind regards.

ing. Ad Schepens

Moors Ovenbouw b.v.
Address: Julianastraat 49
Post address: Post box 35, 5087 ZG DIESSEN, Netherlands
Telephone: 0031135042503
Mobile nr.: 0031653418141
Fax: 0031135042508
schepens@moorsovenbouw.nl
www.moorsovenbouw.nl