

## The chromium (VI) legislation for cement Shelf-life expired cement<sup>1</sup> – chromium (VI)-related

### BCA advice on the options available to Member Company customers

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#### Introduction

Since the introduction of the chromium (VI) directive for cement/cement-containing preparations, its implementation via COSHH and CHIP regulations in the UK on 17 January 2005, and the advent of the 'shelf-life' concept for cement, it is now more likely than before that cement may be discarded as waste. At expiry of the 'chromium (VI)-related shelf-life' (declared storage period), or earlier if a reduced cement has not been stored as recommended by the manufacturer, the cement may become a waste because the 'holder' will be unsure of, or be unable to apply, the several alternatives available. This Fact Sheet describes the possible options under the chromium (VI) legislation.

#### Options available for shelf-life expired cement under the chromium (VI) legislation

At the point that the shelf-life expires, reduced cement may be discarded as waste on the presumption that it no longer complies with the chromium (VI) legislation and therefore can neither be legally used nor further supplied on the market [except into a 'derogated process' (see below)]. Discarding such shelf-life expired cement as waste need not be the only option, however, because, *under the responsibility of the customer*, reduced cement could still be used legally or supplied onwards with the status of a 'product', where one of the following conditions applies:

determination, by testing, of the water-soluble chromium (VI) content reveals that the cement still meets the regulatory limit of 0.0002 % (2 ppm), however, a new shelf-life/storage period would need to be declared;

the cement (or cementitious mix) is treated with an additional reducing agent to control the water-soluble chromium (VI) content to meet the regulatory limit, also confirmed by testing, again a new shelf-life/storage period would need to be declared;

the process in which the shelf-life expired cement is to be used has been 'derogated', that is, has been declared to be "*controlled, closed and totally automated... and in which there is no possibility of contact with the skin*" possibly receiving either an official 'derogation', as defined in the chromium (VI) legislation, or an official 'exemption', from the Health and Safety Executive (HSE).

#### Disposal to landfill of shelf-life expired reduced cement

In the event that shelf-life expired reduced cement is discarded as waste and disposal to landfill is the only realistic option, BCA is obtaining opinion from the Environment Agency

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<sup>1</sup> Any cement based on Portland cement clinker

(EA) on the appropriate generic classification/characterisation for cement. The classification/characterisation process is, however, independent of whether the cement has been chemically reduced in order to comply with the EU/UK legislation for limiting its chromium (VI) content or whether its shelf-life has expired.

BCA will publish guidance in its Fact Sheet 11 when it becomes clear how the EA intends cement as waste should be classified by waste-holders/producers and what the implications are for any prior treatment and disposal to landfill.

### Health and safety

Reducing agents, used to lower soluble chromium (VI) content of cements, do not make cement safe to handle without PPE. Cement, when wet, can cause two types of dermatitis, allergic and irritant. Reducing agents only protect against allergic dermatitis. The same PPE is, therefore, required for handling wet cement now that reducing agents have been introduced as was previously required. Irrespective of the introduction of reducing agents, correct PPE will ensure users do not suffer allergic dermatitis, irritant dermatitis or burns.

### Where can I find out more?

For product-specific information, contact your supplier/manufacturer directly. For generic information, contact: M G Taylor at BCA, Tel: 01276 608716, [michael.taylor@mineralproducts.org](mailto:michael.taylor@mineralproducts.org).

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BUXTON LIME INDUSTRIES LIMITED



CASTLE CEMENT

HEIDELBERGCEMENTGROUP



CEMEX



United Kingdom