

Mill Scale Experts Group
April 15, 2009, 8:30 – 13.30
Stahl-Zentrum, Sohnstraße 65, Düsseldorf
Germany

Minutes

Attendents:

Christoph Angermayer, voestalpine
Norbert Hatscher, Stahlinstitut VDEh
Franz Jost, AG der Dillinger Hüttenwerke
Alvaro Plaza, ArcelorMittal
Anna-Maria Tivegard, SSAB Mercox AB

1 Introductory remarks, apologies, etc.

Norbert Hatscher opened the meeting, the agenda was accepted.

1. Pre registrants for mill scale

• ***possible interest in registration***

279 pre-registrations for mill scale have been sent to EChA. These pre-registrants can be classified as follows:

- 191 producers of steel and steel products
- 27 consultants
- 23 traders
- 23 recyclers
- 1 association
- 14 pre-registrants of unknown function

To evaluate how many of these pre-registrants really want to register mill scale a communication concept is needed.

• ***communication in the Pre-SIEF***

A company named Swag S.L. (akf-reach@swaglab.com) has signed as Pre-SIEF-Facilitator and sent out an online questionnaire to some of the Pre-SIEF-members, but not to the whole Pre-SIEF. A regular communication in the Pre-SIEF does not exist at the moment.

2. Substance identity

For the description of the substance identity the following parameters are important:

- **The production route:** In the ESIS database the following description for the EINECS-number 266-007-8 (= CAS 65996-74-9), Mill scale (ferrous metal) is given: The oxidized

surface of steel produced during reheating, conditioning, hot rolling, and hot forming operations. This substance is usually removed by process waters used for descaling, roll and material cooling, and other purposes. It is subsequently recovered by gravity separation techniques. Composed primarily of high-purity iron oxides. May contain varying amounts of other oxides, elements, and trace compounds.

- **The chemical composition:** Iron oxides (Fe_2O_3 , Fe_3O_4 , FeO) and additional elements like metallic iron, Si, Ca, Mn and Al. Important for the REACH registration will be the elements which could be, in future, defined as dangerous, for example Co, Cr, Ni, Pb, V, Zn. Dangerous accompanying elements have to be specified if their concentration is higher than 0.1%.

3. From the Pre-SIEF to the SIEF

The definition of the sameness of substances is essential. The members of the expert group give the data for the above mentioned elements (average and maximum value) to Norbert Hatscher, who will use them to create a master list.

This master list and a questionnaire comparable to the slag questionnaire will be used to request the substance identity in the Pre-SIEF. Norbert Hatscher contacts Dr. Ursula Gerigk from ThyssenKrupp.

It was agreed that the questionnaire should contain at least the following points:

- Description of the production route
- Definition of the Chemical composition
- Evaluate the SIEF Status of each pre-registrant (involved, active, passive, dormant) acc. to the Cefic SIEF Code system
- To ask whether studies or data are available

4. Possibility of using iron oxide data (read across)

As mill scale consists in an high amount of iron oxides it has to be checked if a read across with the iron oxides is possible. In practice this only can be done by a consultant. Franz Jost contacts Dr. Michael Berger from Bayer Business Service. If the survey shows that other chemical elements (e.g. metals) are contained above 0.1% (for dangerous substances) or 1% (for non dangerous substances), the possibility of a read across to the specific element(s) has to be checked too.

5. Definition of uses

At the moment the following uses can be defined:

- Use in the cement industry
- Use as counterweights
- Use for iron production (in sinter plants and coke ovens)
- Use in the ferroalloy production
- Use in production of friction agents
- Use in the production of refractories
- Use in the production of welding electrodes
- Use in the production of iron salts and iron oxides

Additional uses could be defined by other SIEF members. All the uses for mill scale are industrial uses

6. Organization of the registration process

The steel industry has to decide who will be the lead registrant for mill scale and who will be the SIEF facilitator. As long as the facilitation function is not clear the communication has to be done with the help of EUROFER and the national steel associations.

The members of the expert have to check internally if and which function is possible for them.

To arouse interest for a registration of mill scale in the Pre-SIEF-members a cost calculation is essential. A break even point between costs for waste handling and registration has to be calculated by every interested legal entity. To get as much interested legal entities as possible we need a good estimation of costs. Franz Jost contacts Dr. Michael Berger to get an estimation of costs.

7. Time schedule, Actions

Franz Jost contacts Dr. Michael Berger concerning read across and cost estimation (date 17th April 2009)

Members of expert group send their substance data table to Norbert Hatscher (date 17th April 2009)

Norbert Hatscher sends master table to expert group (date 20th April 2009)

Norbert Hatscher contacts Dr. Ursula Gerigk concerning questionnaire and sends finalised questionnaire to expert group (date 23rd April 2009), Included in the questionnaire will be the question if the potential registrants have studies.

Expert group gives feedback to draft questionnaire from Norbert Hatscher (29th April 2009)

Norbert Hatscher informs Danny Croon about the results of the meeting and asks which contacts between EUROFER and the consultant Swag S.L. have taken place.

After finalisation of the questionnaire it has to be decided who will send it out to the SIEF members and who will handle and present the answers in a way that further steps could be performed efficiently (as soon as possible)

8. Other points

Up to now a next meeting is not planned. If possible a discussion within such a small group can be done via telephone conference.

Norbert Hatscher
Düsseldorf, 20th April 2009