

Good Practice Sheet for Uses of Chromates

C5

Surface treatment with chromates¹ by touch-up with a pen or small brushes

This sheet will help employers to comply with the requirements of EU Directive 2004/37 and the terms of the REACH authorizations for uses of chromates. Working with chromates may cause cancer. This sheet describes good practice to reduce exposure. It covers the points that should be followed to reduce exposure. It is important to follow all the points, or use equally effective measures. This document should be made available to all persons who may be exposed to chromates in the workplace so that they make the best use of the control measures available.

The Process

This GPS covers the industrial surface treatment of articles by touching up small areas, typically during quality control, maintenance or repair.

An even thickness of a surface treatment containing chromates is applied to the article using a pen-stick or a small brush.

Equipment Design and Access

Purpose-designed pen-sticks (pre-filled with the chromate mixture) and small brushes are supplied with the surface treatments formulations.

Workers use the pen-stick or small brushes to apply the proprietary surface treatment containing chromates to small areas.

¹ Chromates may include the following substances: Chromium Trioxide (S1), Strontium chromate (S6), Pentazinc chromate octahydroxide (S7), and Potassium hydroxyoctaoxodizincatedichromate (S8).

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Chromates Emissions

Residual chromate solution on equipment surfaces and articles/parts might be possible after treatment. Pen-sticks are specifically designed to minimize exposure and release during use.

Risk Management Measures - Workers

- Pen-sticks/small brushes and small cups must be cleaned or disposed after use. See GPS D4.
- Implement appropriate measures (e.g. provision of local cleaning facilities and hazardous waste management bins) to prevent cross-contamination from equipment and PPE to adjacent areas.

Risk Management Measures - Environment

- Wastewater is not generated during this activity.
- Floors, drains, equipment in process, chemicals and waste storage areas should be sealed and regularly maintained to ensure integrity.

PPE

All persons carrying out touch up operations must wear:

- protective eye goggles
- protective gloves
- acid-resistant clothing.

GPS E1 and your supplier's extended SDS provide relevant information on PPE.

Training and Supervision

All persons carrying out these operations must be instructed about the risks of working with chromates, the safe way of handling chromates and use of PPE and other control equipment. Workers must be properly trained and equipped to carry out their duties and to safely cease such duties as needed. Adequate supervision must be available at all times.

Monitoring

Adequate monitoring data must be available to evidence that potential exposure of workers and potential environmental release are maintained to as low as reasonably practicable level. Expert input is advisable.

Monitoring should be carried out at least annually. Downstream users may reduce the frequency of measurements once it is demonstrated that exposure of humans and releases to the environment has been reduced to as low a level as technically and practically possible and that the risk management measures and operational conditions correspond to the exposure scenarios and function appropriately.

GPS E2 provide further information on monitoring, including reference to relevant standards.

Other Relevant Good Practice Sheets

Other GPS are also likely to be applicable. A full list can be accessed at [Link](#).

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