

Good Practice Sheet for Uses of Chromates

Introduction

Background

The following Good Practice / Task Sheets ('GPS') are issued by CTACSub in collaboration with several European and national industry organizations¹ to assist users of chromium trioxide in introducing and maintaining good work place handling practices. They may inform the employers' work place safety assessments and the application of the hierarchy of prevention measures mandatory for carcinogenic substances under national and European work place safety laws.

In April 2020, the CCST Consortium, the Members of which applied for and received authorizations for uses in the aeronautics and aerospace industries of specific miscellaneous chromates, joined the efforts of CTACSub and issued GPS for its specific uses (new and amended C-Sheets) and amended, together with CTACSub, certain existing CTACSub GPS. These are all published here. Downstream Users in the aeronautics and aerospace industry are, therefore, invited to apply the entirety of GPS, in as far as applicable to them.

Importantly, by applying these GPS, users should be in a position to comply with the CTACSub and CCST REACH authorizations for chromium trioxide and miscellaneous chromates.

For more information on the status of the authorizations,² please see the various press releases and Questions & Answers (Q&A) of CTACSub and CCST at :

<https://jonesdayreach.com/news/>

Structure of GPS

The GPS are divided into 5 Sections, each starting with a capital letter A till E. Within the alphabetical Sections, consecutive numbering, such as B1, B2, B3 etc. is used.

- The **A-GPS** are primarily targeted at formulators, i.e. companies that mix chromium trioxide and miscellaneous chromates with other substances or mixtures. However, the A-GPS should also be applied by users of chromium trioxide and miscellaneous chromates that carry out mixing operations at their industrial sites.
- The **B-GPS** are considered the core GPS for chromium trioxide plating activities. Different GPS are provided depending on the type of equipment used at any given facility. Hence, the B-GPS apply to both functional plating and functional plating with decorative character facilities and are relevant for the plating part of Uses 2 and 3 of the CTACSub authorizations. They are also relevant for specific chromium trioxide surface treatments.
- The **C-GPS** describe other surface treatment operations and are thus relevant for Uses 4, 5 and 6 in the CTACSub authorizations and the surface treatment operations in the CCST authorizations.
- The **D-GPS** target ancillary activities (e.g. storage, maintenance) that may occur in any industrial installations when handling chromium trioxide or miscellaneous chromates. Usually these are activities that are carried out infrequently or periodically and for a short duration.
- The **E-GPS** are also applicable for all uses. They provide specific guidance on chromium trioxide or miscellaneous chromates, including health hazards, use of personal protective equipment and exposure monitoring.

¹ Informal Group consisting of APEAL (The Association of European Producers of steel for packaging), ASD (Aerospace and Defence), AEA (Association of European Airlines), Eurofer (The European Steel Association), CETS (European Committee for Surface Treatment), EPTA (European Power Tool Association), EGGA (European General Galvanizers Association), ZVO (Zentralverband Oberflächentechnik), VDMA (German Mechanical Engineering Association), ACEA (European Automobile Manufacturers' Association), Members of the CTACSub Consortium (Atotech Deutschland GmbH; Boeing Distribution Inc. (name changed: formerly Aviall Services Inc); Prospere Logistic Baltic OÜ (as legal successor to BONDEX TRADING LTD), in its legal capacity as Only Representative of Aktyubinsk Chromium Chemicals Plant, Kazakhstan; CROMITAL S.P.A. in its legal capacity as Only Representative of Soda Sanayii A.S.; Elementis UK Ltd.GmbH in its legal capacity as Only Representative of Elementis Chromium Inc.; Enthone GmbH (now MacDermid Enthone); LANXESS Deutschland GmbH in its legal capacity as Only Representative of LANXESS CISA (Pty) Ltd.)

² Authorization consultations No. 0032-01 to 0032-06; see at <https://echa.europa.eu/applications-for-authorisation-previous-consultations>. RAC and SEAC have recommended the following review periods (to be counted as of September 21, 2017): Formulation of mixtures (0032-01) / Functional chrome plating (0032-02) / Surface treatment in the aeronautic and aerospace industry (0032-04) – all 7 years; Functional plating with decorative character (0032-03) / Surface treatment in other industries (0032-05) / Passivation of tin-plated steel (ETP) (0032-06) - all 4 years.

Good Practice Sheet for Uses of Chromates

Introduction

Cross references are made between the various GPS as and where useful. However, these cross references should not be considered as exhaustive.

Because the GPS describe industrial activities in practice, considering different possible types of equipment and worker intervention, they do not generally correspond to individual exposure scenarios, workers contributing scenarios or PROCs set out in the extended-SDS or the application for authorization documents published on the ECHA website. In practice, the GPS should be used alongside these documents to provide insight to and inform best practice with regard to the individual set up and layout of each operation.

All GPS in principle follow the same structure and layout. For a full list of all GPS and to which uses they apply, see the **Overview of Good Practice Sheets**.

Instructions for Use

For users of **chromates** to demonstrate compliance with the terms of the specific REACH authorizations, they should proceed as follows:

- Review all activities at each industrial site and assign each and all of them to specific GPS. If they do not fit into any one of the GPS, these activities will likely not be covered by the authorizations. If this is the case, the respective activities with chromium trioxide must stop as of September 22, 2017.
- Use the **Overview of Good Practice Sheets** to identify all relevant activities.
- Review and update a workplace safety assessment for all activities involving **chromates** and apply the strictest conditions described in the respective GPS that can be implemented at the site, for those activities.
- Regularly and periodically review operations and apply more stringent requirements where possible. Investment into new equipment / technology may be necessary.

- Record and archive all work place monitoring and exposure measurements according to the respective GPS. Should the text of the future authorization decisions so require, notify monitoring results and exposure measurements to the national enforcement authorities and/or ECHA as would be required.

Please note that the strict application of the GPS will assist you and your **chromates** suppliers in prolonging the authorizations into the future where necessary.

Revision

Die GPS will be revised from time to time as technology and regulatory guidance develop and the authorizations will be issued, e.g. the periodicity and type of exposure monitoring and the reporting format for exposure measurements to ECHA may be subject to change.

Language

The GPS are originally drafted in English. Courtesy translations into other languages will be provided over time where useful.

Intellectual Property – Use Rights

The GPS are published on <https://www.jonesdayreach.com>. They may be downloaded at any time by users of **chromates** based in the European Union, Iceland, Liechtenstein and Norway for use in their industrial facilities in these countries.

Any other use, duplication, publication, or dissemination is subject to copyrights and a prior license to be obtained from CTACSub.

Pursuant to the widening of the scope of the GPS to miscellaneous chromates, wherever the GPS now refer to 'chromates', they should be understood to apply to both chromium trioxide and the miscellaneous chromates covered by the CCST Consortium.

Disclaimer

CTACSub and/or its Members and its contractors as well as the organizations and their members named in the GPS may not be held liable for any damages arising from the application of the GPS. Each user of **chromates** is at any time individually responsible for compliance with any applicable laws and regulations as well as the terms of the REACH authorizations.