

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.

Importantly, by applying these GPS, users should be in a position to comply with the CTACSub REACH authorizations for chromium trioxide that are currently pending with the European Commission.

Pending Authorization Applications

For more information on the status of the pending applications for authorization² and continuation of use of chromium trioxide after the Sunset date of September 21, 2017, please see the [CTACSub July 2017 Q&A](http://www.jonesdayreach.com) at <http://www.jonesdayreach.com>.

Structure of GPS

The GPS are divided into 5 Sections, each starting with a capital letter A - 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 with other substances or mixtures. They cover the scope of Use 1 of the CTACSub applications for authorization. However, the A-GPS should also be applied by users of chromium trioxide that carry out mixing operations at their industrial sites.
- The **B-GPS** are considered the core GPS for 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 authorization. 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 authorization.
- The **D-GPS** target ancillary activities (e.g. storage, maintenance) that may occur in any industrial installations when handling chromium trioxide. 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, 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), CET5 (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 (LANXESS Deutschland GmbH, Atotech, Aviall Services Inc., Bondex Trading Ltd, Elementis Chromium LLP, MacDermid Enthone, Cromital SpA).

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.

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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 chromium trioxide 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 chromium trioxide 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 chromium trioxide suppliers in prolonging the authorizations into the future where necessary.

Revision

The 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 <http://www.jonesdayreach.com>. They may be downloaded at any time by users of chromium trioxide based in the European Union, Iceland, Liechtenstein and Norway for use in their industrial facilities in these countries.

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Disclaimer

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