

**Is your use covered?  
Guidance on checking use conditions  
for workers and consumers**

CEFIC/DUCC Workshop on Exposure Scenarios  
21 October 2011, Brussels



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# Content

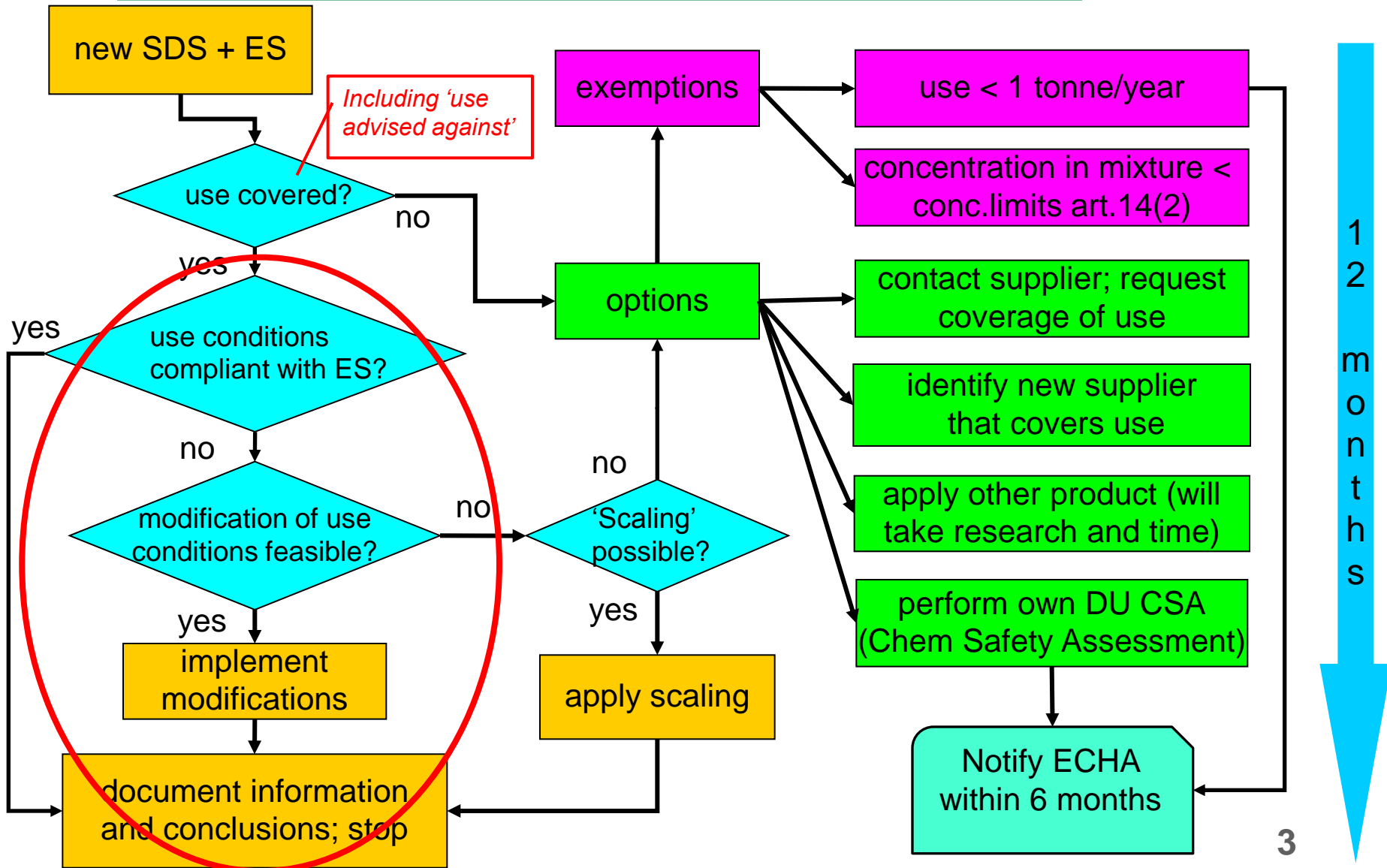
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- Use checking: the full picture
- Which conditions do you need to check?
- Examples of use conditions checking
- Justification of use conditions checking
- Example of a use (conditions) checking form
- Communication with suppliers
- Questions?



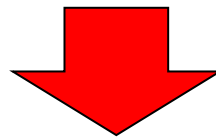
# Use checking: the full picture



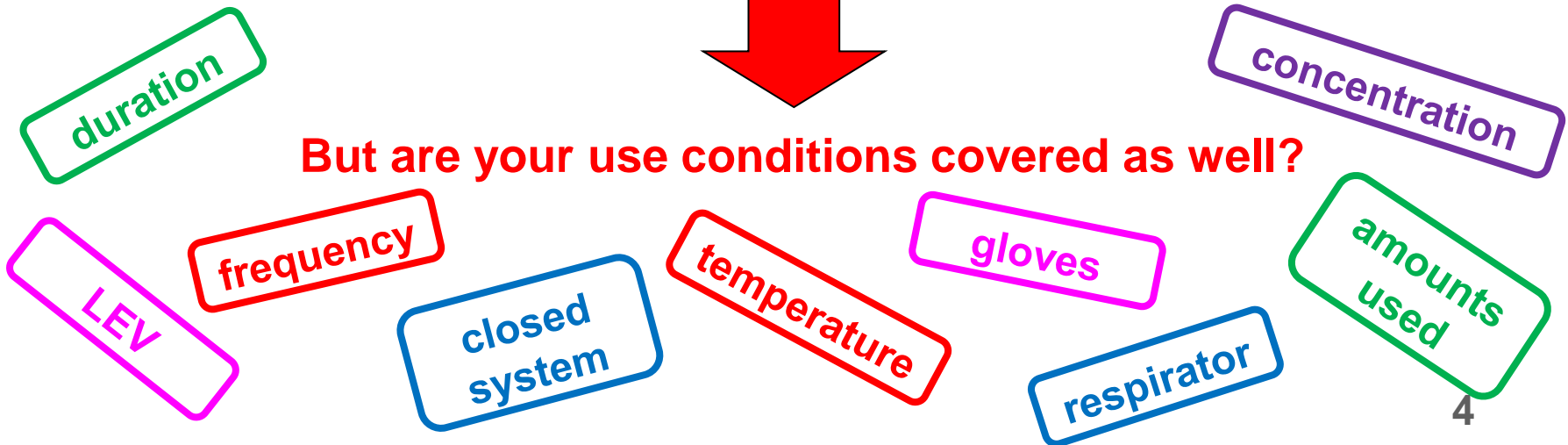
# So your use is covered?



- You have identified a use (ES) title which describes your application **OR**
- The description of activities covered is similar to the activities you are undertaking **OR**
- The combination of use descriptors for this use (ES) title (SU, PROC, PC, AC, ERC) is covering the use descriptors you identified for your use **OR**
- You have identified another use (ES) title with an use descriptor combination that covers your use



**But are your use conditions covered as well?**



# Which use conditions to check for workers?

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- **The ones mentioned in the Exposure Scenario**  
*(relevant use descriptor => PROC (process category)); e.g. PROC7 “industrial spraying”*
- **Substance characteristics: physical state, dustiness for solids**
- **Operational Conditions (OC): process temperature, working indoor/outdoor, concentration, duration/frequency**
- **Risk Management Measures (RMM):**
  - **Technical: closed systems, general ventilation, local extract ventilation**
  - **Organizational: draining/flushing, clearing transfer lines, basic standard of occupational hygiene**
  - **Personal protection: respirators, safety gloves, goggles**

# Which use conditions to check for consumers?



- **The ones mentioned in the Exposure Scenario**  
*(relevant use descriptor => PC (product category) + PC subcategory); e.g. PC1 “adhesives, sealants”, subcategory “glue from sprays”*
- **To be specifically checked by final product manufacturer**
- **Mainly product-integrated measures!!**
- **Substance characteristics: physical state, dustiness for solids**
- **OC's: amounts (per event), concentration, frequency (days/year - times/day), duration (hours/event), room volume, temperature, ventilation**
- **RMM's: OC's mentioned above (as RMM), gloves**

# Examples of checking worker OC/RMM's



OC/RMM's	comments
Process temperature: 20°C or ambient	OC: activities at elevated temperature are not covered and have to be assessed (no scaling possible) — <span style="border: 1px solid red; padding: 2px;"><i>Assuming use of ECETOC TRA worker tool</i></span>
Duration: 1-4 hours	OC: activities taking more than 4 hours are not covered and have to be assessed (scaling possible); lower duration is covered
General ventilation: 1-3 ach	RMM: activities undertaken without good general ventilation are not covered and have to be assessed (scaling possible); higher ventilation rates are covered
Local Extract Ventilation (LEV): efficiency 90 %	RMM: activities undertaken without LEV or with lower efficiency are not covered and have to be assessed (scaling possible); higher efficiencies are covered
Concentration: < 25 %	OC: activities with the substance at higher concentration levels are not covered and have to be assessed (scaling possible); lower concentration levels are covered
Wear a respirator: efficiency 90 %	RMM: activities undertaken without a respirator or with lower efficiency are not covered and have to be assessed (scaling possible); higher efficiencies are covered
Wear suitable gloves tested to EN374: efficiency 80 %	RMM: has to be implemented by DU (scaling not possible); higher efficiencies are covered
Use dry break couplings for material transfers	RMM: has to be implemented by DU; qualitative RMM
Wear solely goggles	RMM: has to be implemented by DU; qualitative RMM

# Justification: use conditions checking for LEV



**Worker assessment: ECETOC TRA for worker tool used**

*(LEV selected as RMM; assumes 90 % efficiency for PROC5, industrial setting)*

**RMM stated in ES for communication:**

**Provide extract ventilation to points where emissions occur [E54]**

*(Generic Exposure Scenario (GES) phrase developed by ESIG/ESVOC; also included in Cefic standard phrases catalogue)*

**DU has integrated an LEV-system in his equipment.**

**DU should be able to justify that LEV-system used does provide 90 % efficiency (for example when inspected by local authorities):**

- **Based on information/guarantees by LEV supplier**
- **Based on measurements**

*TRA tool uses default efficiencies for LEV (for GES's directly linked to certain LEV RMM phrases); assumed efficiencies for other RMM phrases (outside boundaries of TRA tool) can be found in the Cefic catalogue (to be added in the coming months)*



# Justification: use conditions checking for gloves



**Worker assessment: ECETOC TRA for worker tool used**  
*(gloves selected as RMM; efficiency selected: 90 % )*

**RMM stated in ES for communication:**

**Wear chemically resistant gloves (tested to EN374) in combination with 'basic' employee training [PPE16]**

*(Generic Exposure Scenario (GES) phrase developed by ESIG/ESVOC; also included in Cefic standard phrases catalogue; efficiency justification: ECETOC TRA report no. 107, appendix D-3)*

**DU uses gloves in operations; however no efficiency indicated.**

**SDS supplier specifies glove material (in ES or section 8):**

“Neoprene. When prolonged or frequently repeated contact may occur, a glove with a protection class of 6 or higher (breakthrough time > 480 minutes) is recommended.”

**DU may assume that this type of gloves combined with 'basic' training will meet the 90 % efficiency requirement in the ES**

# A use (conditions) checking form



REACH Use Compliance Check		<i>Note: before starting to check your use, first check if your use is exempt from REACH!! If yes, only populate upper part of this form + exemption box.</i>	
Product name:		<b>Exemptions:</b>	<i>if yes=&gt;document</i>
Internal code:		use < 1 tonne/yr	y/n
CAS no:		no SDS required	y/n
REACH reg.no:		conc < class.level	y/n
Supplier:		use in PPOrd	y/n
eSDS date printed:			
eSDS date received:			
Description of own application:			
Use advised against by supplier?	y/n	<i>if yes, goto Contact BOL</i>	
<b>Title relevant Exposure Scenario (ES):</b>			
Own application covered:	<i>always populate relevant use descriptor (UD) combination!</i>		
-based on title of the ES?	y/n	<i>if no, goto next line; if yes=&gt;goto use conditions</i>	
-based on description of activities?	y/n	<i>if no, goto next line; if yes=&gt;goto use conditions</i>	
-by UD combination of relevant ES?	y/n	<i>if no, goto next line; if yes=&gt;goto use conditions</i>	
-by UD combination of other ES?	y/n	<i>if no=&gt;goto Contact BOL; if yes=&gt;goto use conditions</i>	
SU (Sector of Use):			
PROC (Process Category):			
ERC (Env Release Category):			
PC (Product Category):			
AC (Article Category):			
		<b>Plant:</b>	
		Department:	
		Checked by:	
		Check date:	
		Use covered:	y/n
		Compliant with ES:	y/n
		<b>Contact BOL</b>	<i>use not covered; select action and document status</i>
		Optional actions:	status (doc/date/reference)
		request coverage	
		change supplier	
		own DU CSA/CSR	
		select substitute	y/n

**General info**

**Exemptions**

**Confirmation use (conditions) are covered**

**Use verification**

**Actions, when use ≠ covered**

Coverage of Use Conditions		Deviating use condition 1	Deviating use condition 2	Deviating use condition 3	Deviating use condition 4	Action	Documentation/reference
Relevant worker activities:	PROC	<i>state own + ES condition</i>	<i>state own + ES condition</i>	<i>state own + ES condition</i>	<i>state own + ES condition</i>	<i>e.g. scaling; justification of eff % based on other information; use of measurement data (exposure &lt; DNEL); etc)</i>	
Relevant environmental conditions:	ERC						

**Use conditions checking**

# Communication with suppliers

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## When:

- your use (conditions) may not be covered by an ES **OR**
- you need more information to verify if your use is covered **OR**
- You need information to do scaling

## Some recommendations for communication:

- Communicate use and use conditions info in a meaningful way:
  - Short title + meaningful combination of use descriptors
  - Specific Exposure Scenario template
  - Refer to Cefic guidance, March 2009  
[http://www.cefic.org/Documents/IndustrySupport/Guidance\\_Use\\_and\\_ES\\_dvlpt\\_and\\_SCCm.doc](http://www.cefic.org/Documents/IndustrySupport/Guidance_Use_and_ES_dvlpt_and_SCCm.doc)
- When your supplier is not the manufacturer, also check within your sector organization
- When requesting adding a use, first do it informally to avoid the strict response time (1 month) and the stop on selling for this use



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# Thank you for your attention!

## Questions?

