			proposal to include chromium trioxide in annex XIV at this time unless suitable exemptions are in place for this industry. Any exemption must recognise the need to sustain the supply chain.
1626	2011/09/14 15:50	ECOMETAL Consorzio per lo sviluppo sostenibile Industry or trade association Italy	The corpus of European, Italian and local law ruling over the small (according to 2003/361/EC Recommendation) Italian enterprise carrying out chromium plating is rather wide. We wonder whether ECHA's experts, members of the Member State Committee, or of other agencies and public committees are aware of these rules, of what they require and of their effects. Hereafter we draw a non-exhaustive list of these requirements. Environment An Integrated Environmental Authorisation is granted every 5 years within the framework of the Directive 2008/1/EC (IPPC) implemented by the Italian national and regional legislations. The authorisation to operate chromium plating is granted provided that an Environmental Management System is established. This system contains a monitoring plan detailing type and frequencies of controls. This plan must schedule at least: ➢ Recording of quantity of all raw materials and chemicals incoming, stored, used and produced (annual). ➢ Recording of quantity and quality of water used (annual). The utilisation of water is agreed by the competent authority that also states the volume that can be used. ➢ Recording of quantity of energy used and produced and of the fuel used (annual). ➢ Recording of quantity and quality of wastes (at least monthly). ➢ Recording of quantity and quality of effluents (at least monthly).

			➢ Monitoring of emissions into air (twice a year). Periodic sampling and analyses must be carried out by independent, certified laboratories. As soon as results are available, they must be forwarded to authorities charged of controls. A plan of implementation of Best Available Technologies must also be established. This plan requires: ➢ Maintenance book of production plants daily updated. ➢ Maintenance book of the depuration plant daily updated, including daily check of control devices (redox meter, pH meters) and of chemicals for depuration and assessment of the performance (Cr6+ in incoming effluents vs Cr6+ in output). The authorisation to operate the depuration plant is granted by the competent regional authority that also provides the maximum content of Cr6+ of incoming effluents. ➢ Maintenance book of extractor fans and scrubbers. ➢ Annual implementation of technologies aimed at reducing the use of chromium (e.g. reduction of drag out, atmospheric evaporators, vacuum concentrators). Emissions of Cr6+ (as well as Cr tot) are subject to strict limits. ➢ Surface water < 0,2 mg/l ➢ Sewerage < 0,2 mg/l ➢ Air < 1 mg/Nmc ➢ The maximum Cr6+ content of soil is 2 mg/kg in residential areas and 15 mg/kg in industrial areas. ➢ Emission into aquifer is strictly forbidden and the maximum Cr6+ content of aquifer is 5 µg/l. In case the annual amount of chromium (disregarding its oxidation state) released exceeds 50 kg the national authority must be informed. Health and security Within the frame of the Italian national law (Decreto Legislativo 81/2008 and sma) ruling over the safeguard of health and security of workers, a Risk Assessment Report must be implemented. This document: ➢ Establishes procedures for handling chromium substances.

			➢ Identifies personal protective equipments that workers must wear while carrying out each of the activities involving chromium trioxide (e.g. handling, maintenance of plant, re-filling). ➢ Schedules training of workers on risks associated with handling and use of chromium trioxide. ➢ Identifies the doctor responsible of the health of workers who in turn establishes type and frequency of controls (at least on annual basis) and analyses (annual analysis of chromium in urine is compulsory). Workers exposed to the risk of chromium trioxide are recorded in a dedicate register that is submitted to competent authority every three years. The above Risk Assessment Report must be implemented every three years with a specific analysis of the risk associated with handling and use of chromium trioxide. Since 1934 (Regio Decreto 27 luglio 1934, n. 1265) chromium plating is classified as "unhealthy industry" and as that the quality of the air of workplace must be assured by adequate ventilation. In addition number, size and shape of windows must assure adequate natural ventilation. In addition chromium bath must be equipped with aspirators along the edge of the vat and fume must be filtered with scrubbers. Emissions at the edge of the chromium bath are recorded (at least twice a year). The exposure of workers is monitored by periodically personal sampling during the whole work shift. When monitoring detects lowering of exposure the frequency of controls may be reduced. Major-accident hazards Within the frame of the Directive 96/82/EC (and sma) on the control of major-accident hazards involving dangerous substances (the so-called Seveso Directive) implemented by the Italian national legislation a Security Management System must be established. According to this document: ➢ The presence of chromium trioxide is notified to competent and local authorities, also people living in the surroundings of the plant is informed about risks associated with the plating activity and on behaviour in case of accident. ➢ All workers are informed at least four times a year for four hours about major-accident hazards. ➢ Fire-fighting teams are trained at least four times a year for four hours. ➢ First-aid teams are trained at least four times a year for four hours.

			➢ All people in the site are involved in a simulated emergency and completely evacuate the site at least twice a year. ➢ Floor and plants, vats and their containment basins, air intake systems, emergency exits, escape routes, fire extinguishers are daily checked. Also probes that control the temperature and level of the chromium bath are daily checked. ➢ Chromium trioxide is separately stored and floor and roof of the storehouse are checked each time the substance is handled. ➢ Systems of control and alarm in case of spill of the chromium bath are implemented as well as means able to contain the spill and rapidly transfer the fluid bath. ➢ Intrusion into the plant and into the chromium trioxide storehouse is prevented and controlled by installing suitable devices (e.g. webcam). Fulfilling these requirements requires a considerable economic effort to the small enterprise but is certainly improving the awareness of workers. Furthermore the protection achieved is certainly remarkable and the risk for environment and human health is minimized. Should chromium trioxide be banned from the European Union, chromium plating plants will simply be relocated beyond the EU borders where the level of protection of human health and environment will never reach our standard. In addition we will have to import all chromium plated goods that are chromium trioxide free.