

November 2015

Checklist of Risk Minimisation Measures

ECHA published their final opinion regarding the authorisation dossiers submitted by DOW and SAFECHEM for the continued use of Trichloroethylene (TRI).

On the 21st of September 2015 the two ECHA expert committees communicated their final opinions for the “Use of Trichloroethylene **in industrial parts cleaning** by vapour degreasing (Surface cleaning) in closed systems where specific requirements exist” based on the risk for human health and the environment, or respectively the socio economic impacts of a continuous use of TRI after the sunset date versus a prohibition. Customers who want to use TRI in surface cleaning, even after the sunset date (April 21, 2016) have to apply the described Risk Minimisation Measures (RMM) as set out in the application for authorisation accordingly. If not all of the RMM are applied then the use of TRI in industrial parts cleaning is not covered by the authorisation.



The SAFE-TAINER™ System is used successfully since many years. It enables the safe handling, storage and transportation of TRI and is essential to cover all described RMM from Dow's REACH application for authorisation.



Risk Minimisation Measures - Checklist

Risk Minimisation Measures (RMM)	Check
1. Is a closed loop solvent transfer (for fresh and used solvent) using safety containers (SAFE-TAINER™) with controlled solvent access only in place?	
2. Is the cleaning conducted in closed cleaning equipment classified as ECSA Type IV or Type V machine (ECSA Machine Types)?	
3. Is the cleaning chamber hermetically closed before flooding the chamber by pumping solvent from a solvent tank?	
4. Is the cleaning chamber blocked during parts washing until solvent concentration of 1 g/m ³ or less is reached?	
5. Is there no direct sewer connection from the metal degreasing machines? Are there no direct emissions of wastewater?	
6. Is the exposure during unloading of goods by a combination of technical and organisational measures minimised?	
7. Are all other tasks (sampling, analysis, re-stabilisation, equipment cleaning and maintenance) carried out with appropriate personal protective equipment?	
8. In addition to the RMM mentioned in the application for authorisation the national threshold for TRI must be met. If no national threshold established the exposure must be minimised at its best. Do you meet the legal threshold in your process?	

To learn more about the different action points please visit www.chemaware.org or contact SAFECHEM (service@safechem-europe.com).