

Dow submits authorisation applications for trichloroethylene

Applications cover industrial surface cleaning in closed systems, asphalt testing, formulation and repackaging

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In one of the first authorisation applications prepared by a manufacturer of a substance, rather than a user, Dow and its Safechem subsidiary have produced an application for the use of trichloroethylene (TCE/TRI) in surface cleaning in closed systems, plus additional uses such as asphalt testing.

They have also prepared an application for the (re)packaging of the substance in its “Safe-tainer” solvent delivery system and for formulation of different TCE/TRI grades. These have been submitted to Echa and now have to pass a technical completeness check by the agency, before being discussed in its Committees for Risk Assessment (Rac) and Socio-Economic Analysis (Seac). The application for surface cleaning closed systems does not include open or enclosed systems.

TCE/TRI was added to the list of substances subject to REACH authorisation last year, and all uses that are not approved must be phased out by April 2016. It is one of the solvents used in precision cleaning in sectors such as aerospace, automotive, measuring and optical instruments and medical technology. It is also used as a process and extraction solvent, and in adhesives, but is mainly used as feedstock to produce fluorinated hydrocarbons and polymers. It is classified as a category 1B carcinogen.

Dow, along with Romania’s Chimcomplex, is one of two European producers of TCE/TRI. The company says an application by the manufacturer, rather than several users, seemed to be the best option because most are SMEs and, thus, lack the necessary capacity and experience. All authorisation applications for TCE/TRI must be submitted to Echa by 21 October.

Dow and Safechem say any companies that wish to take advantage of the authorisation, and continue to use the substance after the sunset date, must ensure they comply with the exposure scenario included in its extended safety data sheets. They will need to be able to prove and document that there are no suitable alternatives for their particular process. They will also, in accordance with REACH Article 66(1), have to notify Echa within three months of the first supply of the substance.

Safechem says potential alternatives in surface cleaning include the chlorinated solvents perchloroethylene (also known as tetrachloroethylene) and methylene chloride (also known as dichloromethane), plus modified alcohol solvents, all of which they supply. The substance n-propyl bromide is not suitable, says Safechem, as it is on the candidate list for its classification as toxic for reproduction.

It is difficult to predict what proportion of closed systems will switch to an alternative substance, the company says, because the analysis of alternatives is a customer-specific assessment, dependent on individual process parameters and requirements. Customers must evaluate whether



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Further Information

[Dow/Safechem's FAQ document on TCE/TRI under REACH](#)
(<http://www.dow.com/safechem/eu/en/chemaware/pdfs/2014faq.PDF>)

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