

USE 1: Verification of DCC PY.34 & PR.104 RMM and OC Summary of Blood lead, Air Monitoring and RPE

DATE: 28.11..2016

Dear Customer and Down Stream User,

We are pleased to inform you that our pigment supplier DCC has successfully applied for the continued use of Pigment Yellow 34 and Pigment Red 104. In order to ensure safe handling of these pigments, the European Commission has included the assessment of biomonitoring data, air monitoring data and RPE effectiveness by the Authorisationholder.

As per Article 3(e) of the final EC decision, C(2016) 5644 of 07.09.2016, all customers and downstream users are obligated to provide blood lead information and air monitoring results for chromium to ECHA. DCC Maastricht B.V. OR will receive data from ECHA as per Article 3(f) for the purpose of preparing a review reports.

In order to complete your notification to ECHA, please refer to Table 1 which can be found in each eSDS to identify the worker functions and the activities that are covered per use under DCC's Authorisation. Table 1 indicates the specific activities that a worker is permitted to perform under the specified technical and organisational conditions. The table below summarises the uses and the assigned Authorisation numbers for DCC PY.34 and PR.104.

DCC eSDS (Use)	Description of USE for Paint Sector	DCC PY.34 Authorisation Numbers:	DCC PR.104 Authorisation Numbers:
Use 1	Use: distribution and mixing of pigment powder in an industrial environment into solvent-based paints for non-consumer use	REACH/16/3/0	REACH/16/3/6
Use 2	Use: industrial application of paints on metal surfaces (such as machines vehicles, structures, signs, road furniture, coil coating, etc.)	REACH/16/3/1	REACH/16/3/7
Use 3	Use: professional, non-consumer application of paints on metal surfaces (such as machines, vehicles, structures, signs, road furniture, etc.) or as road marking	REACH/16/3/2	REACH/16/3/8

DCC eSDS (Use)	Description of USE for Plastic Sector	DCC PY.34 Authorisation Numbers:	DCC PR.104 Authorisation Numbers:
Use 4	Use: distribution and mixing pigment powder in an industrial environment into liquid or solid premix to colour plastic/plasticised articles for non-consumer use	REACH/16/3/3	REACH/16/3/9
Use 5	Use: industrial use of solid or liquid colour premixes and pre-compounds containing pigment to colour plastic or plasticised articles for non-consumer use	REACH/16/3/4	REACH/16/3/10
Use 6	Use: professional use of solid or liquid colour premixes and pre-compounds containing pigment in the application of hot melt road marking	REACH/16/3/5	REACH/16/3/11

HMG paints Limited & DCC recommends using the attached form **for each employee** involved with DCC PY.34 and/or PR.104 to verify and monitor worker exposures. This form can be submitted to ECHA and to DCC (hschulpen@dominioncolour.nl) by March, 31st of each year, summarising the results of the previous year.

If you have any questions regarding the use of DCC PY.34 and/or PR.104, please feel free to contact your HMG Paints Limited representative.

Thank you for your continued support.

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I. General Information:

Company Name:		Contact Name:	
Address:		Contact Phone #:	
Postal Code		Contact e-mail:	
City, Country:		Date:	
# Workers handling/exposed to PY.34 and/or PR.104			
Annual volume PY.34/PR.104 used:			
Comments:			

II. Company specific: Use and Legal Requirements

REACH Authorisation Number: Tick the boxes that apply to your company	% PY.34/PR.104 in product (ranges are acceptable, but within ± 10% of the contents)	Member State Regulation related to Health Surveillance	Health Surveillance		Air Monitoring for Chromium
			Action Level ¹	Suspension Level ²	Comments:
PY.34 USE 1: REACH/16/3/0 USE 4: REACH/16/3/3 USE 2: REACH/16/3/1 USE 5: REACH/16/3/4 USE 3: REACH/16/3/2 USE 6: REACH/16/3/5		Directive 98/24/EC Directive 2004/37/EC Other.	40 µg lead/100 ml blood Other.	70 µg lead/100 ml blood Other.	Please provide Member State Regulation for Air Monitoring: Please provide Sampling Procedure for air monitoring: Please provide analytical method for air monitoring:
PR.104 USE 1: REACH/16/3/6 USE 4: REACH/16/3/9 USE 2: REACH/16/3/7 USE 5: REACH/16/3/10 USE 3: REACH/16/3/8 USE 6: REACH/16/3/11		If other apply, please specify:	If other apply, please specify:	If other apply, please specify:	
			Please provide Sampling test Method for Blood Lead:		

¹ Action level: triggers employer to carry out investigation, review control measures and take steps to reduce employee's blood lead concentration below the action level so far as reasonably practicable

² Suspension level: concentration at which employees are normally taken off work which exposes them to lead. Return to work/modification of work exposure is based on Doctor's recommendations

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III. Worker / Employee specific

Table 1. Overview of tasks per function for Use 1 (ES 1)

Company:			Employee (internal) Id ³ :					Approximate volume handled by employee over last 6-12 months:									
Comments:			Smoker		Non- smoker			Approximate volume handled by employee/per day:									
Description of Worker Functions and Tasks			Summary of RMM for USE 1					Verification of RMM			Results of Monitoring Programs						
Function	Workplace instruction card (WIC)	Tasks (description of Contributing Scenario)	Technical RMM			Organisational RMM	RPE	Site RMM	Max. hours/week	Type RPE used	Blood lead Testing		Personal Air Monitoring				
			A. Containment of source	B. Personal enclosure (PE) / segregation (SEG)	C. Local exhaust ventilation (LEV)						Maximum hours per week	Minimum Respiratory protective equipment (APF ⁴)	A, B or C	hours	APF	µg lead/100 ml blood	Date of test
Operator / Formulator	WIC01	Manual dosing of pigment powder		-	Y	6	40										
		Automated dosing of pigment powder	Y	Y (SEG)	Y	10	-										
		Mixing of pigment paste	Y			18	-										
		Cleaning of vessel with solvent	Y			6	20										
		Pigment paste charging/discharging by gravity or manual handling				9	-										
		Pigment paste charging/discharging using a dedicated installation				9	-										
		Dried pigment paint cleaning				1	10										
Total					40⁶												

³ Only list non-confidential details. Personal data to be maintained by the customer/downstream user.

⁴ Level of respiratory protection that can realistically be expected to be achieved in the workplace by 95% of adequately trained and supervised wearers using a properly functioning and correctly fitted respiratory protective device.

⁵ The exposure related to chromium can be calculated based on a general 15% Cr-content of PY.34/PR.104

⁶ The limit value for the two pigments is based on an exposure duration of 40 hours per working week. Therefore the maximum duration for any function is 40 even though for this function the summed duration per task can be over 40 hours.

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Table 2 continue: Overview of tasks per function for Use 1 (ES 1)

Company:		Employee (internal) Id ⁷ :					Approximate volume handled by employee over last 6-12 months:								
Comments:		Smoker		Non-smoker			Approximate volume handled by employee/per day:								
Description of Worker Functions and Tasks			Summary of RMM for USE 1			Verification of RMM			Results of Monitoring Programs						
Function	Workplace instruction card (WIC)	Tasks (description of Contributing Scenario)	Technical RMM			Organisational RMM	RPE	Site RMM	Max. hours/week	Type RPE used	Blood lead results		Personal Air Monitoring		
			A. Containment of source	B. Personal enclosure (PE) / segregation (SEG)	C. Local exhaust ventilation (LEV)						Maximum hours per week	Minimum Respiratory protective equipment (APF) ⁸	A, B or C	hours	APF
Lab worker / Quality control	WIC02	Pigment powder quality control / lab work			Y	10	-								
		Pigment paste testing by smearing				9	-								
		Spray testing of pigment paint in industrial booth			Y (spray room)	3	400								
		Pigment paint testing by brushing/rolling			Y	6	-								
		Pigment paste or paint laboratory operations			Y	12	-								
		Total					40								

⁷ Only list non-confidential details. Personal data to be maintained by the customer/downstream user.

⁸ Level of respiratory protection that can realistically be expected to be achieved in the workplace by 95% of adequately trained and supervised wearers using a properly functioning and correctly fitted respiratory protective device.

⁹ The exposure related to chromium can be calculated based on a general 15% Cr-content of PY.34/PR.104

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Table 3 continue: Overview of tasks per function for Use 1 (ES 1)

Company:			Employee (internal) Id ¹⁰ :				Approximate volume handled by employee over last 6-12 months:								
Comments:			Smoker		Non- smoker		Approximate volume handled by employee/per day:								
Description of Worker Functions and Tasks			Summary of RMM for USE 1				Verification of RMM			Results of Monitoring Programs					
Function	Workplace instruction card (WIC)	Tasks (description of Contributing Scenario)	Technical RMM			Organisational RMM	RPE	Site RMM	Max. hours/week	Type RPE used	Blood lead results		Personal Air Monitoring		
			A. Containment of source	B. Personal enclosure (PE) / segregation (SEG)	C. Local exhaust ventilation (LEV)						Maximum hours per week	Minimum Respiratory protective equipment (APF ¹¹)	hours	APF	µg lead/100 ml blood
General worker	WIC03	Delivery, storage and handling of closed bags with pigment powder				10	-								
		Storage of pigment paste / Transfer of pigment paste through closed piping	Y			15	-								
		Manual cleaning / scraping of mixing vessels, equipment and lids				3	10								
		Cleaning of vessel with solvent	Y			6	20								
		Equipment cleaning: scraping and brushing	Y			5	10								
		Dried pigment paint cleaning				1	10								
		Total					40								

¹⁰ Only list non-confidential details. Personal data to be maintained by the customer/downstream user.

¹¹ Level of respiratory protection that can realistically be expected to be achieved in the workplace by 95% of adequately trained and supervised wearers using a properly functioning and correctly fitted respiratory protective device.

¹² The exposure related to chromium can be calculated based on a general 15% Cr-content of PY.34/PR.104

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Table 4 continue: Overview of tasks per function for Use 1 (ES 1)

Company:			Employee (internal) Id ¹³ :				Approximate volume handled by employee over last 6-12 months:								
Comments:			Smoker		Non-smoker		Approximate volume handled by employee/per day:								
Description of Worker Functions and Tasks			Summary of RMM for USE 1				Verification of RMM			Results of Monitoring Programs					
Function	Workplace instruction card (WIC)	Tasks (description of Contributing Scenario)	Technical RMM			Organisational RMM	RPE	Site RMM	Max. hours/week	Type RPE used	Blood lead results		Personal Air Monitoring		
			A. Containment of source	B. Personal enclosure (PE) / segregation (SEG)	C. Local exhaust ventilation (LEV)	Maximum hours per week	Minimum Respiratory protective equipment (APF ¹⁴)	A, B or C	hours	APF	µg lead/100 ml blood	Date of test	pigment µg/m ³	Cr µg/m ³ ¹⁵	Date of Test
Repackager	WIC04	Re-packaging of pigment powder	Y	Y (SEG)		8	-								
		Pigment paste filling into drums/cans at a filling line				32	-								
		Total				40									
Mixing and blending operator	WIC05	Mixing colour paste in closed drum mixing machine with automated dosing of paste	Y			40	-								
		or Mixing colour paste into paint in closed mixing vessel	Y			40	-								
Paint filling operator	WIC06	Pigment paint filling into drums/cans at a filling line		Y (SEG)	Y	40	-								
		or Pigment paint charging/discharging using a dedicated installation		Y (SEG)	Y	40	-								

¹³ Only list non-confidential details. Personal data to be maintained by the customer/downstream user.

¹⁴ Level of respiratory protection that can realistically be expected to be achieved in the workplace by 95% of adequately trained and supervised wearers using a properly functioning and correctly fitted respiratory protective device.

¹⁵ The exposure related to chromium can be calculated based on a general 15% Cr-content of PY.34/PR.104

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IV. Company specific: Stationary Air Monitoring Data for Chromium

Company Name:		Please state Member State Regulation for Air Monitoring:	DMEL inhalation: 0.067 µg pigment/m³		
Approximate Volume of PY.34/PR.104 handled during sampling period:			Sampling method/frequency:		
Location Description	Length of Sampling Period (hours)	Date of Sampling	Results (µg pigment/m ³)	Results (µg Cr/m ³) ¹⁶	Comments

¹⁶ The exposure related to chromium can be calculated based on a general 15% Cr-content of PY.34/PR.104