REQUEST FOR ADDITONAL INFORMATION

Legal name of applicant(s):	Monroe Czechia s.r.o.
Submitted by:	Monroe Czechia s.r.o.
Date:	25 June 2021
Substance:	Dichromium Tris(chromate)
Use title:	Use of dichromium tris(chromate) in a post-treatment step of the autodeposition coating process of shock absorbers for automotive vehicles.
Use number:	Use 1
Communication Number:	AFA-C-2114557994-30-01/F
Submission Number:	TQ831466-08

	ECHA Request	Applicant Response
CSR questions		
1	As a follow-up to your response to RAC Q3, could you please confirm that you do not intend to implement a regular exposure monitoring programme for workers (static/personal measurements) based on the specific tasks where potential exposure to Cr(VI) is possible?	As described in RAC Q3 of the first Request for Information, the Applicant performs quarterly static measurements at the workstations, which show very low exposure to Cr(VI) as provided in Annex A of the CSR. There are also regular biomonitoring tests to all workers working with Cr(VI), as per the replies to RAC Q2 and Q3 of the first Request for Information. A regulator exposure monitoring programme (static measurements) is therefore already in place. The Applicant believes that the current static monitoring represents a worst case of exposure, as it is carried out close to the reactive rinse bath. The operators potentially exposed to Cr(VI) enter the area of the bath for much shorter periods of time than the duration of the static sampling. For this reason there has not until now been any personal measurement programme at this particular location which is not really a workstation as such, because the process is monitored from outside this area. However, for the operators that enter this area on a daily basis (one person per shift, 5 minutes per two hours), the Applicant intends to include these operators in the personal monitoring programme from now on.
2	In your responses to RAC Q5 and Q9, the following is stated: a. In response to Q5, it is stated that 1 worker is involved in WCS 2 and 9 b. In response to Q9, it is stated that six people in total are working on the WWTP (WCS 9). This seems contradicting. Please clarify if the number of workers involved in each WCS (as provided in response to Q5 and in table 10.1 of the CSR) represent the number of workers involved in the WCS per shift or the team of workers that are qualified for the WCS.	The one person in response to RAC Q5 refers to the number of people handling the closed containers of dichromium tris(chromate) (DCTC). The entry in the amended Table 10.1 presented in the report to RAC Q5 should thus only refer to WCS 2. The number of workers relevant to WCS 9 is six, as stated in the response to RAC Q9. It should be noted, however, that these WWTP workers are handling wastewater containing Cr(VI) coming from the hard chrome-plating lines and which is covered by the supplier's upstream application for authorisation. As mentioned in the response to RAC Question 6, the only waste from the reactive rinse process that is treated at the on-site WWTP are the approximately 500 ml a year from the laboratory analysis of samples. As such, the impact of the applied for use to those workers is practically nil. The number of people stated in Table 10.1 as being involved in the other WCS (3-8) are the total people trained for the tasks, across all shifts. This is also mentioned in Sections 9.2.3 to 9.2.8 of the CSR.

3	In your response to RAC Q8, you give a non-exhaustive list of tasks. It seems that the duration (30 minutes) associated with the tasks to be undertaken is underestimated. This is especially valid in case of malfunction or breakdown. Please further clarify and, if necessary, update your exposure and corresponding risk assessment.	It is possible that duration of some maintenance tasks, mainly when repairs are needed due to malfunction or breakdown, can take longer than the 30 minutes. However, such occurrences are rare, so the 30 minutes stated in the CSR represent a typical task duration. It should be noted that this is a rather simple process, which is unlikely to require long maintenance duties. Even during breakdowns or when there is need for repair, the process is still short and unlikely to exceed 30 minutes of exposure. Also note that, as described in Section 9.2.5 of the CSR, during maintenance, equipment is washed and left to dry for 3-4 hours, before any maintenance is carried out. Therefore, the exposure to Cr(VI) during the actual maintenance work is expected to be zero.	
AoA/SP/SEA Questions			
1	With regard to your response to question n.1 on costs & benefits, in the SEA (page 20) it is stated that [redacted] workers are involved in the ACC process and one page 8, it is stated that [redacted] employees [redacted]% of [redacted]) would lose their job. Please explain why the number of people that will lose their job is higher than the number of people working in the ACC step? Does this imply that in addition to those directly exposed also some other workers involved in the previous steps or in other roles will be made redundant and that only part of them can be re-assigned to a second line?	The reactive rinse step and the ACC coating process are part of the overall shock absorber manufacturing process of the Applicant's Hodkovice plant. As described in the Non-Use Scenario, there will be a loss of output of shock absorbers in case of a refused Authorisation, and the production output of the upstream shock absorber assembly lines will also fall. As a result, it is expected that there will be redundancies in earlier steps of the process. This is why the number of job losses in the NUS is higher than the number of exposed workers. In other words, the manufacturing process of shock absorbers is a production line that couples upstream shock absorber assembly lines with the reactive rinse step and the ACC coating processes.	CBI 2
2	Regarding your response to question 7, SEAC understands that more than 65% of current products are validated on the second line (spraying). However, on page 27 (table 5.1), under 5th column it is stated that this line does not appear to be technically suitable. a. Considering the abov e [redacted]%, does this also mean that [redacted]% of the products have been already validated on the second line?	a. The loss in output cannot be directly correlated with the number of product types that could potentially be produced on the second line. The critical points are: 1. At full capacity would still not meet current demand and 2: it would not be feasible to validate the products that have not yet been validated as the technology is not sufficient to meet high end product specifications. As mentioned in the response to SEAC Question 7, the <35% loss of output is driven by the capacity constraints of the coating line. The actual share of products that have not been validated is less than that number.	CBI 2

	b. Please explain how you concluded on the overall technical unfeasibility of this second line (table 5.1, 5th column) considering that most of the products have been already validated on this line?	b. This AfA is a bridging application, seeking a review period to September 2024. The current spray coating line is a relatively old technology and, as per the Applicant's long experience, it is limited in technical performance, especially against high-end customer specifications. Customers' corrosion resistance specifications in particular have been constantly getting more demanding and this is expected to continue and probably increase in the period up to September 2024. It is also necessary to mention that installation of a second coating line will also require validation of all the shock absorbers that will eventually be coated on it before they can be commercially produced, as it is effectively different equipment and any process change triggers the need for validation.
3	With regard to your response to question 5(b), please note that the definition of alternative includes also different processes and not only different substances. Based on this, SEAC understands that most of shock absorbers have been validated on this second line and that the technical requirements can be met by this alternative process. Could you please confirm this? If this is the case, please further explain why you decided to focus on the other two shortlisted alternatives.	Please note that it is the Applicant's specific intention to move to a new Cr(VI)-free process before September 2024. The spray coating line cannot meet the technical requirements of the shock absorbers not yet validated on it. In addition, the spray coating line's capacity is not sufficient for coating the current production of shock absorbers at the Hodkovice plant. Considering that the plant's total output capacity is almost double the coating capacity of the spray coating line, a second coating line is necessary. Therefore, the Applicant is focusing on a best available technology to replace all Cr(VI)-related activities with Cr(VI)-free technology. The two shortlisted alternatives could meet all customer specifications, and offer additional advantages, such as less use of hazardous substances (e.g. solvents) and lower operational costs.
4	Please explain what the differences are between your spraying line and the Alternative 1 which is also a spraying coating application and how you concluded that alternative 1 is technically and/or economically more preferred when compared to your second line.	Tests carried out with Alternative 1 have shown that it has superior results compared to the existing spray coating line. Alternative 1 also has higher transfer efficiency (i.e. the amount of coating used versus the amount that is actually applied on the parts) compared to the current spraying

		process. The current spray line can reach between [redacted]% and [redacted]% (25-75%). Alternative 1 can have a higher transfer efficiency. Thus, using Alternative 1 would result in a more economic and sustainable use of raw materials. Furthermore, use of Alternative 1 would reduce the use of solvents, so it would also limit the risks from exposure to VOCs significantly. Finally, the investment and operational costs of Alternative 1 are lower than that of the spray coating line, based on the preliminary estimations by the Applicant.	CBI 1
5	Considering that some further study is required for the Alternative 2, how did you conclude that also this Alternative appear more suitable when compared to your second line?	Similarly to Alternative 1, the Applicant has carried out performance testing with Alternative 2, which have shown superior results compared to the current spray coating process, in particular in terms of corrosion resistance. The Applicant's preliminary evaluation also shows that switching to Alternative 2 will also have environmental and economic benefits compared to the current spray coating process. Alternative 2 uses less hazardous materials than the spray coating process and it also has a lower material cost. Finally, the investment cost is also expected to be lower than that of a new spray coating line using the same technology as the Applicant's current line.	
6	In response to question 11, it is stated at one point that "..functionalities can be achieved with only CT or DCTC", but the final sentence says that shock absorbers using only CT are not acceptable. Please clarify whether – based on your knowledge - the functionalities and so final specifications can be achieved by single substances.	Based on the results of testing carried out so far, chromium trioxide (CT) alone could not deliver products at the same quality level as the current reaction rinse, which uses a mixture of CT and DCTC. The response to Question 11 wanted to convey that, while some degree of corrosion resistance and other functionalities can be provided by CT alone, it is not sufficient to meet customer specifications, at least insofar as current tests show.	

Annex A: Justification for confidentiality claims

Blanked out item reference	Justification for confidentiality
CBI 1	**Demonstration of Commercial Interest:** Proprietary manufacturing information The details of product manufacture are closely held to prevent competitors from replicating procedures and procedures conditions. These details are only shared under strong non-disclosure agreements and are not made publicly available. **Demonstration of Potential Harm:** If process information were to be revealed, competitors could try to copy the design and process, leading to loss of knowhow and market position. Even a portion of the full process information could be used to “reverse engineer” the process. **Limitation to Validity of Confidentiality:** This claim is valid indefinitely
CBI 2	**Demonstration of Commercial Interest:** Volume of sales, revenue, profits, employment and other economic information are confidential information that are only to be used for the Applicant’s planning and operations. Sharing them publicly may also breach anti-trust and competition laws in the EU. **Demonstration of Potential Harm:** If competitors got hold of this information, they could use it to determine the Applicant’s market share or the weight of the particular products on their overall business. Competitors could use such sensitive information to gain a competitive advantage over the Applicant. Some of the redacted information could also be used to back-calculate sensitive information. **Limitation to Validity of Confidentiality:** This claim is valid indefinitely.