



February IMFormation 2006

Important communications on REACH and COMAH (copied exactly as received, warts and all!) for the attention of members

The REACH (Registration, Evaluation and Authorisation of Chemicals) Directive proposes that synthetic chemicals marketed in everyday objects should be tested for toxicity and abandoned in favour of safer alternatives where possible. The proposals will completely overhaul chemicals safety legislation, and was originally intended to cut the use of deadly chemicals in everyday items such as cleaning products, cosmetics, computers and carpets. Around 100,000 different substances are registered in the EU, of which around 30,000 are manufactured or imported in quantities above 1 tonne, but environmental and health effects is only available for a small proportion of these chemicals. The existing regulatory system has prioritised 140 chemicals of high concern but progress has been slow, such that the European Commission proposed the REACH system:

- All chemicals produced or imported into the EU in quantities above 1 tonne per year would be registered in a central database.
- Chemicals deemed of most concern would need authorisation such that industry to gain specific permission for particular uses and demonstrated to be safe.
- The system would cover both 'new' and 'existing' substances.
- A European Chemicals Agency would be set up and act as a central point for REACH: it would run a database to operate the system, co-ordinate the evaluation of suspicious chemicals and run a public database in which consumers and professionals can find hazard information.

Editor's comment Sounds good but what is the downside – significant increased costs to manufacturers and where substances are made in small quantities then manufacturers could decide that costs would overtake selling prices and decide to cease manufacture, a serious situation where no alternative product is available, and further, could seriously damage the European economy because of associated costs. However, has common sense prevailed at last – let's hope so, only time will tell. Read on:

Members of the European Parliament at their first reading position on the REACH package for regulating chemicals across the European Union. After years of wrangling and one of the most intensive lobbying campaigns in the EU's history, the European Parliament voted on the proposals to reach an agreed position. The outcome of the voting was:

- 90% of commercial chemicals would be exempt from full tests
- Expensive toxicity tests were abandoned
- Substances still under research were given a 15 year exemption from REACH to encourage innovation. Undoubtedly the chemical industry, especially smaller companies, will be pleased with the outcome.

The British EU presidency is hoping that the 25 member states will reach a political agreement on REACH by the end of 2005. The EU could then finalise the details of its position early in 2006. The European Commission says the law is unlikely to come into force until 2007.

Hexavalent Chromium Electroplating Installations and You

A recent letter which members may be interested in ???

From: EUROPEAN COMMISSION Brussels, 7 December 2005
DIRECTOR-GENERAL ENVIRONMENT ENV.A.5/PBTB/isk (D2005) 24825

NOTE FOR THE ATTENTION OF: COMPETENT AUTHORITIES OF THE SEVESO II DIRECTIVE

**Subject: Classification of electroplating baths containing chromium trioxide/chromic acid:
Application of the Seveso II Directive for Airbus Industries and the electroplating industry**

The electroplating industry uses Chromium trioxide which has been classified recently as very toxic by the 29th ATP of the Dangerous Substances Directive. Chromium trioxide is dissolved in Chromic Acid in electroplating baths, but the classification of the chromium component has not yet been identified properly. If the chromium component is eventually classified as very toxic, many electroplating baths exceeding the thresholds of 5 or 20 tons would be covered by the Seveso II Directive.

After a first discussion with the Member States at the Seveso Committee (Attachment 1: Discussion Paper from the UK), Unit A.5 has consulted the Member States and has received substantial comments from Poland, Belgium, Sweden, Germany, Italy and France (Attachment 2: Table compiling the comments attached). On the basis of these comments, no consensus can be reached as the comments raises several technical questions concerning the proper identification of the chromium compound of the electroplating baths and the correct application of Directives 67/548/EC and 1999/45/EC in determining the classification of the composition contained in the baths.

Following a preliminary opinion of the Major Accidents Hazard Bureau (MAHB) within the JRC on the risk classification of chromium solutions (Attachment 15 November 2005), the dilution of chromium trioxide into water leads to the creation of a new substance (mixture of chromic and dichromic acid) which has not yet been classified according to the Directive 67/548/EEC and must therefore be self-classified as a separate substance in accordance with Annex VI of Directive 67/548/EC, as foreseen in Annex I of the Seveso II Directive (see Notes of Annex I, point 1, 2nd paragraph). A generic evaluation of Chromium (VI) compounds classifies them as Cat 2 carcinogens and substances dangerous to the aquatic environment (N; R50/53, but does not address toxicity by inhalation hazards.

On the basis of these preliminary evaluations, it appears that the companies need to carry out selfclassification tests for their baths. Therefore, the testing conditions and procedures should be such that both Committees established under the Dangerous Substance Directive and under Seveso II could agree with. The Commission recommends that the affected Member States discuss their options and agree the next steps. If further tests are agreed, MAHB has accepted to facilitate the discussions for agreement of all parties on the conditions and parameters of these tests, prior to their performance. Furthermore, the MAHB offered to attend the meeting with the electroplating industry on 8 December in the UK and to follow up the discussions closely. Finally, for the long term, the classification of chromium acid/electroplating baths could, on request of a Member State, generally agreed by including these substances in the 31 ATP

Editor's comment. Of course, all owners of companies will immediately understand the ramifications (!!!) of the above letter, especially those responsible persons who have already taken actions to obey what was understood to be what COMAH (the Seveso II Directive) meant. Some companies are known to have told their customers that they have ceased (or are ceasing) to supply chromium plating from CrVI type solutions, whilst some are known to have expended money by having reduced the size of their tank(s) in order to only be classed as lower tier.

If at some time in the future, their action appears incorrect and they have therefore wasted good money, who will compensate them for the actions that they have taken – the Government !, European Union !

Comments from members on both the REACH and the SEVESCO articles are welcome, and should be sent to the Institute at Exeter House, marked for the attention of The Editor IMFormation.

Health, Safety and Environment

Scottish Environment Protection Agency (SEPA)

SEPA has issued a consultative document seeking comment on the proposed increases of the Pollution Prevention and Control (PPC) subsistence charges for 2006/07 and 2007/8 by more than the Retail Price Index (RPI). The document can be viewed on the SEPA website: www.sepa.org.uk, which gives details of the various increases, and how to comment.

Slow progress for IPPC regime

The European Commission has published a report on the implementation of the IPPC regime, under which all major industrial installations must have their Permits by October 2007.

The report highlighted a disappointing progress on the issue of permits among the countries covered, and it anticipates a last minute rush for approvals before the deadline.

Additionally, several Member States are well behind schedule in transposing the legislation itself and



with differing approaches to the methods used to do so. Legal action is ongoing against eight of the EU countries (the UK is not one of them)) for incorrect or delaying transpositions.

The report sets out an action plan to pressure Member States to speed up the 'permitting process' which involves use of the European Pollutant Emission Register (EPER) to identify the main producers of certain pollutants and check on their permitted status.

For more information visit:

Flytippers Beware

A campaign of roadside stop-and-search is targeting flytippers in England as part of a programme to encourage businesses to manage waste responsibly. The checks by police, council staff and Environment Agency officers are part of the Government's Business Resource Efficiency and Waste Programme (BREW), which was set up to help businesses use resources, water and energy more efficiently and to cut the waste they send to landfill. Vehicles carrying waste are being targeted to check that the drivers have the correct registration to carry waste since unregistered waste-carriers are often to blame for incidents of fly-tipping.

UK lags behind in Safety of Abrasives

The UK is lagging behind other European countries when it comes to the safety of abrasive products such as grinding wheels, cut-off discs and coated abrasives. So claims the Organisation for the Safety of Abrasives (OSA), a not-for-profit association of manufacturers who account for 70% of the world's production of hand held abrasives. In some countries it is mandatory to use OSAcertified products whilst in others they should conform to the relevant EN standards. In the UK, whilst HSE recognises EN standards, there are few restrictions on the sale of unsafe products. OSA's methodical and exhaustive tests are performed by recognised test institutes, which confirms that products are safe and issues appropriate certificates. Anyone thinking that OSA is just another club which might lack 'teeth' may be reassured that 50% of new members fail to meet the stringent rules on their first attempt.

First Aid at Work

Are your First Aiders up to date with the latest requirements to enable them to take up their duties with confidence?

- Have they a valid certificate of competence?
 - Do they need to take a refresher course?
 - Have you sufficient First Aiders per number of employees? There are numerous training organisations but do they offer additional training specific to the surface finishing industry?
- To find out more about courses in various centres and company in-house courses, contact: Lifeskills Medical Limited—Advanced Life Support Tel: 0870 225 0101 or E-mail: info@advanced-lifesupport.com

Environmental Management Standard

ISO 14001:1996 will be withdrawn in May 2006 and the revised ISO 14001:2004 will be applicable. All of the old certificates will cease to be valid. Companies wishing to maintain a valid EMS registration must make to transition to ISO 14001:2004.

A Comparison Guide explaining the changes and transition arrangements is available on request from BSI Management Systems – emsenquiries@bsi-global.com

A free e-learning package is available on the BSI website, which contains details of all the changes and a test of understanding. To access the package go to: www.bsi-global.com/training/enviro/elearning

'In Court today'

Two companies have been fined a total of £46,000 and ordered to pay combined costs of £156,244 after wastes including syringes, bottles of pills, batteries, metal knives and an inhaler, was spread on farmland. The companies pleaded guilty to three offences under the Environment Protection Act.

Municipal waste from a recycling centre owned by one of the companies was mixed with green waste and cattle manure and spread on farmland owned by the other company, with a risk of pollution to the environment and harm to human health. The companies claimed it was part of a trial to investigate the potential for recycling biodegradable waste.

A university has been fined a total of £16,000 for breaches of the radioactive substances regulations after it pleaded guilty to five charges. The university after an EA inspection was given three months to



put matters right, but did not do so, hence the prosecution. In court it was stated that the daily discharge limit for one substance, Oxygen-15, had been exceeded by a factor of 840.

Company News and Products

Wheelabrator Group

About 100 visitors attended when the company threw open its doors at its Surface Technology Centre in Birmingham. Visitors had a twelve hour day of seminars and training sessions as well as live demonstrations which included the opportunity for visitors to bring along their own samples and see how they could be cleaned, deburred, peened and polished, using air, wheel, and wet blast technology, plus washing and vibratory finishing. More information - Colin Ward - tel: 01924 276303

3M Abrasive Systems

3M Abrasive Systems offers a free information pack to help employers meet new 'hand-arm' vibration rules. The pack is to help companies comply with the new EU regulations (2002/44/EC) on 'hand-arm' vibration at work, which can reduce levels of vibration by as much as 37%. The pack is available free by calling 0870 60 800 90, or email: abrasives.uk@mmm.com

Riley Industries A fully automated inline barrel plating line formerly used in the UK for zinc plating has been recently exported to South Africa and installed at Saayman Danks in Seaview near Durban. Said director John Danks *'We were introduced to Riley Industries through their recent membership of the South Africa Metal Finishing Association, as a result of which we have been able to acquire a large, modern and sophisticated plant at a fraction of the cost it would have been when new. We are pleased with the equipment and service we have received from Michael Riley and his team'*.

Sandvik Materials Technology UK

Sandvik have launched a new and innovative coated strip material, for decorative applications in the consumer electronics, domestic appliance, automotive and similar industries. Called Sandvik Decorex™, the new material combines an extensive and exclusive colour range in various surface finishes – dull, satin, ground and bright, with excellent processing properties and technical benefits of stainless steel. The new material is seen as an alternative to traditionally used anodised aluminium. In comparison Decorex is more elastic, harder and more ductile and can be used in much thinner sections due to the strength benefits of stainless steel. More details obtainable by telephoning 0121 504 5111. Website: www.smt.sandvik.com

AMETEK Spectro Analytical Instruments

Ametek have a range of X-ray fluorescence analysis and optical emission spectrometry equipment which will be essential instruments for proving the conformity of products under the WEEE and RoHS directives which come into force from July 2006. These analytical techniques, amongst others, are recommended in the ICE 111/24/CD from the International Electrotechnical Commission. For more details telephone: +44 121 550 8997

IMF News

AGM Day

Members and guests who attended the event of Christmas Lectures, Luncheon and Annual General meeting at the Birmingham Medical Institute were very complimentary in their praise of the organisation of the event. The invited lectures by Dr David Hemsley and that by Dr Stuart Lyon were very well received and members who did not attend will be able to read them in a future edition of the Transactions. The full Christmas lunch was excellent washed down with wines and the luncheon concluded with the toast to the Institute proposed by the President of the Institute of Corrosion (Dr Stuart Lyon), in recognition of the Institute's 80 years in existence.

After lunch came the legal requirement of the Annual General Meeting which concluded with the presentation of the Institute's awards. A provisional date for this event in 2006 has been booked for 6 December – put it in your diary now so you don't forget!



IMF at Surface World Exhibition

For the Institute the exhibition was a great recruiting opportunity and we ran out of application forms quite early on! A rapid "mercy dash" from Exeter House and use of the Exhibition's copier soon fixed that. Let us see how many turn into actual new members, both professional and sustaining. This was the first IMF exhibition for Ken and it was a chance for him to get to know the industry, visit other stands and be there for members who looked us up as an oasis. Members and visitors from around the world made a point of checking in with us.

IMF volunteers were there in abundance (thank you for that) and we always seemed to manage two on the stand and one roving for each of the three days.

Sharing a stand (with an invisible demarcation line) with the SEA worked well, giving solidarity between the professional and trade associations.

Honorary Secretary General of the IMF, Barry Gay, is quoted, "I hope the Show was as good for the other stands as it was for the Institute. It was good to see Head Office staff and volunteers pulling together to put on a professional face to the industry."

Books

Guides to Practice in Corrosion Control, produced some years ago by NPL and IMF are now available in downloadable pdf format from: www.nationalcorrosionservice.org and a link is on the IMF website under books.

New members and transfers

Student

Cantwell P, Loughborough

Thangaraj V, India

Affiliate

Allen M, Tadley

Allin D.J, Torrington

Benstead I.P, Barnstable

Boden P, Basingstoke

Hill-Meldrum S, Bideford

Husband S, Bideford

Killner S, Bideford

Lee A.J, Bideford

Little J.C, Bideford

Mitchell D.J, Bideford

Sleigh C.P, Bideford

Smetham MC, Uckfield

Warren J.P, Bideford

Member

Bunn E, Worcester

C.Robinson, Coventry

New Sustaining Member Companies

Messier-Dowty Ltd

Cheltenham Road

Gloucester GL2 9QH

Tel: 01452 712424, Fax: 01452 711549

E-mail: marilyn.white@messier-dowty.org Messier-Dowty Ltd are an aerospace company who manufacture landing gear for the aircraft industry. Their core plating process expertise includes cadmium, chromium and nickel.

KPD Midlands Ltd, Unit 1, Angel Works

St Andrews Street, Birmingham B9 4JT

Tel: 0121 766 8226, Fax: 0121 771 2064

E-mail: kpdmidlands@hotmail.com KPD are a surface treatment engineering company who supply electroplating jigs, anodising jigs, tanks & vats, vat heaters, cooling coils, baskets, pvc coating and also provide a repair service.



Trinity Aerospace Engineering Ltd

Unit 15 – 18 Bilton Road
Kingsland Industrial Estate
Basingstoke RG24 8LJ
Tel: 01256 840276, Fax: 01256 840278
E-mail: sales@trinityaerospace.co.uk.

A member of the APPH Group, specialising in repair and overhaul of aerospace components. Facilities include - electrodeposition of chromium, cadmium and sulphamate nickel, Alocrom, shot peening, machining, plasma spraying and painting.

Tutored Foundation Course

The Midland Branch are contemplating running the tutored Foundation Course in the Spring on Basic Electroplating & Surface Finishing, although dependant on student requirements it may be possible to introduce some of the recently studied organic finishing units. Attendance would be on a two hour evening session, one evening per week over twelve weeks at IMF headquarters – Exeter House. The end of course multiple-choice examination would enable those passing to be awarded the Foundation Certificate and apply for the first stage professional qualification of AssocIMF. Persons or companies interested in this course should contact the Branch Secretary on 0121 308 0777 for receipt of the course syllabus.

Examination success at BMW, Oxford

Dr Keith Davies, Chairman of the IMF's Examination & Qualification Board, together with Ron Read, Chairman of the Education & Training Committee presented students from BMW who were successful in the recent Automotive Surface Finishing examination with their certificates. This is the fourth course that has been completed at BMW and from comments said by Mr Chris Reeve, (Training Specialist) "will not be the last". The occasion commenced with an address by the Automotive Academy that was followed by an impromptu address by Ron Read, which received wide applause. Keith Dennis then presented the successful students with their Technician- Automotive Surface Finishing certificates.

BMW's Director, Peter Crook gave a congratulatory speech and said "the course had been a corner stone to the success of the Paint Shop".

Following the presentations, the IMF were themselves presented with a certificate from the Automotive Academy showing approval of syllabi and module notes for further courses, namely:

Foundation Certificate Course & Module

MF1 Module – General Principles
MF2 Module – Plating Practice
MF2 Module – Paint, Lacquer & Varnish
MF2 Module – Powder Coating

Modified tutored Foundation Course

The first tutored course for the Foundation Certificate comprising a mixture inorganic and organic units has been completed. The course consisted of units on electroplating and anodising together with units on conversion coatings, paints and their application, powder coating together with mandatory units on health & safety, environmental, and control of processes and product quality. The course was tutored by Gordon Davies on-site at IMI Norgren, Lichfield.

Examination results are as follows:

Armstrong S *
Blewitt M *
Carwithen M *
Hall R
Hill D **
Palmer R **
Plover R *
Troy T *
While G

* pass with merit, ** pass with distinction



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Out & About

Organic Coating Environment and Health Issues in the Automotive Industry. One-day symposium & tabletop exhibition on the 14 February 2006.

Birmingham Medical Institute. Details from IMF tel: 0121 622 7387 or see the IMF's website at: www.uk-finishing.org.uk

Impact of the Nickel Risk Assessment. One-day symposium & tabletop exhibition. 16 March 2006.

Birmingham Medical Institute. Jointly organised by IMF tel: 0121 622 7387, NI tel: 01527 584777 and SEA tel: 0121 237 1123 from whom further details can be obtained.