

Succinct summary of representative risk management measures (RMMs) and operational conditions (OCs)

Legal name of applicant: Bard & Brazier Ltd

Submitted by: Bard & Brazier Ltd

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Substance: Chromium trioxide
EC : 215-607-8
CAS : 1333-82-0

Use title: Use of chromium trioxide for the chromium electroplating of sanitaryware and associated accessory components for the purpose of creating a coating to provide very specific performance characteristics and to match existing components and those supplied from other sources.

Use number: 3 - Functional chrome plating with decorative character

Exposure Scenario Use at an Industrial Site - Use of chromium trioxide for the chromium electroplating of sanitaryware and associated accessory components for the purpose of creating a coating to provide very specific performance characteristics and to match existing components and those supplied from other sources

ECS and WCS	Task (ERC/spERC or PROC)	Annual amount per site (tonnes /year)	Technical RMMs, including: *Containment, *Ventilation (general, LEV...) *customized technical installation, etc	Organisational RMMs, including: *Duration and Frequency of exposure *OSH management system *Supervision *Monitoring arrangements *Training, etc	PPE (characteristics)	Other conditions	Effectiveness of waste water and waste air treatment (for ERC)	Release factors: water, air and soil (for ERC)	Detailed info. in CSR (section)
ECS 1	Use in chromium Electroplating	0.050 - 0.075 tonnes per annum					No direct emissions to the environment	No emissions to soil. No direct emissions to air outside of the site No direct emissions to water	
WCS 1	Receipt & storage of chromium trioxide PROC 1	See above	<ul style="list-style-type: none"> ▪ General ventilation ▪ Keep sealed in original container ▪ Transfer to storage location. 	<ul style="list-style-type: none"> ▪ 30 mins. ▪ Every 4 months Av. ▪ One worker ▪ Training - Working with Chromium. ▪ Standard Operating Procedure in place 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overall, eye protection in case of accidental spillage 	None	Not applicable	Chromium trioxide is in sealed containers – no exposure	9.2.1

WCS 2	Offline jiggling / unjiggling / inspection of components PROC 4	See above	<ul style="list-style-type: none"> ▪ General ventilation ▪ The final stage in the plating process is the immersion of jigs & components in neutralising and rinsing solutions. ▪ Components allowed to dry before being removed from jigs 	<ul style="list-style-type: none"> ▪ Daily (Typically 1 hour exposure to plated components) ▪ One worker inside the plating shop. ▪ Training - Working with Chromium ▪ Standard Operating Procedure in place ▪ Good hygiene practices - Standard Operating Procedure in place 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overalls, eye protection 	None	Not applicable	No releases	9.2.2
WCS 3	Working on the Plating Line PROC 13	See above	<ul style="list-style-type: none"> ▪ Mist suppressant to control surface tension and control any potential emissions of chromium trioxide. ▪ Good ventilation 	<ul style="list-style-type: none"> ▪ Maximum time in Chrome Zone: 5 minutes total per load ▪ Main Plater individually ▪ Mist tests taken every 4 weeks ▪ Personal air monitoring ▪ Biological monitoring ▪ Task specific Standard Operating Procedure in place ▪ Training - Working with Chromium ▪ Good hygiene practices - Standard Operating Procedure in place 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overalls, eye protection 	Far field exposure applies for plater while not of the Chrome Zone	Not applicable	No releases	9.2.3

WCS 4	Sampling the chrome tank PROC 8b	See above	<ul style="list-style-type: none"> ▪ Mist suppressant to control surface tension and control any potential emissions of chromium trioxide ▪ Slowly submerge sample container into chrome trioxide solution using long handled tongs. ▪ Seal sample container and thoroughly neutralise and rinse before removing from the plating line. ▪ Good ventilation 	<ul style="list-style-type: none"> ▪ 100ml typically every two months. ▪ Maximum time in Chrome Zone: 10 minutes total ▪ Supervisor only ▪ Task specific Standard Operating Procedure in place ▪ Training - Working with Chromium ▪ Good hygiene practices - Standard Operating Procedure in place 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overalls, eye protection 	None	Not applicable	No releases	9.2.4
WCS 5	Concentration adjustment of the chrome tank (Making additions) PROC 8b	See above	<ul style="list-style-type: none"> ▪ Mist suppressant to control surface tension and control any potential emissions of chromium trioxide ▪ Keep sealed in original container, in specified area when not in use ▪ Good ventilation 	<ul style="list-style-type: none"> ▪ 2kg of flake typically every month on average ▪ Average 15 mins per session (Total activity duration) ▪ Maximum time in Chrome Zone: 5 mins ▪ Supervisor only ▪ Task specific Standard Operating Procedure in place ▪ Training - Working with Chromium ▪ Good hygiene practices - Standard 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overalls, eye protection ▪ Wear FFP3 filter mask 	None	Not applicable	No releases	9.2.5

				Operating Procedure in place					
WCS 6	Maintenance activities PROC 28	See above	<ul style="list-style-type: none"> ▪ Plating process must be stopped before any maintenance commences. ▪ Good ventilation 	<ul style="list-style-type: none"> ▪ Typical time spent in Chrome Zone: 60 mins ▪ Frequency : Every 6 months ▪ Number of workers: Main Plater and Cover Plater together ▪ Task specific Standard Operating Procedures in place ▪ Training - Working with Chromium ▪ Good hygiene practices - Standard Operating Procedure in place. 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overalls, eye protection ▪ Appropriate task specific PPE & RPE is required 	None	Not applicable	No releases	9.2.6
WCS 7	Wastewater / effluent treatment PROC 28	See above	<ul style="list-style-type: none"> ▪ Solid waste is removed from the filter press and dispensed into the holding skip. ▪ Activity performed outdoors but within a courtyard. Out of range of the plating line. 	<ul style="list-style-type: none"> ▪ Frequency : Every month ▪ Typical activity time : 15 mins ▪ One worker ▪ Training - Working with Chromium - Standard Operating Procedure in place 	<ul style="list-style-type: none"> ▪ Wear chemically resistant gloves, overall, eye protection in case of accidental spillage. 	None	Not applicable	No releases	9.2.7

Abbreviations: WCS=Worker contributing scenario, ECS=Environmental Contributing Scenario,* ERC=Environmental Release Category (or spERC if available) , PROC=Process category, LEV=Local Exhaust Ventilation, PPE=Personal Protective Equipment