

# Rubber Industry Exposure Scenario TYRE

Brussels, 17 December 2009

## COVER LETTER

### Introduction

In accordance with EC Regulation 1907/2006 Registration, Evaluation, and Authorisation of Chemicals (REACH) Article 37(2), a downstream user (DU) has the right to make a use known in writing to the manufacturer, importer, downstream user or distributor who supplies him with a substance on its own or in a preparation with the aim of making this an identified use. In making the use known, sufficient **information shall be provided to prepare an exposure scenario**, or if appropriate a use and exposure category, for that downstream use in the registrants chemical safety assessment.

On behalf of ETRMA member companies as downstream users (DU) of chemicals, and as a supplement to the Use Descriptor communication of 5/11/09, this document provides generic exposure scenarios (GES), and **sector specific information for registrants to perform chemical safety assessments** for substances used within the tyre manufacturing industry. The **formulation/industrial use** of subject chemicals during the tyre manufacturing process, and their **professional use** and **service life cycle** stages when used in tyres (articles) are identified in this document.

## Tyre Industry Exposure Scenario

The information provided is assembled based on the CEFIC template for dialog between DU and suppliers created as part of the REACH Guidance on ES development and supply chain communication. The ETRMA document is designed to facilitate specific exposure scenario (SES) development, however, an emphasis has been placed the information required for a **Tier 1 analysis** to develop broad ES inclusive of all facilities and compatible with a **scaling approach**.

The ETRMA GES document consists of:

- **Excel workbook “ETRMA GES Template – Tyre”**, containing the following sheets:
  - Link to the Use Descriptor communication for the tyre industry
  - Schematic of TYRE Manufacturing Process (Formulation and Industrial Use)
  - Schematic of TYRE Professional Use and Service Life
  - **GES Data, including: production phases, activities, operational conditions, risk management measures, and a cross-reference to TGD Substance Class usage and concentrations.**
  - Risk Management Measure reference sheets
  - Transformation products: non-exhaustive list of publicly available information and reports regarding transformation product substances that are potentially generated as a result of the use of certain substances the tyre industry. It is expected that these transformation products, and any others of knowledge by the registrant, are assessed for applicability in the risk assessment process.

Additionally, the following supporting documents are provided:

- **Emission Factor Guidance for Formulation and Industrial Use** (Chemrisk 2009): guidance on default and refined emissions factors for Industrial use.
- **Production Rate Guidance** (Chemrisk 2009): chemical usage quantities for environmental release calculation.
- **Scaling Equation Guidance** (Chemrisk 2009): expectations and methodology for the provision of an exposure scaling equation from the risk assessment process.
- **Service Life Guidance** (Chemrisk 2009): calculation parameters and factors for consideration during assessment of environmental emissions for tyres during service life.
- **End of Life Tyre Guidance** (Chemrisk 2009): end of life stages of tyres, and potential emissions.

## Information on specific substances

In combination with the above documentation, substance specific exposures can be calculated. Details on specific substances within the scope of this communication can be obtained upon request. Substance-specific information available at ETRMA includes:

- TGD group classification, physical form(s),
- maximum usage quantities and concentrations,
- presence and concentration in tread compound, and an estimated transformation factor during industrial use.
- Transformation products

For obtaining substance-specific information, please address your request by email to Lorenzo Zullo ([technical@etrma.org](mailto:technical@etrma.org)), according to the following instructions:

- Subject of the email: “Tyre ES: info on [specify CAS and/or EINECS number]
- The body of the email shall contain the following information:
  - Name/company and contact details of the person requesting information (registrant)
  - Name of the substance intended to be registered
  - CAS and/or EINECS number of the substance intended to be registered
  - Contact details of the lead registrant (if applicable) in order to provide updated information when available)

### Next steps following Tier 1 assessment

This collection of data and documentation should be considered as a starting point for exposure and risk assessment work. It is expected to be subject to future modifications and refinement, as further details are still being researched.

It is further expected that registrants of a substances calculating risk characterisation ratios  $> 1$ , thus not demonstrating “Safe Use”, as a result of the above data shall contact ETRMA as soon as possible for further discussion on data/information refinement options.

### Contact person at ETRMA:

- Lorenzo Zullo, +32 2 218 49 40, [technical@etrma.org](mailto:technical@etrma.org)

### **Disclaimer**

*The information contained in document is intended for guidance only whilst the information is provided in utmost good faith and has been based on the best information currently available, is to be relied upon at the user 's own risk. No representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.*