PUBLIC CONSULTATION

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RESPONSE TO SUBMITTED COMMENTS

Date:	July 15th , 2016
Consultation number:	1040
Submitted by:	SNECMA
Substance:	Chromium trioxide, EC 215-607-8 and CAS 1333-82-0
Uses:	Use-1

1. AIM & GOAL

The present document synthesises the Applicant's responses to the comments submitted by interested third parties during the public consultation for SNECMA's application for Authorisation (consultation number 1040; consultation period: 27/04/2016 to 22/06/2016).

The applicant decided not to answer to comments numbers 1123 and 1001 since they were general comments not specifically related to Snecma's application.

This answer aims at providing interested parties a technical response regarding proposed potential alternative process. It will thereby be demonstrated that these comments do not in the slightest call into question the conclusions of the AfA.

2. COMMENTS 1040

Savroc technology provided technical information on TripleHard technology as a replacement of Cr(VI)-based hard chromium plating. Please note that this technology does not suit the current process of the Applicant's use since SNECMA's current process involves spraying paint coating activity.

Snecma is not aware of Savroc's chrome plating offering since the applicant focused its researches effort on alternative compatible with OEM's standard practice (i.e alternative paint coating). Indeed, chrome plating is generally used as an anti-friction coating rather than an anti-corrosion coating: as a microcracked coating, chrome plating does not have a very good grip in corrosion compared to paint coating. Moreover, as an electrolytic coating, chrome plating would entail several binding constraints (hydrogen release that may damage the parts regarding the very high temperature, oversized tanks for treatment, low efficiency rates in terms of duration of the treatment that would require additional measures to ensure uniformity of the coating inside the shafts) that explain that this type of process does not appear as relevant for the applicant's activity.

Besides, based on public information provided by Savroc, the alternative technology mentioned is a very new process with no actual long-term experience and Savroc's current testing and analysis performed demonstrated a maturity level not exceeding TRL3[1]. As a result, Savroc has not yet demonstrated the required

[1] *According to the European Commission's definition (European Commission, G. Technology readiness levels (TRL), Horizon 2020 – WORK Programme 2014-2015 General Annexes, Extract from Part 19 - Commission Decision C(2014)4995), TRL can be defined as follows:*

TRL 1 - Basic principles observed

TRL 2 - Technology concept formulated

TRL 3 - Experimental proof-of-concept

TRL 4 - Technology validated at laboratory scale

TRL 5 - Technology validated in relevant environment

TRL 6 - Technology demonstrated in relevant environment

TRL 7 - System prototype demonstration in operational conditions

performances at the laboratory scale. As a result, should Savroc's technology be technically appropriate and feasible for Snecma's use, the applicant will still need time to pass different qualifications steps: development, testings, qualification, change of approval and test of the alternative in in-flight conditions. As a result, Savroc's technology implementation in the framework of Snecma's use will not reduce the duration required by the applicant to implement alternative to Cr(VI) paint coating process.

TRL 8 - System complete and qualified

TRL 9 - Actual system proven in industrial environment