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**NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME
(NICNAS)**

FULL PUBLIC REPORT

Polymer in 217 Flake Resin

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**Director
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FULL PUBLIC REPORT**Polymer in 217 Flake Resin****1. APPLICANT AND NOTIFICATION DETAILS**

APPLICANT(S)

Dow Corning Australia Pty Ltd

NOTIFICATION CATEGORY

Self Assessment: Polymer of Low Concern

EXEMPT INFORMATION (SECTION 75 OF THE ACT)

Data items and details claimed exempt from publication:

Chemical Name, Other Names, CAS Number, Molecular and Structural Formulae, Molecular Weight, Polymer Constituents, Residual Monomers/Impurities, Use Details, and Manufacture/Import Volume.

VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT)

No variation to the schedule of data requirements is claimed.

PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S)

None

NOTIFICATION IN OTHER COUNTRIES

None

2. IDENTITY OF CHEMICAL

MARKETING NAME(S)

Polymer in 217 Flake Resin

3. PLC CRITERIA JUSTIFICATION*Criterion**Criterion met
(yes/no/not applicable)*

Molecular Weight Requirements

Yes

Functional Group Equivalent Weight (FGEW) Requirements

Yes

Low Charge Density

Yes

Approved Elements Only

Yes

Stable Under Normal Conditions of Use

Yes

Not Water Absorbing

Yes

Not a Hazard Substance or Dangerous Good

Yes

The notified polymer meets the PLC criteria.

4. INTRODUCTION AND USE INFORMATION

MODE OF INTRODUCTION OF NOTIFIED CHEMICAL (100%) OVER NEXT 5 YEARS

The notified polymer will be imported as Dow Corning® 217 Flake Resin (containing >99.5% of the polymer) into Australia over the next 5 years.

MAXIMUM INTRODUCTION VOLUME OF NOTIFIED CHEMICAL (100%) OVER NEXT 5 YEARS

| <i>Year</i> | <i>1</i> | <i>2</i> | <i>3</i> | <i>4</i> | <i>5</i> |
|-------------|----------|----------|----------|----------|----------|
|-------------|----------|----------|----------|----------|----------|

| | | | | | |
|---------------|-------|-------|--------|--------|--------|
| <i>Tonnes</i> | 10-30 | 10-30 | 30-100 | 30-100 | 30-100 |
|---------------|-------|-------|--------|--------|--------|

USE

The notified polymer will be used in industrial paints and coatings at a concentration of <10%, which can be used for a variety of applications, for example, coating of metallic objects and furniture.

5. PROCESS AND RELEASE INFORMATION**5.1. Operation Description****Manufacturing**

The notified polymer will be manufactured in Dow Corning Corporation's overseas facilities and imported into Australia.

Transportation

The notified polymer will be imported as a 100% polymer flaked solid resin in 20-kg bags for use directly in the preparation of industrial paints and coatings. Bags of the notified polymer will be transported by trucks from the wharf to the relevant warehouses, where they will be unloaded using forklifts.

Reformulation and application

In a typical spray painting workshop, the notified polymer will be manually weighed and then transferred to an automatic mixer where it will be combined with other ingredients to form the final industrial paint or coating formulation. Following the mixing process, the liquid or powder coating (containing <10% of the notified polymer) will be fed through an enclosed system to a spray gun. The paint or coating containing the notified polymer will be applied by standard spray painting methods in a spray booth meeting applicable Australian Standards. Coated articles are then carried by conveyor to an oven where the coating will be cured at a temperature of about 120°C.

The mixing equipment will be cleaned by washing with water and an industrial detergent. The liquid waste will be treated as site industrial waste and dealt with by licensed disposal contractor. A very small amount of the notified polymer (approximately 0.5%) is expected to be released into the sewer from the cleaning of process equipment.

The workroom involved is provided with good mechanical dilution ventilation, while the mixer is fitted with locally exhausted side hoods. The work-floor is bunded to control any surface runoff that may occur. Operators wear overalls and protective gloves to prevent skin contact, and wear chemical goggles to prevent eye contact.

End-use

The cured polymer will adhere strongly to the treated articles and provide a durable protective coating. Degradation of the polymer will not occur under normal use condition.

6. EXPOSURE INFORMATION**6.1. Summary of Occupational Exposure**

During transport and storage, workers are unlikely to be exposed to the notified polymer except when the bag container is accidentally broken. Dermal and ocular exposure can occur during the mixing process. However, exposure to significant amounts of the notified polymer is limited because of the engineering controls, automation of the process, and personal protective equipment worn by workers. Spray painters will come into contact with the notified polymer through dermal, inhalation and ocular routes. The risk of exposure, however, will be minimal as application is done in a ventilated spray booth with workers using protective equipment. After application and once dried, the coating containing the notified polymer is cured into an inert matrix and is hence unavailable to exposure.

6.2. Summary of Public Exposure

The notified polymer will not be available to the public. Members of the public will come into contact with the notified polymer once it is dried and cured, and not available for exposure.

6.3. Summary of Environmental Exposure

6.3.1. Environmental Release

Release to the environment during shipping, transport and warehousing will only occur through accidental spills or leaks of the bag containers.

During mixing and formulation, spills are expected to be minimal. When spills occur, they will be contained by bunding, collected with absorbent material and sent to a licensed off site waste disposal centre.

Empty bags containing very small amount of residual polymer (<1%) will be disposed of to landfill. Some liquid wastes (<1%) generated from the cleaning of process equipment may be released into the sewer.

The major environmental release will be through over spray. This could be up to 30% of the imported amount from use as liquid paints in an industrial situation. This would be captured by conventional engineering techniques and disposed to landfill. Use in a powder coating situation will lead to significantly less release, and would be expected to be up to 5% of the imported amount.

6.3.2. Environmental Fate

Residual polymer disposed of to landfill in empty containers is expected to be adsorbed to soil particles and will eventually be degraded through biological and abiotic processes. When released into the sewer, the polymer will eventually adsorb onto sediments/sludge due to its low water solubility. Although not readily biodegradable, any notified polymer adsorbed onto sewage sludge or sediment is likely to be gradually degraded to natural components. In dry soils, silicone polymers are expected to be rapidly hydrolysed due to abiotic processes (Dow Corning, 1998).

The low water solubility of the notified polymer may indicate a potential for bioaccumulation. However, the high molecular weight will limit bioaccumulation.

7. PHYSICAL AND CHEMICAL PROPERTIES

| | |
|--|--|
| Appearance at 20°C and 101.3 kPa | Solid, colourless, odourless |
| Melting Point/Glass Transition Temp | 64 °C |
| Density | 1250 kg/m ³ at 25°C |
| Water Solubility | < 0.0001 g/L at 20°C |
| Particle Size | Not applicable – waxy material |
| Reactivity | It is a stable polymer |
| Degradation Products | In the event of fire, carbon oxides and silicon dioxide may be formed. |

8. HUMAN HEALTH IMPLICATIONS

8.1. Toxicology

No toxicological data were submitted.

8.2. Human Health Hazard Assessment

The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard.

9. ENVIRONMENTAL HAZARDS

9.1. Ecotoxicology

No toxicological data were submitted. :

9.2. Environmental Hazard Assessment

The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard. Nonionic polymers which have NAMW > 1000 are of low concern.

10. RISK ASSESSMENT

10.1. Environment

No aquatic exposure is anticipated during manufacture and end use of the notified polymer. It is envisaged that less than 2% waste would be generated from the manufacturing process. Most of these wastes would be collected by licenced waste contractors and be incinerated or land-filled.

The major environmental release will be through over spray. This is envisaged to account up to 30% of the imported quantity of notified polymer. This is expected to be collected and subsequently disposed of to landfill.

The notified polymer, once cured to form a water-resistant coating on industrial products, is highly stable to temperature and other environmental conditions. Waste articles may be disposed of via incineration or to landfill. Empty containers of the notified polymer may also be disposed of to landfill.

In the event of an accidental spill of the notified polymer into waterways, the polymer is not expected to disperse in water but settle out onto sediments. If the polymer is spilled on land, it is expected that the polymer would become immobilised in the soil layer. Contaminated soil can then be collected and disposed of to landfill.

Due to its low water solubility, the notified polymer, if released in landfill, is not expected to leach into the aquatic compartment. In soil, siloxanes are degraded.

The notified polymer is not expected to be toxic to aquatic or terrestrial life. The notified polymer is not cationic, nor is it expected to become cationic in the aquatic compartment. Despite the very low water solubility, due to the high molecular weight, no bio-concentration of this polymer is expected. The notified polymer will remain in the soil or sink and remain in the sediment of an aquatic environment.

Given the above, environmental exposure and the overall environmental risk are expected to be low.

10.2. Occupational Health and Safety

The OHS risk presented by the notified polymer is expected to be low, based on low hazard and low exposure as well as the engineering controls and personal protective equipment used by workers.

10.3. Public Health

The notified polymer will not be sold to the public, only being used by professional spray painters. Once the polymer is applied and cured it will be contained in an inert matrix, and hence will not be bioavailable. Risk to the public is considered low.

11. CONCLUSIONS – ASSESSMENT LEVEL OF CONCERN FOR THE ENVIRONMENT AND HUMANS

11.1. Environmental Risk Assessment

The polymer is not considered to pose a risk to the environment based on its reported use pattern

11.2. Human Health Risk Assessment

11.2.1. Occupational health and safety

There is Low Concern to occupational health and safety under the conditions of the occupational settings described.

11.2.2. Public health

There is Negligible Concern to public health when used in the proposed manner.

12. MATERIAL SAFETY DATA SHEET

12.1. Material Safety Data Sheet

The notifier has provided MSDS as part of the notification statement. The accuracy of the information on the MSDS remains the responsibility of the applicant.

13. RECOMMENDATIONS

CONTROL MEASURES

Occupational Health and Safety

- No specific engineering controls or work practices are required for the safe use of the notified polymer itself, however, these should be selected on the basis of all ingredients in the formulation.

Guidance in selection of personal protective equipment can be obtained from Australian, Australian/New Zealand or other approved standards.

- Personal protective equipment required during formulation are
 - Eye protection (safety glasses or goggles)
 - Impermeable gloves
 - Industrial clothing and footwear
- A copy of the MSDS should be easily accessible to employees
- If products and mixtures containing the notified polymer are classified as hazardous to health in accordance with the NOHSC *Approved Criteria for Classifying Hazardous Substances*, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation must be in operation.

Environment

- The following control measures should be implemented by the notifier to minimise environmental exposure during formulation of the notified polymer:
 - Bunding
- The following control measures should be implemented by end users (spray painters) to minimise environmental exposure during use of the notified polymer:
 - Exhaust ventilation with filter

Disposal

- The notified polymer should be disposed of to landfill or incinerated.
- Empty containers should be sent to local recycling or waste disposal facilities.

Emergency procedures

- Spills/release of the notified polymer should be handled by absorbing with sand and put into suitable container for disposal. Contaminated containers can be re-used after cleaning.

13.1. Secondary Notification

The Director of Chemicals Notification and Assessment must be notified in writing within 28 days by the notifier, other importer or manufacturer:

- (1) Under subsection 64(1) of the Act; if
- the notified polymer is introduced in a chemical form that does not meet the PLC criteria.

or

- (2) Under subsection 64(2) of the Act:
- if any of the circumstances listed in the subsection arise.

The Director will then decide whether secondary notification is required.

14. BIBLIOGRAPHY

Dow Corning Corporation (1998) Degradation of Silicone Polymers in Nature. Health Environment & Regulatory Affairs Dow Corning Corporation (Environmental Information Update No. 01-1113-01).

Hamelick, J.L. (1992). Silicones. In: Hutzinger, O. and de Oude, N.T. (eds): The Handbook of Environmental Chemistry, Vol. 3 Part F, Anthropogenic Compounds – Detergents. Springer-Verlag, NY.