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

PUBLIC REPORT

Polymer in KA-94-9778 and KA-87-4334 Hardeners

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (Cwlth) (the Act) and Regulations. This legislation is an Act of the Commonwealth of Australia. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Department of Health and Ageing, and conducts the risk assessment for public health and occupational health and safety. The assessment of environmental risk is conducted by the Department of Sustainability, Environment, Water, Population and Communities.

For the purposes of subsection 78(1) of the Act, this Public Report may be inspected at our NICNAS office by appointment only at Level 7, 260 Elizabeth Street, Surry Hills NSW 2010.

This Public Report is also available for viewing and downloading from the NICNAS website or available on request, free of charge, by contacting NICNAS. For requests and enquiries please contact the NICNAS Administration Coordinator at:

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**Director
NICNAS**

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SUMMARY

The following details will be published in the NICNAS *Chemical Gazette*:

ASSESSMENT REFERENCE	APPLICANT(S)	CHEMICAL OR TRADE NAME	HAZARDOUS SUBSTANCE	INTRODUCTION VOLUME	USE
LTD/1547	PPG INDUSTRIES AUSTRALIA PTY LTD	Polymer in KA-94- 9778 and KA-87- 4334 Hardeners	ND*	< 6 tonnes per annum	A component of surface coatings for application to tanks and associated structural steel

*ND = not determined

CONCLUSIONS AND REGULATORY OBLIGATIONS

Hazard classification

As no toxicity data were provided, the notified polymer cannot be classified according to the *Approved Criteria for Classifying Hazardous Substances* (NOHSC, 2004).

Human health risk assessment

Under the conditions of the occupational settings described, the notified polymer is not considered to pose an unreasonable risk to the health of workers.

When used in the proposed manner, the notified polymer is not considered to pose an unreasonable risk to public health.

Environmental risk assessment

On the basis of the assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.

Recommendations

CONTROL MEASURES

Occupational Health and Safety

- Employers should implement the following safe work practices to minimise occupational exposure during handling of the notified polymer:
 - Avoid contact with skin and eyes
 - Do not inhale vapours/mists
 - Avoid contact with uncured coatings or overspray
- Employers should ensure that the following personal protective equipment is used by workers to minimise occupational exposure to the notified polymer:
 - Respirators
 - Coveralls
 - Gloves
 - Goggles

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

- Spray applications should be carried out in accordance with the Safe Work Australia *National Guidance Material for Spray Painting* [NOHSC (1999)] or relevant State and Territory Codes of Practice.
- A copy of the MSDS should be easily accessible to employees.

- MSDS for products containing the notified polymer should contain reference to Polymer in KA-94-9778 or KA-87-4334 (as appropriate) in the list of ingredients, in order to provide a link for workers to the NICNAS assessment.
- Where not already contained in the MSDS for products containing the notified polymer, appropriate engineering controls, safe work practices and personal protective equipment to reduce exposure should be recommended on the product MSDS.
- If products and mixtures containing the notified polymer are classified as hazardous to health in accordance with the *Approved Criteria for Classifying Hazardous Substances* [NOHSC:1008(2004)] workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation must be in operation.
- If products containing the notified polymer are used in confined spaces, appropriate precautions should be taken in accordance with State/Territory legislation and/or national codes of practice.

Disposal

- The notified polymer should be disposed of to landfill.
- Emergency procedures
- Spills or accidental release of the notified polymer should be handled by physical containment, collection and subsequent safe disposal.

Regulatory Obligations

Secondary Notification

This risk assessment is based on the information available at the time of notification. The Director may call for the reassessment of the chemical under secondary notification provisions based on changes in certain circumstances. Under Section 64 of the *Industrial Chemicals (Notification and Assessment) Act (1989)* the notifier, as well as any other importer or manufacturer of the notified chemical, have post-assessment regulatory obligations to notify NICNAS when any of these circumstances change. These obligations apply even when the notified chemical is listed on the Australian Inventory of Chemical Substances (AICS).

Therefore, the Director of NICNAS must be notified in writing within 28 days by the notifier, other importer or manufacturer:

- (1) Under Section 64(1) of the Act; if
 - the polymer has a number-average molecular weight of less than 1000;or
- (2) Under Section 64(2) of the Act; if
 - the function or use of the polymer has changed from a component of surface coatings for application to tanks and associated structural steel, or is likely to change significantly;
 - the amount of polymer being introduced has increased from 10 tonnes, or is likely to increase, significantly;
 - the polymer has begun to be manufactured in Australia;
 - additional information has become available to the person as to an adverse effect of the polymer on occupational health and safety, public health, or the environment.

The Director will then decide whether a reassessment (i.e. a secondary notification and assessment) is required.

Material Safety Data Sheet

The MSDS of a product containing the notified polymer provided by the notifier was reviewed by NICNAS. The accuracy of the information on the MSDS remains the responsibility of the applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

APPLICANT(S)

PPG Industries Australia Pty Ltd (ABN 82 055 500 939)
McNaughton Rd
CLAYTON VIC 3168

NOTIFICATION CATEGORY

Limited: Synthetic polymer with Mn \geq 1000 Da.

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, analytical data, degree of purity, polymer constituents, use details and import volume.

VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT)

Variation to the schedule of data requirements is claimed as follows: melting/boiling point, density, vapour pressure, water solubility, hydrolysis as a function of pH, partition co-efficient, absorption/desorption, dissociation constant, particle size, flash point, flammability limits, autoignition temperature and explosive properties.

PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S)

None

NOTIFICATION IN OTHER COUNTRIES

None

2. IDENTITY OF CHEMICAL

MARKETING NAME(S)

KA-94-9778 (containing < 30% notified polymer)
KA-87-4334 (containing < 30% notified polymer)

ANALYTICAL DATA

Reference GPC spectra were provided.

3. COMPOSITION

DEGREE OF PURITY > 90%

LOSS OF MONOMERS, OTHER REACTANTS, ADDITIVES, IMPURITIES

Loss of monomers is not expected to occur under the normal conditions of use.

DEGRADATION PRODUCTS

The notified polymer is not expected to degrade under the normal conditions of use. In the case of degradation the products are expected to be oxides of nitrogen and carbon.

4. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AT 20 °C AND 101.3 kPa: yellow viscous liquid (product)

Property	Value	Data Source/Justification
Melting Point/Freezing Point	Not determined	Liquid at room temperature (product)
Boiling Point	Expected to decompose at > 200°C	Estimated
Density	980 kg/m ³ at 20°C	Product MSDS
Vapour Pressure	< 10 ⁻² kPa at 25°C	Estimated (US EPA, 2010)
Water Solubility	Not determined	The notified polymer is expected to have low solubility in water based on

Hydrolysis as a Function of pH	Not determined	its predominately hydrophobic structure and its use in solvent-borne coatings
Partition Coefficient (n-octanol/water)	Not determined	The notified polymer contains functional groups that are expected to hydrolyse very slowly in the environmental pH range (4-9).
Adsorption/Desorption	Not determined	The notified polymer may partition from water into octanol based on its hydrophobicity
Dissociation Constant	Not determined	Based on its presumed low solubility in water and potential cationic functionality, the notified polymer is expected to absorb to soil and sediment and have low mobility in soil
Particle Size*	Not determined	The notified polymer may be ionised in the environmental pH range (4-9) based on the presence of basic functional groups in the polymer structure
Flash Point*	26.3°C (product)	Imported in solution.
Autoignition Temperature*	Not determined	Product MSDS
Explosive Properties	Not predicted to be explosive	Imported in flammable product.
		Estimated based on chemical structure.
*Notified polymer as imported at < 30% concentration in solvent solution.		

DISCUSSION OF PROPERTIES

For full details of tests on physical and chemical properties, refer to Appendix A.

Reactivity

The notified polymer is not expected to be reactive under normal conditions of storage. It reacts when mixed with the other part of the 2-part coating formulation.

Dangerous Goods classification

Based on the submitted physical-chemical data in the above table the notified polymer is not classified according to the Australian Dangerous Goods Code (NTC, 2007). However the data above do not address all Dangerous Goods endpoints. Therefore consideration of all endpoints should be undertaken before a final decision on the Dangerous Goods classification is made by the introducer of the polymer.

5. INTRODUCTION AND USE INFORMATION

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

The notified polymer will be imported as a component of a solvent solution at < 30%.

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>	< 4	< 4	< 6	< 6	< 6

PORT OF ENTRY

Melbourne

IDENTITY OF RECIPIENTS

PPG Industries Australia Pty Ltd

TRANSPORTATION AND PACKAGING

The notified polymer will be imported by sea in sealed 1, 4 and 5 L cans of product containing < 30% of the notified polymer, and transported to end use sites by rail or road.

USE

The notified polymer will be used at < 30% concentration as a component of 2-part coatings for application to tanks and associated structural steel.

OPERATION DESCRIPTION

At end use sites, following decanting and blending with other paint components, the coating containing the notified polymer will be applied by airless spray to tanks as a lining and to associated structural steel in industrial settings.

6. HUMAN HEALTH IMPLICATIONS

6.1. Exposure Assessment

6.1.1. Occupational Exposure

NUMBER AND CATEGORY OF WORKERS

<i>Category of Worker</i>	<i>Number</i>	<i>Exposure Duration (hours/day)</i>	<i>Exposure Frequency (days/year)</i>
Transport and storage	6-8	2-3	10-15
Coating application	100	6	260

EXPOSURE DETAILS

Exposure during transport and storage is not expected except in the case of an accident involving a breach of the containers.

Dermal and ocular exposure to spills and splashes of the notified polymer to painters at industrial sites is possible during decanting and mixing the imported solvent solution containing the notified polymer at < 30% concentration.

Painters may come into contact with the notified polymer (< 30%) through inhalation during spray application, as well as dermal and ocular routes during application, cleaning and maintenance of equipment. The use of personal protective equipment (PPE) such as organic vapour respirators, gloves, goggles and coveralls should minimise exposure.

After application and once cured and dried, the notified polymer will be reacted into the polymer matrix and will not be bioavailable.

6.1.2. Public Exposure

Coatings containing the notified polymer at < 30% are intended for industrial use only and will not be sold to the public. Members of the public are unlikely to come into contact with surfaces of tanks and associated structural steel that have been coated with coatings containing the notified polymer. Furthermore, once the coatings have cured and dried, the notified polymer will be reacted into the polymer matrix and will not be bioavailable.

6.2. Human Health Effects Assessment

No toxicity data were submitted.

The notified polymer contains a functional group of concern for irritation/corrosion with a functional group equivalent weight (FGEW) < 1000 Da. There is a significant percentage of species < 1000 Da. Based on these low molecular weight species, there is potential for irritation/corrosion upon contact with the notified polymer.

The notified polymer belongs to a class of chemicals with potential for skin or respiratory sensitisation. However this effect may be mitigated by the structure of the notified polymer. Dermal absorption is expected to be limited by the high molecular weight (> 1000 Da) and expected low water solubility of the notified polymer.

Health hazard classification

As no toxicity data were provided, the notified polymer cannot be classified according to the *Approved Criteria for Classifying Hazardous Substances* (NOHSC, 2004).

6.3. Human Health Risk Characterisation

6.3.1. Occupational Health and Safety

The notified polymer may cause corrosion/irritation based on structural alerts, and the risk of skin or respiratory sensitisation cannot be ruled out.

The highest risk to workers is likely to occur at end-use sites, where the coating component containing the notified polymer is measured and mixed with other components, before being applied by airless sprayer. At these sites, PPE is available to reduce exposure. Only natural ventilation is expected to be available at these sites.

The products containing the notified polymer are classified as hazardous, and the precautions against exposure to these chemicals may reduce exposure and risk from the notified polymer. After application and once dried, the notified polymer will be trapped in an inert polymer matrix and will not be bioavailable.

Overall, the risk to workers during blending and application of coatings containing the notified polymer at <30% is not expected to be unreasonable given the appropriate use of workplace controls to minimise exposure.

6.3.2. Public Health

Members of the public are unlikely to come into contact with surfaces coated with the notified polymer.

Furthermore, after the coating has been applied and dried, the notified polymer will be cured into an inert matrix and will not be available for exposure, therefore the risk to public health is not considered to be unreasonable.

7. ENVIRONMENTAL IMPLICATIONS

7.1. Environmental Exposure & Fate Assessment

7.1.1. Environmental Exposure

RELEASE OF CHEMICAL AT SITE

The release of the notified polymer to the environment during importation, storage, and transport is unlikely. The most likely source of a release to the environment during these activities will be a transport accident. Releases that do occur as a result of accidents are expected to be physically contained, absorbed into inert material and sent for safe disposal to landfill.

RELEASE OF CHEMICAL FROM USE

During industrial use of the notified polymer it is estimated that up to 1% of the notified polymer may be spilt. These spills will be contained, collected and disposed of to landfill. Less than 1% of the notified polymer may remain as residues in product containers and these will be disposed of to landfill. During application by spray $\leq 10\%$ of the notified polymer will be released as overspray, which will be collected on tarpaulins or plastic coverings and disposed of to landfill. Equipment used to apply the coating formulations may be rinsed with solvent. It is estimated that 1% of the notified polymer, in solvents, will be collected, treated and disposed of by a licensed waste contractor.

RELEASE OF CHEMICAL FROM DISPOSAL

The majority of the notified polymer will be cured into an inert matrix with other chemical substances as part of the coating process and hence will be immobilised within a polymeric film on coated articles. The polymer incorporated in the coating will be disposed of along with the coated articles, at the end of their useful life, and will either go to metal recyclers or be disposed of to landfill.

7.1.2. Environmental Fate

No environmental fate data were submitted. The notified polymer will be applied to tanks and associated structural steel. It is expected to be cured into a solid polymer matrix as part of its normal use pattern and is therefore not expected to be mobile, bioavailable nor biodegradable in its cured form. The majority of the imported quantity of notified polymer is expected to be ultimately disposed of to landfill or thermally decomposed during recycling of metal structures to which it is applied. The uncured notified polymer contains a significant proportion of low molecular weight species that may have the potential to bioaccumulate. However, the risk for bioaccumulation is low due to the limited potential for aquatic exposure of the uncured polymer. The notified polymer, both in the uncured and cured forms, that is disposed of to landfill is not expected to be mobile and will slowly degrade by abiotic and biotic processes to produce water and oxides of carbon and nitrogen.

7.1.3. Predicted Environmental Concentration (PEC)

The notified polymer is not expected to be present at significant concentrations in the aquatic environment because of the very low potential for direct release to surface waters when used in surface coatings. A PEC has therefore not been calculated.

7.2. Environmental Effects Assessment

No ecotoxicity data were submitted. The notified polymer has functionality that has the potential to be toxic to aquatic life. However, no significant exposure of the notified polymer to aquatic organisms is expected. Furthermore, the majority of the notified polymer will be cured with other chemical substances as part of the coating process and is not expected to be bioavailable.

7.2.1. Predicted No-Effect Concentration

A Predicted No-Effect Concentration (PNEC) was not calculated as no ecotoxicological data were submitted and there will be very low potential for aquatic exposure.

7.3. Environmental Risk Assessment

A Risk Quotient ($Q = \text{PEC}/\text{PNEC}$) was not quantified as a PEC and PNEC were not calculated. The reported use pattern of the notified polymer indicates that there is no significant anticipated aquatic release. Moreover, after curing, the majority of the imported quantity of notified polymer will be incorporated into an inert matrix with other chemicals and is not expected to be mobile, bioavailable nor biodegradable. Hence, the environmental exposure is expected to be minimal. On the basis of the assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.

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