

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

POLYMER OF LOW CONCERN PUBLIC REPORT

Acrylic polymer in RC-38-9910

This Self Assessment has been compiled by the applicant and adopted by NICNAS 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), administered by the Department of Health and the Department of the Environment, has screened this assessment report. The data supporting this assessment will be subject to audit by NICNAS.

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
SAPLC/174	PPG Industries Australia Pty Ltd	Acrylic polymer in RC-38-9910	No	≤ 100 tonnes per annum	Component of coatings

CONCLUSIONS AND REGULATORY OBLIGATIONS**Human Health Risk Assessment**

Based on the assumed low hazard and the assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the health of workers and the public.

Environmental Risk Assessment

Based on the assumed low hazard and the assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.

Health and Safety Recommendations

- No specific engineering controls, work practices or personal protective equipment 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.

- A copy of the (M)SDS should be easily accessible to employees.
- Spray applications should be carried out in accordance with the Safe Work Australia Code of Practice for *Spray Painting and Powder Coating* (Safe Work Australia, 2012) or relevant State or Territory Code of Practice.
- If products and mixtures containing the notified polymer are classified as hazardous to health in accordance with the *Globally Harmonised System for the Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation should be in operation.

Disposal

- Where reuse or recycling are not appropriate, dispose of the polymer in an environmentally sound manner in accordance with relevant Commonwealth, state, territory and local government legislation.

Storage

- The following precautions should be taken by workers regarding storage of the notified polymer:
 - Bunding

Emergency Procedures

- Spills and/or accidental release of the notified polymer should be handled by physical containment, collection and subsequent safe disposal.

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 polymer 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 polymer, have post-assessment regulatory obligations to notify NICNAS when any of these circumstances change. These obligations apply even when the notified polymer 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 notified polymer is introduced in a chemical form that does not meet the PLC criteria;or
- (2) Under Section 64(2) of the Act; if
 - the function or use of the notified polymer has changed from a component of coatings, or is likely to change significantly;
 - the amount of notified polymer being introduced has increased, or is likely to increase, significantly;
 - the notified polymer has begun to be manufactured in Australia;
 - additional information has become available to the person as to an adverse effect of the notified 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 (M)SDS of a product containing the notified polymer was provided by the applicant. The accuracy of the information on the (M)SDS remains the responsibility of the applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

PPG Industries Australia Pty Ltd (ABN: 82 055 500 939)
14 – 20 McNaughton Rd
CLAYTON VIC 3168

Exempt Information (Section 75 of the Act)

Data items and details claimed exempt from publication: chemical name, CAS number, molecular and structural formulae, molecular weight, polymer constituents, residual monomers/impurities, and use details.

2. IDENTITY OF POLYMER

Marketing Name(s)

RC-38-9910 (product containing the notified polymer)

Molecular Weight

Number Average Molecular Weight (Mn) is > 1,000 Da.

3. PLC CRITERIA JUSTIFICATION

<i>Criterion</i>	<i>Criterion met</i>
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. PHYSICAL AND CHEMICAL PROPERTIES

Appearance at 20 °C and 101.3 kPa	Clear amber liquid in solution
Density	1000 kg/m ³ at 25 °C
Water Solubility	Not Determined. Based on its high molecular weight and predominantly hydrophobic structure, the notified polymer is expected to have low water solubility.
Dissociation Constant	Not determined. The notified polymer contains dissociable functionalities with expected pKa of 4 - 12. However, the notified polymer is not expected to be significantly ionised in the environment due to its limited water solubility
Reactivity	Stable under normal environmental conditions
Degradation Products	None under normal conditions of use or storage

5. INTRODUCTION AND USE INFORMATION

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>
Tonnes	100	100	100	100	100

Use

The notified polymer will be imported into Australia as part of a formulated automotive refinish clear coat at ~21% concentration. No reformulation of the notified polymer will occur in Australia. The clear coat will be applied by spray application in spray booths by professional applicators.

6. HUMAN HEALTH RISK ASSESSMENT

No toxicological data were available. The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard. The risk of the notified polymer to occupational and public health is not considered to be unreasonable given the assumed low hazard and the assessed use pattern.

Although not considered in this risk assessment, the notified polymer contains residual monomers that are classified as hazardous according to the *Globally Harmonised System for the Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia. These are not present in the notified polymer as introduced above the cut off concentrations for classification.

7. ENVIRONMENTAL RISK ASSESSMENT

7.1. Exposure Assessment

ENVIRONMENTAL RELEASE

The notified polymer will not be manufactured or reformulated in Australia; therefore, there will be no release from these activities. Environmental release during importation, transport and distribution may occur as a result of accidental spills. In the event of a spill, the notified polymer is expected to be collected with an inert absorbent material and disposed of in accordance with local regulations, which is most likely landfill.

The notified polymer will be used as a component of surface coatings for automotive applications to be applied by spray guns in specialised spray booths. The major environmental release of the notified polymer is expected to come from overspray during application of the coatings. Particulate overspray is expected to be contained by ventilation systems and collected on drop sheets to be disposed of to landfill.

ENVIRONMENTAL FATE

The notified polymer in automotive coatings is expected to share the fate of the substrate to which it has been applied, and are predominantly expected to be disposed to landfill, or thermally decomposed during substrate reclamation.

The notified polymer contains groups in the side chains that might hydrolyse under severe conditions, but is expected to be stable under normal environmental conditions. Due to its low water solubility, the notified polymer in solid wastes is expected to remain bound within the soils and sediments of landfills and eventually degrade through biotic and abiotic processes. If spilt on land, the notified polymer is expected to bind to soil and become immobilised in the soil layer. If spilt to water, it is not expected to dissolve but rather disperse or settle to sediment. The notified polymer is not expected to be readily biodegradable but due to its high molecular weight, it is not expected to bioaccumulate. With natural degradation in the environment, the notified polymer is expected to finally form water and oxides of carbon.

7.2. Environmental Hazard Characterisation

No ecotoxicological data were submitted. Anionic polymers are known to be moderately toxic to algae. The mode of toxic action is over-chelation of nutrient elements needed by algae for growth. The highest toxicity is when the acid is on alternative carbons of the polymer backbone, which is not applicable to the notified polymer. Therefore, the notified polymer is not considered to be an over-chelation hazard to algae.

7.3. Environmental Risk Assessment

The notified polymer will be used in automotive coatings that will eventually be incorporated in metal recycling programs or sent to landfill for disposal following its lifecycle. No significant release to the water environment is expected based on the proposed use pattern. During reclamation, the notified polymer will be destroyed in furnaces and converted to water vapour and oxides carbon. No significant aquatic exposure is anticipated during end-use of the notified polymer. The notified polymer will be bound within the cured automotive coating matrix, is not expected to be either bioavailable or bioaccumulative. Based on its assumed low hazard and assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.