NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in ZK-56-6401

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals* (Notification and Assessment) Act 1989 (the Act) and Regulations. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Australian Government Department of Health, and conducts the risk assessment for public health and occupational health and safety. The assessment of environmental risk is conducted by the Australian Government Department of the Environment and Energy.

This Public Report is 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

June 2018

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SUMMARY

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

ASSESSMENT REFERENCE	APPLICANT	CHEMICAL OR TRADE NAME	HAZARDOUS SUBSTANCE	INTRODUCTION VOLUME	USE
PLC/1490	BASF Australia	Polymer in ZK-56-	No	≤ 30 tonnes per	Component of
	Ltd	6401		annum	automotive 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.

- 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, 2015) or relevant State or Territory Code of Practice.
- A copy of the SDS should be easily accessible to employees.
- If products and mixtures containing the notified polymer are classified as hazardous to health in accordance with the *Globally Harmonised System of 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 notified polymer in an environmentally sound manner in accordance with relevant Commonwealth, state, territory and local government legislation.

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 automotive 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.

Safety Data Sheet

The SDS of the notified polymer was provided by the applicant. The accuracy of the information on the SDS remains the responsibility of the applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

BASF Australia Ltd (ABN: 62 008 437 867)

Level 12, 28 Freshwater Place SOUTHBANK VIC 3006

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 import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

ZK-56-6401 (product containing the notified polymer)

Molecular Weight

Number Average Molecular Weight (Mn) is > 10,000 g/mol

3. PLC CRITERIA JUSTIFICATION

Criterion	Criterion met
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 Solid

Melting Point/Glass Transition Temperature
Density
Not determined
1,036 kg/m³ at 23 °C
Water Solubility
Dispersible in water
Particle Size
0.13-0.23 μm

Reactivity Stable under normal environmental conditions

Degradation Products None under normal conditions of use

5. INTRODUCTION AND USE INFORMATION

Maximum Introduction Volume of Notified Chemical (100%) Over Next 5 Years

Year	1	2	3	4	5
Tonnes	≤ 30	≤ 3 0	≤ 30	≤ 30	≤ 3 0

Use

The notified polymer will not be manufactured in Australia. It will be imported as a component of finished coatings at < 6% concentration. No further reformulation or repackaging will occur. The notified polymer will be used as a component in solvent based top-coats for automotive original equipment manufacturer (OEM) and refinish applications at < 6% concentration. The coating will be applied to vehicle bodies in a spray booth using high volume low pressure (HVLP) spray guns.

The notified polymer is intended for professional use only and will not be made available to the public.

6. HUMAN HEALTH RISK ASSESSMENT

No toxicological data were submitted.

The notified polymer is a high molecular weight (> 10,000 g/mol) polymer with low water solubility. Inhalation of polymers with molecular weights > 70,000 g/mol has been linked with irreversible lung damage due to lung overloading and impaired clearance of particles from the lung, particularly following repeated exposure (US EPA, 2018). While there is also a concern for polymers with molecular weights between 10,000 and 70,000 g/mol, it is acknowledged that there is a data gap for this range. If the notified polymer is inhaled at low levels and/or infrequently, it is assumed that it will be cleared from the lungs. However, high level and/or frequent exposure may result in lung overloading effects, though the level of exposure in humans that would result in any effects, as well as the severity, is uncertain. The finished automotive coatings containing the notified polymer will be applied by spray in ventilated spray booths by professional painters only using protective equipment; hence the potential for exposure to the notified polymer should be limited.

The notified polymer meets the PLC criteria and is therefore assumed 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.

7. ENVIRONMENTAL RISK ASSESSMENT

No ecotoxicological data were submitted by the notifier. Polymers without significant ionic functionality are generally of low concern to the environment (Boethling and Nabholz, 1997).

The notified polymer will not be manufactured or reformulated in Australia. It will be imported as a component of finished industrial coatings. These coatings will be used by professional painters and applied to vehicle bodies in a spray booth using HVLP spray guns. As estimated by the notifier, approximately 30% of the import volume of the notified polymer could be released as overspray during use. The overspray is expected to be collected and cured on spray booth filters and water scrubbers before disposal to landfill in accordance with local government regulations. The notifier estimates that up to 5% of the import volume of the notified polymer could be released from application equipment cleaning and up to 0.5% of the import volume of the notified polymer could remain as residues in empty containers. These wastes are expected to be collected for disposal to landfill in accordance with local government regulations. Release of the notified polymer to the environment in the event of accidental spills or leaks during storage, transport and use is expected to be absorbed on suitable materials and disposed of to landfill in accordance with local government regulations.

Following the application, the notified polymer is expected to share the fate of the articles to which it has been applied, either subjected to metal reclamation or being disposed of to landfill at the end of their useful lives. During metal reclamation, the notified polymer will thermally decompose to form water vapour and oxides of carbon. In landfill, the notified polymer will be present as cured solids and will be neither bioavailable nor mobile. Thus, release of the notified polymer from the assessed use pattern is not expected to lead to ecotoxicologically significant concentrations in the aquatic environment. The notified polymer is not expected to bioaccumulate due to its high molecular weight.

The notified polymer in landfill is expected to eventually degrade via biotic and abiotic processes to form water and oxides of carbon.

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

BIBLIOGRAPHY

- Boethling, RS & Nabholz VJ (1997) Chapter 10 Environmental Assessment of Polymers under the U.S. Toxic Substances Control Act. In: Hamilton, JD Sutcliffe R ed. Ecological Assessment of Polymers Strategies for Product Stewardship and Regulatory Programs, 1st ed. New York, Van Nostrand Reinhold, pp 187-234.
- Safe Work Australia (2015) Code of Practice: Spray Painting and Powder Coating, Safe Work Australia, https://www.safeworkaustralia.gov.au/doc/model-code-practice-spray-painting-and-powder-coating.
- US EPA (2018) High Molecular Weight Polymers in the New Chemicals Program. https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/high-molecular-weight-polymers-new. Accessed 13 June 2018.