NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in Synocure 854 BA 80

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.

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:

Street Address: Level 7, 260 Elizabeth Street, SURRY HILLS NSW 2010, AUSTRALIA.

Postal Address: GPO Box 58, SYDNEY NSW 2001, AUSTRALIA.

TEL: + 61 2 8577 8800 FAX: + 61 2 8577 8888 Website: www.nicnas.gov.au

Director NICNAS

August 2015

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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
PLC/1303	Brenntag	Polymer in Synocure	No	≤ 40 tonnes per	Component of industrial
	Australia Pty Ltd	854 BA 80		annum	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 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 component of industrial 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 the 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

Brenntag Australia Pty Ltd (ABN 84 117 996 595) 262 Highett Road HIGHETT VIC 3190

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, use details and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

Synocure 854 BA 80 (product containing the notified polymer)

Molecular Weight

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

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 Clear liquid*

Glass Transition Temp 13 °C (measured by dynamic scanning calorimetry)

Density $1035 \text{ kg/m}^3 \text{ at } 20 \text{ }^{\circ}\text{C}^*$

Water Solubility Not determined. Claimed to be insoluble in water by the

notifier. However, the presence of hydrophilic functionality

may enhance solubility in water.

Dissociation Constant The notified polymer contains a potentially anionic

functionality, which is expected to show typical acidity.

Reactivity Stable under normal environmental conditions. The notified

polymer contains a hydrolysable functionality, however this is not expected to occur within the environmental pH range

of 4-9

Degradation Products None under normal conditions of use

* For Synocure 854 BA 80.

5. INTRODUCTION AND USE INFORMATION

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

Year	1	2	3	4	5
Tonnes	20-40	20-40	20-40	20-40	20-40

Use

Base resin used in polyurethane protective coatings for industrial and commercial applications. Products containing the notified polymer are not intended for sale to the public.

The notified polymer will be imported into Australia in 200 kg steel drums at < 80%. The imported notified polymer solution will be formulated into finished coating products containing the notified polymer at < 20% before being distributed to professional applicators who will apply the paints by spray, roller and brush.

6. HUMAN HEALTH RISK ASSESSMENT

No toxicological data were submitted. 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. 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 alternating carbons of the polymer backbone. This could apply to the notified polymer. However, the toxicity to algae is likely to be further reduced due to the presence of calcium ions, which will bind to the functional groups.

The notified polymer may be released in small amounts (< 4%) during formulation as spills, container residues and waste material. These releases will be collected for disposal to landfill or by thermal decomposition after solvent recovery, with waste material reduced to an insoluble polymeric mass before landfill disposal. Up to 15% may be released to the environment overspray during use. However, it is expected that the notified polymer will rapidly cure and thus become inert within coating matrix particles. The majority of notified polymer will share the fate of the substrates to which it has been applied, which is expected to be to landfill, or recycled for metals reclamation, which will entail thermal decomposition of the paint. In landfill, the notified polymer is expected to degrade slowly in situ. Therefore, the notified polymer is not expected to pose a risk to the environment when it is used as proposed.