

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

POLYMER OF LOW CONCERN PUBLIC REPORT

Trogamid CX7323

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (Cwlth) (the Act) and Regulations. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Australian Government 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 Australian Government 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
PLC/1054	Evonik Australia Pty Ltd	Trogamid CX7323	No	≤ 30 tonnes per annum	Component used in the manufacture of plastic articles

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

- Exhaust ventilation should be used if fumes are generated during moulding.
- No specific 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 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 *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.

Environmental Recommendations

- No specific control measures are required to minimise release of the notified polymer to the environment.

Disposal

- The notified polymer should be disposed to landfill.

Storage

- The following precautions should be taken by workers regarding storage of the notified polymer:
 - Store in a segregated and approved area.
 - Store in original container protected from direct sunlight in a dry, cool and well ventilated area, away from incompatible materials (oxidising substances, strong acids, strong bases).

Emergency Procedures

- Prevent from entering into soil, ditches, sewers, waterways and/or groundwater.
- 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 used in the manufacture of plastic articles, or is likely to change significantly;
 - the amount of notified polymer being introduced has increased per annum, 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 MSDS of the notified polymer was provided by the applicant. The accuracy of the information on the MSDS remains the responsibility of the applicant.

ASSESSMENT DETAILS**1. APPLICANT AND NOTIFICATION DETAILS****Applicants**

Evonik Australia Pty Ltd (ABN 16 079 823 313)
30 Commercial Drive, DANDENONG VIC 3175

Exempt Information (Section 75 of the Act)

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

2. IDENTITY OF POLYMER

Marketing Name(s)

Trogamid CX7323

Molecular Weight

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

Reactive Functional Groups

The notified polymer contains a low proportion of a functional group of high concern but the functional group equivalent weight is > 5000.

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	Colourless, microcrystalline powder
Melting Point	258°C (MSDS)
Density	1,020 kg/m ³ at 20°C (MSDS)
Water Solubility	≤ 3 × 10 ⁻³ g/L at 20°C (OECD TG 120)
Dissociation Constant	Not determined. The notified polymer has acid and base end groups that may be ionised at the environmental pH range (pH 4–9).
Particle Size	Majority > 100 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

<i>Year</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>
Tonnes	30	30	30	30	30

Use

Component used in the manufacture of plastic articles, including personal accessories.

The notified polymer will not be manufactured in Australia and will be imported into Australia at 100% concentration.

The notified polymer may be compounded with other resins and additives in a melt processing operation to form a molten plastic. The molten plastic will be injected into appropriate moulds to form plastic articles. A proportion of re-granulated material may be used to reduce wastage and disposal quantities.

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.

Particle size of the notified polymer is not available, and the notifier indicated that majority of the particle size will be > 100 µm. When the notified polymer is moulded under high temperatures, vapour of oxides of nitrogen and carbon may be released. However the potential for inhalation exposure would be minimised by use of ventilation during moulding.

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. Polymers without significant ionic functionality are generally of low concern to the environment. During use, the estimated environmental release from accidental spillage and residues remaining in import containers is up to 2% of the total import volume. These wastes and import container residues are expected to be disposed of to landfill. Solvent used to wash equipment is flocculated to capture notified polymer residues (< 1 %). These releases containing notified polymer are expected to be collected and disposed to landfill by a licensed waste disposal contractor. The majority of the notified polymer will be physically incorporated within the inert polymer matrix of moulded components and will share the fate of the articles. At the end of their useful life, articles containing the notified polymer are expected to be disposed of to landfill. In landfill, the notified polymer is bound within a polymer matrix and is not expected to be bioavailable or mobile due to its high molecular weight and low solubility in water. The notified polymer is not expected to be readily biodegradable but due to its high molecular weight it is not expected to bioaccumulate. It is expected to eventually degrade by biotic and abiotic processes in landfill to form water and oxides of carbon and nitrogen. Therefore, based on its assumed low hazard and assessed use pattern, the notified polymer is not considered to pose an unacceptable risk to the environment.