NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

LC-29-1029

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.

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/1241	PPG Australia Ptv Ltd	LC-29-1029	ND*	≤ 750 tonnes per annum	Coating for cans

^{*}ND= not determined

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.
- 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 available or practical, dispose of the 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 coating for cans, or is likely to change significantly;
 - the amount of notified polymer being introduced has increased, or is likely to increase, significantly;
 - the method of manufacture of the notified polymer in Australia has changed, or is likely to change, in a way that may result in an increased risk of an adverse effect of the notified polymer on occupational health and safety, public health, or the environment;
 - 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 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 McNaughton road CLAYTON VIC 3168

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, residual monomers, impurities, additives/adjuvants and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

LC-29-1029

Molecular Weight

Number Average Molecular Weight (Mn) > 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 Liquid

Melting Point/Glass Transition Temp Not determined. The notified polymer is a liquid at ambient

temperature

Density $1,030 \text{ kg/m}^{3*}$

Water Solubility The notified polymer is not expected to be soluble in water.

Dissociation Constant Not determined. The notified polymer contains dissociable

functionalities. This is not considered to be a concern given

the expected crosslink structure.

Reactivity Stable under normal environmental conditions. The notified

polymer contains hydrolysable functional groups. However, hydrolysis is not expected to be significant in the environment given the insolubility of the polymer and the

chemical nature of the functional groups.

Degradation Products None under normal conditions of use

*(M)SDS

5. INTRODUCTION AND USE INFORMATION

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

Year	1	2	3	4	5
Tonnes	< 100	< 100	< 100	< 500	< 1,000

Introduction

The notified polymer will be imported in to Australia in a formulated product at a concentration of 74.1%. No reformulation and / or repackaging will take place in Australia. The formulated products containing the notified polymer will be packaged in drums or 1,000 L intermediate bulk containers. From the port of entry, the notified polymer will be transported by road to the site of use. The notifier has stated that the notified polymer may also be manufactured within Australia in the future.

Use

The notified polymer is part of a formulated product which will be used for coating the interior of aluminium beverage cans.

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.

Although not considered in this risk assessment, NICNAS notes that 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

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 does not apply to the notified polymer. In addition, 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 is not considered to have a bioaccumulative potential given the high molecular weight (> 1000 Da).

Most of the notified polymer will be irreversibly incorporated within the coating to the interior of aluminium beverage cans and share the fate of the treated cans. At the end of the treated containers' life, the associated notified polymer is expected to be disposed of to landfill within the used cans or thermally destroyed during can recycling processes. Release of the notified polymer to the aquatic environment is not expected from application as any spills, residues in equipment washings and import containers are expected to be collected and disposed of to landfill. When disposed of to landfill, the notified polymer is expected to eventually degrade to form water and oxides of carbon. Therefore, based on its assumed low hazard and reported use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.