

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

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in FLODRILL PP 136 and FLODRILL FL 137

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 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 2016

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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/1365 | SNF (Australia) Pty Ltd | Polymer in FLODRILL PP 136 and FLODRILL FL 137 | No | < 100 tonnes per year | Additive in drilling cement for oil and gas well casings |

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.

- In the interest of occupational health and safety, the following precautions should be observed for use of the notified polymer as introduced in powder form:
 - The level of atmospheric nuisance dust should be maintained as low as possible. The Safe Work Australia exposure standard for atmospheric dust is 10 mg/m³.
- 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 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 fluid loss additive in drilling cement for oil and gas well casings, 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 products containing the notified polymer were 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

SNF (Australia) Pty Ltd (ABN: 32 050 056 267)
298 Broderick Road
LARA VIC 3212

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, polymer constituents, residual monomers/impurities, use details and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

Polymer in FLODRILL PP 136 and FLODRILL FL 137

Molecular Weight

Number Average Molecular Weight (Mn) > 10,000 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 | Granular white solid (neat polymer) or clear to slightly yellow liquid (polymer in solution) |
| Melting Point/Glass Transition Temp | Not determined. (Thermal decomposition is expected at > 150 °C) |
| Density | 1,000–1,300 kg/m ³ at 25 °C (polymer in solution) |
| Water Solubility | Expected to be soluble based on its predominantly hydrophilic structure |
| Dissociation Constant | pKa = 1.2 ± 0.4 (strongest acid; calculated based on the monomer) |
| 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 | < 100 | < 100 | < 100 | < 100 | < 100 |

Use

The notified polymer will not be manufactured in Australia. It will be imported in either powder form at > 95% concentration or in aqueous solution at < 30% concentration. The notified polymer will be used as a fluid-loss additive in drilling cement for oil and gas well casings.

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.

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 of 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.

The notified polymer is water soluble and therefore if inhaled at low levels is likely to be cleared from the upper respiratory tract readily through mucociliary action. Small proportions of the notified polymer may reach the lower respiratory tract, but it should still be readily cleared from the lungs unless high levels are inhaled. When high concentrations of the notified polymer are inhaled, it is likely to be cleared from the lungs, but this may be slower and temporary respiratory impairment is possible. The expected use of dust masks by workers handling the notified polymer in powder form should reduce inhalation exposure levels and hence lower any risk of temporary lung overloading.

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 generally of low toxicity to fish and daphnia, however they 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, which may apply to the notified polymer. However, the toxicity to algae is likely to be reduced due to the presence of calcium ions in environmental waters, which will bind to the functional groups.

The notified polymer will be imported into Australia neat, or as a component of a solution, for reformulation into a fluid-loss additive in drilling cement for use in conventional oil and gas well formation. Local blending and repackaging of the formulation containing the notified polymer into cement additive is expected to occur within enclosed automated systems. Release of the notified polymer during reformulation in Australia is expected to be limited to accidental spills or leaks and residue in import containers. Spilt material and container residue are expected to be collected and disposed of in accordance with local government regulations, most likely to landfill.

The notified polymer will be used in cementing processes in conventional oil and gas well formation operations. The cement additive containing the notified polymer will be mixed into the cement slurry at the site of application, then pumped directly into drilling wells to form cement casings. Once cured, the notified polymer will be irreversibly bound within the cement matrix, and share the fate of the

cement. Residues in empty containers are expected to be rinsed, and the rinsate added to subsequent cement slurries. Empty containers will be disposed of in accordance with local government regulations, most likely to landfill.

Based on its very high molecular weight and chemical structure, the notified polymer is not expected to be readily biodegradable. However, based on its very high molecular weight and expected water solubility, the notified polymer is not expected to cross biological membranes, and is therefore not expected to bioaccumulate. The notified polymer will share the fate of the cement within which it is bound, and is not expected to be bioavailable or mobile. In landfill, the notified polymer is expected to eventually degrade by biotic and abiotic processes to form water and oxides of carbon, nitrogen, and sulphur.

Therefore, based on its assumed low hazard and assessed use pattern in cement casings for conventional oil and gas well formation, the notified polymer is not considered to pose an unreasonable risk to the environment.