NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in Uradil AZ-516 Z-60

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

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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/1504	Reschem Technologies Pty Ltd	Polymer in Uradil AZ-516 Z-60	No	≤ 75 tonnes per annum	Component of paints

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, 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 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 component of paints, 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 product containing 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

Reschem Technologies Pty Ltd (ABN: 90 315 656 219)

Suite 1103, 4 Daydream Street WARRIEWOOD NSW 2102

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)

Uradil AZ516 Z-60 (containing the notified polymer at < 60% concentration)

Molecular Weight

Number Average Molecular Weight (Mn) is > 1,000 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 Aqueous dispersion*

Melting Point/Glass Transition Temperature 0 °C*

Density $1,070 \text{ kg/m}^3 \text{ at } 23 \text{ }^{\circ}\text{C*}$

Water Solubility Partially soluble in cold and hot water (SDS)

Dissociation Constant Contains dissociable functionalities and expected to be

ionised at the environmental pH 4-9

Reactivity Stable under normal environmental conditions

Degradation Products

None under normal conditions of use
*For Uradil AZ516 Z-60 (containing the notified polymer at < 60% concentration)

5. INTRODUCTION AND USE INFORMATION

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

Year	1	2	3	4	5
Tonnes	5-30	10-50	25-75	25-75	25-75

Use

The notified polymer will be imported at < 60% concentration and reformulated into paints containing the notified polymer at < 30% concentration for both commercial and "Do It Yourself" uses. The paints will be applied *via* brush, roller and spray.

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 by the notifier. 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, leading to chelation of essential nutrients. However, this does not apply to the notified polymer and it is therefore not considered to be an over-chelation hazard to algae (Boethling & Nabholz, 1997).

The paint products containing the notified polymer will be applied to substrates using brush, roller and spray. Waste produced from overspray is expected to be contained, collected and disposed of to landfill. The majority of the notified polymer is expected to be cured on the substrate and share the fate of the coated articles to be disposed of to landfill. In landfill, the notified polymer will be present as cured solids, which will be neither bioavailable nor mobile. The notified polymer is not expected to bioaccumulate due to its high molecular weight.

During both professional and DIY use of paints, notified polymer is likely to be released to environment from cleaning processes. Waste water from cleaning processes may be incorrectly disposed of to the sewer, drains or ground from waste. Assuming 5% of the total import volume of the notified polymer being released to water system and no removal at sewage treatment plants, the predicted environment concentration (PEC) is calculated to be 2.96 μ g/L in river and 0.3 μ g/L in ocean based on the release occurring nationwide on 260 working day (PEC = 75 000 kg/year × 5% \div 260 days \div (200.0 L/person/day × 24.386 Million population). The calculated PEC values indicate that the notified polymer is not expected to reach ecotoxicologically relevant concentrations in aquatic environment.

The notified polymer is expected to eventually degrade via abiotic or biotic process in the environment to form oxides of carbon and water vapour. Therefore, based on its assumed low hazard and assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the 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.