NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in Daron 41

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

April 2012

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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/1045	Excel Composites (Australia) Pty Ltd	Polymer in Daron 41	No	< 4 tonnes per annum	Component of a resin for pultrusion processes

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.
- 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.

Guidance in selection of personal protective equipment can be obtained from Australian, Australian/New Zealand or other approved standards.

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 a component of a resin for pultrusion processes 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 MSDS of a product containing 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

Exel Composites (Australia) Pty Ltd (ABN: 58 118 504 699) 3/991 Mountain Highway Boronia VIC 3155

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, and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

Daron 41 (< 70 % notified polymer)

Molecular Weight

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

Reactive Functional Groups

The notified polymer contains only low concern functional groups.

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	Yellow solid. The notified polymer will be introduced as a
	component of Daron 41 (yellow liquid; < 70% notified
	polymer) and is not isolated from solution.
Melting Point/Glass Transition Temp	Not determined. Polymer is not isolated from solution.
Density	$1,100 \text{ kg/m}^3 \text{ at } 25 \text{ °C*}$
Water Solubility	Not determined. Based on its predominately hydrophobic
	structure and high molecular weight the notified polymer is
	not expected to be water soluble.
Dissociation Constant	Not determined. The notified polymer may have end groups
	that are expected to be ionised at the environmental pH
	range (pH 4 –9).
Particle Size	Not determined. Polymer is not isolated from solution.
Reactivity	Stable under normal environmental conditions
Degradation Products	None under normal conditions of use

^{*}Daron 41 containing < 70 % notified polymer

5. INTRODUCTION AND USE INFORMATION

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

Year	1	2	3	4	5
Tonnes	< 4	< 4	< 4	< 4	< 4

Use

The notified polymer will not be manufactured in Australia.

The notified polymer will be imported into Australia at < 70 % concentration and will be reformulated into a thermosetting resin (< 10 % notified polymer) for use in pultrusion processes. The notified polymer is intended to be used in industrial settings only and will only be available to the public in the form of finished articles (e.g. industrial tubing).

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. Polymers without significant ionic functionality are generally of low concern to the environment. During reformulation into thermosetting resin, releases of the notified polymer may occur due to spills (< 1 % of the import volume) or as residues in import containers (< 1 %). 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. During the pultrusion process, the majority of excess resin containing the notified polymer is expected to be collected and reused in the manufacturing process, or disposed of to landfill (< 15 %). The majority of the notified polymer will be cured within the inert matrix of pultruded articles, which are expected to ultimately be disposed of to landfill. In landfill, in both its cured and uncured form, the notified polymer is not expected to be bioavailable, mobile nor rapidly degradable due to its high molecular weight and low solubility in water. It is expected to eventually degrade by biotic and abiotic processes in landfill to form water and oxides of carbon. 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.