

NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in NeoRez R-9029

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/1092	ResChem Technologies Pty Ltd	Polymer in NeoRez R-9029	No	≤ 50 tonnes per annum	Component of floor and industrial coatings

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.
- Spray application should be carried out in accordance with the Safe Work Australia *National Guidance Material for Spray Painting* [NOHSC (1999)].
- 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.

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 of to landfill.

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 component of floor and industrial coatings, 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 the 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

ResChem Technologies Pty Ltd (ABN 90 315 656 219)
Suite 1103/4 Daydream St
Warriewood NSW 2102

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, reactive functional groups, polymer constituents, residual monomers/impurities, and use details.

2. IDENTITY OF POLYMER

Marketing Name(s)

NeoRez R-9029 (< 30% notified polymer)

Molecular Weight

Number Average Molecular Weight (Mn) is > 1,000 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	Light tan to amber liquid*
Melting Point/Glass Transition Temp	Not determined. Imported in aqueous solution.
Density	1.04 g/cm ³ at 20 °C*
Water Solubility	Not determined. Expected to be water dispersible based on the presence of hydrophilic functionalities and its use in aqueous products.
Dissociation Constant	Not determined. The notified polymer is a salt that is expected to be ionised under environmental conditions (pH 4-9).
Reactivity	Stable under normal environmental conditions
Degradation Products	None under normal conditions of use
*NeoRez R-9029 containing < 30% notified polymer	

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	50	50	50	50	50

Use

The notified polymer will be imported into Australia at a concentration of < 30%. It will then undergo reformulation into coating products, with the finished products containing the notified polymer at a concentration of < 15%. The notified polymer will be used in floor and industrial coatings and may be applied by brush, roller or spray. Spray application of coatings by members of the public is not expected.

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. 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 is unlikely to apply to the notified polymer and it is therefore not considered to be an over-chelation hazard to algae. The notified polymer also contains potentially cationic functionality, however the cationic charge density is low and the notified polymer is therefore not expected to be of concern to the aquatic environment.

The imported notified polymer will be reformulated into coating products and applied to concrete and parquet floors, in addition to use as industrial wood lacquers. Small amounts of the notified polymer may be released to sewer from the cleaning of reformulation and application equipment. The main release during industrial application is from overspray, which will typically entail landfill disposal after interception by spray booth filters. The residues from containers, discarded applicators and brushes (for both industrial and DIY applications), are estimated to be less than 0.5% of the import volume, and are anticipated to be handed as solid waste, to be collected after water evaporation and disposed of to landfill. The containers may be either sent to landfill or recycled. The notified polymer associated with the discarded coated articles is expected to be disposed of to landfill with the used articles. In landfill, the notified polymer incorporated into an inert matrix of cured coating is not expected to be mobile or bioavailable to the aquatic organisms. The notified polymer is not expected to be readily biodegradable. However, due to its high molecular weight, the notified polymer is not expected to cross biological membranes and is therefore unlikely to be bioaccumulative. It is expected to degrade in landfill by abiotic and biotic processes, 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 unreasonable risk to the environment.