File No: SAPLC/209

NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in CP 8327

This Self Assessment has been compiled by the applicant and adopted by NICNAS in accordance with the provisions of the Industrial Chemicals (Notification and Assessment) Act 1989 (the Act) and Regulations. This legislation is an Act of the Commonwealth of Australia. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS), administered by the Department of Health and the Department of the Environment and Energy, has screened this assessment report. The data supporting this assessment will be subject to audit by NICNAS.

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

July 2019

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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
SAPLC/209	Total Oil Australia Pty Ltd	Polymer in CP 8327	No	≤ 300 tonnes per annum	Component of fuel additives

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 the selection of personal 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 fuel additives, 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
Total Oil Australia Pty Ltd (ABN: 15 149 501 922)
L1/415 Riversdale Road
HAWTHORN EAST VIC 3123

Exempt Information (Section 75 of the Act)
Data items and details claimed exempt from publication: chemical name, molecular and structural formulae, molecular weight, polymer constituents, and residual monomers/impurities.

2. IDENTITY OF POLYMER

Marketing Name(s)
CP 8327 (product containing the notified polymer at 30 – 50%)
CP 9032 and CP 9302 (products containing the notified polymer at 5%)
CP 10632 (product containing the notified polymer at 4%)
CP 10632 D (product containing the notified polymer at 3.5%)
CP7249, CP 7500 (product containing the notified polymer at 1.5%)
TACS CFI 2212, TACS CFI 2211 L, CP 7194 D, CP 7249 D, CP 7249 L, CP 7249 DL, CP 7500 D, CP 7500 DL and CP 10234 (products containing the notified polymer at ≈ 1%)
CP 7194 and CP 7500 L (products containing the notified polymer at ≤ 1%)

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	Solid
Glass Transition Temp	Not determined
Density	903 kg/m^3 at 15 °C
Water Solubility	Predicted to be insoluble in water
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

Year	*1*	*2*	*3*	*4*	*5*
Tonnes	100	100	200	200	300

Use
The notified polymer will not be manufactured in Australia. It will be imported in a solution at ≤ 50% concentration, blended with various other ingredients and used as a fuel's cold flow improver additive at ≤ 0.005% in refinery or fuel depot in a closed system in industrial settings only.

6. HUMAN HEALTH RISK ASSESSMENT

No toxicological data were available. The notified polymer meets the PLC criteria and can therefore be considered 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, 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.

7. ENVIRONMENTAL RISK ASSESSMENT

7.1. Exposure Assessment

ENVIRONMENTAL RELEASE
Environmental release of the notified polymer is not expected during importation, storage and manipulation. Spillage during a transport or manipulation accident is the most likely reason for environmental release. Accidental spills and leaks during transportations and blending of the product into fuels will be contained and collected using an absorbent, non-flammable material. The collected polymer is to be disposed of via landfill.

When used as an additive in fuel, the majority of the notified polymer will be consumed during the combustion of the fuel by vehicles or machinery.

Waste water from the cleaning of the import containers and storage vessels is expected to be collected by an approved waste management company to be disposed of to landfill in accordance with local government regulations. Release of the notified polymer to surface water is expected to be negligible.

ENVIRONMENTAL FATE
No environmental fate data were submitted. Most of the notified polymer will be consumed and thermally decomposed during use. The notified polymer is not expected to be readily biodegradable and is not expected to be bioaccumulate. The notified polymer is not water soluble.

7.2. Environmental Hazard Characterisation

No ecotoxicological data were submitted. PLCs without significant ionic functionality are of low concern to the aquatic environment.

7.3. Environmental Risk Assessment

When used as intended, the notified polymer will be combusted and will have limited potential for aquatic release. As such, the notified polymer is unlikely to reach concentrations of eco-toxicological concern. Therefore, based on its proposed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.