File No: NA/690

May 1999

NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME

FULL PUBLIC REPORT

Polymer in Acrylic Resin RC-0714

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Director Chemicals Notification and Assessment

FULL PUBLIC REPORT

Polymer in Acrylic Resin RC-0714

1. APPLICANT

PPG Industries Australia Pty Ltd of McNaughton Road, Clayton, Victoria 3168 has submitted a notification statement in support of their application for an assessment certificate for the Polymer in Acrylic Resin RC-0714.

2. IDENTITY OF THE CHEMICAL

The chemical name, CAS number, molecular and structural formulae, molecular weight and details of the polymer composition have been exempted from publication in the Full Public Report and the Summary Report.

Trade Name: Acrylic Resin RC-0714

Method of Detection

The polymer is characterised by GPC and identified by and Determination:

IR spectroscopy. A reference spectrum has been

provided.

3. PHYSICAL AND CHEMICAL PROPERTIES

The polymer is manufactured as a 49 % (w/w) solution in n-butanol and n-butyl acetate. It is never isolated. The properties reported below are variously those of the polymer solution and of the notified polymer, as stated.

Appearance at 20°C the polymer solution is a clear, viscous liquid

and 101.3 kPa:

Boiling Point: approximately 118-126°C for the solution; the polymer

is not expected to be volatile

Specific Gravity: 0.95 for the solution; 1.03 (calculated) for the polymer

Vapour Pressure: not volatile

Water Solubility: the notifier states that the water solubility is < 1 mg/L;

see comments below

Partition Co-efficient

(n-octanol/water):

not determined - see comment below

Hydrolysis as a Function

of pH:

no groups are expected to be hydrolysed under normal

environmental conditions

Adsorption/Desorption: not determined - see comment below

Dissociation Constant: not determined - see comment below

Flash Point: 23°C; from MSDS (for the solvent n-butyl acetate)

Flammability Limits: Upper Explosive Limit = 11.2 %

Lower Explosive Limit = 1.4 % (for the solvent n-butyl

acetate)

Autoignition Temperature: 345°C (for the solvent n-butyl acetate)

Explosive Properties: The polymer is not expected to be explosive

Reactivity/Stability: The polymer is expected to be stable

Comments on Physico-Chemical Properties

No vapour pressure data were presented. The polymer is expected to be of low vapour pressure, by analogy with similar polymers, and exhibit negligible release to the atmosphere. For the polymer solution, the vapour pressure should be similar to that of the major solvent, n-butyl acetate (i.e. 2 kPa at 25°C).

No accurate water solubility, hydrolysis and partition coefficient data were available as the notified polymer is never isolated from its solution. The notifier states that the polymer is expected to be of low water solubility since it is non-ionic, of high molecular weight and contains a high level of aliphatic and hydrophobic groups. The majority of the polymer consists of hydrophobic groups, but there are both acidic and basic groups and the polymer is likely to be zwitterionic in the environmental pH range of 4-9. The functional group equivalent weight (FGEW) is high for both types of potentially ionic group and the resultant water solubility is likely to be low due to the predominance of hydrophobic groups.

The determination of partition coefficient and adsorption/desorption could not be undertaken as the notified polymer is expected to be insoluble in water and will largely partition into noctanol rather than water. Furthermore, due to its very low water solubility, the polymer is expected to become associated with the organic component of soils and sediment.

No dissociation constant data was provided as the notifier claims that the polymer has no units likely to dissociate. However, the notified polymer contains secondary amine and carboxylic acid groups likely to have typical basicity and acidity, respectively.

Flammability limits, autoignition temperature and explosive properties were not available for the polymer. Data presented above correspond to the polymeric solution, which were assumed to be similar to those for the solvents n-butyl acetate and n-butanol. The polymer solution is flammable but expected to be stable under normal use conditions.

4. **PURITY OF THE CHEMICAL**

< 15 % in pre-prepared paints; resin solution contains **Degree of Purity:**

49 % in n-butyl acetate and n-butanol

All residual monomers are present at < 0.001 % (or **Maximum Content** of Residual Monomers:

less), and all are present below the cutoff levels for

classification of the polymer as hazardous.

Toxic or Hazardous

Impurities:

none

Additives/Adjuvants:

Chemical name: 1-butanol

Synonyms: n-butyl alcohol

Weight percentage: < 10 % in polymer resin solution

CAS No.: 71-36-3

On the List of Designated Hazardous Substances Regulatory Controls:

(National Occupational Health and Safety Commission,

1994c)

Harmful (Xn) cutoff $\geq 25 \%$

NOHSC exposure standard 50 ppm peak limitation

(skin notation)

R10 'Flammable' *Toxic properties:*

R20 'Harmful by inhalation'

Chemical name: n-butyl acetate

Weight percentage: < 50 % in polymer resin solution CAS No.: 123-86-4

Regulatory Controls: NOHSC exposure standard 150 ppm TWA, 200 ppm

STEL

Toxic properties: eye and mucous membrane irritant

The notified polymer will initially be imported in pre-prepared paints, and will have a large number of adjuvants such as stabilisers, pigments and solvents.

5. USE, VOLUME AND FORMULATION

The notified polymer will initially be imported as a component in automotive refinish coatings at up to 15 % (w/w). It will be imported at a volume of 1 tonne of polymer in the first year. The polymer solution, RC-0714, containing 49 % (w/w) notified polymer will later be imported for local reformulation into coatings. The polymer solution may also be manufactured locally at some later date. After the first year, the import or manufacture volume is expected to be in the range of 1-10 tonnes per annum.

6. OCCUPATIONAL EXPOSURE

Pre-prepared paints containing the notified polymer will be imported in 1 L and 3.5 L tinplate cans. The notifier has provided no detail on the type of packaging for the overall shipment of imported individual containers or the handling involved in breaking up the shipment into individual containers for dispatch to the customer sites. The individual product containers are not expected to be opened before arrival at the end use site and the likelihood of a spill is low.

The polymer solution, RC-0714, will initially be imported in 200 L steel drums. At a later date, this polymer solution may be locally manufactured then transferred for reformulation in 200 L steel drums.

Waterfront, transport and warehouse workers are not expected to be exposed to the notified polymer except in the case of an accident involving spillage of the paint or resin solution.

The laboratory development, polymer manufacture and reformulation into coatings, along with the warehouse storage, will all be carried out at a single site within Australia.

Laboratory Development

The notifier indicated that 3 laboratory workers would be involved in trials for the manufacture of the polymer and the manufacture and testing of paint. The potential exposure would be for up to 8 hours per day, for up to 20 days per year. Exposure would be by skin contact during the handling of small quantities of the polymer solution and paint. The use of appropriate laboratory ventilation facilities and personal protective equipment such as a laboratory coat and safety glasses would be expected.

Polymer Manufacture

The polymer manufacture, when commenced, will involve 9 workers for up to 8 hours per day, 10 days per year. The reactants and solvents will be added to an enclosed reactor, and the resultant polymer solution will be filtered through an enclosed filter and filled into 200 L steel drums. During the filling process, there is potential for dermal exposure to the polymer solution in the form of drips and spills. As the polymer solution will be viscous, the formation of aerosols is unlikely.

The filling will be carried out under local exhaust ventilation to prevent exposure to the solvents. Workers will wear impervious gloves, coveralls and goggles, with additional personal protective equipment being used as required.

Reformulation (Paint Manufacture)

The reformulation of polymer solution into paint components, when commenced, will involve 9 workers for up to 8 hours per day, 30 days per year. Three groups of workers will be involved in the process; in paint mixing, quality control and drum or can filling. The mixers used for preparing the paint will be enclosed and fitted with local exhaust ventilation. Dermal exposure to the polymer will be possible at several points throughout the process; charging the polymer solution into the mixer, removal and testing of quality control samples, and drips and spills during the paint filtration and filling. The formation of aerosols during the high speed mixing will be unlikely because of the viscosity of the mixture.

The mixing and filling will be carried out under local exhaust ventilation to prevent exposure to the solvents. Paint quality control testing is to be performed in a ventilated spray booth equipped with a fume extraction system. Workers will wear impervious gloves, coveralls and goggles, with additional personal protective equipment being used as required.

End Use

The notifier estimates that as many as 6000 spray painters in up to 3000 establishments across Australia could be exposed to the notified polymer. The exposure is estimated to be for up to 4 hours per day, for up to 220 days per year.

The spray painters who will be exposed to the notified chemical will be fully TAFE trained. Typically the spray painter will measure the appropriate amounts of the different components required in a particular formulation into an open container and pour this mixture into a spray gun. The spraying of the automobile will be carried out in a laminar flow downdraft spray booth which is designed to rapidly remove aerosol particles and solvent vapour from the atmosphere. Several possible booth designs may be used. In a dry floor booth, the overspray will be collected in filters contained in the floor of the booth; any unremoved particulates will reach the exhaust stack with the solvent vapours. In a wet floor booth, overspray will collect in a pool of water below the grill floor or in a wet scrubber in the exhaust and will be removed with a filter. The residual solids will be disposed of to secure landfill. The spray booths are subject to AS/NZS/4114.1:1995 Spray Painting Booths – Design, Construction and Testing and AS/NZS/4114.1:1995 Spray Painting Booths –

Selection, Installation and Maintenance. After application of the paint, the automobile may be heated to cure the coating.

Residual paint mixture will be washed from the equipment manually, using recycled paint solvent, and the washings will be disposed of by solvent recyclers.

Once residual final paint mixture has dried, the notified polymer will be irreversibly bound within the cured matrix and not separately available for either exposure to workers, or for dermal absorption.

Spray painters will wear appropriate personal protective equipment at all times; impervious gloves and anti-static flame retardant overalls while mixing the paint, and, in addition, a full face shield and respirator conforming to AS/NZS1715 and AS/1716 while inside the spray booth.

7. PUBLIC EXPOSURE

There is little potential for public exposure to the notified polymer arising from manufacture, transport, occupational use and disposal. In the event of an accidental spill, the polymer will remain part of the paint, which the notifier states should be scraped up and placed in suitable containers for disposal. The polymer would not be expected to partition into the aqueous compartment, but rather to associate with the sediments, as detailed below. Waste from the industrial use of the polymer will be disposed of through a licensed waste disposal contractor in approved landfill. The polymer in the form of uncured paint will therefore remain within the industrial domain, and public exposure due to the environmental spread of the polymer is unlikely.

The notified polymer will enter the public domain only in the form of cured paint films on automobiles. This paint film will contain the polymer in a crosslinked unreactive form which will not be bioavailable.

8. ENVIRONMENTAL EXPOSURE

Release

There is potential for release during the polymer manufacture, the paint formulation and the paint application. The manufacturing and formulation processes (when commenced) will take place at the notifier's plant and any spills that occur will be contained by the plant bunding. Paint is applied to motor vehicles with approximately 30 % efficiency in a spray booth with control measures, such as filters and paper masking, in place. The resulting surface coat is heat cured. Cleaning of the spray gun and mixing equipment will generate waste which will be collected and disposed of in the same manner as waste water from the spray booth.

During the manufacturing and formulation processes, the notifier estimates that up to 210 kg per year of waste polymer would be generated. During paint application it is expected that 700 kg of polymer waste during the first year and up to 7000 kg of waste during subsequent years will be produced.

Some residue (an estimated 2 % of the container contents) will also remain in the 'empty' containers after use. Up to 20 kg in the first year and 200 kg annually in the subsequent years will remain as residue in the containers.

Fate

Once the notified polymer is applied as part of the automotive surface coating, the polymer will be incorporated in an inert film and it will not present a significant hazard. Any fragments, chips or flakes of the coating will be of little concern as they are expected to be inert. The metal panels coated with the polymer are likely to be either recycled for steel reclamation or placed into landfill at the end of their useful life. When recycled, the polymer would be destroyed in the blast furnaces and converted to water vapour and oxides of carbon and nitrogen.

The solid waste generated in the manufacturing, formulation and application of the coating will be disposed of to landfill (although incineration is an option). It is likely that the polymer is recovered as an insoluble solid from the wastewater used for cleaning and also disposed of to landfill. The containers and their residue will also be disposed of in this manner.

When deposited into landfill with used paint cans or on discarded panels, the organic components of the paint coating including the new polymer would be inert and immobile, but could nevertheless be expected to be very slowly degraded through the biological and abiotic processes operative in these facilities. Leaching of the polymer from landfill from these sites is unlikely, given the low solubility of the substance.

The polymer is not expected to cross biological membranes, due to the low solubility and high molecular weight, and as such should not bioaccumulate (Connell, 1989).

9. EVALUATION OF TOXICOLOGICAL DATA

No toxicology data were submitted, which is acceptable for a limited notification of a polymer with NAMW > 1000. The polymer is stable with low volatility. Polymers of high molecular weight and low water solubility do not readily cross biological membranes. The notifier states that no occupational or public health issues have been reported for polymers of similar composition in Australia.

10. ASSESSMENT OF ENVIRONMENTAL EFFECTS

No ecotoxicological data were provided, which is acceptable for a limited notification of a polymer with NAMW > 1000.

11. ASSESSMENT OF ENVIRONMENTAL HAZARD

The polymer cross-links with other coating components to form a very high molecular weight and stable film that adheres firmly to the primer layer to which it is applied. The polymer, as part of this surface coating, will therefore share the fate of the vehicle panel. The coating will slowly deteriorate under the action of UV light, but this is negligible over the life of the motor vehicle. When the vehicle panel is recycled, the polymer would be destroyed through incineration.

The majority of notified polymer associated with waste from the application of the coating to the automotive surface should not enter the environment until it is disposed of to landfill. Movement of the polymer by leaching from landfill sites is not expected because of its lack of mobility due to either its low water solubility and high binding affinity to soil or cross-linking in the cured coating.

In the event of accidental spillage of the polymer solution into waterways, the polymer is not expected to disperse into the water, but settle out onto sediments. If the polymer is spilt on land, either during usage or transport, it is expected that the polymer would become immobilised in the soil layer. Contaminated soil can then be collected and disposed of to landfill.

Given the above, environmental exposure and the overall environmental hazard is expected to be low.

12. ASSESSMENT OF PUBLIC AND OCCUPATIONAL HEALTH AND SAFETY EFFECTS

On the information available, the notified polymer cannot be classified as a hazardous substance according to the NOHSC *Approved Criteria for Classifying Hazardous Substances* (National Occupational Health and Safety Commission, 1994c). The polymer solution RC-0714 also is not classified as a hazardous substance. It is classed as a Class 3 dangerous good (flammable liquid) because of the solvent content. The MSDS for the polymer solution RC-0714 lists a number of potential health effects, namely nausea, vomiting, skin, eye and respiratory irritation and central nervous system depression. These relate mainly to the solvents, n-butanol and n-butyl acetate, rather than the notified polymer.

Occupational Health and Safety

There is little potential for significant occupational exposure to the notified polymer in the transport and storage of the paint components containing this polymer. There will be exposure during the manufacture and reformulation of the polymer and during the local

production of the paint components (when commenced), and in the use and disposal of the paints.

During the manufacture and reformulation processes, the main exposure route for the notified polymer will be dermal. The paints and polymer solutions will be viscous, and ready formation of aerosols is not expected. The polymer is not expected to be hazardous by dermal exposure as the high molecular weight will preclude absorption through the skin. Protective measures used to prevent exposure to the hazardous solvents should provide sufficient protection against the notified polymer.

The final paint mix, including the pre-prepared paint containing the notified polymer, could contain a wide variety of additional ingredients once fully mixed. This is likely to introduce human health hazards because, apart from a range of potentially toxic solvents, there may be components containing resins with pendant isocyanate groups. The spraying procedure also produces a dense aerosol of paint particles which would adversely affect human health even in the absence of additional hazardous components. It is also probable that professionals involved in the spray painting industry will use a number of different paint formulations.

For these reasons, the notified polymer must be assessed for the contribution it makes to the hazards associated with use of the spray paints. The presence of many potential and actual hazardous substances in the formulations requires the use of stringent engineering controls, such as a correctly constructed and maintained spray booth, and of a high level of personal protective equipment, such as impermeable overalls and gloves and a full face shield and respirator. The use of the paint containing the notified polymer should be in accordance with the NOHSC *Draft National Code of Practice for Spray Painting* (National Occupational Health and Safety Commission, 1991). The level of protection from exposure afforded by the standard protective measures will provide adequate protection from the notified polymer, which is likely to be less intrinsically toxic than most of the solvents, pigments and other paint resins.

Once the applied final paint mix has hardened, the polymer will not be separately available for exposure or absorption.

There are NOHSC exposure standards for n-butanol and n-butyl acetate, identified as ingredients in the polymer solution RC-0714. There is a skin notation with the listing of n-butanol, indicating a propensity for dermal absorption on contact. The NOHSC exposure standards only consider absorption via inhalation and are valid on the condition that significant skin absorption cannot occur. Control measures are required to prevent absorption through the skin. The employer is responsible for ensuring that these exposure standards, and exposure standards pertaining to other final paint mix additives, are not exceeded in the workplace.

The paint components containing the notified polymer are flammable due to their solvent content. Precautions must be taken to avoid sources of ignition, e.g. use of earthing leads. Operators should wear antistatic overalls and footwear.

Similar considerations apply in the disposal of the polymer. The wastes containing the notified polymer may be hazardous substances on the basis of the solvent and other resin content, and the precautions used on the basis of these additional materials should be adequate for protection from the notified polymer. In addition, much of the polymer will be crosslinked, hardened and immobilised by the time of disposal.

Public Health

There is negligible potential for public exposure to the notified polymer arising from use in paints. There may be public contact with the notified polymer on the painted surfaces of motor vehicles, but its adhesion to the substrate and the physico-chemical properties of the cured paint will be sufficient to preclude absorption across the skin or other biological membranes. Therefore, based on its use pattern and physico-chemical characteristics, the notified polymer will not pose a significant hazard to public health.

13. RECOMMENDATIONS

To minimise occupational exposure to the Polymer in Acrylic Resin RC-0714 the following guidelines and precautions should be observed:

- Employers should ensure that NOHSC exposure standards for all of the components of the final paint mix are not exceeded in the workplace;
- Safety goggles should be selected and fitted in accordance with Australian Standard (AS) 1336 (Standards Australia, 1994) to comply with Australian/New Zealand Standard (AS/NZS) 1337 (Standards Australia/Standards New Zealand, 1992);
- Industrial clothing should conform to the specifications detailed in AS 2919 (Standards Australia, 1987) and AS 3765.2 (Standards Australia, 1990);
- Impermeable gloves or mittens should conform to AS 2161 (Standards Australia/ Standards New Zealand, 1998);
- All occupational footwear should conform to AS/NZS 2210 (Standards Australia/ Standards New Zealand, 1994);
- Spillage of the notified chemical should be avoided. Spillages should be cleaned up promptly with absorbents which should then be put into containers for disposal;
- Good personal hygiene should be practised to minimise the potential for ingestion;
- A copy of the MSDS should be easily accessible to employees.

14. MATERIAL SAFETY DATA SHEET

The MSDS for the notified chemical was provided in accordance with the *National Code of Practice for the Preparation of Material Safety Data Sheets* (National Occupational Health and Safety Commission, 1994a).

This MSDS was provided by the applicant as part of the notification statement. It is reproduced here as a matter of public record. The accuracy of this information remains the responsibility of the applicant.

15. REQUIREMENTS FOR SECONDARY NOTIFICATION

Under the Act, secondary notification of the notified chemical shall be required if any of the circumstances stipulated under subsection 64(2) of the Act arise. No other specific conditions are prescribed.

16. REFERENCES

Connell D. W. (1989) General characteristics of organic compounds which exhibit bioaccumulation. <u>In Connell D. W., (Ed) Bioaccumulation of Xenobiotic Compounds. CRC Press, Boca Raton, USA.</u>

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Standards Australia/Standards New Zealand (1994) Australian/New Zealand Standard 2210-1994, Occupational Protective Footwear. Standards Association of Australia/Standards Association of New Zealand, Sydney/Wellington.

Standards Australia/Standards New Zealand (1998) Australian/New Zealand Standard 2161.2-1998, Occupational protective gloves, Part 2: General requirements. Standards Association of Australia/Standards Association of New Zealand, Sydney/Wellington.