

File No: NA/307

Date: July 1996

**NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION
AND ASSESSMENT SCHEME**

FULL PUBLIC REPORT

Modified Acrylic Polymer E-2506

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Director
Chemicals Notification and Assessment

FULL PUBLIC REPORT**Modified Acrylic Polymer E-2506****1. APPLICANT**

Rohm and Haas Australia Pty Ltd of 969 Burke Road CAMBERWELL VIC 3124 has submitted a limited notification statement accompanying their application for an assessment certificate for Modified Acrylic Polymer E-2506.

2. IDENTITY OF THE CHEMICAL

Based on the nature of the chemical and the data provided, Modified Acrylic Polymer E-2506 is not considered to be hazardous. Therefore, the identity of the chemical, its composition and purity, use, import volume and details of the manufacturing process have been exempted from publication in the Full Public Report and the Summary Report.

3. PHYSICAL AND CHEMICAL PROPERTIES

The modified acrylic polymer is imported into Australia as a component in a water-based emulsion. The properties given below are of the emulsion unless otherwise specified.

Appearance at 20°C and 101.3 kPa:	milky white liquid
Odour:	ammonia-like
Boiling point:	expected to be similar to that of water
Glass-transition temperature:	-29.1°C (polymer)
Density:	1290 kg/m ³
Vapour pressure:	expected to be that of water
Water solubility:	expected to be very low (polymer)

Combustion products:	oxides of carbon, hydrogen and nitrogen may be produced
Pyrolysis products:	acrylic monomers may be produced
Decomposition temperature:	> 177°C
Decomposition products:	acrylic monomers

Comments on Physico-Chemical Properties

Acrylate polymers are known to be very insoluble in water and in this case there is only a small proportion of free acid. The cross-linking of the polymer would further reduce the solubility.

Hydrolysis of the polymer could be expected, as the notified polymer has esters and nitrile groups on the side chains. However, hydrolysis under environmental conditions is expected to be slow due to the expected low solubility in water.

The partition coefficient would be difficult to measure but is expected to be high due to the low solubility in water.

The polymer has a small number of acidic side groups but determination of a dissociation constant would be difficult due to the expected low solubility in water. Typical acidity is expected.

4. USE, VOLUME AND FORMULATION

The applicant expects to import more than one tonne of the notified polymer per annum for the first five years. The finished products will be imported in 200 L open-head drums.

The imported products will be used as basecoat and topcoat components, respectively, for application by rotary spray or roller to leather. The imported products are to be used as components of "finishing mixes" containing other ingredients such as water, pigments, waxes, wetting agents, fillers and pigment extenders. The finishing mixes are prepared at the sites where they will be used.

5. OCCUPATIONAL EXPOSURE

The emulsions will be transported in open head 200 L drums by truck to customers who are experienced in reformulation into finishing mixes and application of the mixes onto leather.

At each customer site it is expected that approximately 33 workers may be exposed to the notified polymer during formulation, application and transfer of retanned leathers. Of these, 15 are expected to be involved in formulation, 6 in application

and 12 in feeding and removing the leather. Formulators are expected to be exposed for about 3 hrs/day, 144 days/yr and other workers 4 hrs/day, 240 days/yr.

Minimal exposure to other workers may occur, these being involved in supervision, storage, transport and drum recycling.

Formulation of basecoat (1st coat) and topcoat (3rd coat) is carried in an open top mixer by addition of binders, flow modulators, water and pigments to the polymer emulsion. Once the finishing mixes have been formulated they are applied to the unfinished leather by roll coating (1st coat) or rotary spray (3rd coat). The finishing mixes are manually added to the rolling and spray machines followed by curing in catalytic gas dryers at 70°C.

Local exhaust ventilation is present in the mixing room and above the reciprocating spray machines but not at the roll coat machine as aerosols are not expected to be generated there. Overspray during spray application is collected by water curtains.

6. PUBLIC EXPOSURE

No public exposure to the notified polymer is expected to occur during storage or transport.

No public exposure is expected to occur during the processing of the leather or during the disposal of any liquid or solid residue containing the polymer.

Public contact with products made from the treated leather may be extensive. However, when cured, the polymer becomes bound to the leather and is not expected to migrate from the leather, and therefore, no public exposure is expected to occur.

7. ENVIRONMENTAL EXPOSURE

Release

Release of the polymer to the environment is expected to be < 15% of the total imported from residues in containers, blending operations, cleaning of application equipment and losses during application. Liquid wastes containing the polymer are expected to be disposed of as either trade waste after coagulation and settling of solids, or collected by a licensed liquid waste disposer (when concentrated). Solid residues containing the polymer are expected to be disposed of by landfill or incineration.

Other possible releases of the polymer could occur as spills during formulation or during use of the finishing mixes. These operations are done on industrial sites using appropriate equipment designed to reduce possible spills etc. This together with the instructions on the clean up of spills in the Material Safety Data Sheet (MSDS) should limit the possibility of environmental release.

Fate

The fate of the majority of the polymer (> 85% of that imported) will be tied to the fate of the finished leather. Most of the leather will be landfilled, either as trimmings when the final leather articles are formed or when the leather goods are disposed of.

Solid waste containing the polymer which is generated during the formulation and application of the finishing mixes, is expected to be disposed of according to the appropriate local, state and federal legislation. Disposal will normally be either to landfill or by incineration. The polymer would not be expected to biodegrade or be mobile in landfill.

No bioaccumulation of the polymer is expected because its very large molecular size is likely to inhibit membrane permeability and prevent uptake during exposure (1, 2).

8. EVALUATION OF TOXICOLOGICAL DATA

Toxicological data are not required for polymers of number-average molecular weight (NAMW) > 1000 according to the Act, and no data were submitted for the notified polymer.

9. ASSESSMENT OF ENVIRONMENTAL EFFECTS

No ecotoxicity information for the polymer was presented by the company. This is acceptable according to the Act for polymers with NAMW > 1000.

Due to its high NAMW the polymer is not expected to cross biological membranes.

10. ASSESSMENT OF ENVIRONMENTAL HAZARD

Most of the polymer will be disposed of to landfill with the leather to which it is cured. The majority of the remaining polymer will be trapped in solids and disposed of by incineration or landfilled. There could be a small amount of polymer disposed of as trade waste via the municipal sewer.

Incineration of the polymer will produce water, together with oxides of carbon and nitrogen and is unlikely to present an environmental hazard. Polymer disposed of to landfill could undergo hydrolysis to give the backbone polymer but this process will be very slow. The polymer is not expected to leach from the landfill. The environmental hazard from disposal of the polymer by incineration or landfill is expected to be low.

Most of the polymer lost due to washing equipment, overspray, or disposal as trade waste is expected to be trapped by coagulation and settling of solids before discharge to the sewer and further removal at the sewage treatment works. These solids and sludges from waste water treatments are normally disposed of by landfill or incineration. Assuming that no polymer is trapped or removed in treatment

processes, calculations show that the concentration entering the environment could be approximately 1 ppb, which is unlikely to cause significant environmental effects. As most will be trapped, the concentration of the polymer entering the environment is expected \ll 1 ppb, and environmental effects are expected to be negligible.

The only other sources of environmental contamination is from accidental spills etc. during transport. The recommendations contained in the MSDS are adequate to limit the environmental exposure.

Overall the environmental hazard can be rated as low.

11. ASSESSMENT OF PUBLIC AND OCCUPATIONAL HEALTH AND SAFETY EFFECTS

The notified polymer has a NAMW greatly in excess of 1000 and should not be able to be absorbed across biological membranes to cause systemic effects. The levels of low molecular weight species ($< 0.1\%$) and residual monomers (maximum of 0.03%) would not render the polymer hazardous according to the criteria of Worksafe Australia (3). Local effects such as skin and eye irritation are not expected to occur based on the toxicity profiles of aqueous emulsions compositionally similar to those containing the notified polymer according to the supplied MSDS (see attachments).

Exposure of workers to aerosols is recognised as a risk factor by the customers employing the notified polymer for leather finishing. Local exhaust ventilation is employed in those processes which may generate aerosols (formulation and spray coating). Significant dermal and/or eye exposure could occur during formulation, coating, feeding or removing leather. Hand and eye protection is routinely worn by workers as protection against components of the emulsions and finishing mixes other than the notified polymer and this protection would serve to minimise exposure.

The risk of workers suffering adverse health effects from exposure to the notified polymer during formulation, coating operations or leather handling is expected to be low.

While public contact with Modified Acrylic Polymer E-2506 may be significant, it will be bound to treated leather, and therefore, no public exposure is expected to occur.

12. RECOMMENDATIONS

To minimise occupational exposure to Modified Acrylic Polymer E-2506 the following guidelines and precautions should be observed.

- . When using the notified chemical the following protective equipment should be worn:
 - impervious gloves conforming to Australian Standard (AS) AS 2161 (4),
 - protective eye goggles conforming to AS 1336 (5), and AS/NZS 1337 (6)
 - protective clothing conforming to AS 3765.2 (7), and
 - protective footwear conforming to AS/NZS 2210 (8).
- . If mist, vapour or aerosols are generated, and engineering controls are not sufficient to control exposure, the following protective equipment should also be worn:
 - respiratory protection conforming to AS/NZS 1715 (9) and AS/NZS 1716 (10).
- . When entering poorly ventilated enclosed spaces, tanks or vessels the following protective equipment should be worn:
 - self-contained breathing apparatus conforming to AS/NZS 1715 (9).
- . Safe work practices should be implemented to prevent splashing and spillages.
- . Good personal hygiene practices should be observed.
- . Copies of the MSDS should be easily accessible to employees.

13. MATERIAL SAFETY DATA SHEETS

These MSDS for formulations containing the notified chemical were provided in accordance with the *National Code of Practice for the Preparation of Material Safety Data Sheets* (11).

These MSDS were provided by Rohm and Haas Australia Pty Ltd as part of the notification statement. They are reproduced here as a matter of public record. The accuracy of this information remains the responsibility of Rohm and Haas Australia Pty Ltd.

14. REQUIREMENTS FOR SECONDARY NOTIFICATION

Under the Act, secondary notification of Modified Acrylic Polymer E-2506 shall be required if any of the circumstances stipulated under subsection 64(2) of the Act arise. No other specific conditions are prescribed.

15. REFERENCES

1. Anliker et al. 1988. *Chemosphere*, 17, 1631-1644.
2. Gobas et al. 1986. *Environmental Toxicology and Chemistry*, 5, 637-646.
3. National Health and Safety Commission, *Approved Criteria for Classifying Hazardous Substances*, NOHSC:1008 (1994), AGPS, Canberra, Australia
4. Standards Australia, 1978, *Australian Standard 2161-1978, Industrial Safety Gloves and Mittens (excluding Electrical and Medical Gloves)*, Standards Association of Australia Publ., Sydney, Australia.
5. Standards Australia, 1994, *Australian Standard 1336-1994, Recommended Practices for Eye Protection in the Industrial Environment*, Standards Association of Australia Publ., Sydney, Australia
6. Standards Australia, Standards New Zealand 1992, *Australian/ New Zealand Standard 1337-1992, Eye Protectors for Industrial Applications*, Standards Association of Australia Publ., Sydney, Australia, Standards Association of New Zealand Publ. Wellington, New Zealand.
7. Standards Australia, 1990 Australian Standard 3765 - 1990 *Clothing for Protection Against Chemical Hazards*, Part 1, *Protection against General or Specific Chemicals*; Part 2, *Limited Protection Against Specific Chemicals*, Standards Australia Publ., Sydney, Australia.
8. Standards Australia, Standards New Zealand 1994, *Australian/ New Zealand Standard 2210 - 1994 Occupational Protective Footwear, Part 1: Guide to Selection, Care and Use. Part 2: Specifications*, Standards Association of Australia Publ., Sydney, Australia, Standards Association of New Zealand Publ. Wellington, New Zealand.
9. Standards Australia, Standards New Zealand, 1994, *Australian/New Zealand Standard 1715 - 1994 Selection, Use and Maintenance of Respiratory Protective Devices*, Standards Association of Australia Publ., Sydney, Australia, Standards Association of New Zealand Publ., Wellington, New Zealand.
10. Standards Australia, Standards New Zealand, 1991, *Australian/ New Zealand Standard 1716 - 1991 Respiratory Protective Devices*, Standards Association of Australia Publ., Sydney, Australia, Standards Association of New Zealand Publ., Wellington, New Zealand.

11. National Occupational Health and Safety Commission, 1994, *National Code of Practice for the Preparation of Material Safety Data Sheet*, [NOHSC:2011] AGPS, Canberra, Australia.