

File No PLC/583

August 2005

**NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME  
(NICNAS)**

**FULL PUBLIC REPORT**

**Polymer in CYDROTHANE® HP-5000/6000 series**

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

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**Director  
NICNAS**

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**FULL PUBLIC REPORT****Polymer in CYDROTHANE® HP-5000/6000 series****1. APPLICANT AND NOTIFICATION DETAILS**

## APPLICANT(S)

Cytec Australia Holdings Pty Ltd (ABN 45 081 148 629)  
Suite 1, Level 1 Norwest Quay  
21 Solent Circuit  
Norwest Business Park  
Baulkham Hills NSW 2153

## NOTIFICATION CATEGORY

Polymer of Low Concern

## EXEMPT INFORMATION (SECTION 75 OF THE ACT)

Data items and details claimed exempt from publication:

- Chemical name
- Other names
- Molecular formula
- Structural formula
- Means of identification
- Number average molecular weight
- Weight-average molecular weight
- Weight percentage of polymer species with MW < 1000 and MW < 500
- Charge Density
- Polymer Constituents
- Residual Monomers and impurities
- Reactive Functional Groups
- Import Volume
- Site of manufacture and or reformulation
- Purity

## VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT)

No variation to the schedule of data requirements is claimed.

## PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S)

None.

## NOTIFICATION IN OTHER COUNTRIES

US PMN - Added to TSCA 1992  
Canada NSN - Added to DSL 2005

**2. IDENTITY OF CHEMICAL**

## MARKETING NAME(S)

CYDROTHANE® HP-5035 Polyurethane Dispersion  
CYDROTHANE® HP-6000 Polyurethane Dispersion  
CYDROTHANE® HP-5500 Polyurethane Dispersion  
CYDROTHANE® HP-6500 Polyurethane Dispersion

## MOLECULAR WEIGHT (MW)

Number Average Molecular Weight (Mn) >10000

### 3. COMPOSITION

#### PLC CRITERIA JUSTIFICATION

The notified polymer contains only low concern functional groups.

<i>Criterion</i>	<i>Criterion met (yes/no/not applicable)</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. INTRODUCTION AND USE INFORMATION

#### MODE OF INTRODUCTION OF NOTIFIED CHEMICAL (100%) OVER NEXT 5 YEARS

The notified polymer will be imported in 200 L polypropylene drums as an aqueous dispersion at a concentration of < 40%.

#### 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>
<i>Tonnes</i>	1-2	1-2	1-2	1-2	1-2

#### USE

Ingredient in coatings for surfaces. 60% will be used in construction and 40% for automotive purposes.

### 5. PROCESS AND RELEASE INFORMATION

#### 5.1. Operation Description

Truck drivers will transport the sealed CYDROTHANE® HP 5035 Polyurethane Dispersion drums (containing <40% notified polymer) by road from the wharf to the Paint formulator's warehouse and then used as needed. Two incoming goods receiving personnel will unload the containers of CYDROTHANE® HP 5035 Polyurethane Dispersion and store them in designated storage areas. The only chance of exposure for these workers will be in the case of damaged and leaking containers.

The liquid polymer will be formulated into paint products at the customer's paint manufacturing site. Formulation of the notified polymer into paint products will involve transfer of notified polymer by metered dosing to mixing vessel and mixing the notified polymer and other ingredients in a sealed vessel fitted with a high-speed mixer and local exhaust ventilation system. Each batch is to be quality checked and adjustments made as required. The resultant paint is filtered prior to being dispensed into 1 L, 4 L, 10 L steel paint cans and 200 L closed head drums under exhaust ventilation for supply to customers.

The concentration of the notified polymer in the final product will be <20%. Paint products containing the notified polymer will be warehoused at the paint manufacturer's site in and distributed to end-users. At the end users site the paint containing the notified polymer is applied to wood boards by curtain coating. The curtain method involves a continuous film of paint, which falls over the board as it passes on the conveyor. The board passes through the curtain of paint and emerges on the other side with their new coating. The curtain is created by pumping the paint through a wide trough, which has a narrow opening in the bottom. Excess paint is collected and returned to the paint reservoir. The application is a non contact method and gives a very smooth, even distribution of coating across the whole board.

The finished paint containing the notified polymer is also used as a topcoat for original equipment manufacture (OEM) or refinishing in the automotive industry. At the customer sites the paint will be mixed, stirred and diluted then placed in a spray gun. The object to be primed with the paint will be sprayed then heat cured, resulting in the painted article.

## 6. EXPOSURE INFORMATION

### 6.1. Summary of Occupational Exposure

<i>Category of Worker</i>	<i>Number</i>	<i>Exposure Duration</i>	<i>Exposure Frequency</i>
<i>Transport and Storage</i>			
Transportation	2	2-3 hours/day	10-15 days/year
<i>Paint formulation</i>			
Weighing/mixing	6	30 min to 6 hours/day	30 days/year
Drum filling	4	3 hours/day	30 days/year
Quality control	4-8	1 hour/day	30 days/year
Cleaning	2	30 min/day	30 days/year
<i>End use</i>			
Curtain coating of wood	50	8 hours/day	220 days/year
Automotive spray painting	1000	8 hours/day	220 days/year

*Transport and Storage:* 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 CYDROTHANE® HP 5035 Polyurethane Dispersion containing the notified polymer at < 40% as emulsion in water. Spills are cleaned up by absorbing with inert absorbent material and recovered into containers for disposal to landfill. No controls are required. Gloves, coveralls and goggles are available if required.

*Paint formulation: Paint mixing* – Workers may be exposed to polymer via dermal and ocular exposure due to drips, spills and splashes during charging of mixer and blending. Workers will wear coveralls, goggles and impervious gloves. Aerosols may be released during blending, but inhalation exposure is expected to be low because of use of enclosed mixing and exhaust ventilation system.

*QC testing:* Dermal and ocular exposure is possible from drips, spills and splashes during batch adjustment and when taking and testing samples. Workers will wear coveralls, goggles and impervious gloves to minimise exposure.

*Filling into drums:* Dermal exposure may be possible due to drips and spills when connecting filling lines. The paint is filled into drums under local exhaust ventilation and workers will wear overalls, goggles and impervious gloves. Therefore only incidental exposure is expected.

*Maintenance workers:* There is possible of skin contact during equipment maintenance. Workers will wear coveralls, goggles and gloves.

#### End use

*Wood coating application:* Paint will be applied using curtain coating machine. The risk of worker exposure is very low, as the notified polymer is present at <20% in the finished paint product. The notified polymer is stable under normal working conditions and has a high molecular weight and therefore not volatile and won't be taken up through the skin or by inhalation.

*Automotive OEM and refinish application:* Workers exposed during end-use of the formulated paints will mostly consist of spray painters preparing and applying the formulated paint coatings to surfaces (e.g. automotive parts), and cleaning equipment after use. The final concentration of the notified polymer in paints will be < 20%, reducing the potential for worker exposure. Dermal exposure is

possible during preparation of paint, which involves stirring, transfer and dilution steps. Aerosols may be formed during spray application and therefore inhalation exposure may be possible. To minimise exposure during end use, the paint is diluted and applied in a well ventilated, down draft spray booth with an effective fume extraction system. Workers also wear anti-static footwear and flame retardant overalls, impervious gloves, eye protection and an air fed breathing mask or respirator if local exhaust ventilation is inadequate. Spray painting may be carried out without the full range of controls mentioned above, increasing exposure. Worker exposure to the notified polymer in dried paints is likely to be minimal, as the polymer will be encapsulated as part of the cured paint film.

## 6.2. Summary of Public Exposure

The general public is not expected to come into contact with CYDROTHANE® HP 5035 Polyurethane Dispersion or products containing it, except in the case of transport accidents where the packaging is breached. Once the paint containing the notified polymer is applied to the substrate in the wood coating and automotive industry, the notified polymer is bound in an insoluble polymeric matrix and is not bioavailable.

## 6.3. Summary of Environmental Exposure

### 6.3.1. Environmental Release

#### RELEASE OF CHEMICAL AT SITE

Local operations will include transport and storage, formulation, filling and packaging; and application by end-users using curtain coating in the wood coating industry and spray gun in the automotive industry. During storage and paint manufacture the notified polymer will be released in the following ways:

- Spills - up to 1%, ranging from 10-20 kg annually to landfill
- Import container residue - up to 1%, ranging from 10-20 kg annually to waste contractor
- During paint formulation - up to 1%, ranging from 10-20 kg annually to waste contractor.

During paint formulation, it is anticipated that there will be minimal release of the notified polymer during manual transfer from the storage containers to the mixers and during filling of paint into containers or during blending since it is undertaken in enclosed systems under exhaust ventilation and in a bunded area. Spills will be contained by the bunding, collected with inert absorbent material (eg sand) and placed in a sealable container ready for disposal. The process equipment, blending tanks and mixers will be cleaned with suitable solvent which is collected, reused, if possible, otherwise it will be disposed off-site. Import containers will be rinsed with the rinsate being used in the paint formulation and the rinsed containers will be disposed of to landfill.

#### RELEASE OF CHEMICAL FROM USE

Release of the notified polymer to the environment as a result of its use in the wood coating industry is expected to be minimal, unless an accidental spillage occurs, and include:

If accidental spillage occurs during normal operating procedures at the end-users site, it will be contained and soaked up with inert absorbent material (sand) and placed in a sealable container for disposal. Waste material is disposed of to landfill. The finished paints containing the notified polymer at < 20% will be sold in 200L closed head drums to wood board painting customers.

The residues in the drums are expected to account for up to 2.5 % of the import volume (ranging from 25 - 50 kg/year). The drums are rinsed with solvents before collection by waste disposal contractors. The coating is applied to the wood boards at the end-users site using the curtain method and any excess paint is collected and returned to the paint reservoir. The equipment is used continuously, but may be shut down for maintenance from time to time. The equipment is cleaned with a suitable solvent which is collected and sent off site to a liquid waste treatment facility. It is estimated that 1% of the import volume (ranging from 10-20 kg/year) may be lost from cleaning of equipment. There will be no release to sewer during end-use the products containing the notified polymer.

Release of the notified polymer to the environment as a result of its use in the automotive industry is expected to be minimal, unless an accidental spillage occurs, and include:

- Spills - up to 1%, ranging from 10-20 kg annually to landfill
- Container residue - up to 2.5 %, ranging from 25 - 50 kg/year annually to waste contractor

Overspray	- up to 30%, ranging from 300 - 600 kg/year annually to landfill
Equipment cleaning	- up to 5%, ranging from 50 - 100 kg/year annually to waste contractor

The finished paints containing the notified polymer at <20% will be sold in 1 L, 4 L and 10 L steel paint cans to the automotive industry.

All spills will be contained, collected with inert absorbent material (eg sand) and placed in a sealable container ready for disposal. Since the modern high volume low pressure HVLP spray guns have a 70% spray efficiency while the older high pressure guns have an efficiency of only 30%, the former are used more frequently and have been used in the above overspray release estimation. As the paint will be applied within a specialized spray booth, all overspray will be contained and collected for disposal. Since the paint is water based, equipment will generally be cleaned with water, however, solvent may be used. This effluent will be collected and reused if possible otherwise it will be disposed of. Any paint residue in empty paint containers will be allowed to dry and then disposed of with the container.

### 6.3.2. Environmental Fate

Information provided below is for the analogue (CYDROTHANE®1035 polyurethane dispersion).

<i>Endpoint</i>	<i>Result</i>	<i>Effects Observed?</i>
Assessment of Ready Biodegradability (Modified Sturm) OECD 301B	28.5%	no

The analogue was not readily biodegradable within a 28-day test period when exposed to microorganisms maintained in an aerobic, aqueous mineralised environment. The mean cumulative biodegradation of the test substance was 28.5% after the 28-days and did not meet the test criteria for ready biodegradability. Based on this information the notified polymer is not ready biodegradable.

Ultimately, the notified polymer is expected to be disposed of to landfill. Here, it is not expected to hydrolyse nor be mobile. However, it should slowly degrade via abiotic and biotic processes to form simple carbon and nitrogen based compounds.

The notified polymer is not expected to cross biological membranes due to its high molecular weight, and as such should not bioaccumulate.

## 7. PHYSICAL AND CHEMICAL PROPERTIES

**Appearance at 20°C and 101.3 kPa**  
**Melting Point/Glass Transition Temp**

White emulsion

Not applicable as it is a liquid. Boiling point is similar to water.

**Specific gravity**  
**Water Solubility**

1.04

Insoluble. Dispersible in water. While the notified polymer contains a small amount of hydrophilic functionality, this would be outweighed by the major hydrophobic portion.

**Dissociation Constant**

Not determined. The notified polymer contains acidic groups which are expected to have pKa values of 3-4.

**Particle Size**

Not determined. The polymer will be imported in a liquid dispersion.

**Reactivity**

Stable under normal conditions. The notified polymer is not expected to polymerise.

**Degradation Products**

Thermal decomposition or combustion may produce carbon monoxide, carbon dioxide and/or nitrogen oxides.

## 8. HUMAN HEALTH IMPLICATIONS

### 8.1. Toxicology

The following toxicological end-points were submitted:

<i>Endpoint</i>	<i>Result</i>	<i>Classified?</i>	<i>Effects Observed?</i>
*1. Rat, acute oral	LD50 > 5000 mg/kg bw	no	no
*4. Rabbit, skin irritation	Non-irritating	no	no
*5. Rabbit, eye irritation	Non-irritating	no	yes
6. Skin sensitisation – in Guinea Pig – Magnusson and Kligman Maximisation Method	No evidence of sensitisation.	no	yes

\*Endpoints 1, 4, 5 are based on the analogue CYDROTHANE® HP 1035 Polyurethane Dispersion.

The Material Safety Data Sheet (MSDS) for CYDROTHANE®HP-5035 Polyurethane Dispersion contains references to rabbit acute dermal toxicity, rat acute inhalation toxicity and sensitisation by inhalation. However, the values for these studies are estimates. No actual test data are available on these endpoints for the notified polymer.

All results were indicative of low hazard.

#### 8.1.1 Discussion of Observed Effects

**Eye Irritation:** Unwashed: There was no corneal opacity or iritis noted at any observation period. Conjunctival irritation, noted in 3/3 eyes, cleared by day 2.

Washed: One eye appeared normal at each observation period. Conjunctival irritation, noted in two eyes, cleared by day 1.

**Skin sensitisation** – *Skin reactions observed with Intradermal Induction:*

Discrete or patchy to moderate and confluent erythema was noted at the intradermal induction sites of test group animals. Discrete or patchy erythema was noted at the intradermal induction sites of control group animals.

*Skin reactions observed after topical induction:*

Discrete or patchy to moderate and confluent erythema and very slight oedema were noted at the topical induction sites of test group animals. Bleeding from the intradermal injection sites was noted in 15 test group animals at the 1-hour observation. A hardened dark brown/black coloured scab was noted at the induction site of one test group animal at the 24-hour observation. No reactions were noted at the topical induction sites of control group animals.

*Skin reactions observed after topical challenge:*

One test group animal was humanely killed on day 22 due to respiratory problems. One control group animal was found dead on day 21, cause of death not known.

### 8.2. Human Health Hazard Assessment

The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard. This is supported by the low acute oral toxicity, non-irritation to skin, minimal irritation to the eye and non-sensitising potential in the guinea pig using the Magnusson and Kligman Maximization Method.

In chemical conditions where there is free N, N-diethylethanamine, classification as R36/37/38 may be appropriate.



## 9. ENVIRONMENTAL HAZARDS

### 9.1. Ecotoxicology

No ecotoxicological studies were submitted for the notified polymer, information provided below is for the analogue CYDROTHANE®HP-1035 Polyurethane Dispersion :

<i>Endpoint</i>	<i>Result</i>	<i>Effects Observed?</i>
Fish Toxicity	EC50 > 100 mg wm/l*	No
Daphnia Toxicity	EC50 632 mg/L	No

\*"wm" in "mg wm/L" stands for "whole material"

All results were indicative of low hazard.

#### 9.1.1 Discussion of Observed Effects

In Rainbow Trout (*Oncorhynchus mykiss*) the 96-hour LC<sub>50</sub> could not be calculated due to the lack of significant mortality at the specified time, and therefore can be stated to be > 100 mg wm/L. The no-observable-effect concentration (NOEC) was 100 mg wm/L based on the lack of significant mortality and sublethal effects at this test concentration.

In Water Flea (*Daphnia magna*) the 48-hour EC50 was calculated to be 632 mg wm/L (based on nominal concentrations) with 95% confidence limits of 454 and 881 mg wm/L. The no-observable – effect concentration (NOEC) was 160 mg wm/L.

### 9.2. Environmental Hazard Assessment

The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard. This is supported by the low toxicity observed in the studies carried out on analogue data with fish and daphnia.

## 10. RISK ASSESSMENT

### 10.1. Environment

CYDROTHANE®HP-5035 Polyurethane Dispersion will be reformulated into paint products for the wood board industry and the automotive industry. The formulated paint products will contain the notified polymer at less than 20 %. The paint will be packaged in 1 L, 4 L, 10 L steel paint cans and 200 L closed head drums. The paint products containing the notified polymer will be supplied to professional curtain coaters and Automotive OEM and refinish industry.

Any waste material will be captured and disposed of to landfill, as will paint residues in empty drums. Equipment residues will be washed with solvent and sent for solvent recycling and disposal of solid residues to landfill. There will be no release of the notified polymer to sewer. Thus, aquatic species will not be exposed to the notified polymer.

Once applied to the substrate, the notified polymer crosslinks with other paint components to form a high molecular weight film and becomes immobilised. The notified polymer, as part of this surface coating will, therefore, share the fate of the wooden board or automotive article. The notified polymer has a NAMW of greater than 1000 and it is unlikely to cross biological membranes and cause toxicity or bioaccumulate.

### 10.2. Occupational Health and Safety

Based on toxicity data provided, the analogous polymer indicated low acute toxicity by oral route. The analogous polymer is non-irritating to rabbit skin and eyes. The notified polymer showed no evidence of sensitization in Guinea Pig – Magnusson and Kligman Maximisation Method

Exposure to the polymer is unlikely during transportation and storage. Exposure may occur in the case of an accidental spill or leak in the container. No controls are required. Gloves, coveralls and goggles are available if required.

During paint formulation workers may be exposed to polymer at <40% concentration via dermal and ocular exposure due to drips, spills and splashes during charging of the mixer and blending. Workers will wear coveralls, goggles and impervious gloves. Aerosols may be released during blending, but inhalation exposure is low due to an exhaust ventilation system.

During QC testing dermal and ocular exposure is possible from drips, spills and splashes during batch adjustment and when taking and testing samples. Workers wear coveralls, goggles and impervious gloves to minimise exposure.

During filling of drums dermal exposure may be possible due to drips and spills when connecting filling lines. The paint is filled into drums under local exhaust ventilation and workers wear overalls, goggles and impervious gloves. Therefore exposure is minimal.

There is a possibility of skin contact during equipment maintenance. Workers wear coveralls, goggles and gloves.

In the wood coating industry, paint will be applied using a curtain coating machine. The risk of worker exposure is very low, as the notified polymer is present at <20% in the finished paint product. The notified polymer is stable under normal working conditions and has a high molecular weight and therefore won't be taken up through the skin. After application and once dried, the paint containing the notified polymer is cured into an inert matrix and is hence unavailable for exposure.

Potential for exposure may occur in the automotive industry, when paint formulations containing < 20% of the notified polymer are prepared for application and sprayed onto automotive components. Dermal/ocular exposure is likely during cleaning of the equipment and during the small-scale preparation for spraying, which may involve stirring the paint, diluting with solvent, and transfer to the spray gun. During the spraying process itself, inhalation and possibly ingestion exposure is possible, because aerosols containing the notified polymer would be formed during atomisation of the paint. The extent of dermal/ocular and inhalation exposure will depend on the controls in place, including isolation and engineering measures. It is estimated that > 1000 workers will carry out spray painting using formulations containing the notified polymer. Some of this will occur at large facilities manufacturing new automotive components. Some will occur as refinishing at crash repair shops which may vary in the type and effectiveness of spray booths or other equipment. It should be noted that worker exposure to the notified polymer in paint would leave obvious staining, and would therefore be avoided by workers wherever possible.

On the basis of the above information, the OHS risk presented by the notified polymer is expected to be of low concern. The control measures in place will ensure sufficient protection against the notified polymer.

### **10.3. Public Health**

Once the paint containing the notified polymer is applied to the substrate in the wood coating industry and automotive industry, the notified polymer is bound in an insoluble polymeric matrix and is not bioavailable.

Therefore no significant dermal or inhalation exposure to the public is expected.

The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard.

## **11. CONCLUSIONS – ASSESSMENT LEVEL OF CONCERN FOR THE ENVIRONMENT AND HUMANS**

### **11.1. Environmental Risk Assessment**

The polymer is not considered to pose a risk to the environment based on its reported use pattern.

## 11.2. Human Health Risk Assessment

### 11.2.1. Occupational health and safety

There is Low Concern to occupational health and safety under the conditions of the occupational settings described.

### 11.2.2. Public health

There is Negligible Concern to public health when used in the wood coating and automotive industry.

## 12. MATERIAL SAFETY DATA SHEET

### 12.1. Material Safety Data Sheet

The notifier has provided MSDS in accordance with the schedule item B 12 of the *ICNA Act*. The accuracy of the information on the MSDS remains the responsibility of the applicant.

## 13. RECOMMENDATIONS

### CONTROL MEASURES

#### Occupational Health and Safety

- Employers should implement the following isolation and engineering controls to minimise occupational exposure to the notified polymer:
  - Closed tanks and lines for formulation and filling of paint containing the notified polymer;
  - Use of engineering controls in spray painting to minimise exposure of workers.
- Employers should implement the following safe work practices to minimise occupational exposure during handling of the notified polymer;
  - Avoid splashing, spills and generation of aerosols during formulation and filling processes;
  - Spray application of paint containing the notified polymer should be in accordance with the NOHSC *National Guidance Material for Spray Painting* (NOHSC, 1999b)
  - Workers using spray products containing the notified polymer should be instructed in their proper handling and use, including information about the additional risks posed by spray application.
- Employers should ensure that the following personal protective equipment is used by workers to minimise occupational exposure to the notified polymer:
  - Protective gloves
  - Safety glasses or goggles
  - Industrial clothing
  - Respiratory protection during spray painting, or if aerosols are formed
  - Full body protection during spray painting

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

- 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 NOHSC *Approved Criteria for Classifying Hazardous Substances*, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation must be in operation.

#### Environment

- The following control measures should be implemented by paint manufacturers and

warehouse sites to minimise environmental exposure during paint formulation and storage of the notified polymer:

- All process equipment and storage areas should be bunded.

#### Disposal

- The notified polymer should be disposed of to landfill for solids and to licensed waste contractors for liquids.

#### Emergency procedures

- Spills/release of the notified polymer should be contained by soaking up with inert absorbent material and dispose of as special waste in compliance with local and State regulations as recommended in the MSDS.
- Use detergent in cleaning up.
- Prevent product from entering drains.

### 13.1. Secondary Notification

The Director of Chemicals Notification and Assessment must be notified in writing within 28 days by the notifier, other importer or manufacturer:

- (1) Under subsection 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 subsection 64(2) of the Act:
  - if any of the circumstances listed in the subsection arise.

The Director will then decide whether secondary notification is required.