

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

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in 80358 Latex

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (the Act) and Regulations. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Australian Government Department of Health, 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 the Environment and Energy.

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:

Street Address: Level 7, 260 Elizabeth Street, SURRY HILLS NSW 2010, AUSTRALIA.
 Postal Address: GPO Box 58, SYDNEY NSW 2001, AUSTRALIA.
 TEL: + 61 2 8577 8800
 FAX: + 61 2 8577 8888
 Website: www.nicnas.gov.au

**Director
NICNAS**

April 2019

Table of Contents

SUMMARY	2
CONCLUSIONS AND REGULATORY OBLIGATIONS.....	2
ASSESSMENT DETAILS.....	4
1. APPLICANT AND NOTIFICATION DETAILS.....	4
2. IDENTITY OF POLYMER	4
3. PLC CRITERIA JUSTIFICATION	4
4. PHYSICAL AND CHEMICAL PROPERTIES.....	4
5. INTRODUCTION AND USE INFORMATION.....	5
6. HUMAN HEALTH RISK ASSESSMENT.....	5
7. ENVIRONMENTAL RISK ASSESSMENT	5
BIBLIOGRAPHY	7

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/1533	Cintox Australia Pty Ltd	Polymer in 80358 Latex	No	≤ 10 tonnes per annum	Component of paints

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

- Water-insoluble high molecular weight polymers have the potential to cause lung overloading. Respiratory protection and local exhaust ventilation should be used to prevent inhalation exposure if mist/dust/aerosol formation is expected.

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

- A copy of the SDS should be easily accessible to employees.
- Spray applications should be carried out in accordance with the Safe Work Australia Code of Practice for *Spray Painting and Powder Coating* (Safe Work Australia, 2015) or relevant State or Territory Code of Practice.
- 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 paints, 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 products 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

Cintox Australia Pty Ltd (ABN: 63 122 874 613)
Suite 1, Level 2
38 – 40 George Street
PARRAMATTA NSW 2150

Exempt Information (Section 75 of the Act)

Data items and details exempt from publication include: chemical name, other names, CAS number, molecular and structural formulae, molecular weight, polymer constituents, residual monomers/impurities, use details and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

80358 Latex (containing the notified polymer at < 30% concentration)

Molecular Weight

Number Average Molecular Weight (Mn) is > 10,000 g/mol

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	Milky white liquid*
Melting Point/Glass Transition Temperature	0 °C*
Density	1,054 – 1,210 kg/m ³ *
Water Solubility	Fully dispersible
Dissociation Constant	Contains dissociable functional groups, and is expected to dissociate under normal environmental conditions (pH 4-9)
Reactivity	Stable under normal environmental conditions
Degradation Products	None under normal conditions of use

*For 80358 Latex (product containing the notified polymer at < 30% concentration)

5. INTRODUCTION AND USE INFORMATION

Maximum Introduction Volume of Notified Chemical (100%) Over Next 5 Years

Year	1	2	3	4	5
Tonnes	1 – 10	1 – 10	1 – 10	1 – 10	1 – 10

Use

The notified polymer will be used as a component of water-based architectural paints at < 30% concentration.

The notified polymer will not be manufactured or reformulated within Australia. It will be imported as a component of finished paints at < 30% concentration. Small quantities of other components of paint may be added into the product prior to use.

Finished paints containing the notified polymer will be available to both professional workers and DIY painters. The paints will be applied by brush, roller or spray. Once the paints are cured, the notified polymer will be bound into an inert matrix and will not be available for exposure.

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.

It is noted that the notified polymer is expected to be water-insoluble with molecule weight > 10,000 g/mol. Inhalation of polymers with molecular weights > 70,000 g/mol has been linked with irreversible lung damage due to lung overloading and impaired clearance of particles from the lung, particularly following repeated exposure (US EPA, <https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/high-molecular-weight-polymers-new>, accessed on March 2019). There is a data gap for polymers with MW between 10,000 and 70,000 g/mol, and uncertainty may exist. If the notified polymer is inhaled at low levels and/or infrequently, it is assumed that it will be cleared from the lungs.

Although not considered in this risk assessment, NICNAS notes that 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.

7. ENVIRONMENTAL RISK ASSESSMENT

No ecotoxicological data were submitted. The notified polymer contains some functionality which has the potential to become anionic under environmental conditions (pH 4–9). Anionic polymers are generally of low toxicity to fish and daphnia, however they 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, leading to chelation of essential nutrients (Boethling & Nabholz, 1997). However, this does not apply to the notified polymer and it is therefore not considered to be an over-chelation hazard to algae.

The notified polymer will only be imported into Australia as a component of end-use paints. The paints containing the notified polymer will be used by professional and do-it-yourself (DIY) users. During use, the paints containing the notified polymer are expected to be applied by brush, roller, and spray techniques. It is expected that some of the paints will be in the form of overspray during spraying operations, and will typically entail disposal to landfill after being collected and cured. The

liquid waste from cleaning of the application equipment is expected to be collected by a licensed waste contractor, and disposed of safely. During use, the notified polymer may also be released to the environment as accidental spills. These releases are expected to be collected and disposed of to landfill in accordance with local government regulations.

Based on a scenario that 100% of the total annual import volume of notified polymer is used by DIY users, environmental exposure from the following worst-case scenario has been calculated. Up to 5% of the amount used by DIY users may be incorrectly disposed of to the sewer, drains, or ground from waste and washing of application equipment. Assuming the releases occur nationwide over the entire year and there is no removal of the notified polymer during wastewater treatment, the predicted environmental concentration (PEC) is estimated to be 0.28 µg/L [PEC = 1.37 kg notified polymer/day ÷ (200 L/person/day × 24.386 million people)]. As the notified polymer is not expected to be a hazard to aquatic life, its release from the assessed use pattern is not expected to lead to ecotoxicologically significant concentrations in the aquatic environment.

Most of the notified polymer is expected to share the fate of the articles on which it was applied, to be either recycled for metal reclamation or disposed of to landfill at the end of their useful life. A small proportion of the notified polymer may remain as residue in empty import and end-use containers. These residues are expected to be cured and disposed of to landfill along with the containers in accordance with local regulations. During metal reclamation, the notified polymer will thermally decompose to form water vapour and oxides of carbon, sulphur and nitrogen. In landfill, the notified polymer will be present as cured solids and will be neither bioavailable nor mobile. The notified polymer is not expected to bioaccumulate due to its high molecular weight. The notified polymer in landfill and water is expected to eventually degrade via biotic and abiotic processes to form water and oxides of carbon, sulphur and nitrogen.

Therefore, based on its assumed low hazard and reported use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.

BIBLIOGRAPHY

Boethling, RS & Nabholz VJ (1997) Chapter 10 Environmental Assessment of Polymers under the U.S. Toxic Substances Control Act. In: Hamilton, JD Sutcliffe R ed. Ecological Assessment of Polymers Strategies for Product Stewardship and Regulatory Programs, 1st ed. New York, Van Nostrand Reinhold, pp 187-234.

Safe Work Australia (2015) Code of Practice: Spray Painting and Powder Coating, Safe Work Australia, <https://www.safeworkaustralia.gov.au/doc/model-code-practice-spray-painting-and-powder-coating>.