

File No PLC/926

June 2010

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

FULL PUBLIC REPORT

Polymer in RC-73002

This 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, Water, Heritage and the Arts.

For the purposes of subsection 78(1) of the Act, this Full Public Report may be inspected at our NICNAS office by appointment only at 334-336 Illawarra Road, Marrickville NSW 2204.

This Full Public Report is also 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**

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FULL PUBLIC REPORT**Polymer in RC-73002****1. APPLICANT AND NOTIFICATION DETAILS**

APPLICANT(S)

Dupont (Australia) Ltd (ABN 59 000 716 469)
7 Eden Park Drive
MACQUARIE PARK, NSW, 2113

NOTIFICATION CATEGORY

Polymer of Low Concern

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, Residual Monomers/Impurities, Use Details and Import Volume.

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

None.

2. IDENTITY OF CHEMICAL

MARKETING NAME(S)

RC-73002 (<50% notified polymer)

MOLECULAR WEIGHT (MW)

Number Average Molecular Weight (Mn) > 1,000 Da

REACTIVE FUNCTIONAL GROUPS

The notified polymer contains only low concern functional groups.

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:	White translucent solid (RC-73002 is a milky white liquid emulsion)
Melting Point/Glass Transition Temp	12.8 to 28.4 °C
Density	1290 kg/m ³ at 20 °C (calculated) (Note: units are kg/m ³ ; density in kg/m ³ is 1000 x density in g/cm ³)
Water Solubility	687 mg/L at pH 7

	(OECD TG 120 by TOC)
Dissociation Constant	Not determined. The notified polymer is an organic salt and is dissociated at environmental pH (4-9).
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	<10	<10	<20	<20	<20

Use

The notified polymer will be used as component of automobile refinish paints.

Mode of Introduction and Disposal

Resin RC-73002 (<50% polymer in aqueous solution) will be imported as a component of refinish paints (<10% notified polymer). Professional spraypainters in refinish shops will then measure and mix the imported product with other components to form the final paint formulations. The finished coating will be applied to automobiles using spray guns in purpose built spray booths.

6. HUMAN HEALTH IMPLICATIONS

Hazard Characterisation

No toxicological data were submitted. The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard.

Occupational Health and Safety Risk Assessment

Professional spray painters at refinish shops may encounter dermal, inhalation and ocular exposure to the notified polymer in the imported product (<10%) and finished paints during transfer steps (weighing and mixing), spray-application and cleaning. However, exposure to significant amounts of the notified polymer will be limited because the paint will be applied in a ventilated spray booth and personal protective equipment will be worn by workers. After application and once dried, the notified polymer will be crosslinked and unavailable for exposure. It may also be covered by additional layers of topcoat.

Although exposure to the notified polymer could occur during the abovementioned processes, the risk to workers is not considered to be unacceptable due to the workplace controls in place and assumed low hazard of the notified polymer.

Public Health Risk Assessment

The notified polymer is intended for use by professional spray painters in automotive refinish shops. The public may be exposed to the applied coating. However, following application, the notified polymer will become crosslinked and in most cases, will be further coated with a protective clear coat. Therefore, the risk to public from exposure to the notified polymer is not considered to be unacceptable.

7. ENVIRONMENTAL IMPLICATIONS

Hazard Characterisation

No ecotoxicological data were submitted. Anionic polymers 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. This does not apply to the notified polymer and it is therefore unlikely to pose an overchelation hazard to algae.

Environmental Risk Assessment

A maximum of 3% of the imported quantity of notified polymer will be released as container and equipment washings during use, and will be sent to a licensed hazardous waste facility for disposal in accordance with state/territory legislative requirements. The main release (approximately 30% as overspray during use) will typically entail landfill disposal, after interception by spray booth filters. Discarded end use articles containing the notified polymer within the cured paint film will be disposed to landfill, or recycled for metals reclamation, which will entail thermal decomposition of the paint to form oxides of carbon, nitrogen and water vapour. In landfill, the notified polymer will be present as a cured solid film and will be neither bioavailable nor mobile. Therefore, the notified polymer is not expected to pose a risk to the environment when it is used as proposed.

8. CONCLUSIONS AND RECOMMENDATIONS**Human health risk assessment**

Under the conditions of the occupational settings described, the notified polymer is not considered to pose an unacceptable risk to the health of workers.

When used in the proposed manner, the notified polymer is not considered to pose an unacceptable risk to public health.

Environmental risk assessment

Based on the reported use pattern, the notified polymer is not expected to pose a risk to the environment.

Recommendations

CONTROL MEASURES

Occupational Health and Safety

- 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.
- Spray applications should be carried out in accordance with the Safe Work Australia *National Guidance Material for Spray Painting* [NOHSC (1999)] or relevant State and Territory Codes of Practice.
- 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 *Approved Criteria for Classifying Hazardous Substances* [NOHSC:1008(2004)], workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation must be in operation.

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

Disposal

- The notified polymer should be disposed of to landfill.

Emergency procedures

- Spills and/or accidental release of the notified polymer should be handled by physical containment, collection and subsequent safe disposal.

Regulatory Obligations*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 a component of refinish 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 chemical 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.

Material Safety Data Sheet

The MSDS of the notified polymer (and products containing the notified polymer) provided by the notifier were reviewed by NICNAS. The accuracy of the information on the MSDS remains the responsibility of the applicant.