Poisson centres notification and the painting industry

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Who shall notify? On which action?

- Mixer who places his mixture on the market
- Importer if he sells or does not sell his imported mixture
- Re-filler who changes the packaging of the mixture
- Distributor who changes the brand name of the mixture on the label (re-labeller/re-brander)
- Distributor who resells the mixture in the same or another countri(es) (re-seller)
- *Knowledge of information about the components (identification and percentage):*

Mixer >> Importer ≈ Re-filler ≈ Re-labeller ≈ Re-seller

Detailed composition > Generic Component Identifier for colour (not classified and no reference substance needed) ≈ MIM for unknown compositions (only one component enough with reference substance and classification) ≈ Interchangeable Component Group (changing composition)

PCN notification of waterborne paints

- Shall we? They are generally not classified as hazardous.
- TiO_2 from 1 October 2021 is Carc. 2, but not in liquid formulation!
  - Additional new labelling requirements: EUH211, Warning! Hazardous respirable droplets may be formed when sprayed. Do not breathe spray or mist.
- Methanol from methyl acrylate polymer hydrolyses <3% ➔ No STOT SE 2 classification!
  - Because it is a contamination ➔ no EUH 210 Safety data sheet available on request – but advisable
- Biocide(s) for preservation needed against fungi
  - Classification problems ➔ specific concentration limits, M-factors
  - Elucidation problems ➔ labelling EUH 208
  - Treated article problems ➔ labelling requirements

Biocidal active ingredient (no PCN) ↔ Biocidal product (PCN) ↔ Treated article (PCN)

Specific and elucidation concentration limits of some isothiazolinones

	specific limit	elucidation limit
• Octyl isothiazolinon	≥ 15ppm	1,5 ppm
• Methyl(chloro) isothiazolinon	≥ 15ppm	1,5 ppm
• Methyl isothiazolinon	≥ 15ppm	1,5 ppm
• Benzoisothiazolinon	≥500ppm	50 ppm

- If concentration in paints ≥ specific limit ➔ paint classified as Skin Sens. 1A, „biocide active" on the label
- If concentration in paints between elucidation and specific limits ➔ EUH 208 written on the label „Contains biocide active. May produce an allergic reaction"
- If concentration in paints below elucidation limit ➔paint is a „treated article", biocid actives shall be on the label because it is a requirement in the approval regulation
- Poison centres notification is not required (except the first case or for mixtures classified for other reason).
- Please note that any paint preserved by CIT/MIT (Aquatic Chronic 1) should be classified as Aquatic Chronic 4
- Conc. = 10 ppm * M=100 = 1 000 ppm =0.1%, not Cat. 1, but 0.1%*10*10*10 = 100% ➔ Aquatic Chronic 4
- No PCN problem, but problem with CLP regulation ☺

Poison centres notication problems for classified waterborne paint

- Components: intentionally added substances (mixtures)
- Components (not constituent!) for comprising 70% or rather 90% of the mixture shall be identified
  - Polymer shall be identified with reference substance (But they are not in EINECS): 2-propenoic acid methyl ester, homopolymer CAS 9003-21-8 ➔ copolymers ??? IUPAC name
  - Water shall be identified ☺
- Constituents:
  - Ingredients added with the substances as contaminations (methyl acrylate monomer) ➔ no need to identify in notification
  - Ingredients as by-product when preparing the mixture: methanol from poly(methyl acrylate) ➔ no need to identify in notification
  - Constituents of a Reaction mass: CIT/MIT = Reaction mass of 2-methyl-2H-isothiazol-3-one and 5-chloro-2-methyl-2H-isothiazol-3-one ➔ no need to identify in notification, only the substance, CIT/MIT: CAS 55965-84-9

Alkyd resins, Epoxy resin, Polyurea coatings

- Frequently they are identified as mixture – it helps
- Identification of one component is enough (but all shall be notified)
- Classification for the mixture as well as for the component selected shall be given
- Identification of the reference substance may be a problem: there are no polymers in the EINECS list
  - IUPAC name
  - A short guidance: http://publications.iupac.org/pac/pdf/2012/pdf/8410x2167.pdf
- Problems with two-component kits:
  - Both shall be notified separately
  - Two UFIs needed (placed separately)
  - Information on the product from the mixed components may be placed in the Toxicological section of the notification, if relevant.

Hydrocarbons in paints

- If substances: identification is generally clear. BUT:
  - New names for hydrocarbon solvents – not in EINECS or on harmonised list.
  - Xylenes as an example
  - Classifications additional to harmonised for several basic hydrocarbons in the REACH registrations.
  - Not differentiate components from constituents in 3.2. of safety data sheets – occupational exposure limits.
- If mixtures: changing raw material and composition
  - Hydrocarbon solvents are not listed on the fuels list in PCN
  - MIM or Interchangeable component groups are the solution

New names for hydrocarbon solvents

http://www.esig.org/uploads/HSPA-naming-convention-substance-identification-march-2011.pdf

	EINECS number	HSPA convention
Substance description	265-150-3 Naphtha (petroleum) Hydrotreated heavy	Hydrocarbons, C9-11 n-alkanes, isoalkanes, cyclics, <2% aromatics **919-857-5**
Specified carbon range	C6 - C13	C9 - C11
Specified boiling range	65 - 230 °C	not given, but +_ 160 - 190 °C
Aromaticity	Not addressed	Addressed
Allowed hazard classification	R11, R20,R45, R46, R48, R63 R38, R65, R66, R67, R51/53	R10, R65, R66

Which names are available for xylene??

- Xylene has three isomers. They are manufactured together in refinery. But 4 substances are REACH registered (next to o-, m- and p-xylene):
- 1330-20-7 215-535-7 xylene

  26 registrants 1-10 000 t/év
- No 905-562-9 Reaction mass of ethylbenzene and m-xylene and p-xylene

  5 registrants 10-100 000 t/év
- No 905-570-2 Reaction mass of ethylbenzene and m-xylene

  1 registrants 100 000-1 000 000 t/év
- No 905-588-0 Reaction mass of ethylbenzene and xylene

  102 registrants 1-10 000 000 t/év
-

Harmonised contra registered classification for xylenes??

- 1330-20-7 Xylene harmonised classification:

Flam. Liquid 3 Acute Tox. 4 (skin, inhal.) Skin Irrit. 2

- 1330-20-7 Xylene registered classification:

Flam. Liquid 3 Acute Tox. 4 (skin, inhal.) Skin Irrit. 2

Eye Irrit. 2 Asp. Tox. 1 STOT SE 3 (resp.) STOT RE 2 (inhal. lessions) Aquatic Chronic 2

- No CAS No Reaction mass of Ethylbenzene and xylene

Flam. Liquid 3 Acute Tox. 4 (skin, inhal.) Skin Irrit. 2

Eye Irrit. 2 Asp. Tox. 1 STOT SE 3 (resp.) STOT RE 2 (ototoxicity)

- Where route and affected organ are possible, separate place to introduce them.
- Other languages are possible but not required at P sentences and EUH sentences.

Extracts (petroleum) solvent-rerfined heavy paraffinic distillate solvent

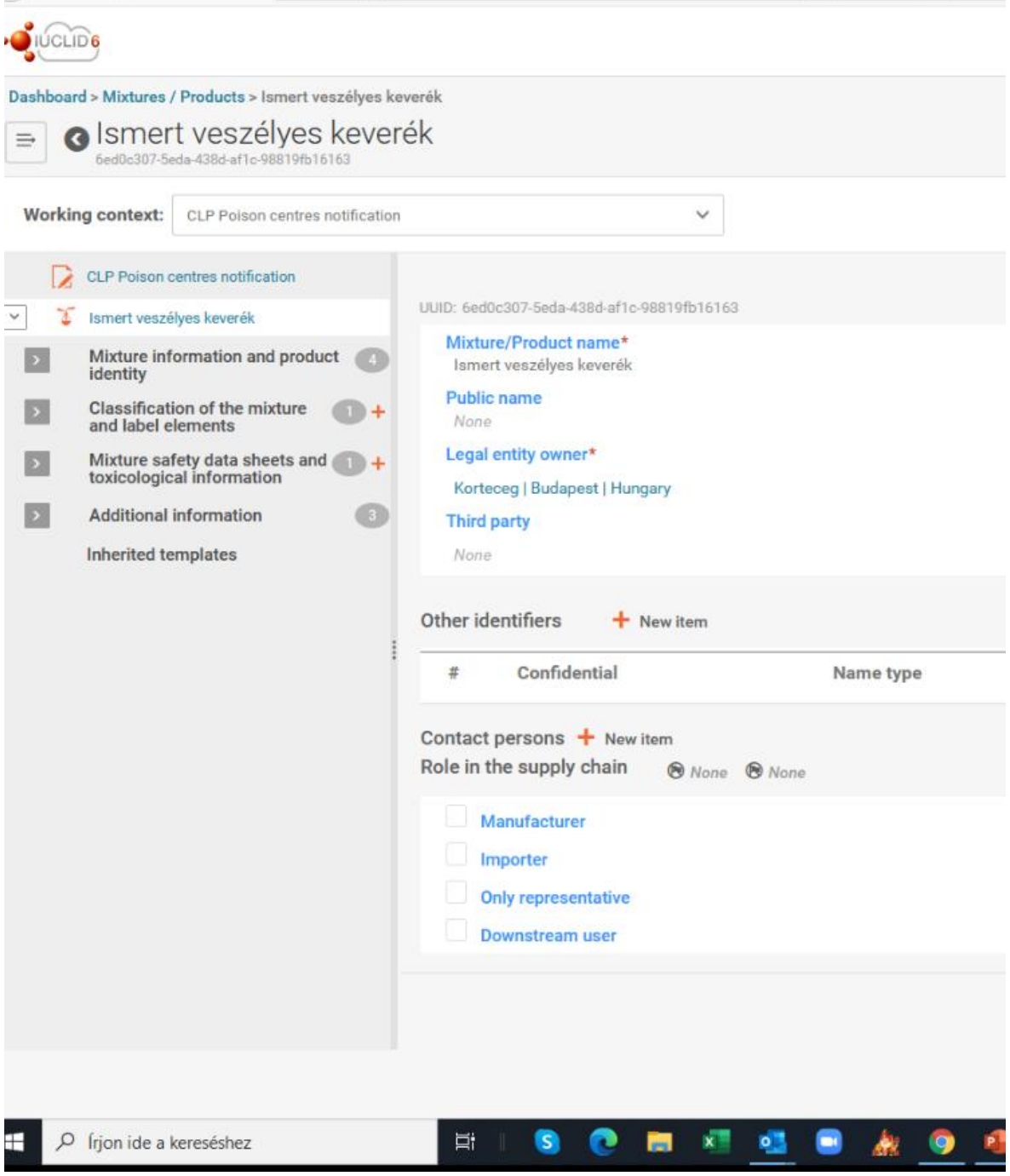
- Safety data sheet in **3.1. Substances**
- EC-No. : 272-180-0
- Extracts…. < =100%
- DMSO extract < 3%
- Poison centres notification: only Extracts… shall be mentioned as substance. DMSO extract does not….

Hydrocarbons, C6-7, isoalkanes, cyclics, < 5% hexane

- Safety data sheet in **3.1. Substances**
- EC-No. : 926-605-8
- Hydrocarbons…. < =100%
- N-hexane (component) < 3%
- Toluene (classification marker) < 1%
- Benzene (classification marker) < 0.01%
- In 8.1.
- Monitoring data for hexane and toluene (and not for benzene)
- Poison centres notification: only Hydrocarbons… shall be mentioned as substance

How to define „Product use categories”?

	Quantities	Time in use	Site	Persons exposed
Industrial	large	continuous	Built for the aim	employee
Profesional	medium	frequent	changing	Painter + employee + (consumer)
Consumer	small	occasional	Not built for the aim	consumer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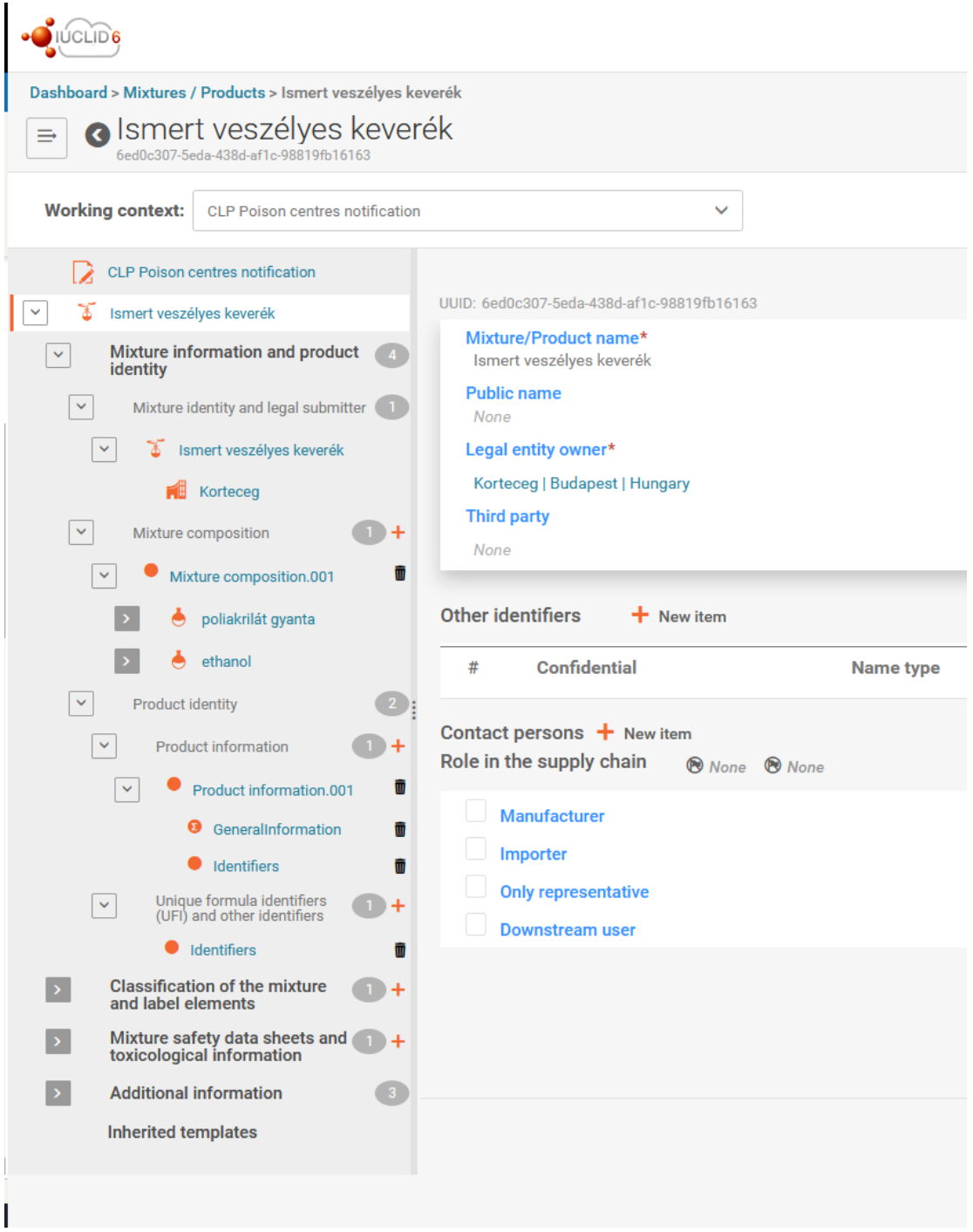
Dashboard > Mixtures / Products > Ismert veszélyes keverék
Ismert veszélyes keverék
6ed0c307-5eda-438d-af1c-98819fb16163
Working context:
CLP Poison centres notification
CLP Poison centres notification
Ismert veszélyes keverék
Mixture information and product identity 4
Classification of the mixture and label elements 1
Mixture safety data sheets and toxicological information 1
Additional information 3
Inherited templates
UUID: 6ed0c307-5eda-438d-af1c-98819fb16163
Mixture/Product name*
Ismert veszélyes keverék
Public name
None
Legal entity owner*
Korteceg | Budapest | Hungary
Third party
None
Other identifiers
New item
Confidential Name type
Contact persons
New item
Role in the supply chain
None
None
Manufacturer
Importer
Only representative
Downstream user
Írjon ide a kereséshez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Ismert veszélyes keverék
6ed0c307-5eda-438d-af1c-98819fb16163
Working context:
CLP Poison centres notification
CLP Poison centres notification
Ismert veszélyes keverék
Mixture information and product identity 4
Mixture identity and legal submitter 1
Ismert veszélyes keverék
Korteceg
Mixture composition 1
Mixture composition.001
poliakrilát gyanta
ethanol
Product identity 2
Product information 1
Product information.001
GeneralInformation
Identifiers
Unique formula identifiers (UFI) and other identifiers 1
Identifiers
Classification of the mixture and label elements 1
Mixture safety data sheets and toxicological information 1
Additional information 3
Inherited templates
UUID: 6ed0c307-5eda-438d-af1c-98819fb16163
Mixture/Product name*
Ismert veszélyes keverék
Public name
None
Legal entity owner*
Korteceg | Budapest | Hungary
Third party
None
Other identifiers
New item
Confidential Name type
Contact persons
New item
Role in the supply chain
None
None
Manufacturer
Importer
Only representative
Downstream user

Thank you for your kind attention!

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