

MONSANTO CHEMICAL COMPANY

10/8/61 SD
Inter-Office Correspondence

From LOCATION : St. Louis - General Offices
DATE : May 19, 1961
SUBJECT : HAZARDOUS SUBSTANCES LABELING
REFERENCE :

cc: G. E. Gibson
H. O. Mehner
L. E. Klein
H. L. Minckler
T. C. Tupper, Jr.

*Copy made for
John G. Tupper, Jr.*

TO : Mr. G. R. Sido

We met on May 16, 1961, to set ground rules for the Organic Division for the interpretation of the Federal Hazardous Substances Labeling Act. It was decided that the following rules would be used as the bases for determining whether or not the Organic Division Products are subject to the Hazardous Labeling Act:

1. Any product designated U.S.P., N.F., other drug, or food chemical is exempt.
2. Products used as drugs and non-drugs are exempt in both cases.
3. Any product whose smallest standard container is too large to be generally found in or around the home is exempt.
4. Any product, which by its nature or application is unlikely to be found in or around the home, is exempt.
5. A non-hazardous product is exempt. -- A product whose acute oral toxicity (LD₅₀ for rats) is less than 5 grams per kilogram is considered hazardous.
6. Product Samples (about 1 lb.) are handled separately.

Attachment I lists all of the Organic Division Products which we believe hazardous and subject to the Federal Hazardous Substances Labeling Act. The list gives the product name, smallest standard container size, and oral toxicity of each.

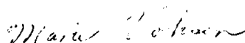
MONS 097566

May 19, 1961

Attachment II lists all of the Organic Division Products which we believe are exempt from the Federal Hazardous Substances Labeling Act. The list gives the product name, smallest standard container size, and the basis for exemption of each.

Sido
Note →

Due to the great amount of work involved, Mr. Elmer Wheeler will not proceed with compilation of the oral toxicity data for all of these substances unless you request it.



Marie Vohsen



H. O. Mehner

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Attachments

MONS 097567

ATTACHMENT I

HAZARDOUS AND SUBJECT TO THE FEDERAL HAZARDOUS SUBSTANCES LABELING ACT

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Acute Oral Toxicity LD50 (rats)-mg./kg.</u>
<u>Intermediates Group</u>		
Santochlor (para-Dichlorobenzene)	100 lb.	2620
<u>Plasticizers Group</u>		
Santocizer 140	5 gal.	approx. 2000 to 5000
Tricresyl Phosphate	5 gal.	varies from 500 to 5000
<u>Paper Chemicals</u>		
Santobrite	10 lb.	90 to 300

ATTACHMENT II

EXEMPT FROM FEDERAL HAZARDOUS SUBSTANCES LABELING ACT

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Basis for Exemption</u>
<u>Mine Chemicals Group</u>		
Acetanilid	100 lb.	N.F.
Acetophenetidin	100 lb.	U.S.P.
Acetylsalicylic Acid	100 lb.	U.S.P.
Actamer	50 lb.	size
Benzoic Acid	28 gal.	U.S.P.
Benzyl Benzoate	55 gal.	U.S.P.
Caffeine Anhydrous	100 lb.	U.S.P.
Chloramine - T	125 lb.	N.F.
Coumarin	25 lb.	N.F.
Ethavan	25 lb.	size
Methapyrilene Fumarate	5 lb.	drug
Methapyrilene Hydrochloride	5 lb.	U.S.P.
Methyl Salicylate	5 gal.	U.S.P.
Phenolphthalein	100 lb.	U.S.P.
SA - 326	50 lb.	size
Saccharin Monsanto	100 lb.	size
Salicylic Acid	100 lb.	U.S.P.
Santophen 1	22 gal.	size
Santophen 1 Solution	15 gal.	size
Sodium Benzoate	28 gal.	U.S.P.
Sodium Salicylate	100 lb.	U.S.P.
Sopanax	150 lb.	size
3,4,4-Trichlorocarbaniide	100 lb.	size
Vanillin Monsanto	25 lb.	food
Acetyl Sulfathiazole Tech.	150 lb.	size
G78 Amide	100 lb.	size
Guaiacol	55 gal.	N.F.
Metanitrochlorbenzene	55 gal.	size
Tertiary-Butylamine	55 gal.	size
Theobromine Refined	standard bulk container	Not in Home
Adipic Acid, Food Grade*	50 lb.	food
Fumaric Acid, Food Grade*	50 lb.	food

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Basis for Exemption</u>
<u>Intermediates Group</u>		
Benzoic Acid Tech.	50 lb.	size
Benzoic Acid Industrial	42 lb.	size
Benzyl Chloride	55 gal.	size
Biphenyl Tech.	100 lb.	size
Cyclohexanol	430 lb.	size
Cyclohexylamine	55 gal.	size
2,4-Dichlorophenol	55 gal.	size
Dicyclohexylamine	55 gal.	size
Dihydroxydiphenyl Sulfone	200 lb.	size
2,4-Dinitroaniline	225 lb.	size
H-Acid	100 lb.	size
Meta-Chloroaniline	55 gal.	size
Methyl Toluenesulfonate	55 gal.	size
Monochlorophthalic Anhydride	200 lb.	size
ortho-Anisidine	55 gal.	size
ortho-Chloroaniline	55 gal.	size
ortho-Chlorophenol	55 gal.	size
ortho-Dichlorobenzene Tech.	55 gal.	size
ortho-Nitroaniline	175 lb.	size
ortho-Nitroanisole	55 gal.	size
ortho-Nitrochlorobenzene	55 gal.	size
ortho-Phenetidine	55 gal.	size
para-Anisidine	55 gal.	size
para-Chloroaniline	55 gal.	size
para-Chlorophenol	55 gal.	size
para-Nitroaniline	350 lb.	size
para-Nitrochlorobenzene	55 gal.	size
para-Nitrophenol	200 lb.	size
para-Phenetidine	55 gal.	size
para-Toluenesulfonamide	275 lb.	size
Paratoluenesulfonylchloride	300 lb.	size
Phenol	23 gal.	U.S.P.
Phenol Solutions	55 gal.	size
Phenolsulfonic Acid	55 gal.	size
Phthalyl Chloride	55 gal.	size
Phenylcyclohexane	5 gal.	Not in Home
Salicylic Acid Tech.	250 lb.	size
Salicylic Acid Industrial	250 lb.	size
Sodium Benzoate Tech.	100 lb.	size
Sodium Paranitrophenate	55 gal.	size
Thiourea	75 lb.	size
Toluenesulfonic Acid Tech.	10 gal.	size

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Basis for Exemption</u>
<u>Intermediates Group</u>		
3,4-Dichloroaniline*	5b gal.	size
Dimethylacetamide*	5 gal.	NIH (Not in home)
5-Sulfosalicylic Acid*	200 lb.	size
Tetrapropenylsuccinic Anhydride*	55 gal.	size
t-Butylamine*	55 gal.	size
Bicyclohexyl*	5 gal.	NIH
<u>Plasticizers Group</u>		
Aroclors	5 gal.	size
Dibutyl Phthalate	5 gal.	Non-toxic
Dicyclohexyl Phthalate	250 lb.	size
Diethyl Phthalate	5 gal.	Non-toxic
Diisodecyl Adipate	5 gal.	NIH
Diisodecyl Phthalate	5 gal.	NIH
Dilsooctyl Phthalate	5 gal.	NIH
Dimethyl Phthalate	5 gal.	Non-toxic
Di(n-Octyl, n-Decyl)Adipate	5 gal.	NIH
Diocetyl Adipate	5 gal.	NIH
Diocetyl Phthalate	5 gal.	Non-toxic
Diphenyl Phthalate	400 lb.	size
Dytrol	5 gal.	Non-toxic
HB-20	5 gal.	NIH
HB-40	5 gal.	NIH
Mod Epox	5 gal.	NIH
Montars	50 lb.	NIH
Santicizer 1-H	380 lb.	size
Santicizer 3	45 gal.	NIH
Santicizer 8	5 gal.	NIH
Santicizer 9	250 lb.	size
Santicizer E-15	5 gal.	FDA
Santicizer B-16	5 gal.	FDA
Santicizer M-17	5 gal.	NIH
Santicizer 141	5 gal.	FDA
Santicizer 160	5 gal.	NIH
Santicizer 165	5 gal.	NIH
Santicizer 213	5 gal.	NIH
Santicizer 214	5 gal.	NIH
Santicizer 216	55 gal.	size
Santicizer 409	5 gal.	NIH
Santicizer 602	1000 gal.	size

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Basis for Exemption</u>
<u>Plasticizers Group</u>		
Santicizer 603	5 gal.	NIH
Santicizer 630	1000 gal.	size
Santicizer 631	1000 gal.	size
Santicizer 636	1000 gal.	size
Santicizer 644	5 gal.	NIH
Santolite M-H-P	7 gal.	NIH
Santolite MS 80% Solution	5 gal.	NIH
Santomask II	1 gal.	Non-toxic
Santonox	55 gal.	size
Santonox R	55 gal.	size
Triphenyl Phosphate	225 lb.	size
Triphenyl Phosphite	5 gal.	NIH
Santicizer 405*	5 gal.	NIH
Santicizer 117*	55 gal.	size

Petroleum Chemicals

Defoamer PC-1244	5 gal.	NIH
Defoamer PC-1344	5 gal.	NIH
Santolene C	55 gal.	size
Santolube 31	55 gal.	size
Santolube 70	55 gal.	size
Santolube 70-A	55 gal.	size
Santolube 311	55 gal.	size
Santolube 312	55 gal.	size
Santolube 393	54 gal.	size
Santolube 401	54 gal.	size
Santolube 410	54 gal.	size
Santolube 411	55 gal.	size
Santolube 493	54 gal.	size
Santolube 631	54 gal.	size
Santopoid S	55 gal.	size
Santopoid 22 RI	54 gal.	size
RT 215-D SM*	5 gal.	NIH
Santolube 602*	55 gal.	size
Santolube 602 SM*	55 gal.	size
Pydraul F-9	5 gal.	NIH
Pydraul AC	5 gal.	NIH
Pydraul 60	5 gal.	NIH
Pydraul 150	5 gal.	NIH
Pydraul 600	5 gal.	NIH
Pydraul 625	5 gal.	NIH
Pydraul A-200	5 gal.	NIH

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Basis for Exemption</u>
<u>Petroleum Chemicals</u>		
Santowax R	75 lb.	size
OS-100	5 gal.	NIH
Cresyl Diphenyl Phosphate	55 gal.	size
Prostane (MDP)	55 gal.	size
Tricresyl Phosphate	54 gal.	size
N-30	55 gal.	size
Coolanol 45	1 qt.	NIH
OS-45 (Types III & IV)	1 qt.	NIH
Skydrol	1 qt.	NIH
Skydrol 500	1 qt.	NIH
Skydrol 500 A	1 qt.	NIH
Skydrol 7000	1 qt.	NIH
Aroclors	5 gal.	NIH
Coolanol 35	1 qt.	NIH
Inertech PPO	5 gal.	NIH
Pyranol 1457	5 gal.	NIH
Pyranol 1470	5 gal.	NIH
Pyranol 1481	5 gal.	NIH
Monoisopropyl Biphenyl*	5 gal.	NIH
OS-81*	5 gal.	NIH
Santowax OMP*	5 gal.	NIH
OS-59*	1 gal.	NIH
OS-80*	1 gal.	NIH
OS-124 (Skylube 500)*	5 gal.	NIH
<u>Resin Materials</u>		
Adipic Acid	50 lb.	size
Benthal	200 lb.	size
Bisphenol A	50 lb.	NIH
Dibutyl Fumarate	55 gal.	size
Dibutyl Maleate	55 gal.	size
Fumaric Acid	50 lb.	size
Maleic Anhydride	50 lb.	size
Phthalic Anhydride	30 lb.	size
Succinic Anhydride	250 lb.	size
Hydrogenated Bisphenol A*	45 lb.	size
Phosgar C-22-R*	5 gal.	NIH
Tetrachlorobisphenol A*	50 lb.	NIH
Tetracyanophthalic Anhydride*	early stages-not for sale	NIH

<u>Product Name</u>	<u>Smallest Standard Container Size</u>	<u>Basis for Exemption</u>
<u>Paper Chemicals</u>		
Mersize CD-2	50 lb.	size
Mersize RM Dry	50 lb.	size
Mersize RM 70% & 77%	55 gal.	size
Monsanto Penta	50 lb.	size
Monsanto Penta (Oiled)	50 lb.	size
<u>Rubber Chemicals</u>		
A-32	150 lb.	size
A-100	150 lb.	size
Bantex	50 lb.	size
Plectol H	50 lb.	size
Santoflex DD	25 lb.	size
Santoflex 75	50 lb.	size
Santoflex AW	25 lb.	size
Santowhite Crystals	150 lb.	size
Santowhite Powder	125 lb.	size
Santowhite MK	25 lb.	size
Santowhite L	40 lb.	size
DPG	50 lb.	size
Guantal	50 lb.	size
Santocure	40 lb.	size
Santocure NS	40 lb.	size
Sintocure 20	175 lb.	size
El-Slaty	50 lb.	size
Mertax (MBT)	150 lb.	size
Thiotax (MBT)	50 lb.	size
Thiofide (MBTS)	50 lb.	size
A-1 (Thiocarbanilide)	50 lb.	size
Santovar A	150 lb.	size
Elastopar	2 lb.	NIH
Sulfasan R	175 lb.	size
Insoluble Sulfur 60	50 lb.	size
Thiurad	100 lb.	size
Mono Thiurad	100 lb.	size
R-2 Crystals	50 lb.	size
Accelerator B	200 lb.	size
RZ-50A	40 lb.	size
RZ-50B	40 lb.	size
N-4-Dinitroso-N-Methyl Aniline*		NIH
Santoflex GP*		NIH
Santocure MOR*		NIH

*Development Products

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SANTOCHLOR (para-Dichlorobenzene)

Acute Oral Toxicity: LD₅₀ in rats - 2620 milligrams per kilogram

DIBUTYL PHTHALATE

Acute Oral Toxicity: Approximate oral lethal dose in rats -
5000 milligrams per kilogram

DIETHYL PHTHALATE

No toxicity data. Safe as a plasticizer for food packaging.

DIMETHYL PHTHALATE

Acute Oral Toxicity: LD₅₀ in rats - 6.9 milliliters per kilogram

DIOCTYL PHTHALATE

Estimated Acute Oral Toxicity: LD₅₀ in rats - 30,600 milligrams
per kilogram

DYTROL (Santicizer 141)

Acute Oral Toxicity: MLD in rats - greater than 24,000 milligrams
per kilogram

SANTICIZER 140

Acute Oral Toxicity: LD₅₀ in rats - approximately 2000 to 5000
milligrams per kilogram

SANTOMASK II

Acute Oral Toxicity: LD₅₀ in rats - probably more than 5000 milli-
grams per kilogram

TRICRESYL PHOSPHATE

Acute Oral Toxicity: LD₅₀ in rats - varies from 500 milligrams per kilogram to 5000 mg/kg

PHOSGARD C-22-R

Acute Oral Toxicity: LD₅₀ in rats - approximately 2750 milligrams per kilogram

SANTOBRITE (Pentachlorophenol)

Acute Oral Toxicity: LD₅₀ in rats - 90 to 300 milligrams per kilogram.