C. E. Caspari, C-2[illegible]-S
E. F. Wheeler, A-2[illegible]-S
J. W. Newcombe, B-2-S

St. Louis, Missouri

December 19, 1958

D. F. Smith

B-2-S

LABELING PYDRAULS

At the present time California, Oregon, Illinois, New York, New Jersey, and Connecticut have a regulation requiring warning labels on all containers of hazardous substances. Quite a number of other states have laws pending which will require warning labels. These regulations define hazard under fairly broad categories, but Monsanto and the Chemical Industry have always interpreted these to mean that if the product under normal expected conditions of use creates a hazard to the health of the workman, we shall put statements on our label calling attention to these hazards and precautionary measures to be taken.

Our PYDRAULS contain chlorinated hydrocarbons which are not generally hazardous substances, but the material is used under high pressure and sometimes at elevated temperatures. A leak in a hydraulic line could cause a workman to be exposed to very high concentrations of vapors. For this reason we believe that the products PYDRAUL 150, PYDRAUL 600, PYDRAUL F-9, PYDRAUL 625, PYDRAUL-AC must bear the following statement on the label:

CONTAINS CHLORINATED HYDROCARBONS

CAUTION: Avoid prolonged or repeated breathing of vapor or mists.
Avoid prolonged or repeated contact with skin or eyes.
If splashed in eyes, flush with water for at least 15 minutes and get medical attention.
Wash contaminated clothing before reuse.

In the case of transformer fluids which are composed of mixtures of Aroclor 1260 and Trichlorobenzene, and bear the trade name "Pyranol" or "Inerteen", a different problem exists. Strictly speaking, it would be wise to have a caution label on these products. However, we have never had such a caution statement during the many years of their manufacture and it would very probably cause considerable unrest in the transformer plants. More important, however, is the fact that these compounds go just to one specific usage and are never used at elevated temperatures.

TRAN 012178

Transystem
EXHIBIT NO. 153
4/30/92 kr

WATER_PCB-SD0000033546

There is no particular hazard involved in filling a transformer with this liquid so we think we can avoid the caution label.

R. D. Minteer

R. Emmet Kelly, M.D.

RDM:de

TRAN 012179

WATER_PCB-SD0000033547