

January 23, 1969

Mr. Joseph J. Silverstein
Vice President
The Ore-Lube Corporation
126-06 18 Avenue
College Point 56, New York

Dear Mr. Silverstein:

We have the following information concerning the alleged difficulties in Japan with chlorinated biphenyls:

> "December 4, 1968 -- It was only last month that a serious accident happened at an edible rice-bran oil manufacturing plant in Kitakyushu, where Kaneclor in use leaked out into edible oil through stainless steel piping. The authorities investigated the whole plant and found out cracks of the Kaneclor circulating stainless steel pipe. As many as 12,000 people suffered from toxication in addition to a great number of chickens fed with the oil died. The Ministry of Welfare shut down the plant. The sensation was caused. The investigation is still going on but it is certain that 5,000 to 7,000 PPM of Kaneclor contained in the food oil caused toxication."

Further, we have received copies of newspaper accounts of the incidents in the Japan Times of Nov. 3, 7 and 17. Copies of these items are enclosed.

We are currently attempting to determine the facts in this incident as well as the current status of chlorinated biphenyl usage or prohibition in Japan.

In correspondence with our representatives there we have pointed out that the chlorinated biphenyls are not poisons or drugs as the newspaper items would indicate. There are a number of

definitions in the U. S. relating to the classification of industrial chemicals and household products. Included are definitions of the Interstate Commerce Commission, the Federal Hazardous Substances Labeling Act, the National Safety Council recommendations, etc. Each of these establishes levels of toxicity and poison categories by the results of specific animal tests. The chlorinated biphenyls would not be classed as "poisons" by any of these definitions. They would be considered "toxic" but no more so than many common industrial chemicals and, as a matter of fact, many formulated products used around the home.

In connection with formulations of oil containing Aroclors, we have always pointed out that in animals at least the chlorinated biphenyls appear to be more toxic than when administered to the animals undiluted. I do not have data for a formulation of 35% Aroclor 1248 in a petroleum oil.

We would discourage the marketing of such a product if it were intended to be used as the common lubricating oils for automobiles are used. For example, if there were thousands of garage mechanics around the country exposing their hands, forearms, etc. a number of hours daily to an oil containing Aroclor we believe the people would experience difficulties. On the other hand industrial-type oils including extreme pressure lubricants fall in a different category, we believe. There are not many people working in industry today who do not have some appreciation for the possible hazards associated with many industrial chemicals. Secondly, there is a greater appreciation for the warning labels and texts on formulations used in industry.

If Monsanto were to market a product such as you describe we would include the following warning statements on our labels:

"CAUTION!
Contains Chlorinated Hydrocarbons
Avoid prolonged breathing of vapors or mists.
Avoid contact with eyes or prolonged contact with skin.
If skin contact occurs, remove by washing with soap and water. Following eye contact flush with water.
If clothing becomes soaked with fluid, launder before wearing again."

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Whether or not we actually classified the formulation as "toxic" would depend on the data from animal toxicity studies and whether or not the product was intended to be used in such a fashion that it would fall within the jurisdiction of the Federal Hazardous Substances Labeling Act. Motor oils or lubricants for farm machinery use do fall under this act.

Very truly yours,

Elmer P. Wheeler
Manager, Environmental Health

EPW:cjs

cc: Mr. Paul Benignus

Enclosure

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