C. E. Caspari, C-2c;-S
E. P. Wheeler, A-2c:-S
J. W. Newcombe, 5-2-S

St. Louis, Missouri

December 19, 1958

D. F. Smith

B-2-S

LABELING FYDRAULS

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 FYDRAULS 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 FYDRAUL 150, FYDRAUL 600, FYDRAUL F-9, PYDRAUL 625, FYDRAUL-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.

PRR 018747
SCM 033188

Kelly
EXHIBIT NO. 21
R.G. 12/12/00

HARTOLDMON0011704

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

R. D. Hunter

R. Emmet Kelly, M.D.

RDM:de

PRR 018748

SCM 033189

HARTOLDMON0011705

ORIGINAL

IN THE COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

IN RE: PAOLI RAILROAD YARD PCB LITIGATION,	)	
	)	MASTER FILE NO. 90-0609-C-6

EXHIBITS TO THE
DEPOSITION OF R. EMMET KELLY, M.D.
DECEMBER 11-12, 1990

GORE REPORTING COMPANY
408 OLIVE STREET ST. LOUIS, MISSOURI
241-6750

HARTOLDMON0011706