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Your reference AEM/gd
Our reference MS 19/10/0263
Date 15th October 1970

P Hansen Esq
Traffic Services Ltd
11/12 Clifford Street
LONDON W 1

Dear Mr Hansen

I refer to a letter sent to this Department dated 15 September 1970 by a Mr A E Meadowcroft of Monsanto concerning the transport of Chlorinated Diphenyl Brochlor 1242 in 150 Freight Tanks. I understand that Mr Roberts has spoken to you on this matter.

I have now consulted with the Government Chemist and Mr Roberts, our Technical Advisor and am writing to confirm his telephone conversation with you and add some information supplied by the Chemist.

The latter has told me that the toxicological information supplied by Monsanto shows that Brochlor 1242 has a low ingestion toxicity to mammals but is moderately toxic by absorbtion through the skin. Excessive or repeated contact with the skin may produce a form of Dermatitis known as Chloracne. At ambient temperatures the vapour pressure of Brochlor 1242 is low, so that inhalation of toxic amounts is unlikely in normal conditions. If used at elevated temperatures, however, or in confined, unventilated spaces, respirators would be necessary.

Since traces of Chlorinated Diphenyls were discovered in wildlife there has been considerable publicity on these substances as environmental contaminants. It would appear that Monsanto have recognised this fact by including a suitable warning on their label to the effect that care should be taken to prevent spillages. In particular Chlorinated Diphenyls are highly toxic to fish, (the LC50 is about 0.3ppm) and it is therefore important that there should be no major spillage in coastal waters.

Thus, in view of the above properties of the substance concerned, the Chemist considers there should be some control over the carriage of it at sea and feels the most appropriate classification for this type of transport is class 9. It should be stowed away from foodstuffs and the label should make it clear that skin contact should be avoided. Since it is highly poisonous to marine life the ship's master should be aware that spillages into ports; estuaries and near coasts should also be avoided.

In view of the above classification a tank suitable for the carriage of dangerous goods should be used for its transport by sea.

The relaxation on minimum thickness for tanks under 6 ft in diameter as given in the IMCO portable tank code may be accepted in this case. The shell thickness should therefore be 3/16" in stainless steel or 1/4" in mild steel if the tank diameter is 6 ft or greater but may be of 10 BSW gauge in stainless steel or 3/16" in mild steel if the diameter is less than 6 ft.

MONS 090650

In all other respects such a tank should comply with the requirements for a Dangerous Goods Tank.

I hope this answers your query.

Yours sincerely

S. Morris

S MORRIS
Marine Division
Dangerous Goods Section

MONS 090651