St. Louis - General Offices

R. Davis RDAVI

May 27, 1964

Aroclor 1232
Federal Hazardous Substances Labeling Act

Your Memo of May 21, 1964

Frank T. Nemits
Los Angeles

Under the provisions of the subject act, Aroclor 1232 would be classified as a "toxic" substance since its oral $LD_{50}$ in rats is under 5 g/kg of body weight but more than 50 mg/kg. Similarly, the lethal dose when applied to the skin of rabbits is less than 2 g/kilo but more than 200 mg/kilo. The ranges indicated above apply to those products which reach the market place in such a fashion that they are included under the Federal act.

I cannot predict what the lethal doses would be for a formulation made up of 25% Aroclor 1232 in mineral oil. It is quite possible that they (the oral and skin lethal doses) would not be four times greater than for Aroclor alone. We have several indications that the Aroclors are more toxic when in an oil solution than when administered undiluted to animals.

The ultimate responsibility for the proper labeling of a formulation remains with the customer since we cannot be expected to get animal data on every possible formulation containing a Monsanto product. In all the varying concentrations and with the innumerable combinations of other components such as antioxidants, colorants, etc.

The very minimum precautionary statement that I think would be necessary would be:

"CAUTION -- Harmful if swallowed.

Keep out of the reach of children"

Elmer P. Wheeler

EPW:mjb

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Transmittal
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