

From **MONSANTO CHEMICAL COMPANY**

At St. Louis

- 4 SEP 1953

Date September 1, 1953

To Mr. E. Mather

Reference Your memo to  
ATB - 8/11/53

At Ruabon

Subject **AROCLORS: TOXICITY**

cc Mr. T.K. Smith - 7  
Mr. A.T. Beauguard - 7  
Mr. P. G. Benignus - 7  
Dr. J.W. Barrett - London  
Dr. J.A. Gardner, - Fulmer  
Mr. J.F. Sticklely - KXOK  
Dr. N.B. Dyson - Newport

Mr. Beauguard has asked the Medical Department to comment on your letter referred to above.

As I am sure you know, Aroclors cannot be considered nontoxic. The interpretation of the toxic properties of a compound, however, determine whether or not there is any hazard associated with the specific use of a compound. To my knowledge, there is no hazard involved in the use of transformers containing Aroclors as a substitute for other materials. To my understanding, in the United States this application of Aroclors is widely accepted and has not resulted in any difficulty from a toxicological standpoint.

I cannot state whether or not a flash discharge might generate phosgene. I believe, however, that any phosgene so generated would be in a very small proportion to the total smoke and fumes resulting from the discharges. In instances where Aroclor, as a heat exchange medium, has been subjected to fire and high temperature after a leak in equipment, the clouds of breakdown products have been highly irritating but probably no more so than one would expect from the burning of any type of industrial oil or chemical.

I'm sure that Mr. Benignus will answer your questions relative to the effect of Aroclor on insulating materials, when he returns from his vacation next week.

As you indicated, we are watching the use of the Aroclors as plasticizers in emulsion paints. We do not recommend that they be used in paints which might be applied in confined or unventilated areas, particularly if the paints might be used on heated surfaces. As you stated, this is a case of worrying about the exposure of painters who might apply such materials day in and day out rather than the worrying about those who might occupy the room during or shortly after the paint has been applied.

*EPW*  
Elmer P. Wheeler

EPW:SMB

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EXHIBIT 12