FILE NAME: Talc (TALC)

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Johns-Manville Corporation

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Denver, Colorado 80217

Paul Kotin, M. D.
Vice President
Health, Safety and Environment

February 11, 1975

Mr. Howard Schulte
Deputy Assistant Secretary of Labor
U.S. Department of Labor
Occupational Safety and Health
Administration
Washington, D.C. 20210

Dear Mr. Schulte:

Our meeting on Wednesday, January 29, was most helpful to me and the other Johns-Manville representatives present. The question of what caution label is required for talc products containing asbestos is an important one for Johns-Manville and is one which we believe should be quickly resolved by the Occupational Safety and Health Administration.

Johns-Manville will continue to label its talc products with both the regulated asbestos caution label and a caution as to the inhalation of talc dust. We feel it is imperative that persons occupationally exposed to these products be warned of the potential hazards.

We are convinced that the question of what a fiber is should be subordinated to the question of what harm is likely to be caused by the particle involved. While proceeding to eliminate the semantic confusion which exists, we believe the Administration should move quickly to sample the talc products now being marketed and determine whether caution labels are required under existing regulations. Such sampling will reveal, we believe, excessive levels of tremolite fibers and chrysotile fibers in some products not now being labeled with the asbestos caution.

Prompt action by the Administration is essential to the well-being of hundreds of workers in the talc, paper and paint industries and other users of talc products containing asbestos.

We would appreciate the opportunity to assist you in any way and we are looking forward to hearing from you.

Very truly yours,

Paul Kotin, M.D.
Vice President
Health, Safety and Environment

xc: Mr. Harry Gilbert
Mr. Ray McClure
Mr. Grover Wrenn