

November 2, 1978

To: Members of the CTFA Talc Subcommittee

The attached SRI International "First Draft" of a talc report and recommendations for a new standard for the workplace is under consideration by NIOSH and OSHA. No doubt, some of you have already seen this report, but since we have no way of knowing who has and has not, it is being sent to the entire Committee.

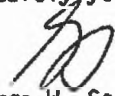
I learned today that industry comments must be presented by November 30, 1978 in order to be considered, therefore, please review this document and forward your comments to me, as soon as possible, so that an industry response may be prepared. This will be presented by CTFA to the government agency.

In the meantime, the CTFA legal staff is reviewing our legal position. Among the things to be considered are:

1. The fact that as far as we know, the proposed standard (which reduces the amount of respirable airborne talc allowed from 3 mg/m³ to 0.1 mg/m³) has not been officially published in the Federal Register for comments.
2. The time frame allowed for preparation and submission of comments is extremely short.
3. The epidemiological data on which the recommended standard is based was not secured on Cosmetic Talc.

Please give this your prompt attention.

Sincerely yours,


George W. Sandland, Chairman
CTFA TALC SUBCOMMITTEE

GWS:dd
Enclosure

PLAINTIFF'S
EXHIBIT
WCD-174

WCD 001604