

September 5, 1973

Norman F. Estrin, Ph.D.
Vice President, Science
Cosmetic, Toiletry & Fragrance Assoc.
1625 Eye Street, N.W.
Washington, D.C. 20006

Dear Norman:

This will confirm the discussion Dr. Schaffner, Mr. Wenminger and I had with you last Friday, August 31, 1973, concerning methods of determination of asbestos in cosmetic talc products.

There is considerable controversy among investigators with regard to the accurate determination of asbestos at concentrations of less than 1 percent. Apparently, conventional methods employing x-ray diffraction or differential thermal analysis are not sufficiently reliable to produce quantitative results of the desired precision. The Food and Drug Administration, therefore, has been exploring refractory optical microscopy as a means of measuring asbestos in talc. A copy of this method was handed to you on Friday.

You were urged to contact the scientific experts in the cosmetic industry and have them analyze samples of cosmetic talcs by this method. The results of their findings and their comments on this analytical procedure should greatly assist FDA in the assessment of the asbestos problem.

The second request submitted to you concerned a statistical measurement of the amount of airborne talc that might be inhaled by an infant per day under average conditions of use of a baby talc product. This information should be helpful in estimating the potential exposure of a child to asbestos.

The data provided by industry will supplement the efforts initiated by FDA in this matter and hopefully resolve the asbestos question in a scientifically sound manner.

Sincerely yours,

Heinz J. Eiermann, Acting Director
Division of Cosmetics Technology
Office of Technology

cc: SF-400 Dr. Schaffner
SF-440 Mr. Eiermann
SF-441 Mr. Wenminger

cc: BF-400 Dr. Schaffner
BF-440 Mr. Eiermann
BF-441 Mr. Wenninger

You were urged to contact the scientific experts in the cosmetic industry and have them analyze samples of cosmetic talcs by this method. The results of their findings and their comments on this analytical procedure should greatly assist FDA in the assessment of the asbestos problem.

The second request submitted to you concerned a statistical measurement of the amount of airborne talc that might be inhaled by an infant per day under average conditions of use of a baby talc product. This information should be helpful in estimating the potential exposure of a child to asbestos.

The data provided by industry will supplement the efforts initiated by FDA in this matter and hopefully resolve the asbestos question in a scientifically sound manner.

Sincerely yours,

Heinz J. Eiermann, Acting Director
Division of Cosmetics Technology
Office of Technology

September 5, 1973

Norman F. Bustin, Ph.D.
Vice President, Science
Cosmetic, Toiletry & Fragrance Assoc.
1625 Eye Street, N.W.
Washington, D.C. 20006

Dear Norman:

This will confirm the discussion Dr. Schaffner, Mr. Wenninger and I had with you last Friday, August 31, 1973, concerning methods of determination of asbestos in cosmetic talc products.

There is considerable controversy among investigators with regard to the accurate determination of asbestos at concentrations of less than 2 percent. Apparently, conventional methods employing x-ray diffraction or differential thermal analysis are not sufficiently reliable to produce quantitative results of the desired precision. The Food and Drug Administration, therefore, has been exploring refractory optical microscopy as a means of measuring asbestos in talc. A copy of this method was handed to you on Friday.