FILE NAME: Talc (TALC)

DATE: 1971 Sept 2

DOC#: TALC423

DOCUMENT DESCRIPTION: Letter to Phillips Petroleum Co. from Desert Minerals, Inc.

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September 2, 1971

Mr. A. Merrill Schnitzer
Food, Drug and Toxicant Coordinator
Phillips Petroleum Company
Research and Development Department
356 Research Building 1
Bartlesville, Oklahoma 74004

Dear Mr. Schnitzer:

Subject: Talc Toxicity Data

Your letter of August 23, 1971, was duly received. Please pardon the delay in answering as we are shorthanded right now due to vacations.

We have considerable data on the use of talc in products coming in contact with foods. Enclosed is a copy of our memorandum dated May 22, 1970, which lists the products in which talc may be used as a "safe substance." You will note that the list shown therein does not include talc for use in plastic products coming in contact with food. Last year we exchanged correspondence with the FDA relative to having talc declared as a safe substance in plastics. I am enclosing copies of letters dated February 6, 1970; April 16, 1970; April 21, 1970; and June 2, 1970. We have heard of no changes in classifications or end-use approvals since the above mentioned dates. However, we do receive copies of all FDA bulletins and try to maintain a complete file.

The general provisions of the Food Additives Regulations requiring substances to be of a purity suitable for their intended use is also recognized by us. However, as a raw material supplier, we must rely on the user to supply us with specifications which will cover FDA requirements. We see no reason why the use of talc in plastic products coming in contact with food should not be accepted as a safe substance considering the fact that it is already approved for use in rubber, paper, cotton, and paint products coming in contact with food. Furthermore, we do not think there would be any migration of the talc from a plastic container into the food.

More specifically answering your three questions, replies are as follows:

1. We have no specific toxicity data on any of our talcs including DESERTALC® 56 and DESERTALC 57. Talc is recognized as a nontoxic inert extender, filler.

2. We are undertaking a mineralogical study in our laboratory by advanced methods to det[illegible] the presence of any minor elements other than theoretically pure magnesium silicate, talc. As this work is completed we shall be glad to reply more specifically. In the meantime, please advise us if possible, under what government regulations these minerals are referred to. We can find no such references in the Food Additives Regulations.

3. We do consider our talcs suitable for use as components in food contact articles. However, we shall be happy to endeavor to comply with any specifications relative to our products, but we assume that you will satisfy yourself with the FDA as to the acceptability of talc in your products.

We appreciate your interest in our talcs and the test work that you have apparently done on DESERTALC 56 and DESERTALC 57 over the past few months. We wish you success in this project and assure you of our cooperation.

Very truly yours,

DESERT MINERALS, Inc.

President

EJEllsworth:kjb

Enclosures

cc: Mr. W. B. Grantham
Mr. Richard S. Lamar
Cron Chemical Corporation