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Desert Minerals, Inc.
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R. T. VANDERBILT ACTIVITIES FDA-OSHA REGULATIONS

On January 11 as arranged by Norman B. Scheffel, a meeting was held at the R. T. Vanderbilt New York offices to observe a presentation of the field by RTV to Government agencies concerning talc vs. asbestos. In attendance were Dr. Speil, R. S. Lamar, N. B. Scheffel, and E. B. Smith.

The presentation consisted of a series of slides as photomicrographs comparing Vanderbilt New York State talc (Nytal 100, 200, 300, 400), California talcs (Westal 101, 303, and 404), and beneficiated California talcs. Compared also were slides of asbestos minerals. In this presentation, it is the objective of Vanderbilt to establish that tremolite is non-fibrous and non-asbestosiform in order to obtain an amendment or variance in the OSHA regulations to exclude tremolite. The presentation did contrast the particle shape of their talc mineral as compared to asbestos fibers but lacked any real scientific evidence to differentiate current definitions.

Vanderbilt has made this presentation to the New York State Bureau of Mines attended by Dr. Jacquelin Messite, Merley, Sheffield, and Stein. Kleinfeld not present due to his retirement. Vanderbilt has also made this presentation to Earl Goodwin at the U. S. Bureau of Mines. They have also made these presentations to EPA at Durham attended by Mr. Arthur Stevens, Deputy Director of the Bureau of Mines and Safety. Vanderbilt feels that they have cast some doubt on the definition and are hopeful to pursue Government agency toward a new definition of "commercial asbestos" as opposed to tremolite as an asbestos mineral. Vanderbilt has also been in communication with the A.S.T.M. Committee D-1-31-07 concerning extender pigment. Presentation made by Allan Harvey at Miami was oriented towards the removal of tremolite from the asbestos definition. It is their hope to obtain A.S.T.M. approval and use this approval with other Government agencies.

Vanderbilt has justifiably been reluctant to tackle NIOSH until more confidence is developed in their presentation. Dr. Speil was of considerable help at this meeting in pointing out the pitfalls and errors in Vanderbilt's thinking. It was concluded that the attack on tremolite vs. chrysotile must be medically oriented as opposed to a simple fiber definition or redefinition. Speil suggested that a more appropriate approach would be to obtain an exclusion

LA 5-8; FILM 00008-1820 002686A (2 pgs)

- of tremolite based on scientific or medical reasons as opposed to a redefinition separating tremolite from chrysotile and/or asbestos. However, Vanderbilt intends to pursue the subject by enlisting the Talc Industry Association's help in developing an acceptable definition of talc, asbestos, etc. at the meeting scheduled for February 5 in New York. In view of the expertise obtained by J-M people in this mineralogical area and the Government communications area, we urge that Dr. Spelt and additional environmental people at J-M attend the February 5 meeting in New York.

Attached to this memo are some definitions that Bob Bacon has extracted from various encyclopedias and from the Federal Register concerning asbestos fibers. It is in this direction that RTV intends to proceed. We certainly question this attack and increased help from J-M to guide this program properly and scientifically and not to the detriment of the talc industry.

Earl B. Smith

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