



WHITTAKER, CLARK & DANIELS, INC.

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CABLE "SLEINAD"

Telex: 138248

December 13, 1978

Mr. V. E. Rose
Director of Division of Criteria Documents
and Standard Development
5600 Fisher Lane
Rockville, Maryland 20850

Dear Mr. Rose:

A First Draft of a study on "Talc" prepared by SRI International for the Division of Criteria Documentation and Standards Development National Institute for Occupational Safety and Health has been received for study. This SRI Project No. 6455 has been reviewed and there are several important points which, however unintentional, could lead to serious and unjustified damage to certain parts of the talc industry.

The points for consideration concern Table III-2 "Composition of Talc Mined in the United States."

1. (897,898) North Carolina Talc — The presence of tremolite has not been detected in our source of talc (The Hitchcock Corporation, Murphy, North Carolina). Our X-Ray diffraction examination program started in August 1971 and this North Carolina talc has never shown the presence of any asbestos minerals. These results were determined by several independent consulting laboratories.

2. It is unfair and inaccurate to claim that a talc is good or bad by its origin from a certain state or area in the United States. While this type of classification makes it easy for reporting purposes, it can lead to certain incorrect conclusions based on Table III-2, that is, (a) all Alabama and Arkansas talcs (as examples) are free of asbestos form minerals and can be freely used; and (b) all North Carolina talcs contain asbestos form minerals and cannot be used even for industrial purposes. Actually our North Carolina talc represents one of the finest quality cosmetic talcs available.

3. The study, as "sumarized" in Table III-2, completely ignores all foreign talcs. These talcs come into the country as finished product and also as ore.

continued.....

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Mr. V. E. Rose

-2-

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A major part of this report (149 out of 203 pages) represents literature references going back to 1898. I suggested that all of these references were "lifted" from the literature by a professional searcher. Some of these references appear to be based on sound medical conclusion, but many are inclusive reports which are listed probably to make the large size of the report more impressive.

Very truly yours,

WHITTAKER, CLARK & DANIELS, INC.

*Frederick F. Roesch
Executive Vice President*

FFR/cs

**cc: Mr. George W. Sandland
Chairman CTFA Talc Subcommittee
Mr. Charles Haynes
CTFA Headquarters
Washington, DC**