FILE NAME: Talc (TALC)

DATE: 1972 June 20

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DOCUMENT DESCRIPTION: Letter to Thermofil, Inc. from Desert Minerals, Inc.

FINE TALCS, CLAY PRODUCTS, AND OTHER NON-METALLIC MINERALS

DESERT MINERALS, INC.

AMERICAN MINERAL COMPANY

1891 SOUTH COAST HIGHWAY • LAGUNA BEACH, CALIF. 92651

Telephone: (714) 494-0704

June 20, 1972

Mr. Daniel C. Fuccella
Product Development Manager
Thermofil Inc.
884 Railroad Street
Ypsilanti, Michigan 48197

Dear Mr. Feccella:

Dick Lamar has forwarded your letter of June 12, 1972, to this office. Because I have been closely involved in the current asbestos regulations, I am replying.

If your concern is involved with the regulations of the Occupational Safety and Health Act, we do supply our customers with copies of the Material Data Sheets showing a threshold limit value of 20 mppcf for talc. New regulations due to become effective July 7, 1972, will list a TLV for asbestos as not to exceed five fibers longer than five micrometers per cubic centimeter of air. This is taken from Paragraph 1910.93a of the Act per Federal Register, Volume 37, No. 110, dated June 7, 1972. Talc is listed in Paragraph 1910.93, Table G-3, Air Contaminants, Mineral Dusts.

In Paragraph 1910.93a the minerals listed under asbestos include, among others, tremolite. Many of the talcs that are best adapted for use as reinforcing agents in plastics, paint, ceramics, and other industries, do include varying percentages of tremolite ranging from 0% to as high as 60%. We have strongly objected to the inclusion of talcs containing tremolite in the restrictions applicable to asbestos. Considerable research is now being instigated by the talc industry to obtain clarification and/or modification of the new regulations.

Tremolite is present in talc as a residual mineral from the alteration of the basic rocks to the mineral talc. Talc is often a pseudomorph after tremolite. The present campaign to control asbestos is primarily directed toward commercial asbestos. True commercial asbestos is chrysotile which accounts for about 95% of the world consumption. None of our talcs contain <u>any</u> chrysotile.

The nature of the asbestos fiber accounts for its being so hazardous. A fiber is described in the leading mineral books as indestructible to chemicals or heat, flexible, and can be spun or woven. We do not consider the tremolite particle as being fibrous but rather an acicular or elongated crystal. It is not flexible. It cannot be woven or spun. It is not indestructible.

All our literature and specifications refer to our DESERTALC® "50" Series as acicular-platy, the acicular portion being tremolite or talc which is a pseudomorph after tremolite. The platy portion is the straight talc mineral. None of our

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analyees or technical literature reflect the percent of tremolite present. X-ray diffraction and microscopic anelysis indicate the tremolitic portion as being in the range of 30% to 40%. We assume you do have our technical literature. If not, please let us know and we shall be glad to send it to you.

In the study we have made of all phases of this problem one fact clearly emerges and that is that the use of neither asbestos nor talc is prohibitive, the only restriction, and the only obligation, is on the part of the user to maintain a dust-free plant within Threshold Limit Values.

This is a very complicated problem, Mr. Fucella, which we hope explains why we could not give you a brief and simple answer to your letter of June 12. We do have talcs containing lower percentages of tremolite and one containing none. Samples and technical data will be sent you on request. However we do feel that our DESERTALC "50" Series are best suited to your uses.

If you have any questions pertinent to this matter, please let us know, or if any regulations other than O.S.H.A. are involved, please advise.

Yours very truly,

DESERT MINERALS, Inc.

E. J. Ellsworth

President

EJEllsworth:tjf

cc: O'Connor-Boyles Chemicals
Mr. R. S. Lamar

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