



walter c. mcrone associates, inc.

CONSULTING: ULTRAMICROANALYSIS • MICROSCOPY • SMALL PARTICLE PROBLEMS • SOLID-STATE CHEMISTRY

12 March 1976

Dr. Norman Estrin
Cosmetics Toiletries and Fragrances Association
1133 15th Street, N.W.
Washington, D.C. 20005

Dear Dr. Estrin:

This letter will amplify our recent conversation on talc analyses for asbestos.

Since 1971, Walter C. McCrone Associates, Inc., has worked with several producers and users of talc, the majority of them involved with cosmetic grades of talc. During this period we have analyzed several hundred talc samples for the presence of asbestosiform minerals. The methodologies used have been principally X-ray diffraction and light microscopy using dispersion staining, although extensive transmission electron microscopy examinations have been carried out for some companies. Subject to the approval of our clients, we are prepared to make available to the FDA through CTFA, the results of these analyses. We also have available retained samples for most of the analyses.

Verbal agreement to release this data has been already given by clients accounting for probably 80-90% of the samples; the others have not yet been approached. It would, however, be improper for us to comment on specific samples until such time as written approval is received from our clients, together with identification of those materials used in cosmetic production. The latter point is stressed because several of our analyses represent the results of raw material assessments which some companies initiated and might include talc ore bodies which are unacceptable for cosmetic applications.

I do not think, however, that I would be violating any company confidences if I were to comment on the asbestos in talc situation as we saw it over the last 5 years. I think our view can be summarized quite briefly as follows.

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Some cosmetic talcs prior to about mid-1972 to early 1973 were found to contain amphiboles — principally of the Tremolite-Anthophyllite type at levels, determined by X-ray diffraction, of the order of 5-15% by weight.

Microscopical examination of these talcs, however, indicated that the bulk of this amphibole content (>90%) was non-fibrous, even applying the 3:1 aspect ratio criterion for a fiber, and hence not asbestos.

No chrysotile asbestos was found in these talcs.

Since 1973 none of the talcs which we have examined and which have been identified to us as production materials have shown any detectable levels of either chrysotile or asbestiform amphibole.

Yours sincerely,



Ian M. Stewart
Manager, Electron Optics Group

Companies contacted and granting verbal approval to release information include:

Avon Products, Inc.
Bristol-Myers Products
Chesebrough-Ponds, Inc.
Colgate-Palmolive, Inc.
Faberge, Inc.
Johnson & Johnson
Windsor Minerals, Inc.
Whittaker, Clark & Daniels, Inc.

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