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TALC AND THE OSHA ASBESTOS STANDARD 1910.93a

Executive Synopsis

The OSHA Asbestos Regulation 1910.93a includes, in its definition of asbestos, a mineral form (tremolite) that is found in some talcs, but is not generally considered an asbestiform material (see Safety and Health Bulletin No. 15, "Asbestos Handling Guidelines" dated October 30, 1973). Through the extensive efforts of several NPCA members, a clarification of the regulation was obtained from OSHA. This now allows talc manufacturers to certify their material is "asbestos free" and the user of that talc is then exempt from regulation under 1910.93a.

ACTION REQUIRED BY YOU - Forward this Bulletin to the person or persons responsible for your safety and health operations.

ACTION TAKEN BY NPCA - Through the efforts of NPCA members and the Occupational Health Task Force a clarification of the standard was accomplished.

OPERATIONS AFFECTED IN YOUR COMPANY - Manufacturing, safety and health.

STAFF CONTACT AT NPCA - Richard W. Murry, Assistant Technical Director

BACKGROUND

With the promulgation of the asbestos Standard 1910.93a in July 1972 the possibility of certain talc materials being regulated as asbestos was created. According to the regulation, asbestos is defined as the following mineral forms: chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite. While some talcs are indeed marketed as containing asbestiform minerals and noted for their fibrous properties, the standard also encompassed other talcs not previously considered to be fibrous or considered to contain asbestiform materials. These are the tremolite (or more correctly non-asbestiform tremolite) containing talcs.

Since late 1972 the R. T. Vanderbilt Company Inc. and the International Talc Company (later purchased by Vanderbilt) have had numerous meetings with OSHA officials to obtain a clarification on the regulation of the talcs under 1910.93a.

RECENT DEVELOPMENTS

On October 9, 1974 in a letter to Mr. H. B. Vanderbilt, President of R. T. Vanderbilt Company, Inc., Mr. John Stender, Assistant Secretary of Labor, stated in part:

> "...if you (the talc manufacturer) have scientific evidence that the naturally occuring talcs, prior to processing by milling or crushing, do not contain fibrous or asbestiform tremolite, anthophyllite, actinolite or other asbestiform minerals, you may certify to your customers that the talc does not contain asbestos." (A copy of the letter is attached to this bulletin.)

Also a directive to such effect has been issued to OSHA field personnel as a guide in making inspections. This directive indicates that if a talc user, i.e., a paint and coatings manufacturer, is monitored for asbestos the person behind the microscope counting fibers should use the following identification criteria:

A. Particles must appear to be fibrous rather than as crystals or slivers.

B. The maximum diameter of a fiber to be counted is 3 microns.

C. The maximum length of a fiber to be counted is 30 microns.

D. The length to width ratio must be 5 or more to 1, that is, 5 times or more longer than wide.

E. The separate or individual fibers must contain fibrils or the "bundle of sticks" effect, unless they are at a nondivisible stage. A fibril cannot be subdivided and would be counted, if it meets the other criteria. The electron microscope may be used to prove the fibrous nature of the particles. The length to width ratio of 5 or more to 1 is not meant to imply that other particles are not hazardous.

The directive further states that if the talc is of the non-asbestiform or non-fibrous variety the time weighted average (TWA) of 20 millions of particles per cubic foot of air (mppcf) will be used.

If monitoring of your operations using talc is done by the OSHA inspector you should retain a sample of the talc material being used in the event a discrepancy may arise.

RECOMMENDATION

If you have been using talc products that have been questionable regarding asbestos content, request certification from the manufacturer that they do not contain asbestos.

Retain this certification to show to an OSHA inspector if he questions the asbestos content of the talc. If it is however determined that a talc does contain true asbestiform minerals, that material will not be certified and is subject to the provisions of the regulation.