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D. Cohen*

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Cyprus Industrial Minerals Company

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OCT 27 1977

To You, Our Customer.....

We would like to take this opportunity to clarify some of the confusion which appears to be building in terms of talc and asbestos. A number of significant developments have recently occurred which tend to cloud the regulatory aspects of the problem.

In May, 1977, OSHA published a booklet entitled "A Report on the Fiber Content of Eighty Industrial Talc Samples Obtained from, and Using the Procedures of the Occupational Safety and Health Administration". You may have received a letter from one of your suppliers analyzing the data presented in this OSHA report. We feel that this analysis of the data was misleading in the manner in which it was offered.

While we are of the opinion that the OSHA method of fiber analysis is not adequate to identify asbestos, OSHA does continue to employ this method. The conclusions drawn by the National Bureau of Standards in its discussion of the results states quite conclusively that they also feel the OSHA method is in dire need of review. We quote from the NBS report, Section V, Conclusions, P. 17, as follows:

"The variability of these results raises several questions regarding the OSHA procedure, particularly sampling technique, sample homogeneity, and determining fiber morphology. It is the opinion of NBS that, even under favorable circumstances (e.g., homogeneous samples, easily identified fibers, etc.), the existing OSHA procedure is useful only for determining 'fiber' content and not 'asbestos' content. Although careful manipulation of the mounting medium might make it possible to identify some of the fibers as 'asbestos', the problem of the definition of 'asbestos' still remains. NBS believes that the resolution of the measurement problem, including the definition and identification of asbestos, will be accomplished only by significant changes in the procedure and probably the method as well."

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Following this report, a "Workshop on Asbestos" was held at the National Bureau of Standards in Washington, July 18-20, 1977. Unfortunately, this workshop did not result in any change of test method but did serve to point out the extreme inadequacy of the procedure as it is presently constituted.

We do not feel we should speak for the talc industry in general, but rather, will review our own situation as it presently stands. In this OSHA report, 16 samples were tested which were identified as Cyprus Industrial Minerals Company talc. The results of the tests on these 16 samples are shown below:

CYPRUS INDUSTRIAL MINERALS COMPANY

<u>Mining Source</u>	<u>Total Samples</u>	<u>No Fiber</u>	<u>Fiber Present</u>
Montana	4	4	0
Texas	1	1	0
California	11	4	7

CYPRUS THOMPSON, WEINMAN, COMPANY

Georgia	1	1	0
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As can be seen from this data, both our Montana and Texas talcs are indicated to be free of asbestiform material. Our California talcs contain only very minute quantities of tremolite in some instances. We do state that they are free of asbestiform impurities to the level of sensitivity as measured by X-ray Diffraction techniques. This is approximately 0.1% to 0.3%. If certification to zero asbestiform level is deemed necessary by your company, only our Montana talc based grades should be used.

The one sample included in the survey from our Cyprus Thompson Weinman subsidiary is included only to illustrate the weakness of the OSHA analysis method. This sample is analyzed as talc but is, in reality, a platy mica (sericite), not a talc material at all. Again, let us point out, the OSHA method of fiber analysis by optical microscopy is incapable of identifying the exact mineral nature of the sample being inspected. In the manner in which the rulings are stated, fibers are not to be considered asbestos unless they are positively identified as being one of six minerals specifically stated in the Federal Register, 29 CFR 1910.1011 (a) Definitions. These minerals can best be positively identified by Transmission Electron Microscopy combined with Selected Area Electron Diffraction.

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