FILE NAME: Talc (TALC)

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MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
CENTER FOR DISEASE CONTROL
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH

TO : Howard J. Schulte
Deputy Assistant Secretary of Labor
U.S. Department of Labor
Occupational Safety and Health Administration

DATE: April 1, 1975

FROM : Deputy Associate Director for Cincinnati Operations, National Institute for Occupational Safety and Health

SUBJECT: Analysis of Talcs for Asbestos Fiber Content

Your request dated March 5, 1975 to Mr. Edward J. Baier, Acting Director, NIOSH, for analysis of 19 talc products from the R.T. Vanderbilt Company is being handled by the Division of Field Studies and Clinical Investigations, NIOSH, Cincinnati, Ohio.

In your memorandum, you requested that these products be analyzed for asbestos by the method proposed by the Food and Drug Administration in the Federal Register of September 28, 1973 (21 CFR Parts 121 and 133). At the time this method was proposed, NIOSH expressed its concern about the adequacy of this method to the FDA (see attached memorandum dated January 21, 1974). As you probably are aware, the promulgation of this method has been delayed by the FDA as stated in the Federal Register of March 14, 1975 (Pages 11865 - 11869). Therefore, the analysis of the subject talc products for asbestos fibers will be completed utilizing the techniques we are presently using, which includes identification by electron microscopy with selected area diffraction and x-ray microprobe analysis. In addition, optical properties such as refractive index and angles of extinction will be determined.

We do anticipate difficulty in obtaining the subject talc products, especially considering the fact that we want to obtain representative, unbiased samples. Also, the analysis of these samples by the techniques mentioned above takes a good deal of time to assure accurate and reproducible results. It is estimated that this project will take the Division of Field Studies and Clinical Investigations from three to five months to complete.

For your information, we are attaching a NIOSH internal report from the Division of Field Studies and Clinical Investigations which was prepared at the request of the OSHA Toledo, Ohio Area Office for their enforcement action against the Borg-Warner Corporation. The talc sample 4711 which

was identified as containing asbestos fibers by NIOSH is R.T. Vanderbilt's NYTAL 200. (It should be noted that R.T. Vanderbilt had specified to the Borg-Warner Corporation that this talc was free of asbestos fibers.) Since we have already performed the necessary analysis on NYTAL 200, this will not be repeated in the future work.

We hope the information gathered during this project will be useful to both NIOSH and OSHA in our research efforts to evaluate the health effects associated with occupational exposures to talc. Any further communication you have on this matter should be directed to Mr. Ronald D. Dobbin, Chief, Environmental Investigations Branch, Division of Field Studies and Clinical Investigations, NIOSH, Post Office Building, 5th & Walnut Streets, Cincinnati, Ohio 45202 (513/684-3258).

Bobby F. Craft, Ph.D.

Attachments (2)