

April 26, 1976

TO: R. E. Norwood  
 FROM: H. D. Stanley  
 SUBJECT: CTFA Talc Subcommittee Meeting - March 31, 1976  
 cc: J. K. Barr W. M. Stephenson  
 J. P. Bartels N. C. Trivedi  
 W. J. Goebelbecker D. B. Vanderheiden  
 W. Nazarewicz G. A. Wells

The list of attendees is contained in the attached minutes of Mr. George Sandland, the Talc Subcommittee Chairman.

There was considerable discussion regarding whether or not to initiate a blind pickup of over the counter, (OTC), talc products for a determination of their asbestos content, if any. There was talk of submitting these samples to FDA and Mt. Sinai after testing by a CTFA approved outside laboratory, (McCrone Associates, Chicago, Illinois). A brief discussion of the CTFA definition of asbestos and analysis method followed. According to the CTFA, in order for an amphibole mineral to be considered asbestiform it must meet the following definition:

- 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 non-divisible stage.

This is different from the current OSHA definition. In methodology CTFA is also different from OSHA. OSHA's method relies solely on low power, (400X) light microscopy with visual counting of any fibers present. The CTFA method involves step-scanning X-ray diffraction with a detection level of 0.5% by weight. This is followed by dispersion staining light microscopy to determine if any asbestos present is fibrous or not. Dr. C. Costello, (Colgate-Palmolive) and I both questioned whether either of these analytical schemes was the

R. E. Norwood  
April 26, 1976  
Page Two

most sensitive available as the CTFA claims. A brief discussion of analytical technique ensued. Dr. Costello closed the discussion by saying that Colgate did not care what the CTFA did, Colgate was going to do the same as Pfizer and examine every talc they used by transmission electron microscopy.

Dr. Norm Estrim, (CTFA), then asked the members if they could commit their companies to such a blind study. When no one volunteered, the project was dropped.

*Hal Stanley*  
Harold D. Stanley

HDS/kmm