



The Cosmetic, Toiletry and Fragrance Association, Inc.

1133 15th STREET, N.W., WASHINGTON, D.C. 20005 • 202/331-1770 • TELEX 89-2673

James H. Merritt
President

Norman F. Estrin, Ph.D.
Vice President—Science

March 24th, 1976

Mr. Heinz J. Eiermann
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

Attached, Mr. Eiermann --

-- are two letters to supplement our March 15th submission to you on Talc.

Cordially,

Norman F. Estrin, Ph.D.
Vice President - Science

NFE:jj
Attachments
cc: Robert Suffis

PLAINTIFF'S
EXHIBIT
WCD-308



WCD 000104

RECEIVED MAR 18 1976

Cyprus Industrial Minerals Company

555 South Flower Street
Los Angeles, California 90071
Telephone 213) 489-3700

Dr. Norman Estrin
Vice President - Science
The Cosmetic, Toiletry and
Fragrance Association, Inc.
1133 Fifteenth Street, N.W.
Washington, D.C. 20005

March 12, 1976

Dear Dr. Estrin:

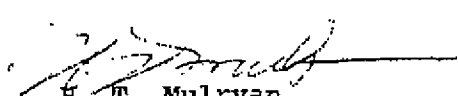
As a result of discussions I have had with Louis Murino concerning the March 11, 1976 CTFA Talc Sub-Committee Meeting, I would like to state that we have a continuing program in existence to test our Montana grades of talcs that are being offered to the cosmetic industry.

Prior correspondence between ourselves and Mr. George W. Sandland, Chairman of the Talc Sub-Committee, has established that we have tested 2,839 samples from our core drilling program and by X-ray diffraction patterns have not seen any detectable levels of chrysotile and tremolite. Our X-ray diffraction techniques are in accordance with the CTFA J-4-1 method outlined for use under CTFA specifications for cosmetic talc.

Since our original investigation and submission (August 8, 1975), we have evaluated an additional fifty Montana production samples with the same excellent results. We continue to use X-ray diffraction techniques as outlined by CTFA J-4-1.

We shall be happy to continue to cooperate with CTFA in our testing program.

Very truly yours,


H. T. Mulryan
President

HTM/mc
CC: Mr. George W. Sandland
Bristol Myers
225 Long Avenue
Hillside, N.J. 07207

APG
LDM

CYPRUS

WCD 000105

The **MENNEN** *Company*

MORRISTOWN, NEW JERSEY 07960

March 22, 1976

Dr. N. Estrin
Cosmetic, Toiletry and Fragrance
Association
1133 - 15th Street, N.W.
Washington, D.C. 20005

Dear Dr. Estrin:

Since 1971 Whittaker, Clark & Daniels has been the sole supplier of all of the talc used by The Mennen Company. During this period, they have certified that the talc supplied has no detectable asbestiform minerals. The periodic testing done by Whittaker, Clark & Daniels has already been reported to you.

In the future, in addition to the testing done by our supplier, The Mennen Company plans to conduct a regular program of screening talc raw materials for the presence of asbestos using McCrone Associates as the testing laboratory. At the present time, they are also testing a variety of Mennen raw materials and finished product samples.

On March 16, 1976, I had a telephone conversation with Dr. Langer of Mt. Sinai Medical School concerning his analysis of asbestos in talc, particularly on the samples of Mennen shave talc and Mennen bath talc. The bath talc sample, which he found to be free from asbestos, was identified by code date 25DE as having been produced on May 25, 1973. The talc used was a blend of Italian and Montana talc. The shave talc, which was identified as having a low level of asbestos, had a code date of A19CJ, which was produced September 19, 1972. The talc used at this time was 100% Italian Talc.

I visited Dr. Langer on March 18, 1976, and discussed the analytical techniques and results on the Mennen samples. He showed me the results of continuous scan and step scan X-ray diffraction on the shave talc sample. These data, he claimed, showed the presence of a low level of Tremolite. At my request, new samples were taken and analyzed by continuous scan X-ray diffraction in my presence. The analysis was rerun approximately ten times using various instrument conditions and in each case, Dr. Langer was not able to confirm the presence of Tremolite.

Dr. Langer plans to rerun this sample by step scan X-ray diffraction, and promised to report these results to me. It is also my understanding that the sample of Mennen shave talc was run by Dr. Poolley of the University College, Cardiff, Wales.

Dr. N. Estrin

The **MENNEN** *Company*

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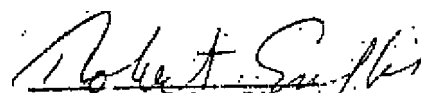
March 22, 1976

I am informed that his data is at variance with those of Dr. Langer, since he did not show the presence of asbestos in this particular sample.

Thank you for your cooperation.

Very truly yours,

THE MENNEN COMPANY


Robert Suffis, Director
Science & Technology

RS/jln

WCD 000107