

August 26, 1974

Mr. C. U. Driscoll

R. Bauman

CTFA Talc Subcommittee

Dear Larry:

As a member of the CTFA Talc Subcommittee, we attended a meeting on August 14 at Bristol Meyers' laboratories, Hillside, New Jersey, to hear a report by the Scientific Committee headed by Dr. F. Robert Rolle of Johnson & Johnson Company. His committee was formed to determine "a method of testing talc to identify the presence of asbestos form minerals". On approval of the Talc Subcommittee, the findings would be submitted to the Food and Drug Administration. Their recommendation was that D.T.A. (Differential Thermal Analysis) should be used to identify the presence of chrysotile asbestos since it is effective and accurate to a degree of 0.5% to 1.0%. This method is suggested over the previous use of X-Ray Diffraction because when chlorite, a desirable mineral, is present it has been misinterpreted as chrysotile asbestos.

X-Ray Diffraction will be recommended to identify the presence of tremolite and other forms of asbestos. This is the continuous scan method, using the compressed pellet or tablet. When presence is identified, the "step scan method" will be used to determine the percentage degree to an accuracy of 0.5% to 1.0%. If detectable, the use of optical microscopy will be employed. This is dispersion staining method, a modified refractive index system to determine the fiber form. The phase form contrast microscope method is not recommended. Some discussion was given that the fiber particle should be able to be fiberized; that is, split into individual fibrils. The approved recommendation will be sent to the Food and Drug Administration, suggesting a limit of 1% chrysotile and 1% tremolite in talc.

The D.T.A. test for the project was run on several cosmetic talcs such as Italian, North Carolina, Vermont and Alabama and all were found with no detectable presence of chrysotile. The companies running the test were Johnson & Johnson and Avon. Both Chesebrough Ponds and McCrone Associates are going to buy this equipment which costs in the range of \$2,000.00 to \$12,000.00.

PLAINTIFF'S
EXHIBIT
WCD-196

continued.....

August 29, 1974

At this meeting a most timely report was given by Mr. J. N. Silvertson, Manager - Statistical and Computer Operations of Johnson & Johnson Company, on "an estimate of a safe detection level of asbestos fiber in baby powder talc". A copy of this is attached to this report. It shows that even if there were a presence of 1% asbestos, under the most adverse applications of baby powder to an infant, the exposure would be far less than the ceiling limit of 10 asbestos fibers per cc of air. In fact, the computed safety factor would be approximately 48,300 to 1. Thus, an analytical method capable of detecting 1% asbestos in talc would be more than adequate to confirm an acceptable low level of asbestos in talcum powder used on infants.

This report will be sent to the Food and Drug Administration for consideration even before the report on the test method is submitted. It is felt that, if this report on baby powder is acknowledged by the Food and Drug Administration, it will definitely support our test method.

Fred Rousch

FFR/aam

Attachment

cc/Mr. G. J. Dippold

Mr. R. R. Krammes

Mr. J. C. Woodruff

Mr. D. Ferry

Mr. P. Bixby