

The Cosmetic, Toiletry and Fragrance Association, Inc.

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FRED ROESCH

The FDA, Mr. Driscoll --

-- has informed us that they are about to publish limits for asbestos in foods and will utilize an optical microscopy method for the determination.

Their problem is that the Bureau of Foods has been considering an X-ray diffraction method for cosmetic analysis of asbestos that has a sensitivity of one to two percent, as opposed to the claimed sensitivity microscopic method of 0.001 to 0.1 percent. FDA does not feel it can publish two different methods of differing sensitivities and has asked our cooperation in testing their optical method.

FDA proposes that cosmetic manufacturers test and submit coded data for various cosmetic grade talcs, so that they can check on the validity of the method and get a feel for the type of results which can be expected.

I have attached a copy of the method for your review and a copy of a letter from Heinz J. Eiermann (FDA) requesting assistance from the Cosmetic Industry.

If you would like to participate by testing talcs, please drop a note to me or to Mr. George Sandland (Bristol-Myers) who is chairing a subcommittee which will test this and other methods.

Thank you for your cooperation.

Cordially,

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

NFE:jj
September 13th, 1973
Attachments - 2

PLAINTIFF'S
EXHIBIT
WCD-139

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