FILE NAME: Goodyear (GY)

DATE: 1977 Feb 9

DOC#: GY099

DOCUMENT DESCRIPTION: Letter to GY from Pfizer RE Asbestos in Talc & OSHA Standards

MINERALS, PIGMENTS & METALS DIVISION
PFIZER INC., 235 E. 42ND ST NEW YORK, N Y. 10017

February 9, 1977

GTR

MAR 7 1977

INDUSTRIAL HYGIENE

GEORGE M HICKS, JR.
PROFESSIONAL SALES REPRESENTATIVE
216 526-1293

Pfizer MINERALS, PIGMENTS & METALS DIVISION
PFIZER INC
7630 CHIPPEWA ROAD BRECKSVILLE OHIO 44141

Mr. R. H. Gerster
Material Development
Goodyear Tire & Rubber Co.
1144 East Market Street
Akron, Ohio 44316

File: Toxicity Talc
cc: R W Moore ✓

Dear Mr. Gerster:

In recent months there has been increasing interest in the subject of talc, particularly with regard to the nature and extent of its asbestos content. Since you are one of our many valued talc purchasers, we feel you should be aware of important information on this subject.

The Occupational Safety and Health Administration (OSHA) currently has in effect an asbestos standard which prescribes that employees may be exposed to no more than asbestos fibers per cubic centimeter of air for an 8-hour time-weighted average, and to no more than 10 asbestos fibers per cubic centimeter at any time. In October, 1975, OSHA proposed to lower the 8-hour time-weighted limit to 0.5 asbestos fibers per cc. and 5 asbestos fibers per cc. for any period not exceeding 15 minutes. Very recently it has been reported that the National Institute for Occupational Safety and Health has recommended the respective permitted exposure levels be limited even further - to 0.1 asbestos fibers and 0.5 asbestos fibers per cc.

In its' October, 1975 proposal, OSHA defines asbestos to include chrysotile, amosite, crocidolite, tremolite, anthophyllite and actinolite, and every product containing any of these minerals. OSHA also defines an asbestos fiber as a particulate form of any of these minerals which is longer than 5 micrometers, and has a maximum diameter of 5 micrometers and a length to width ratio of at least 3 to 1.

Discussed with Gerster 3-21-78. He will check to see if we have Calif OSHA CF or CP stds
RWM

GIH 000589

GY01-020239

The reason for the proposed revision of the standard for occupational exposure to asbestos is that asbestos, in its several commercial forms, has been associated with the production of not only asbestosis but a variety of cancers and malignancies. Because of the many unknown factors, including the variability of individual response to carcinogens and the absence of data to establish a safe level, OSHA has concluded that employee exposure must be reduced as low as is feasible. OSHA proposes to hold hearings on the entire subject, but until those hearings and subsequent deliberations take place there will continue to be considerable uncertainty.

Nevertheless it is prudent for your workers, while using any talc which might contain asbestos fibers, to avoid creating dust to the extent possible. Monitoring procedures should be employed to determine dust concentrations under working conditions. Where appropriate, dust control equipment or use of respirators should also be considered, and worker training programs implemented. You will no doubt wish to review the various provisions of the OSHA standard for occupational exposure to asbestos (29 Code of Federal Regulations 1910.1001) and the proposed amendments which appeared in the October 9, 1975 issue of the Federal Register.

Since we have no control over the conditions of use of talc products in your plant, it is not possible for us to indicate the airborne fiber concentrations which could possibly result from your use of talc. However, we can provide information on the asbestiform mineral content of the talcs we supply.

Pfizer research has developed the most accurate and sensitive method available today of analyzing for asbestos and asbestiform minerals in talc. This method, based on step scanning x-ray diffraction, electron diffraction, and transmission electron microscopy, permits identification of true chrysotile asbestos at levels of 0.5% and fibrous amphiboles, such as tremolite, at levels as low as 0.1% in the talc. No other identification methods in use today, including optical microscopy and scanning electron microscopy, are as sensitive and as direct.

GY01-020240

Pfizer routinely monitors its' talc production, using this sensitive methodology. Based on many months of evaluation, we can state that:

> The California CP talcs which you purchase normally contain between 1% and 5% total tremolite with a fiber content of less than 0.1% by weight (the practical detection limit of the analytical method).
>
> The Montana MP talcs which you purchase contain no detectable quantities of tremolite or any of the asbestiform minerals. Thus, you can employ these MP talcs with full assurance that you are fully in compliance with the OSHA asbestos worker exposure standard.

/e believe that it is in your best interests and ours that nformation on this subject be brought to your attention. /e trust you will find this letter useful, and that you ill follow the OSHA hearings and other developments as hey occur. We will continue to monitor these hearings nd try to keep you aware of significant developments. f you have any questions, please do not hesitate to ontact us.

ery truly yours,

P. Bartels
esident

B:sp