

PLAINTIFF'S EXHIBIT

BOND-306

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To Our Customers:

In our ongoing efforts to keep you apprised of the OSHA controversy concerning talc, we would like to present the results of a study requested by OSHA. Dr. Morton Corn, former head of OSHA, commissioned the National Bureau of Standards to analyze 80 talc samples from various domestic sources. NBS was to analyze each sample by the current OSHA method used by OSHA's Salt Lake City laboratory.

NBS sent the completed results to OSHA in May, 1977 at which time OSHA identified the commercial source of each sample and issued a final report.

The key conclusion made by NBS as stated on their conclusion page (copy attached) was:

"It is the opinion at NBS that, even under favorable circumstances the existing OSHA procedure is useful only for determining 'fiber' content and not 'asbestos' content."

A summary of the paint grade talc samples tested is appended. Two separate analysts tested each sample with the following results:

<u>Company</u>	<u>Results</u>
Pfizer	"fibers" found in 6 of 6 samples by one or both analysts
Cyprus	7 of 16 samples
Southern Talc	8 of 9 samples
Pioneer Talc	5 of 6 samples
R. T. Vanderbilt	13 of 14 samples

The method used did not include adherence to the criteria specified in the OSHA Field Memorandum 74-92. This memorandum was rescinded by Dr. Corn on January 20, 1977 and was the subject of an earlier mailing.

In light of the NBS findings that almost all manufacturer's talcs contain OSHA defined asbestos, what comfort can you derive from any guarantee that any product does not contain OSHA defined asbestos? A switch to a talc containing less "fiber" won't help since Dr. Corn in his Field Memorandum of January 19, 1977 cautioned:

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"If the laboratory results indicate the presence of asbestos fibers in any amount, the compliance officer should enforce the caution labeling requirement, 29 CFR 1910.1001 (g) (2)."

NBS is continuing with Dr. Corn's second assignment which is to develop suitable methods of differentiating between asbestos fibers and non-asbestos particles. A seminar in July will hopefully result in an amendment to the OSHA Asbestos Standard. This could be six to twelve months away.

We will try to keep you posted as to new developments. We appreciate your continuing loyalty as we continue to seek resolution. The entire NBS study is available through your sales representatives.

Sincerely,

R. T. VANDERBILT COMPANY, INC.



Robert W. Ross, Sales Manager
Paint/Paper Department

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REPORT OF INITIAL SCAN OF TALC SAMPLES *
FOR FIBER CONTENT

	<u>Number of Samples</u>	<u>No Fiber By Both Analysts</u>	<u>Fibers Present By One Analyst</u>	<u>Fibers Present By Both Analysts</u>
<u>CYPRUS INDUSTRIAL MINERALS</u>				
Ceramic	2	-	1	-
Cosmetic	1	-	1	-
Paint	6	2	1	3
Unknown and Ore Samples	7	6	1	-
Total	16	9	4	3
<u>EASTERN MAGNESIA TALC</u>				
Paint	1			1
<u>INTERNATIONAL MINERALS & CHEMICALS</u>				
Unknown and Ore Sample	1		1	
<u>PFIZER</u>				
Ceramic	2		1	1
Paint	4		3	1
Total	6		4	2
<u>PIONEER TALC COMPANY</u>				
Unknown and Ore Sample	6	1	2	3
<u>SOUTHERN CLAY PRODUCTS</u>				
Unknown and Ore Sample	2	2		
<u>SOUTHERN TALC COMPANY</u>				
Unknown and Ore Sample	8		3	5

* Cosmetic talc producers are not listed in this abstract

"A Report On The Fiber Content Of Eighty Industrial Talc Samples Obtained From,
And Using The Procedures Of, The Occupational Safety And Health Administration"
May, 1977

V. Conclusions

In this report the results of the determination of the fiber content of 80 OSHA-supplied samples of talc are presented, along with a statistical interpretation of these results. Of the 45 samples on which fiber counts were made, the results for replicate analyses on 26 of the samples were statistically incompatible. This incompatibility was not confined to any particular concentration range of fibers. As a result, NBS deemed it inadvisable to report uncertainty limits for the fiber content determinations obtained on the samples measured. Fiber counts could be made using the present procedure on the 35 samples which were not counted, but it is doubtful that any useful additional information would be obtained.

The variability of these results raises several questions regarding the OSHA procedure, particularly sampling technique, sample homogeneity, and determining fiber morphology. It is the opinion at NBS that, even under favorable circumstances (e.g., homogeneous samples, easily identified fibers, etc.), the existing OSHA procedure is useful only for determining "fiber" content and not "asbestos" content. Although careful manipulation of the mounting medium might make it possible to identify some of the fibers as "asbestos", the problem of the definition of "asbestos" still remains. NBS believes that the resolution of the measurement problem, including the definition and identification of asbestos, will be accomplished only by significant changes in the procedure and probably the method as well.

In order to complete the tasks requested by Dr. Corn in his letter of September 1, 1976, it will be necessary to arrive at an acceptable definition of asbestos and to develop the necessary measurement techniques and standards. Once that has been achieved, a more meaningful analysis of the 80 OSHA-supplied talc samples can be accomplished.

	<u>Number of Samples</u>	<u>No Fiber By Both Analysts</u>	<u>Fibers Present By One Analyst</u>	<u>Fibers Present By Both Analysts</u>
<u>STANDARD INDUSTRIAL MINERALS</u>				
Unknown and Ore Sample	3	2		1
<u>TEXAS TALC COMPANY</u>				
Unknown and Ore Sample	2	1	1	
<u>THOMPSON-WEINMAN COMPANY</u>				
Unknown and Ore Sample	1	1		
<u>R. T. VANDERBILT COMPANY, INC.</u>				
Paint	7			7
Ceramic	1		1	
Ore Samples & Misc. Sampling	6	1		5
Total	14	1	1	12
<u>WESTERN TALC COMPANY</u> (Milwite Talc Company)				
Unknown and Ore Samples	8	7	1	