

File

AVON PRODUCTS, INC.

SUFFERN • NEW YORK 10501

September 21, 1976

Mr. James Donovan
OSHA Compliance Office
Room 4028
Federal Office Building
550 Main Street
Cincinnati, Ohio 45202

Dear Mr. Donovan:

This is in response to your questions on Friday, September 10th, about the talcs we use at Avon.

Since early 1973 we have analyzed all incoming lots of talc for chrysotile and amphiboles, to assure that the talcs we were using were asbestos-free. During 1973 all samples were sent to McCrone Associates for x-ray diffraction analysis. During that time we developed our own tests, Differential Thermal Analysis (DTA) for chrysotile and Infra-Red (IR) absorption for tremolite specifically, since the other amphiboles were rarely seen in our talcs. From the beginning of 1974 until the present we did our own analyses, sending out to McCrone Associates those that looked positive for tremolite. Of over 400 samples tested, none was found to contain chrysotile, and only three contained detectable tremolite at about 1-2%. These were shown by McCrone to be non-fibrous.

Early in March of this year, we began receiving talc from a new source. Each lot of this talc is analyzed by x-ray diffraction, and a copy of the Analytical report is sent to Avon. This new talc, Olympic Talc from Cyprus Industrial Minerals Company, will represent about 80-85% of our total talc usage. You will see in the attached letter from Cyprus that the material is mostly talc with a small amount of chlorite and dolomite, with only a trace of quartz. I am enclosing also some typical Laboratory Reports from Cyprus which states that no tremolite is detected. Other amphiboles, if present, would be reported.

We have not been analyzing our talcs on a routine basis for quartz, although a typical analysis from our major supplier (see attached letter from Cyprus) indicates that most of our talc is essentially free of quartz. Tests that

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were run by an outside laboratory on the other talcs that we currently use indicate that they too are essentially free of quartz.

Please let me know if I can be of any additional assistance.

Yours truly,


John J. Travers
Senior R&D Associate

JJT:mc
Enclosures

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