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Russ ← Please review carefully —

cc: Dr. H.H. Hutchins
Dr. A.J. Goudie
Mr. W.H. Ashton
Dr. R.L. Sundberg
Dr. T.H. Shelley

Johnson & Johnson

New Brunswick, N.J.

January 23, 1973

Subject: Weekly Monitoring of Vermont Talc
Project No. 0124.00

Dr. D.R. Petterson

I have discussed Dr. Shelley's memo on this subject with Bill Ashton and Al Goudie and we agree that if and when these tests are proven to be accurate then routine inspection of incoming ore should be placed in the hands of QA. However these are several points which must be brought out before this course of action should be taken.

1. The FDA has stated that there shall be no asbestos in talc which is used to polish rice. Presently the Cosmetic Division has indicated their willingness to accept x-ray diffraction as the analytical method for testing. We are currently using this technique to monitor our talc, the method has a detection limit of ca 1% and it will detect the various forms of asbestos.

2. The McCrone method for the detection of chrysotile in talc is based on a light microscopic technique. It is neither simple nor specific in that it requires a highly trained optical microscopist to run it and substances with the same refractive index as chrysotile, such as quartz or cellulose will give rise to a positive result. This method will not detect other forms of asbestos.

3. The method described by Dr. Pooley is also used to detect and measure chrysotile. He concentrates the chrysotile by complexing it with potassium amyl-xanthate and extracting this complex into kerosine. He examines the extract and the material at the interface by: light microscopy or electron microscopy or x-ray diffraction or all three. He reports as a lower limit of detection 0.05% chrysotile.

Both methods share the same weakness, they do not measure or detect other potentially troublesome forms of asbestos, such as tremolite, anthropholyte, amosite, or chrocidilite. All three techniques require well trained people and of course some highly sophisticated equipment.

Presently, QA does not have the equipment and, I am informed, the manpower to do the job. It will take time to train people and to acquire the equipment. During this time we suggest the following:

1. Obtain samples from Vermont on some regular basis. A portion of the sample sent to ESDP each week for microbial content would be adequate.

2. Al's group would run these samples by straight x-ray diffraction, the McCrone method and the Pooley method, collecting the data and getting a good feel for the techniques.

3. QA could start training people by sending them to the course offered by McCrone on microscopy, followed by having them work with Al's group.

4. At the end of 3 - 6 months review the data. If the methods appear workable we propose to turn the sample preparation and the light microscopic examinations over to QA. The sample concentrate, if necessary, could be turned over to Al's group for x-ray diffraction, or sent out for electron microscopic examination.

5. In case of doubt QA can send samples back to Al and/or Bill for a more complete examination and clarification of the matter.

6. We must decide what course of action we will take if any sample gives rise to a positive test. It is clear to me that if we find asbestos by the straight x-ray diffraction technique we can not use that batch of talc. But what do we do if we find chrysotile by Pooley's method? Should we use the material? Since we are dealing with a continuous process would we have to examine material made from previous shipments? If these too show chrysotile would we have to issue a recall?

Pete, I do not have the answers to these questions and so my recommendation is that we move cautiously on this one, making sure that each step forward is the proper and corrent one. Let us not generate unreliable or meaningless data just for the sake of generating data. Before we turn this job over to QA I want to be certain that the methods they will be using have been completely evaluated. There is only one place to do that, here at Research.

Mel
M. Goodman

paj