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Sent: Friday, April 23, 2010 1:22 PM
To: NIOSH Docket Office (CDC)
Cc: Middendorf, Paul (CDC/NIOSH/OD)
Subject: comments attached on version 4 of NIOSH Roadmap for asbestos and other elongate mineral particles (NIOSH Docket 099A)
Attachments: NIOSHroadmap4commentsWK4 23 10.pdf

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**Comments on Latest NIOSH Draft of
"Asbestos Fibers and Other Elongate Mineral Particles:
State of the Science and Roadmap for Research" (Version 4, Jan. 2010)
(NIOSH Docket 099A)**

Dear NIOSH:

Like the previous drafts of the Roadmap, this draft contains numerous references to, and discussions of, studies of the possible health effects of talc mined in northern New York State. The cover of the previous draft (June 2008) showed a USGS photograph of such talc that gave the distinct impression that it is structurally similar to asbestos.

Although talc is a magnesium silicate, its structure, morphology, and physical properties are very different from asbestos. [1] A great number of human health and toxicology studies of talc also demonstrate that its biological effects are very different from asbestos. In addition, "talc" is marketed for many different purposes and has different compositions. [*Id.*]¹ It often contains accessory minerals (other than asbestos) in addition to pure talc that are useful for different commercial applications. "Commercial" or "industrial" talc is distinct from the talc used in cosmetics, which is, of necessity, a very pure form of talc with a laminar or plate-like form rather than an elongate or fibrous form. (Although sometimes talc that is laminar can appear to contain elongate particles because those particles are either being viewed on edge or are cleavage fragments.)

The "talc" mined in upstate New York (often referred to also as Gouverneur talc, R. T. Vanderbilt (or "RTV") talc, or tremolitic talc) has long been recognized as distinctive for its considerable fibrous-appearing content, and it is not used in cosmetics.

¹ CRE is a regulatory and government information watchdog organization that is particularly interested in regulatory and information issues that have broad implications. Talc health studies raise many controversial analytical issues and talc is of great commercial importance, being used in a wide variety of industrial and personal care applications (e.g., automotive plastics, ceramics, paints, paper, pharmaceuticals, agricultural products, cosmetics and body powders).

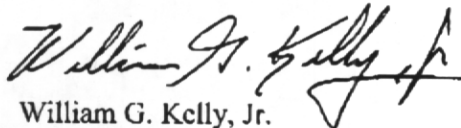
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Our concern is that the frequent discussion of New York talc in the Roadmap might reinforce the mistaken impression on the part of some (including some members of the scientific community) that talc is generally similar to asbestos or contains asbestos. This distorted view appears frequently, for example, in epidemiology studies involving talcum powder used as a personal care product, in an attempt to provide a biologically plausible explanation for an apparent minor statistical association [2-8], and that view is often repeated on non-scientific websites.[9]

In order to avoid the possibility that the Roadmap could further contribute to this confusion, we recommend that NIOSH add a comment, in a footnote or otherwise, to the effect that mined talc varies from deposit to deposit, and that "New York State talc" is recognized as distinctive for the elongate appearance of many of its particles and its composition, while pure talc is laminar in form and very different from asbestos or other elongate minerals.

Thank you for considering this matter. If you have any questions or need further information, please contact me at (208) 354-3050 or wgkelly@silverstar.com

Sincerely,



William G. Kelly, Jr.
Western Representative and General Counsel
Center for Regulatory Effectiveness

References

1. See, e.g., Zazenski RJ. 1998. The commercial significance of talc. *Comments Toxicol, Special Issue on Talc* 6(5):313-26.
2. Chang S and Risch HA. 1997. Perineal talc exposure and risk of ovarian carcinoma. *Cancer* 79:2396-2401, at 2400 ("Talc and asbestos are chemically related").
3. Cramer DW *et al.* 1999. Genital talc exposure and risk of ovarian cancer. *Int J Cancer* 81:351-356, at 354 (talc is a "chemical relative" of asbestos).
4. Gertig DM *et al.* 2000. Prospective study of talc use and ovarian cancer. *J Natl Cancer Inst* 92:249-252, at 252 (refers to "chemical similarity of talc and asbestos").
5. Mills PK *et al.* 2004. Perineal talc exposure and epithelial ovarian cancer risk in the Central Valley of California. *Int J Cancer* 112(3):458-64, at 458 (talc has been suspected as a carcinogen because of its "structural similarity" to asbestos).

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6. Huncharek M *et al.* 2003. Perineal application of cosmetic talc and risk of invasive epithelial ovarian cancer: A meta-analysis of 11,933 subjects from sixteen observational studies. *Anticancer Res* 23:1955-60, at 1955 (refers to the "structural similarity" between talc and asbestos). But *cf.* Huncharek M *et al.* 2007. Use of cosmetic talc on contraceptive diaphragms and risk of ovarian cancer: A meta-analysis of nine observational studies. *Eur J Canc Prev* 16:422-29, at 423 (discusses some of the differences between talc and asbestos).
7. Parazinni F *et al.* 1991. The epidemiology of ovarian cancer – review. *Gynecol Oncol* 43:9-23, at 19 ("The rationale for suspecting an association between talc and ovarian carcinogenesis comes from the similarity and the frequent contamination of talc with asbestos, an important factor in carcinogenesis of pleural and peritoneal mesotheliomas.")
8. Wong C *et al.* 1999. Perineal talc exposure and subsequent epithelial ovarian cancer: A case-control study. *Obstet Gynecol* 93(3):372-376, 372 (refers to the "chemical similarities between talcum powder and asbestos").
9. *E.g.*, http://www.naturalnews.com/024978_talcum_powder_cancer_asbestos.html;
<http://www.amazon.com/Condoms-cause-ovarian-cancer/forum/FxJNYOOGH0STSB/Fx1UJIMZ2WEXZ7Q4/1?encoding=UTF8&asin=0801880904>.