MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION

TO

Heinz J. Eiermann, (HFF-440)

DATE: January 7, 1976

Director, Division of Cosmetics Technology

THROUGH: Henry M. Davis, (HFF-446)

Chief, Product Composition Branch

FROM:

Ronald L. Yates, (HFF-446)

Product Composition Branch

SUBJECT:

Tabulated Results of DCST's Analyses for Asbestos Minerals in Lewin, Field Activity Surveillance (FAS). Investigational and Consumer Cosmetic Talc Products.

Attached are a series of tables summarizing data obtained from the DCST analyses of cosmetic talc products for asbestos minerals. Also included, for purposes of comparison, are Dr. S. Z. Lewin's analytical data obtained by x-ray diffractometry.

Attachments:

- Master table. "Summary Table of Results of the Investigations of Commercial Cosmetic Talc Products For Asbestos Minerals by S. Z. Lewin and the Division of Cosmetic Technology." This table contains analytical data of all the Lewin samples analyzed by DCST. Included is Lewin's data on these samples.
- Table I. "Summary of Results of DCST's Analyses For Asbestos Minerals in Talc Samples Reported by Lewin to contain Tremolite and/or Chrysotile." Information in this table was extracted from the master table and lists only those samples which Lewin reported the presence of asbestos minerals.
 - "Cosmetic Talcs Analyzed by Lewin and Reported to Table II. Contain Chrysotile and/or Tremolite which were not Analyzed by DCST by Either DTA or Optical Microscopy." DCST does not possess the samples listed in this table and, therefore, were unable to analyze them.
- "Summary of DCST's Analyses of Cosmetic Talc Products d. Table III. by Differential Thermal Analysis (DTA) and Optical Microscopy." This table summarizes, by number of samples, DCST's analyses of talc samples from all sources.

DEFENDANT'S EXHIBIT

e. Table IV. "Summary of S. Z. Lewin's Analyses of Commercial Cosmetic Talcs For Tremolite and Chrysotile by X-Ray Diffraction." This table summarizes, by number of samples, S. Z. Lewin's results for all samples analyzed.

Ronald L. Yates

Product Composition Branch

SUMMARY TABLE OF RESULTS OF THE INVESTIGATIONS OF COMMERCIAL COSMETIC TALC PRODUCTS FOR ASBESTOS MINERALS BY S. Z. LEWIN AND THE DIVISION OF COSMETICS TECHNOLOGY (1)

SAMPLE # AND MFG. CODE Trienolite (%) Chrysotile (%) Optical M 14 Desitin Baby Powder, Antibacterial; Pfizer (11392) ND ND - 26 Helen Press1 "Little Lady" ND ND ND ND 29 Johnson's Baby Powder (028Q) ND ND ND 35 Lewis Baby Powder ND ND ND ND 37 Macy's Scented Borated Talcum ND ND ND ND 38 Macy's Talcum, Apple (2K4) ND ND ND - 42 Mennen Quinsana Foot Powder (H202) ND ND ND - 50 Quest Deodorant Powder; ND ND ND - 52 Riviana Foods-Italian Stearin Talc; For Rice ND ND ND 53 September Morn By Pond's (19B) ND ND - 54 Seven Winds After Bath Talc; DuBarry (021085) ND ND ND						40 F 20 WY45804	DCST's Resu	
26 Helen Pressl "Little Lady" ND ? ND ND ND ND ND ND	MPLE #	PRODUCT NAME AND MFG.	CODE				Tremolite (fiber/mg) Optical Microscopy	Chrysotile (%) - DTA
Johnson's Baby Powder (028Q) Johnson's Baby Powder (028Q) Lewis Baby Powder ND	14	Desitin Baby Powder, Antibacterial; Pfizer	(1139Z)		_{ND} (2)	. ND	-	ND
135 Lewis Baby Powder ND ND ND 137 Macy's Scented Borated Talcum ND ND ND 128 Macy's Talcum, Apple (2K4) ND ND ND 129 Mennen Quinsana Foot Powder (H202) ND ND ND ND 150 Quest Deodorant Powder; ND	26	Helen Pressl "Little Lady"			ND	?	ND	ND
Macy's Scented Borated Talcum Macy's Scented Borated Talcum Macy's Talcum, Apple (2K4) Mennen Quinsana Foot Powder (H2O2) ND ND ND ND ND ND ND ND ND N	29	Johnson's Baby Powder	(028Q)		ND	ND	ND	ND
Mennen Quinsana Foot Powder (H2O2) ND ND ND Quest Deodorant Powder; ND ND ND Rivina Foods-Italian Stearin Talc; For Rice ND	35	Lewis Baby Powder			ND	ND	-	ND
Mennen Quinsana Foot Powder (H202) Mennen Quinsana Foot Powder; Quest Decdorant Powder; Riviana Foods-Italian Stearin Talc; For Rice September Morn By Pond's (19B) Seven Winds After Bath Talc; DuBarry (021085) Vaseline Intensive Care Baby Powder (same as 130) (1209) Yves Saint Laurent Rive Gauche Spray Talc RD ND ND ND ND ND ND ND ND ND	37	Macy's Scented Borated Talcum			ND	ND	200 (.02%) (3	3) _{ND}
Quest Deodorant Powder; Riviana Foods-Italian Stearin Talc; For Rice ND ND ND September Morn By Pond's Seven Winds After Bath Talc; DuBarry (021085) ND ND ND ND ND ND ND ND ND N	38	Macy's Talcum, Apple	(2K4)		ND	ND	-	ND
Riviana Foods-Italian Stearin Talc; For Rice 53 September Morn By Pond's (19B) ND ND 54 Seven Winds After Bath Talc; DuBarry (021085) ND ? 56 Vaseline Intensive Care Baby Powder (same as 130) (1209) ND ND ND 57 Yves Saint Laurent Rive Gauche Spray Talc 58 Z B T Baby Powder (F1021) ND ND ND 59 Zeasorb Super Absorbent Medicated Powder; Stiefel 60 Ambush-Dana Dusting Powder 61 April Showers (9884) ND ND	42	Mennen Quinsana Foot Powder	(H202)		ND	ND	600 (.06%)	?
September Morn By Pond's (19B) ND ND - 54 Seven Winds After Bath Talc; DuBarry (021085) ND ? 56 Vaseline Intensive Care Baby Powder (same as 130) (1209) ND ND ND - 57 Yves Saint Laurent Rive Gauche Spray Talc ND ND ND - 58 Z B T Baby Powder (F1021) ND ND ND - 59 Zeasorb Super Absorbent Medicated Powder; Stiefel ND ND ND - 60 Ämbush-Dana Dusting Powder (9884) ND ND ND - 61 April Showers (9884) ND ND ND	50	Quest Deodorant Powder;			ND	ND	-	ND
Seven Winds After Bath Talc; DuBarry (021085) ND ? Vaseline Intensive Care Baby Powder (same as 130) (1209) ND N	52	Riviana Foods-Italian Stearin Talc; For Rice	v	*	ND	ND	-	ND
Vaseline Intensive Care Baby Powder (same as 130) (I209) ND ND ND Yves Saint Laurent Rive Gauche Spray Talc ND ND ND ND Zeasorb Super Absorbent Medicated Powder; Stiefel April Showers (9884) ND N	53	September Morn By Pond's	(19B)	-	ND	ND	=	ND
Yves Saint Laurent Rive Gauche Spray Talc ND ND ND RD ND ND Seasorb Super Absorbent Medicated Powder; Stiefel ND ND ND ND Ambush-Dana Dusting Powder (9884) ND	54	Seven Winds After Bath Talc; DuBarry	(021085)		ND	?	-	ND
58 Z B T Baby Powder (F1021) ND ND - 59 Zeasorb Super Absorbent Medicated Powder; Stiefel ND ND - 60 Ämbush-Dana Dusting Powder ND ND - 61 April Showers (9884) ND ND 7	56	Vaseline Intensive Care Baby Powder (same as 130)	(1209)		ND	ND	-	ND
59 Zeasorb Super Absorbent Medicated Powder; Stiefel ND ND - 60 Ambush-Dana Dusting Powder ND ND - 61 April Showers (9884) ND ND 7	57	Yves Saint Laurent Rive Gauche Spray Talc			ND	ND	-	ND
60 Ambush-Dana Dusting Powder ND ND - 61 April Showers (9884) ND ND 7	58	Z B T Baby Powder	(F1021)		ND	ND	-	ND
61. April Showers (9884) ND ND 7	59	Zeasorb Super Absorbent Medicated Powder; Stiefel			ND .	ND	- .	ND
U. APITI SIBNETS	60	Ambush-Dana Dusting Powder		2	ND	ND .		- ND
62 Avon Unforgettable Perfumed Talc ND ND	61,	April Showers	(9884)	-	ND	ND	700 (.07%)	ND
	62	Avon Unforgettable Perfumed Talc			ND	ND	-	ND
63 Beloved Perfumed Dusting Powder, Prince Matchabelli 5% ND 3	63				5%	ND	36,000 (3.69	H) ND

SAMPLE #	PRODUCT NAME AND MFG.	CODE	5. Z		s (X-Ray Diff.) Trysotile (%)	Tremolit Optical	Microscopy	(8)	- DTA
64	Coty Face Powder Rachel (Airspun)			ND .	ND		2		ND .
68	Faberge Flambeau Deodorant Spray Powder	(37WBF)		ND	ND			,	ND
70	Jeris Talc, Flesh A & B		1	ND	ND		500 (.05%)		ND
71	Jolie Madame Dusting Powder, Balmain			3%	ND		ND		ND
72	Lady Esther Face Powder, Rachel			ND	ND		ND		ND
73	A&B Max Factor Face Powder, Rachelle			ND	ND		-		ND
74	Medicated Comfort Powder; Parke-Davis	45		ND	ND		3,300 (.33%)		ND
75	OH! de London Talc; Yardley	(498)		ND	ND		-		?
77	Touch and Glow Face Powder, Creamy Peach; Revlon			3%	ND		2,800 (.28%)		?
78	Toujours Moi Bath Powder; Corday			5%	ND		96,000 (9.6%)		ND .
79	Yardley April Violets	(4908)		ND	ND.		-		ND
80	Chantilly Dusting Powder; Houbigant	(11F)		ND.:	7		ND		ND
81	Cashmere Bouquet, Imported White Talcum Powder			NID -	?		ND	*	ND .
82	Jean Nate Talc	(on 345)		ND	?		-		ND .
84	Shower To Shower Body Powder; Johnson & Johnson	(5507BG)		ND	?				ND
85	Pure Baby Powder, Dart Drug	(KllC)		ND	?		ND		ND _
86	Pond's Dream Flower Perfumed Talc	(013D)		ND	?		-	×	ND
87	Almay Hypo-Allergenic Face Powder			ND	?		-		ND
88	Constance Carroll, Bouquet Talc			4%	5%		7,000 (.7%)		ND
89	Djer-Kiss Talcum; Kerkoff			5%	5%		2,900 (.29%)		ND
90	Flamingo Dusting Powder, Tussy	(L1047)		3%	5%		4,000 (.4%)		ND .
92	Mavis Talcum; Vivaudou	-		5%	5%		7,300 (.73%)		ND

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'SAMPLE #	PRODUCT NAME AND MFG.	CODE		. Lewin's Results remolite (%) Chr	(X-Ray Diff.) ysotile (%)	DCST's Results te (fiber/mg) Chr Microscopy (%)	ysotile - DTA
93	Mavis Body Powder; Vivaudou			5%	4%	5,100 (.51%)	ND
94	Tangee; Luft-Tangee	*		4%	?	2,500 (.25%)	ND
95	ZBT Baby. Powder	(B0048)		2%	3%	300 (.03%)	ND
96	Blanchard's Dusting Powder	*		8%	10%	5,600 (.56%)	-
97	Born Wild Dusting Powder; Del Labs			12%	15%	13,000 (1.3%)	ND
99	A&B Lander Lilacs and Roses Deodorant Body Talc			ND	ND	ND	ND
100	Miss Dior Dusting Powder			ND	ND	trace	-
101	Tai Winds Spray Talc; Avon	(DCC1272)		15%	ND	60,000 (6%)	ND
102	A&B Tosca Dusting Powder			10%	7%	8,900 (.89%)	ND
107	Coty Muguet des Bois Dusting Powder	(2DO)		ND	ND	ND	-
131	Johnson & Johnson Medicated Powder	(1171K)		trace	ND	ND .	ND
133	Johnson's Baby Powder	(108T)		ND	ND	ND	ND
134	Johnson's Baby Powder	(109T)		ND	ND	ND	ND
135	Johnson & Johnson Medicated Powder	(0452K)		ND	ND	ND	ND
136	Johnson & Johnson Shower to Shower Body Powder	(C512Z)	*	ND	ND	ND	ND
137	Johnson & Johnson Shower to Shower Body Powder	(0709XL)		ND	ND	ND	ND
138	Johnson & Johnson Shower to Shower Body Powder	(0872K)		ND	ND	ND ·	ND
143	Pin-Zow Talque; Perfection Beauty Products, Inc.			5%	10%	1,800 (.18%)	-
144A	Overton's "High-Brown" Face Powder			5%	?	400 (.04%)	ND
145	Softee Face Powder			ND	2%	ND	ND
148	Lady Wayne Face Powder			2%	ND	trace	ND
149	Solitaire Cake Makeup			8%	?	3,000 (.3%)	ND

SAMPLE #	PRODUCT NAME AND MFG.	CODE		Lewin's Results emolite (%) Chr	(X-Ray Diff.) ysotile (%)	Tremoli Optical	DCST's Resul te (fiber/mg) Microscopy		
151	Early American Old Spice Talcum Powder			ND	ND		ND .	_	
152	Corsage Dusting Powder; Lander			ND	ND		ND	_	
153	Ammens Powder, Medicated			ND · ·	ND		ND	?	
154	Bismoline Medicated Powder			2%	ND		200 (.02%)	-	
155	Rite Aid Pure Baby Powder			ND	?		ND	NI	D
156	Warner Pure Baby Powder			2%	ND		200 (.02%)	NI	D
157A	Mavis Imported Talcum			6%	88		9,000 (.9%)	NI	D
158	Avon Brocade Perfumed Talc			ND	ND		ND	NI	D
159	Avon Blue Lotus Perfumed Talc	8		ND	?		ND	NI	D
160	Avon Beauty Dust Refill - Charisma			ND	trace		ND	NI	D
163	Pinaud Clubman Talc	¥		10%	10%		9,000 (.9%)	_	ir
164	Grand Union Baby Powder	(101672)		ND	1%		trace	-	
165	Cashmere-Bouquet	(4212DX)		ND	?		ND	NI	D -
167	Tawny Tone Body Talc From Black Heritage; Beauty Mustus, Inc.			2%	ND		ND	NI	D
168	Colgate Tooth Powder			ND	ND		NĎ	NI	D
169	Dr. Lyon's Tooth Powder			ND .	ND		ND	N	D .
170A	"C" Bouquet Talc; Winarick, Inc.	(2662)		ND .	8%		6,300 (.63%)	·NI	D
173A	Corsage Dusting Powder; Lander Co.			ND	?		-	?	Í.
175A	Lander Baby Powder			ND	?		-	NI	D
176A	Lander Lilac & Roses Body Talc			ND	?	920	-	N	D

SAMPLE #	PRODUCT NAME AND MEG.	CODE	s.	Z. Lewin's Re Tremolite (%)	esults Ch	(X-Ray Diff.) rysotile (%)	Tr Op	DCST's Resu emolite (fiber/mg) tical Microscopy	
178A	Jean Nate Talc No. 60	(2264)		ND		?		3 · · · ·	ND
194	Tinkerbell Dusting Powder; Tom Fields, Ltd.			ND		?		_	, ND
	×								
								9	
				· les					
				र्ग भाग					
(1) Resu	alts are shown for only those talc products analy	yzed by both Lewin and DO	ST.	*					
(2) _{ND} -	- Not Detected								

⁽³⁾ DCST tremolite % is based on following conversion: 1000 fibers/mg talc = 0.1% tremolite where average tremolite fiber dimensions are 5 x 15 /m.

If it assumed that microscopist sees 10% of fibers present, % values would be increased 1 order of magnitude.

TABLE I

SUMMARY OF RESULTS OF DCST'S ANALYSES FOR ASBESTOS MINERALS IN TALC SAMPLES REPORTED BY LEWIN TO CONTAIN TREMOLITE AND/OR CHRYSOTILE

the state of the s				
Sample No.	S. Z. Lewin's Re	DCST'S Results		
•	Tremolite (%)	Chrysotile (%)	Tremolite (Fiber/mg) Optical Microscopy	Chrysotile (%)-DTA
63	5	ND	36,000 (3.6%)	ND
71	3	ND	ND	ND
77	3	ND	2,800 (0.28%)	?
78	5	ND	96,000 (9.6%)	ND
88	4	5	7,000 (0.7%)	ND
89	5	5	2,900 (0.29%)	ND
90	3	5	4,000 (0.4%)	ND
92	5	5	7,300 (0.73%)	ND
93	5	4	5,100 (0.51%)	ND
94	4	?	2,500 (0.25%)	ND
95	2	3	300 (0.03%)	ND -
96	8	10	5,600 (0.56%)	
97	12	15	13,000 (1.3%)	ND
101	15	ND	60,000 (6%)	ND
102	10	7	8,900 (0.89%)	ND
131	trace	ND	ND	ND

Sample No.		S. Z. Lewin's Re	sults (X-Ray Diff	.)	DCST'S F	DCST'S Results		
			Tremolite (%)	Chrysotile	(%)	Tremolite (fiber/mg) Optical Microscopy	Chrysotile (%)-DTA	
143 .	,		5	10		1,800 (.18%)		
144A			5	7		400 (.04%)	ND	
145			ND	2		ND	ND	
148	r		2	ND		trace	ND	
149			8	?		3,000 (0.3%)	ND	
154	u 7		2	ND		200 (0.02%)	ND	
156			2	ND		200 (0.02%)	ND	
157A		*	, 6	8		9,000 (0.9%)	ND	
160			· ND	trace	*:	ND	ND	
. 163			10	10		9,000 (0.9%)		
164			ND	1		trace		
167			2	ND		ND	ND	
170A			ND	8		6,300 (0.63%)	ND	
	-							

TABLE II

COSMETIC TALCS ANALYZED BY LEWIN AND REPORTED TO CONTAIN CHRYSOTILE AND OR TREMOLITE WHICH WERE NOT ANALYZED BY DCST BY EITHER DTA OR OPTICAL MICROSCOPY

Sample No.		Tremolite	Lewin F	lesults	(X-Ray	Diff.)	Chrysotile 2%
66		ND					
		2%					ND
67		5%					ND
76 .							5%
91		ND					
		2%					MD
108		2%					?
109							ND
111		1%					
		trace					trace
130		2%					ND
172					4		?
183		1%					ND
184		3%					
		2%					ND
187							?
188	Ŷ.	1%					ND
189	X	1%					ND

According to John Stuart's notes, the above samples are not present in the lot of Lewin's samples. Inventory of Lewin's talcs verified that DCST does not possess the above samples.

TABLE III

SUMMARY OF DCST'S ANALYSES OF COSMETIC TALC PRODUCTS BY DIFFERENTIAL THERMAL ANALYSIS (DTA) AND OPTICAL MICROSCOPY (OM)

Analytical Method	Differential Thermal Analysi		Thermal Analysis	vsis Optical Microscopy				
Source	S. Z. Lewin	FAS	Investigational and Consumer	S. Z. Lewin	FAS	Investigational and Consumer		
Total Analyzed	78	76	2	57(1)	47	11		
Chrysotile Detected .	5?(2)	0	0	0	0	0		
Tremolite Detected	NA	NA	NA	30	О	0		

- (1) Includes 25 of 37 samples in which S. Z. Lewin reported presence of tremolite by x-ray diffraction. DCST detected tremolite in 22 of the 25 samples. DCST detected tremolite in 8 samples where S. Z. Lewin reported none detected.
- (2) Results on all 5 samples were ambiguous due to interferences and/or low levels of chrysotile.

TABLE IV

SUMMARY OF S. Z. LEWIN'S ANALYSES OF COMMERCIAL COSMETIC TALCS FOR TREMOLITE AND CHRYSOTILE BY X-RAY DIFFRACTION

No. of Samples Analyzed	Samples Only Chrysotile Detected	Samples Only Tremolite Detected	Samples Tremolite and Chrysotile Detected
195	6	24	13