Specialty MINERALS
Your Technology Resource™
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July 16, 2004

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Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
Bldg. 4401, Rm. 3118
79 T. W. Alexander Drive
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Comments on the nomination of Talc (Occupational Exposure) for the Twelfth Report on Carcinogens

Dear Dr. Jameson:

I am writing on behalf of Specialty Minerals Inc. ("SMI") to comment on the proposed listing, in the Twelfth Report on Carcinogens, of talc with respect to "occupational exposures." SMI mines talc at one location in the United States and processes it at two other U.S. facilities. SMI is thoroughly committed to implementation of all appropriate safety measures for our workers and our customers with regard to talc exposure. Since the company's inception in 1992, we have closely monitored health and safety developments in this area, and have had in place an aggressive program to ensure that the talc we process and sell does not contain asbestos. Such asbestos-free talc has never been implicated as an occupational carcinogen.

Several representatives of SMI attended the December 2000 public meeting of NTP's Board of Scientific Counselors, in which the Board evaluated the nomination of "asbestiform and non-asbestiform" talc for listing in the Tenth RoC. As noted by many who were present for those discussions, inadequate characterization of the minerals in past epidemiological and workplace studies resulted in significant confusion concerning the alleged association of talc and health effects.

Despite this confusion, NTP consistently noted the *lack of association* of cancer with occupational exposure to talc not-contaminated-with-asbestos. In the Draft Background Document, NTP staff concluded that "inhaled non-asbestiform talc is unlikely to pose a cancer risk to humans under exposure conditions that do not impair clearance mechanisms or cause chronic lung toxicity." Draft Report on Carcinogens Background Document for Talc Asbestiform and Non-Asbestiform, December 13 –14, 2000, at 71- 72.

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This Paper Contains Specialty Minerals Inc.'s PCC

In a letter to SMI, dated July 9, 2001, Kenneth Olden, Director of NTP, explained that the proposed listing of "the talcs" would be revisited in the future to address "concerns raised . . . over the excess lung cancers reported in people who were exposed to talc containing asbestiform fibers, [and] the apparent increase in ovarian cancers in women using cosmetic talc." We had understood that Dr. Olden did not cite a concern with occupational exposure to talc *not* containing asbestiform fibers because the review for the Tenth RoC had not identified any such concern.

SMI is unaware of any studies published since the last NTP review in 2000 and 2001 that would alter this conclusion. We respectfully suggest that the nomination of talc on the basis of occupational exposures results (once again) from a confusion between pure talc and talc-contaminated-with-asbestiform fibers. Given the fact that asbestos is already listed in the RoC, and the enormous potential for confusion among the public in distinguishing between pure talc and talc-contaminated-with-asbestiform fibers, the listing of asbestos-contaminated talc as a separate substance in the Twelfth RoC could hardly serve any legitimate public health concern. We therefore urge you to withdraw the nomination of talc – occupational exposure.

Sincerely yours,

SPECIALTY MINERALS INC.

D. R. Harrison