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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

July 15, 2004

JUL 16 2004

RE: 12th Report of Carcinogens (RoC) Nomination – Public Comment
OCCUPATIONAL ESPOSURE TO TALC – SUPPLEMENTAL COMMENT

Dear Dr. Jameson:

R. T. Vanderbilt Company, Inc ("Vanderbilt") and its wholly owned subsidiary, Gouverneur Talc Company, Inc. appreciate this opportunity to submit additional comment to the National Toxicology Program (NTP) regarding the captioned nomination. These supplemental comments follow our submission dated June 24, 2004.

Vanderbilt notes that in addition to addressing its upstate New York talc worker health studies, NTP highlighted two studies as possible evidence of the mineral talc as a human pulmonary carcinogen. These included a study of sanitary ware pottery workers by Thomas (1990) and Thomas and Stewart (1987) **(Ref. 1)** and a rodent inhalation bioassay sponsored by the NTP in 1993 **(Ref. 2).**

Studies of Gouverneur Talc workers were correctly excluded from the 10 RoC review in regard to talc because the mineral talc makes up a minor fraction of the dust exposure (as noted in our June 24, 2004 submission). Vanderbilt further wishes to point out that NTP recognized that the pottery worker study also involved a highly mixed dust exposure and that the NTP rodent inhalation study had been critiqued as showing a non-specific generic response of dust overload and not the reflection of a direct activity of talc (a conclusion reached by other scientific reviewers) **(Ref. 3).**

Coupled with other occupational and animal studies involving talc, the NTP concluded in the background document prepared for the 10th RoC as follows:

"In the light of these findings, the evidence from studies of occupational exposure to non-asbestos-containing talc is not sufficient to support a conclusion that this form of talc is carcinogenic." (at page 29).

Vanderbilt is not aware of any animal or occupational study of workers exposed to pure talc that supports an occupational pulmonary cancer link to talc. Studies produced since the 10th RoC **(Ref. 4, 5)** and noted in our earlier submission, lend no support to such a link.

In light of these considerations and NTP's own earlier finding, Vanderbilt petitions the NTP to drop the nomination of "Occupational Exposure to Talc" from further review in the 12th RoC.

Sincerely yours,

R. T. VANDERBILT COMPANY, INC.

John W. Kelse, Corporate Industrial Hygienist
Manager, Corporate Risk Management Dept.

References:

1. Thomas, TL. et al: "Mortality From Lung Cancer and Respiratory Disease Among Pottery Workers Exposed to Silica and Talc". Amer J of Epi. Vol. 125 No.1 pp.35-43 (1987).

2. NTP: "Toxicology and Carcinogenesis Studies of Talc (CAS 14807-96-6 Non-Asbestiform) in F344/N Rats and B6C3Fi Mice. TR-421, National Toxicology Program. Research Triangle Park, NC (1993).

3. Carr, CJ: "Talc: Consumer Uses and Health Perspectives". Regul. Toxicol. Pharmacol. 21, pp. 211-215 (1995).

4. Wild P. et al: "A cohort Mortality and Nested Case-control Study of French and Austrian Talc Workers" Occup. Environ. Med 59:0-7 (2002).

5. Coggiola, M. et al: "An update of Mortality Study of Talc Miners and Millers in Italy" Am J. of Ind Med: 44-63-69 (2003).