Johnson Johnson

June 28, 1977

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SUBJECT: Audit Testing of Windsor 66 Talc for Asbestos

'TO: Mr. G. Lee

FROM: Mr. A. Frank

To formalize the audit testing currently performed to ensure the absence of asbestos in Windsor 66 Talc, the following protocol is currently being used:

1) Scope

Windsor 66 talc is manufactured from a previously approved mine site known to contain an acceptable cosmetic grade talc ore which has been tested by and has met the requirements for detectable asbestos by the test methods and sampling plan described below. Windsor Minerals will assure mine site evaluation data to include analysis of diamond drill core samples, and deposit testing of composite ore samples removed from the mine site during the development phase prior to production of cosmetic talc to be used for JOHNSON'S* Baby Powder.

Asbestos is defined to be the fibrous serpentine, chrysotile and the fibrous forms of the amphibole group as represented by amosite, anthophyllite, crocidolite, tremolite asbestos and actinolite.

2) Testing Requirements

| CHARACTERISTIC | TEST METHOD | REQUIREMENT |
|--|-------------|----------------|
| Fibrous Amphibole Forms | CTFA J4-1 | None detected |
| Serpentine Forms (Chrysotile) | TIM 7019 | 'None detected |
| Asbestiform Minerals (fibrous forms) (Transmission Electron Microscopy) | ТМ 7024 | None detected |
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3) Testing Procedure/Frequency

The following sample types are tested on an audit basis according to the test procedures and frequencies noted.

| SAMPLE TYPE | TESTS | FREQUENCY |
|------------------|----------------------|----------------------------------|
| Raymond Grind | TM 7024 | bi-weekly composite sample |
| Flash Dried Talc | CTFA J4-1 TM 7019 | weekly composite samples |
| Finished Talc | TM 7024 | quarterly audit of random sample |
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A. M. Frank

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cc: H. Cohen L. Orlando J. Runnells

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Johnson-Johnson

BABY PRODUCTS COMPANY

RARITAN, N. J. 08869

February 23, 1978

Mr. R. N. Miller, President Windsor Minerals, Inc. P. O. Box 680 Windsor, Vermont 05089

Dear Roger:

As you know, Windsor Minerals and the Baby Products Company have already authorized the documentation of a "no detectable asbestos" requirement in the Windsor 66 Talc Material Specification. In this regard, the testing requirement is solely for fibrous amphibole by the CTFA Method J4-1 and is intended to make the specification wholly consistent with the CTFA standard for cosmetic grade talc.

However, we need to recognize that Windsor Minerals and Johnson and Johnson have exercised more extensive controls and testing in the past than just meeting the J4-1 requirement. Furthermore, we intend continuing to surpass the industry testing as reflected by CTFA's J4-1. During the July 15, 1977 meeting in your office, we had agreed to the need of documenting the entire audit protocol which has been your standard operating policy and procedure since August 1973 and will continue to be practised by Windsor Minerals for Windsor 66 Talc. These are the following:

Examination for Non-Detection of Asbestos

Asbestos is defined to be the fibrous serpentine, chrysotile and the fibrous forms of the amphibole group as represented by amosite, anthophyllite, crocidolite, tremolite asbestos and actinolite.

Material will be tested for conformance on an audit basis, frequencies noted according to sample types described and tests required:

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Mr. R. N. Miller Windsor Minerals, Inc. Windsor, Vermont

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| Sample Type | Tests | Frequency |
|------------------|----------------------|--|
| Ground Ore | TM 7024 | biweekly composite samples by Windsor |
| Flash Dried Talc | CTFA J4-1 TM 7019 | weekly composite samples by J&J |

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| Characteristic | Test | Requirement |
|-------------------------|-----------|---------------|
| Fibrous amphibole forms | CTFA J4-1 | none detected |
| Serpentine forms | TM 7019 | none detected |
| Asbestiform minerals | TM 7024 | none detected |

Windsor 66 talc shall be manufactured from a previously approved mine site known to contain an acceptable cosmetic grade talc ore which has been tested by and has met the requirements for asbestos according to the test methods and sampling plan described above. Windsor Minerals will assure mine site evaluation data to include analysis of diamond drill core samples and deposit testing of composite ore samples removed from the mine site during the development phase prior to production of cosmetic talc to be used for JOHNSON'S Baby Powder.

Sincerely George Lee

/by Attachment: TM 7019 TM 7024

cc: D. R. Petterson J. E. Runnells B. M. Deavenport

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