BURGESS
PIGMENT, LLC

August 12, 2026

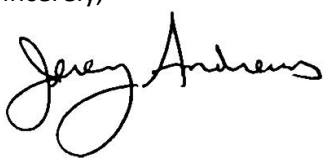
Concerning the removal of asbestos, crystalline silica, and unbound titanium dioxide from Burgess clays-

The kaolin clay products manufactured by Burgess Pigment, LLC fall into two classifications based on processing techniques: hydrous clays; and anhydrous clays. All Burgess hydrous and anhydrous products are created from clay stocks that are water-washed. The water-washing process purifies the clay by removing unwanted contaminants. Asbestos, mica, quartz (crystalline silica) and free titanium dioxide are removed as the raw clay travels through the process that involves physical and magnetic separation while the clay is suspended in water. After washing, the kaolin is air dried resulting in a 99.9% pure clay product.

Testing of Burgess hydrous and anhydrous clays by X-Ray Diffraction (XRD) and Computer Controlled Scanning Electron Microscopy (CCSEM) reports no crystalline silica present above the method detection level. Based on the usual detection level of 0.1% this is reported as “less than 0.1% crystalline silica”. Chemical testing shows titanium oxide (reported as titanium dioxide by convention) is present above 0.1%, ranging from approximately 1.35 % to 2.5 %, however it is tightly bound within the clay matrix. This means the titanium oxides are locked into or surrounded by the aluminum silicate structure and not considered pure or available for exposure.

Therefore, crystalline silica and titanium dioxide are not listed on the SDS for Burgess hydrous or anhydrous kaolin clays. The American Conference of Governmental Industrial Hygienists (ACGIH) has set a threshold limit value (TLV) of 2 mg/m^3 time weighted average (TWA) exposure for kaolin and Burgess Pigment recommends this exposure limit be observed for all hydrous and anhydrous clay products.

Sincerely,



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