

# Attapulgite

## Handling/Processing

### Identification of Petitioned Substance

**Chemical Name:** Attapulgite  
**CAS Numbers:** 12174-11-7

**Other Names:**  
Palygorskite  
Aluminum Magnesium Silicate, Hydrated  
Fuller's earth (CAS # 8031-18-3)

[Note: In the United States, the term "attapulgite" is used in place of palygorskite; however, the International Nomenclature Committee determined that palygorskite is the preferred name.]

### Characterization of Petitioned Substance

#### Composition of the Substance:

Attapulgite is complex magnesium (Mg) aluminum (Al) silicates with an open-channel structure, which forms elongate (needle-shaped) crystals. Its chemical formula is  $Mg_{1.5} Al_{0.5} Si_4 O_{10} (OH) \cdot 4H_2O$ . Actual composition varies because of partial replacement of magnesium (Mg) and aluminum (Al), by iron (Fe), and other elements (Harben, 2002).

Attapulgite consists of double silica tetrahedral chains linked together by octahedral oxygen and hydroxyl groups containing Al and Mg ions in a chain-like inverted structure. The inverted tetrahedral occurs regularly and causes channels through the structure, see Figure 1, (Murray, 1999). Attapulgite contains two types of water – one coordinated to the octahedral cations and other loosely bonded in the channels. The latter water is referred to as zeolitic water. The channels may also contain exchangeable cations. The elongated morphology and the presence of the channels are the most important physical attributes (Murray and Zhou, 2006).

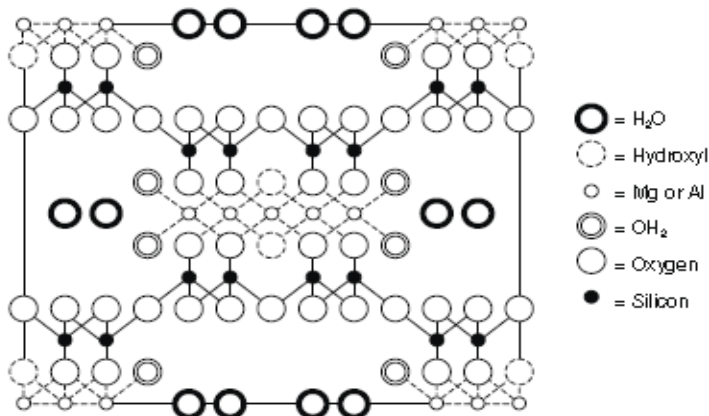


Figure 1. Attapulgite Structure

In addition, Haden (1963) indicated that there are two unusual characteristics from the structure. First, since the structure is three-dimensional, little swelling can occur. Second, cleavage will be easiest along the Si-O-Si bonds holding together the three-layer strips. Hence, it is of the needle-like rather than plate-like particle shape. The typical attapulgite needle has a length of about 1 $\mu$ m and a width of about 0.01 $\mu$ m.

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**Properties of the Substance:**

Physical and Chemical Properties	
Color	Bluish-grey tint
Particle shape	Elongate
Mohs hardness <sup>1</sup>	2.0-2.5
High surface area	150 m <sup>2</sup> /g
Specific gravity	2.0-2.3 g/cm <sup>3</sup>
Moderate base exchange capacity	30-50 meq/100g
Charge on the lattice	Moderate
Melting point	1550°C
Sorptive capacity	High
Water absorption	Up to 100% of the weight of the clay
Oil absorption	Up to 80% of the weight of the clay
pH	7.5-8.5

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Attapulgite has a strong ability to absorb water. When it is wet, attapulgite shows plastic and adhesive properties; and when it gets dry, attapulgite does not shrink much and does not show cracks. When it is soaked in water, attapulgite collapses.

**Specific Uses of the Substance:**

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According to the petition, attapulgite will be used as a processing aid and function as a natural bleaching clay for the purification of vegetable and animal oils.

Attapulgite also has other uses. Haden (1963) divided the applications of attapulgite into two broad categories: colloidal and non-colloidal. A number of representative applications are listed in Table 1, see below:

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Table 1. Some Uses of Attapulgite

Colloidal	Non-Colloidal
1. Oil-base and water-base foundry sand binders	1. Petroleum refining, decolorizing, neutralizing, brightening, desulfurization, deodorizing
2. Adhesive viscosity control	2. Vegetable oils and animal fats neutralizing, decolorizing, deodorizing
3. Oil well drilling mud	3. Carrier for granular and powdered agricultural chemicals (insecticides, herbicides, etc.)
4. Latex paint thickener and gelling agent	4. Pharmaceutical intestinal absorbent
5. Pharmaceutical thickener and adsorbent	5. Floor absorbents
6. Liquid suspension fertilizers	6. Animal bedding, pet litter
7. Polishes – suspending agent for abrasives	7. Flowability additive to dry fire extinguisher powders
8. Wax emulsion stabilizer	8. Catalytic applications (no carbon required papers, olefin polymerization, etc.)
9. Metal drawing lubricants – suspending agent	9. Anti-caking agent
10. Laundry washing powders	10. Chromatographic adsorbent
11. Bonding agent for granulation of powders	11. Drying of oils

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<sup>1</sup> A scale used to measure the hardness of minerals, with talc at zero and diamond at 10. Each mineral on the scale is hard enough to scratch the one below it in the scale.

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### **Approved Legal Uses of the Substance:**

The U.S. Food and Drug Administration (FDA) — Attapulgitite (Doc. No. 1943) is listed under Everything Added to Food in the United States (EAFUS) and referred to in 21 CFR Part 582 -- Substances Generally Recognized as Safe (GRAS), §582.99 Adjuvants for pesticide chemicals.

The U.S. Environmental Protection Agency (EPA) — Attapulgitite is listed as an inert ingredient can be used in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 25(b) pesticide products applied to food use site (e.g., food crops, animals used for food) and nonfood use site (e.g., ornamental plants, highway right-of-ways, rodent control). In addition, attapulgitite can be used, under 40 CFR §180.910 Inert Ingredients, during pre- and post harvest. It is exempted from the requirement of a tolerance.

### **Action of the Substance:**

Attapulgitite is classed as a 2:1 layer inverted structure (Fig. 1). Substitution of iron, magnesium, calcium, and other elements for aluminum generates an excess negative charge and a cation exchange capacity. Because of the inversions in the silica tetrahedral sheet, the structure has parallel channels or holes throughout, which along with the elongate habit and the fine particle size, give a high surface area (porous structure). The charge on the particles, the channels through the structure, and the high surface area give attapulgitite a capacity to absorb and adsorb various materials. [Note: Absorption is the penetration of fluid molecules into the bulk of an absorbing clay, whereas adsorption is the interaction between the fluid molecules and the clay surface.] In addition, the elongate particles cause higher viscosity when it is added to any liquid (Murray, 1999).

The channels or holes of attapulgitite are filled with zeolitic water that may be driven off by heating to 500°C and so activated to form bleaching clay. This bleaching clay derived from attapulgitite can be utilized in refining animal fats and vegetable oils. Bleaching is carried out by mixing it with the oil or fat to be treated. The impurities, including color pigments, are adsorbed onto the surface of attapulgitite clay. The clay combined with impurities is filtered and thus removed from the bleached oil (Harben, 2002).

<b>Status</b>
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### **Domestic:**

According to FDA, the Everything Added to Food in the United States (EAFUS)<sup>2</sup> list dated June 2009 is from a database maintained by the FDA Center for Food Safety and Applied Nutrition under the Priority-based Assessment of Food Additives program. The EAFUS list of substances contains ingredients added directly to food that FDA has either approved as food additives or listed or affirmed as GRAS. "CLAY, ATTAPULGITE" (Doc No. 1943<sup>3</sup>, updated 11/09/2009) is found in the database and referred to FDA Regulation 582.99 (Adjuvants for pesticide chemicals) where the chemical appears.

The petitioned substance lists under *Table 87.5 Additional Special Purpose Products* in 2008 Official Publication of the Association of American Feed Control Officials. "Attapulgitite Clay" is classified under Food Additives Amendment function as anti-caking agent and pelleting aid (not to exceed 2% in finished feed) and suspension aid in liquid feed supplement (not to exceed 2.5% in supplement). It contains a reference to FDA Regulation 582.1 (Substances that are generally recognized as safe).

<sup>2</sup> <http://www.fda.gov/Food/FoodIngredientsPackaging/ucm115326.htm>

<sup>3</sup> <http://www.accessdata.fda.gov/scripts/fcn/fcnDetailNavigation.cfm?rpt=eafusListing&id=683>

108 According to the EPA document 'Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products', last  
109 updated March 3, 2009<sup>4</sup>, attapulgit is an inert ingredient. It is eligible for inclusion in pesticide products  
110 under EPA the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)'s Section 25(b). The residues of  
111 the attapulgit are exempted from the requirement of a tolerance when used in accordance with good  
112 agricultural practice as inert (or occasionally active) ingredients in pesticide formulations applied to  
113 growing crops or to raw agricultural commodities after harvest. See, e-CFR dated December 8, 2009, 40  
114 CFR §180.910 Inert Ingredients used pre- and post harvest; Exemptions from the requirement of a  
115 tolerance.

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117 "Palygorskite fibers (>5 µm in length)" is also on the California Proposition 65 List<sup>5</sup> (updated September  
118 11, 2009) as a chemical known to the State to cause cancer. The initial appearance of the chemical on the list  
119 was dated December 28, 1999. State of California, Environmental Protection Agency, Office of  
120 Environmental Health Hazard Assessment, the Safe Drinking Water and Toxic Enforcement Act of 1986  
121 requires that the Governor revise and republish at least once per year the list of chemicals known to the  
122 State to cause cancer or reproductive toxicity.

#### 123 **International:**

124 Regulation (EC) 1831/2003 – "Attapulgit (clay) CAS No. 12174-11-7", under silage additives functional  
125 group, listed in Community Register of Feed Additives. The date of first entry in the Register is July 11,  
126 2005.

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129 Canadian Food Inspection Agency, Feed Program – Schedule IV of the Feeds Regulations, 1983, lists  
130 ingredients approved for use as livestock feed. Attapulgit clay (Schedule IV Number 8.111) is listed under  
131 *Class 8. Miscellaneous Product of the Feeds Regulations*. It stated, "Attapulgit clay (IFN<sup>6</sup> 8-14-008) is hydrated  
132 aluminum-magnesium silica, a naturally occurring mineral mined in Attapulgit, Georgia... It shall be  
133 labeled with the following statement: This product is for use in non-medicated feeds only as an anticaking  
134 agent or pelleting aid in an amount not to exceed 0.25% of the finished feed or as an emulsifier in liquid  
135 feed supplements at a level not to exceed 2.5% of the supplement."

### 136 **Evaluation Questions for Substances to be used in Organic Handling**

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140 **Evaluation Question #1: Is the petitioned substance formulated or manufactured by a chemical process?**  
141 **(From 7 U.S.C. § 6502 (21).)**

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143 Attapulgit is the principal mineral of attapulgit clay, which is surface mined by open-pit method with  
144 stripping by scrapers, draglines, or bulldozers and extraction by shovels, backhoes, small draglines, or  
145 front-end loaders. The clay is then loaded onto trucks and transported to the processing plant. They are  
146 then dried, milled, and sieved to obtain a desired range of particle sizes (Patterson, 1992).

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148 Occasionally, special processes are also used to enhance certain properties, such as adding 1% or 2% MgO  
149 to improve the viscosity; drying with high heat to remove the zeolitic water from the channels in the  
150 structure to increase the sorbent properties; and pulverizing to ultrafine particles for improving suspension  
151 properties and increasing the surface area (Murray and Zhou, 2006). In addition, some attapulgites are  
152 acid activated, which is treated with sulfuric or hydrochloric acid, to enhance its bleaching activation for  
153 using in clarifying edible and non-edible oils. Murray (2007) reported that sulfuric acid is preferred  
154 because it is less expensive and is not as harsh as hydrochloric acid. This acid treatment can be a dry or  
155 wet process. The dry process involves crushing, drying, pulverization, acid treatment, and packaging. The

<sup>4</sup> [http://docs.google.com/gview?a=v&q=cache:IIDC-2IWGQ8J:www.epa.gov/opprd001/inerts/section25b\\_inerts.pdf+EPA+CAS+12174-11-7&hl=en&gl=us](http://docs.google.com/gview?a=v&q=cache:IIDC-2IWGQ8J:www.epa.gov/opprd001/inerts/section25b_inerts.pdf+EPA+CAS+12174-11-7&hl=en&gl=us)

<sup>5</sup> [http://www.oehha.ca.gov/prop65/prop65\\_list/files/P65single091009.pdf](http://www.oehha.ca.gov/prop65/prop65_list/files/P65single091009.pdf)

<sup>6</sup> International Feed Number

156 wet process involves blunging (mixing clay with water), heating (around the boiling point), adding acid  
157 (sulfuric or hydrochloric), dewatering, drying, and then formed into a powder or granules.  
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159 The difference between natural and acid activated bleaching clay is that natural bleaching clay in aqueous  
160 suspension is slightly acid or neutral, whereas that of acid activated bleaching clay is highly acidic.  
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162 **Evaluation Question #2: Is the petitioned substance formulated or manufactured by a process that**  
163 **chemically changes the substance extracted from naturally occurring plant, animal, or mineral sources?**  
164 **(From 7 U.S.C. § 6502 (21).)**  
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166 According to the petitioner, the petitioned substance is a fine powder (<325 mesh) and produced by the  
167 following steps:

- 168 • The shredded clay from the crude clay shed is dried in a rotary dryer and is pulverized in a  
169 Raymond mill. As an optional method, the shredded clay from the crude clay shed can be dried  
170 and pulverized simultaneously in a heated hammer mill such as Williams mill.
- 171 • The dried, pulverized clay is packaged into bulk containers for transport.  
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173 **Evaluation Question #3: Is the petitioned substance created by naturally occurring biological**  
174 **processes? (From 7 U.S.C. § 6502 (21).)**  
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176 Attapulgite deposits were formed in various geological environments. Formation in soils, lakes, or shallow  
177 seas, was associated with the Mediterranean-type climate (i.e., dry summer subtropical climate), prevalent  
178 during certain geological times. Formation in inland seas and lakes was as chemical sediments or from the  
179 constitution of clays during diagenesis<sup>7</sup>, in open oceans by hydrothermal alteration of basaltic glass,  
180 volcanic sediments or clays, in marine deposits by slumping and turbidity currents transporting near-shore  
181 materials. Generation may also be by direct crystallization in calcareous soils or the weathering of  
182 serpentinite<sup>8</sup> and magnesite<sup>9</sup>.  
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184 **Evaluation Question #4: Is there a natural source of the petitioned substance? (From 7 CFR § 205.600 (b)**  
185 **(1).)**  
186

187 Bleaching clay (earth) is made from naturally occurring minerals, such as palygorskite (also known as  
188 attapulgite), sepiolite, and bentonite (Zschau, 2000). They have some common properties such as a  
189 medium to high surface area, sorptive abilities, and decolorizing, binding, and thickening power.  
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191 The natural deposits of palygorskite can be found in United States, China, Senegal, Spain, and Ukraine. All  
192 of these major deposits were formed during geologic time of Eocene or Miocene. In the US, the  
193 palygorskite rich deposits in south Georgia and north Florida dominate the world's production. The  
194 deposits extend from Quincy, Florida, on the south to the Meigs, Georgia, area on the north, about 80 km.  
195 The deposition of the palygorskite took place in a shallow water trough that connected the Gulf of Mexico  
196 with the Southeast Georgia Embayment on the Atlantic Ocean. The seawater in this trough was  
197 characterized by fluctuating salinities, and at times the lagoons were closed off from normal circulation.  
198 There was sufficient magnesium present to precipitate palygorskite. The mineralogical content changes  
199 from dominantly palygorskite in the Quincy-Attapulgus District to a mixture of smectite and palygorskite  
200 in the northern area around Ochlocknee and Meigs. Smectite is transformed to palygorskite and sepiolite  
201 in a saline, alkaline water environment. Murray (2007) stated "Both attapulgite and sepiolite are natural  
202 bleaching earths. They are used to clarify automotive oil and many edible oils which are used in cooking."  
203 Attapulgite and sepiolite are hydrated magnesium aluminum silicates with thin elongate chain type  
204 structures. Sepiolite has higher magnesium content than attapulgite and has a slightly larger unit cell size.

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<sup>7</sup> Recombination or rearrangement of constituents (as of a chemical or mineral) resulting in a new product.

<sup>8</sup> A metamorphic rock consisting almost entirely of minerals in the serpentine group. Serpentine forms from the alteration of ferromagnesian silicate materials, such as olivine and pyroxene, during metamorphism.

<sup>9</sup> A white, colorless, or lightly tinted mineral consisting of naturally occurring magnesium carbonate in hexagonal crystalline form: a source of magnesium.

205  
206 In addition, Pickering and Heivilin (2006) have reported that bleaching earths, with or without acid  
207 activation, need a particular pore size and porosity to clean and decolorize edible oils. There are only two  
208 such actively mined fuller's earth clay deposits in the US — In northeastern Mississippi, where acid  
209 activation (the clay treated with sulfuric or hydrochloric acid) is necessary, and in the south Georgia  
210 district near Meigs, where clays can be a natural bleaching earth or acid activated bleaching earth.

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212 **Evaluation Question #5: Is there an organic agricultural product that could be substituted for the**  
213 **petitioned substance? (From 7 CFR § 205.600 (b) (1).)**

214  
215 No information was identified to suggest that an organic agricultural product can be used as a bleaching  
216 earth for processing vegetable and animal oils.

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218 As mentioned above, Evaluation Question #4, attapulгите, sepiolite, and bentonite have common properties  
219 and they all can be used as bleaching earth. However, attapulгите and sepiolite may be used as a natural  
220 bleaching earth, which does not require acid activation. Bentonite is an acid activated bleaching earth  
221 because the necessary surface area and porosity have to be created by an acid treatment (Murray, 2007).  
222 On the NOP National List, bentonite is a nonsynthetic allowed substance listed under 7 CFR §206.605.

223  
224 Acid activation enhances properties already present in the clay. Sulfuric acid is most commonly used in  
225 the activation process but hydrochloric acid is also effective. The acid treatment increases the surface area  
226 and pore volume thus improving the clays performance in removing color pigments and impurities from  
227 vegetable oil and animal fat. Although acid activated bleaching earth is often more effective, it is also more  
228 costly.

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230 **Evaluation Question #6: Are there adverse effects on the environment from the petitioned substance's**  
231 **manufacture, use, or disposal? (From 7 CFR § 205.600 (b) (2).)**

232  
233 Attapulгите is surface mined and, in most countries, the mining company is required by law to reclaim the  
234 land. Common practice is to open a cut, mine the clay, and then spoil the overburden from the next cut  
235 into the mined-out area. The spoil is leveled or sloped to meet the standards prescribed by the  
236 government, and grasses and/or trees are planted. Sometimes the topsoil is put back on top of the spoil  
237 and is used for agriculture (Murray and Zhou, 2006).

238  
239 The major environmental issue is air quality, because the dust during manufacture, use, or disposal.  
240 Repeated or prolonged inhalation of dust may cause delayed lung injury. The employees should wear  
241 proper personal protective equipment and a NIOSH<sup>10</sup> approved (or equivalent) respirator to prevent  
242 inhaling the dust. For occupational exposures, attapulгите is regulated by US Occupational Safety and  
243 Health Administration (OSHA) with the inert or nuisance dust standard: permissible exposure limits, 15.0  
244 mg/m<sup>3</sup> total dust and 5.0 mg/m<sup>3</sup> respirable dust (29 CFR §1910.1000).

#### 245 246 **Manufacture**

247 In the processing plant, air quality is maintained by using dust collectors on dryers, pulverizers, baggers,  
248 and belt-transfer points. Dust collectors, facemasks, and other devices should be provided to protect the  
249 workers from inhaling and contacting the dust.

#### 250 251 **Use**

252 The petitioned substance should be placed in adequate ventilation and good housekeeping storage and  
253 work areas to minimize dust. To handle this product, employees should wear protective gloves, coveralls  
254 and/or an apron to minimize skin contact, if necessary; wear goggles or safety glasses with side-shields;  
255 and wear appropriate NIOSH approved respirators to prevent inhaling the dust.

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<sup>10</sup> National Institute for Occupational Safety and Health

**Misuse**

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259 Prevent dispersion of dust and avoid all contact in accidental spills of attapulгите. Person needs to wear  
260 proper personal protective equipment. Contain the spill. Scoop up or vacuum the spilled material into a  
261 sealable container for reclamation or disposal; if appropriate, moisten first to prevent dusting.

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**Disposal**

263  
264 According to the petition's MSDS, unused material is suitable for disposal in sanitary landfills. The spent  
265 bleaching earth, or spent filter cake is discarded in a land field. Zschau (2000) has reported that for each  
266 ton of bleaching earth added to the bleaching process, the oil processor has to dispose of 1.25–1.50 ton of  
267 spent bleaching earth. A typical range of oil retention, which is defined as the amount of oil retained in the  
268 spent bleaching earth, is 35–40%. Therefore, self combustion or self-ignition of spent bleaching earth is a  
269 very important consideration for storage and transportation before disposal in a land field. [Note:  
270 Generally, the danger of self combustion rises as the unsaturated fatty acids increase in the retained oil.  
271 This means that spent bleaching earths containing fish and linseed oil, but also soybean, sunflower seed  
272 and rapeseed oil, have a relatively high risk for self combustion, whereas the risk is much lower for  
273 bleaching earths that contain hydrogenated fats, palm oil, or animal fats.]

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**Evaluation Question #7: Does the petitioned substance have an adverse effect on human health as defined by applicable Federal regulations? (From 7 CFR § 205.600 (b) (3).)**

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277  
278 The petitioned substance is a hydrated magnesium aluminum silicate that occurs as a fibrous chain-  
279 structure mineral in clay deposits in several areas of the world. Attapulгите fiber characteristics vary with  
280 the source, but fiber lengths in commercial sample are general less than 5  $\mu\text{m}$ . Attapulгите has been mined  
281 since the 1930s and is used mainly as an absorbent for pet wastes and oils and greases and as a component  
282 of drilling muds. Occupational exposure to the petitioned substance occurs during its mining, milling,  
283 production and use. General population exposures also may occur in its use as pet waste absorbent, in  
284 fertilizers and pesticides, and by ingestion of anti-diarrheal preparations. Attapulгите is listed as an inert  
285 ingredient can be used in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 25(b)  
286 pesticide products applied to food use site (e.g., food crops, animals used for food) and nonfood use site  
287 (e.g., ornamental plants, highway right-of-ways, rodent control). In addition, attapulгите is under 40 CFR  
288 §180.910 Inert Ingredients used pre- and post harvest; Exemptions from the requirement of a tolerance.  
289 In the US, typically, an adult dose of 1.2 g is prescribed at the onset of diarrhea with repeated use up to a  
290 maximum daily dose of 8.4 g (Engle, 1994).

291

292 In the report of International Agency for Research on Cancer (IARC) Monographs (Volume 68, 1997), a  
293 single cohort study of palygorskite (attapulгите) miners and millers was available for human  
294 carcinogenicity data. In the summary stated "It showed small excesses of mortality from lung cancer and  
295 stomach cancer, but no indications of any exposure-response for either cancer."

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297 Wilbourn et al. (1997) and the working group of IARC (1997) have reported that epidemiological studies on  
298 palygorskite (attapulгите), where available, were considered to be inadequate or of insufficient quality to  
299 allow an evaluation of its carcinogenicity in humans. There was sufficient evidence in experimental  
300 animals for the carcinogenicity of long palygorskite fibers (>5  $\mu\text{m}$ ) based upon studies in rats by inhalation  
301 and intrapleural and intraperitoneal administration. There was inadequate evidence in experimental  
302 animals for the carcinogenicity of short palygorskite fibers (<5  $\mu\text{m}$ ). Consequently, long palygorskite fibers  
303 (>5  $\mu\text{m}$ ) were classified as possibly carcinogenic to humans (Group 2B), while short palygorskite fibers (<5  
304  $\mu\text{m}$ ) could not be classified as to their carcinogenicity to humans (Group 3).

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**Evaluation Question #8: Is the nutritional quality of the food maintained when the petitioned substance is used? (From 7 CFR § 205.600 (b) (3).)**

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309 According to the petition, attapulгите is used as a natural bleaching clay in the purification of vegetable and  
310 animal oils. This purification step is often referred to as bleaching process, which is used for the removal of  
311 impurities from the edible oils. During the process, the bleaching clay not only adsorbs impurities but  
312 also a certain amount of oil. Zschau (2000) has stated "for each 100 kg of fresh bleaching earth, about 25–45



313 kg of oil is lost.” According to Brooks’ study (1999), the bleaching process can have a significant effect on  
314 oil loss and production costs. There is no information sources reviewed specifically addressing the issue of  
315 the impact on the nutritional value (such as Vitamins A &D and minerals) of the vegetable and/or animal  
316 oils when attapulgit is used.

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318 **Evaluation Question #9: Is the petitioned substance to be used primarily as a preservative? (From 7**  
319 **CFR § 205.600 (b) (4).)**

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321 By definition, bleaching is the physical and chemical interaction of a sorbent (bleaching clay) with oil or fat  
322 to improve its quality in the edible oil processing. It refers to removing impurities from a given oil through  
323 the addition and subsequent removal of bleaching sorbents (such as attapulgit). The impurities, in the  
324 spent bleaching earth, may contain oxidation products, color pigments, phospholipids and glycolipids,  
325 metal traces, soaps, and contaminants (such as pesticides). No information was identified to suggest that  
326 attapulgit is used primarily as a preservative.

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328 **Evaluation Question #10: Is the petitioned substance to be used primarily to recreate or improve**  
329 **flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g.,**  
330 **vitamin D in milk)? (From 7 CFR § 205.600 (b) (4).)**

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332 The function of a bleaching clay is to remove undesirable by-products (impurities) for the vegetable oil and  
333 animal fat, thus improving the appearance, flavor, taste, and stability of the final product (Zschau, 2000).

334

335 Duff (1991) has reported that adsorptive bleaching removes all gross impurities such as meals, metal  
336 contaminants (e.g. iron or copper), and any soaps left over from alkali refining. In addition, it removes  
337 peroxides and some of the secondary products of oxidation. But it does a poor job for removing pigments  
338 (e.g. chlorophyll, gossypol, and carotene) and gums. Hastert (1991) has indicated that attapulgit is not  
339 ordinarily used for vegetable oil adsorption because of its limited decolorizing ability. It is more likely to  
340 be used in treating meat fats which require little color removal.

341

342 **Evaluation Question #11: Is the petitioned substance generally recognized as safe (GRAS) when used**  
343 **according to FDA’s good manufacturing practices? (From 7 CFR § 205.600 (b) (5).)**

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345 Attapulgit (Doc. No. 1943) is listed under Everything Added to Food in the United States (EAFUS) and  
346 referred to in 21 CFR Part 582 – Substances Generally Recognized as Safe (GRAS), §582.99 Adjuvants for  
347 pesticide chemicals. Adjuvants, identified and used in accordance with EPA Regulations (40 CFR  
348 §180.1001(c) and (b)), which are added to pesticide use dilutions by a grower or applicator prior to  
349 application to the raw agricultural commodity, are exempt from the requirement of tolerances.

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351 **Evaluation Question #12: Does the petitioned substance contain residues of heavy metals or other**  
352 **contaminants in excess of FDA tolerances? (From 7 CFR § 205.600 (b) (5).)47**

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354 No information sources in the public domain specifically address that attapulgit contains residues of  
355 heavy metal or other contaminants in excess of FDA tolerances. It is not listed as a commodity (the  
356 applicable human food and animal feed products) under FDA’s “*Guidance for Industry: Action Levels for*  
357 *Poisonous or Deleterious Substances in Human Food and Animal Feed*”. However, according to Shenzhen  
358 Aoheng Science & Technology Co., Ltd. in China, its ‘Fuller’s Earth’ product, which is made from the  
359 attapulgit clay, contains arsenic ≤ 0.5 mg/kg, lead ≤ 1 mg/kg, and mercury ≤ 0.3 mg/kg.

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