

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
WEST VIRGINIA

APR 29 1983

THOMAS F. STAFFORD
CLERK

BARBARA CANTWELL
CHRISTMAN, et al.,

Plaintiffs,

v.

AMERICAN CYANAMID COMPANY,

Defendant.

Civil Action No. 80-0024

DEFENDANT AMERICAN CYANAMID COMPANY'S
FOURTH NONCONFIDENTIAL SUPPLEMENTAL RESPONSES
TO PLAINTIFFS' FIRST INTERROGATORIES

Pursuant to Federal Rule of Civil Procedure 33, defendant provides the following Fourth Nonconfidential Supplemental Responses to Plaintiffs' First Interrogatories. Defendant also reasserts objections 3, 5, 6 and 7 of its First and Second Objections to Plaintiffs' First Interrogatories to the extent they apply to the material now being provided for the first time. A copy of these objections is attached hereto.*/

15. With respect to the Willow Island facility, state separately for each year from 1965 to the present the number of men and the number of women:

*/ Assisting in the compilation of material used in the preparation of these responses to Plaintiffs' First Interrogatories were: C. Ballard, R. Heilman.

31. With regard to each chemical identified in response to Interrogatory No. 25(c), (d)(v), or (e)(iii) which is present in the Willow Island facility:

* * *

(b) For each document so identified, state the number of copies in existence at any given time, where the copies are kept, what procedures, if any are followed to insure that employees are able to read each document thoroughly, and what other instruction or information is available to employees;

Answer:

1. Chemical Hazard Sheets - Ten copies.
Maintained by Dept. Supt., General Supervisor, Safety Information Center in the production facility, Safety Dept., Stores, Medical Dept., Purchasing, Control Laboratory, Development Laboratory, and Plant Manager.
2. Chemical Safety Data Sheets - Manufacturing Chemists Association. Two copies. Maintained in Department of use and in the Safety Department.
3. M.C.A. Chem - Card - Manufacturing Chemists Association (now Chemical Manufacturers Association) - Used in applicable areas as attachments to outgoing shipments to provide

information in event of transportation emergency.

4. Operating Instructions and Log Sheets - These items are maintained at each operational point in the manufacturing area to provide procedural steps, safety instruction and emergency instructions to operating personnel.
5. Job Safety Analysis - Usually four copies. Safety information centers in each building, Dept. Superintendent, Area Manager, and Safety Dept.
6. Training Program - Lead and Lead Products - Copies maintained in applicable manufacturing facility at Safety Information Center and Dept. Superintendent's Office, and in the Training Dept. and Safety Dept.
7. Toxicological Study Letters - Copies of letters dated June 23, 1975, October 3, 1975 and August 11, 1976, from Ralph Clay, Plant Manager, regarding DCMA epidemiological study of exposure to lead chromate levels given to employees.
8. Work Habits Govern Health - Copy given to each employee assigned to Lead-Chromate Pigment Operation.
9. Benzene Monitoring Letter - Copy of letter dated April 15, 1977, from Ralph Clay, Plant Manager,