

**INTER-COMPANY AND
OFFICE CORRESPONDENCE**

DATE: June 5, 1990
FROM: Jane Walker
DIV./DEPT. Corp. Industrial Hygiene
ADDRESS: 6555 Busch Boulevard
Columbus, OH 43229
TELEPHONE: 614-431-6685

TO: Steve Ritchie
SUBJECT: Female Exclusion Policy
from VCM or PVC Production

I was contacted by Pat West at BCP in Geismar, LA to determine if the policy of excluding women of childbearing potential from PVC Polymerization and VCM Production Operations should be continued. In view of the recent court decisions reversing the exclusion of such women from exposure to high levels of lead during battery manufacturing, the Law Department at BCP feels that this policy should be reviewed.

A copy of the original letter instituting the exclusion policy has been included with this memo.

Please contact Pat West at BCP in Geismar, LA with any decisions pertaining to this issue.

Jane Walker
Sr. Industrial Hygienist

JW/mc

cc: T. Mekaru
N. Brusk
P. West
B. Neale

BOR 014318

614-431 6632

BCP

(Borden Chemicals and Plastics)

Purchasing Department
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FACSIMILE REPORTS OR MESSAGES:PLEASE DELIVER THIS COVER PAGE, ALONG WITH THE FOLLOWING 4 PAGE(S)TO: JANE WALKERAT: CORP IND HYGIENE
(location)FROM: PAT WESTAT: GEISMAR

**RECIPIENT: IF YOU DO NOT RECEIVE THE NUMBER OF PAGES INDICATED ABOVE,

PLEASE CONTACT PAT WESTAT: TELEPHONE # 387 5101THANK YOU!

BOR 014319



INTER-COMPANY AND OFFICE CORRESPONDENCE

Messrs. H. A. Peed, J. S. Bellecci,
J. R. Little

FROM: H. L. Schmidt, Jr.

LOCATED AT: Columbus, Ohio

DATE: August 27, 1976

{ Dept.
Branch
Division
CompanyFEMALE EMPLOYMENT IN PVC
POLYMERIZATION AND VCM
PRODUCTION OPERATIONS

My letter (copy attached) of 7/20/76 to Mr. H. L. Parker reflects our current posture with reference to female employment in the PVC Polymerization and VCM Production Operations.

More specifically, women of childbearing potential, pregnant, and lactating women, will not be assigned to these operations at the present time.

If plant or plant sites conducting the above operations have areas where VCM exposure will never be appreciable, qualified women may be assigned.

PVC Fabricating Operations are presumed to meet these requirements and are excluded from the requirements of this memo.

Local Affirmative Action plans should be amended to include the above.

If you have any questions--particularly about those areas where women may be assigned--please contact me.

Very truly yours,

H. L. Schmidt, Jr.

HLS:p

Enc.

cc: Max A. Minnig
C. C. Braun
H. R. Jepsen
J. D. Antler
A. S. Cummin
T. Mekar
R. B. O'Connor, M.D.
H. L. Parker

OFFICE CORRESPONDENCE

Mr. H. L. Parker

EXPOSURE OF WOMEN OF CHILDBEARING AGE
TO VCM

FROM:

H. L. Schmidt, Jr. ✓

DIV/DEPT:

Chemical Adm.

ADDRESS:

Columbus - 24th Floor

TELEPHONE:

4822

When the suspected teratogenic effect of VCM became known, Borden Chemical adopted the recommendation of our then Medical Consultant, Dr. Norman Williams, of "not employing women of childbearing age or capable of bearing a child, in operations involving exposure to vinyl chloride monomer, or the polymer, in situations where appreciable amounts of the monomer may be released."

As suggested by Dr. Williams (who is now deceased), we have again reviewed our posture with reference to employment of women of childbearing age in VCM areas. The results of our current investigation indicate that we should continue to refrain from assigning women to VCM/PVC areas until such time as sufficient data has been developed to determine the true teratological effect of VCM.

In private conversations with medical or scientific personnel of seven of the major VCM/PVC producers, consensus was that it would be prudent to refrain from assigning women of childbearing age to the VCM/PVC workplace for teratological reasons at the present time.

Guidance was sought at the Conference on Women and the Workplace sponsored by the Society for Occupational and Environmental Health in Washington on June 17--19, 1976.

At this meeting, Dr. Joseph K. Wagoner, the President-elect of SOEH and Chief, Bureau of Industry-Wide Studies at NIOSH, said that studies suggest that "women of reproductive ages should be excluded from employment in VCM or PVC facilities."

An overall summary of the 2-1/2 day meeting pointed out that on an equal weight basis, women and men should not experience any different risk in the workplace because of their sex except during that period when a woman is pregnant. Neither Dr. John Finklea, the Director of NIOSH, nor Dr. Morton Corn, Assistant Secretary for Osha - U.S. Dept. of Labor, would address themselves to a solution of this teratogenic or mutagenic problem, stating that there was not sufficient information as yet to make positive decisions in this area.

Other speaker-physicians at the meeting firmly stated that fertile or lactating women should not be employed where they would be exposed to suspected teratogenic agents until adequate information has been developed.

BOR 014321

Mr. H. L. Parker

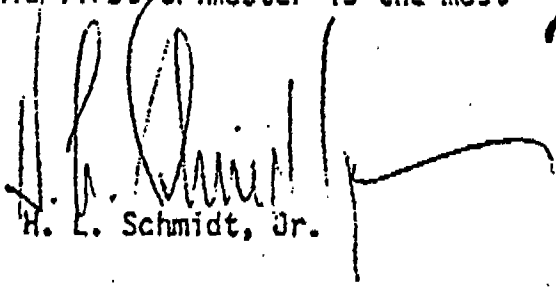
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July 20, 1976

Subj: Exposure of Women of
Childbearing Age to VCM

Our present Medical Consultant, Dr. Robert O'Connor, also supports and advocates our present posture.

In view of the above, and as stated earlier, we shall refrain from assigning women of childbearing age to our PVC/VCM areas until adequate information has been developed and/or a practical method has been devised for determining immediately when a woman is pregnant, for this first trimester is the most susceptible period.


H. L. Schmidt, Jr.

HLS:p

cc: Messrs. Max A. Minnig
C. C. Braun
A. S. Cummin
T. Mekaru
H. A. Peed
H. R. Jepsen
Dr. R. O'Connor

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