

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

FILED AT HARRISBURG, W. VA.

BARBARA CANTWELL CHRISTMAN,
et al.,

Plaintiffs,

v.

AMERICAN CYANAMID COMPANY,

Defendant.

THOMAS F. STAFFORD, Clerk

Civil Action
No. 80-0024-P

DEFENDANT AMERICAN CYANAMID COMPANY'S
FIRST SUPPLEMENTAL AND AMENDED NONCONFIDENTIAL
RESPONSES TO PLAINTIFFS' SECOND INTERROGATORIES

Pursuant to the Court's Order entered on January 18,
1983 and pursuant to Federal Rules of Civil Procedure 26(e) and
33, defendant provides the following First Supplemental and
Amended Nonconfidential Responses to Plaintiffs' Second Inter-
rogatories. ^{*}/

^{*}/ Assisting in the compilation of material used in the
preparation of the first supplemental responses to Plaintiffs'
Second Interrogatories were: C. Ballard, J.C. Caporossi,
R. Heilman, W. Fead, G.E. Mercer, P. Shopene, J. Tobin, J.
Noble, R. Smith, J. Calitri, M. Friedman, C. Peterson,
R. Clyne, L. Long, H. Kiltie, W. Andresen, H.C. Gaffney, J.
White, and H.M.D. Utidjian.

In addition, to the best of Cyanamid's knowledge the following identifies permanent and temporary female laboratory workers who, since 1970, routinely ran pigments process samples in the laboratories during the dates and for the percentage of time stated below:

<u>Name</u>	<u>Date</u>	<u>Percentage of Time*/</u>
Linda L. Hall	5/28/74 - 8/9/74	80-90%
	5/24/76 - 8/20/76	56-63%
Cathy J. Radcliffe	6/7/76 - 7/30/76	40-60%
Lisa R. Smith	6/1/78 - 8/15/78	10-15%
JoAnn Stewart	2/1/76 - 11/1/77	10-15%
	7/16/79 - 5/1/80	10-15%
Mary Anne Chambers (Poole)	7/16/79 - 5/1/80	10-15%
Deborah C. Allen	5/1/74 - 5/1/75	80-90%
Pavanne P. Canary	8/23/73 - 5/16/74	80-90%
Terrie L. Davis (Piersol)	10/25/77 - 9/16/78	80-90%
Sharon A. Czajkowski	9/1/78 - 4/1/80	10-15%

The percentage of time exposed to lead is an estimate based upon the knowledge of plant personnel of the laboratory positions held by these persons and the processes they were required to perform while holding those positions.

c. To minimize exposure to lead and lead chromate, the importance of good personal hygiene was reinforced through periodic safety meetings and close

*/ No routine lead or lead chromate exposure occurred after the Pigments Department closed in January 1980.

<u>Name</u>	<u>Dates*/</u>
Mary A. Cottle	6/6/77 - 8/11/77
Deborah A. Short	6/13/77 - 8/5/77
Brenda K. Sams	6/10/74 - 8/8/75
JoAnn Stewart	8/11/75 - 5/1/80
Virginia E. Davis	2/16/78 - 1/14/80
Sally A. Whited	9/16/78 - 11/1/80
Mary Anne Chambers (Poole)	2/16/78 - 5/1/80
Linda L. Hall	5/28/74 - 8/9/74 5/24/76 - 8/20/76
Penny K. Northcraft	6/19/79 - 8/15/79
Cathy J. Radcliffe	6/7/76 - 7/30/76
Lisa R. Smith	6/1/78 - 8/15/78
JoAnna L. Rose	6/1/76 - 9/30/76
Deborah C. Allen	5/1/74 - 5/1/75
Pavanne P. Canary	8/23/73 - 5/16/74
Terrie L. Davis (Piersol)	10/25/77 - 9/16/78
Rozella R. Baum	6/16/77 - 4/1/79 7/16/79 - 11/1/80
Sharon A. Czajkowski	6/7/76 - 4/1/80
Sally L. Demyan	2/9/76 - 4/30/76
Denise A. Tillery (Robinson)	6/1/76 - present
Rebecca D. Garst (Cutlip)	7/22/74 - 1/1/81

*/ No lead and lead chromate analysis occurred routinely after the Pigments Department closed in January 1980.

e. See response to Interrogatory 25(i), part II (A-D). Cyanamid's health professionals also relied on information obtained in the course of their professional experience.

49. Identify all female laboratory workers at Willow Island who, since 1970, were routinely exposed to lead or lead chromate. For each such worker:

- a. state the inclusive dates of employment in the laboratory;
- b. state the percentage of time exposed to lead or lead chromate and explain in detail the method for calculating this percentage;
- c. describe in detail any actions taken by Cyanamid to reduce exposure to lead and chromate; and
- d. describe all tests and studies monitoring exposure to lead and chromates including, without limitation, air sampling, blood testing and physical examination; state the frequency of each such test or study, and identify all documents containing the results of each such test or study.

Answer: a-b. To the best of Cyanamid's knowledge, the following identifies permanent and temporary female laboratory workers at Willow Island who, since 1970, were assigned to laboratory areas where lead and lead chromate analysis occurred routinely and the dates during which they were assigned to those laboratory areas.