

UNION
CARBIDE

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) Plant Letter List B1
 COMPANY B2, B3, and B4
 LOCATION TEXAS CITY PLANT

DATE October 6, 1977

COPY TO Plant Letter List A
 Mr. D. E. Deese
 Dr. D. L. Glenn
 Mr. T. Harrison
 Dr. E. Q. Hull - 511
 Mr. J. D. Martin - 510
 Mr. A. E. Montagna - 501 (21)
 Mr. R. E. Peele

SUBJECT Placement of Fertile Females
 Within the Work Place -
Interim Guidance
 Ref: Attached Procedure, Placement
of Fertile Females in the Work
Force

Gentlemen:

In response to action plans as developed in the first meeting of the Plant Committee for Placement of Fertile Females held September 16, 1977 and follow-up meetings on September 27 and October 5, teratogens, transplacental carcinogens, and anoxia agents have been reviewed by Dr. D. H. Glenn, Plant Medical Director, Mr. D. E. Deese, Plant Industrial Hygiene Director and other members of the committee.

The review consisted of categorizing the chemicals relative to plant impact based upon present knowledge of exposure potential in affected areas of the plant.

Priorities were then set. Interim guidelines were developed based upon present knowledge, and action plans established to procure needed additional exposure data. Summaries of these items are as follows:

Priorities: Teratogenic chemicals that could significantly impact upon fertile female job placements within the Texas City Plant have been categorized as follows:

Zero Exposure
Permitted

Ucon 22

Limited Exposure
Permitted

Lead

Limited Exposure Permitted
 But of Equal Concern to
 Males

Vinyl Chloride
 Benzene
 DMAC
 DES

The above lists will likely change as additional knowledge of other chemicals is developed.

UCC 094818

*This is the
key point
for us.
Females
will be allowed
to work regulated
areas, but
will have to be
protected to our
satisfaction, the
same as
males.
B*

Plant Letter List B1, B2, B3 and B4
October 6, 1977
Page 2

Interim Guidelines: Based upon present knowledge, fertile females should not be allowed to work in the:

- (1) Air Conditioning Craft/Shop
- (2) Lead Craft/Shop
- (3) Spray Painting Craft/Shop
- (4) Welding Craft/Shop

Action Plans for Development of Additional Data:

- (1) Methods for monitoring of DES and Ucon 22 will be developed. D. E. Deese to coordinate.
- (2) Periodic monitoring of tasks involving DMAC at No. 3 Olefins will be initiated by D. E. Deese.
- (3) Monitoring of Lab Analysts handling DMAC will be initiated by D. E. Deese.
- (4) Lead monitoring plan (initiated) to be completed by D. E. Deese. 4-1-78.

A procedure Placement of Fertile Females in the Work Force developed by the Medical Department based upon corporate SHARE guidelines is attached. A plant procedure will be issued by the Safety Department at a later date.

Plant Department Heads are invited to attend a meeting:

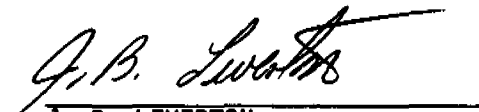
DATE: Thursday, November 10, 1977

TIME: 11:00 a.m. to 12:00 Noon

PLACE: Nos. 1 and 2 Conference Rooms

At this time Medical, Industrial Hygiene and other committee representatives will be available to clarify the procedure and answer any questions you may have.

Yours very truly,


J. B. LEVERTON

JBL:ir
Attachment

UCC 094819

Teratogens

Zero Exposure
UCON 22

Limited Exposure

Lead

?

♂ → + ♀

VCM	1 ppm
Benzene	1 ppm
DES	1 ppm
DMAC	10 ppm

PLANT PROCEDURE RE: PLACEMENT OF FERTILE FEMALES
IN THE WORK FORCE

Female employees of reproductive capability are entering the work force in increasing numbers and are being assigned jobs in the plant which subject them to a variety of potential chemical exposures. It is recognized that certain chemicals (teratogens, transplacental carcinogens, and anoxia agents) may have adverse effects on an unborn child if the expectant mother is exposed to unsafe levels during pregnancy.

To eliminate the risk to an unborn child, line management, with the advice and counsel of the Medical Department, must exercise prudent judgment in the placement of female employees with reproductive capabilities; and once placed, ensure that all practical steps are taken to prevent them being exposed above Union Carbide Corporation recommended levels.

The responsibilities of line management and the Medical Department under this procedure are specified below:

A. Responsibilities of Line Management

- 1) By use of industrial hygiene monitoring and other available means, line management will determine those units/areas, or portions thereof, which may potentially pose a hazard. In making this determination management should be guided by the

UCC 094821

recommended limits of exposure which have been established by the Corporation. Such limits are available from the Medical Department.

- 2) If exposure levels are presently in excess of the limits established by the Corporation, line management will be responsible to develop action plans to ensure that recommended levels are achieved. In the event this is not economically and/or technically feasible, continuing efforts to achieve these levels will be documented. In the interim, line management will ensure that the appropriate protective equipment and/or clothing is used in those instances when a specific job assignment does not protect the fertile female from exposure.
- 3) Line management will always consult with the Medical Director on the advisability of subjecting a female employee to levels of exposure above the Union Carbide Corporation recommended limits.
- 4) Although all females at time of hire or transfer will be briefed by the Medical Department, line management has the responsibility of advising female employees working in a unit/area of the risk involved and of the safeguards available. A detailed record

will be kept documenting that such advice has been given. A copy of such documentation will be forwarded to the Medical Department.

- 5) Line management, upon being informed of the pregnancy of an employee, will immediately inform the Medical Department.
- 6) The appropriate Assistant Plant Manager or designee will review all restrictions suggested by the Medical Department and render a decision as to whether the employee should be reassigned, remain in place, etc. Cases which cannot satisfactorily be resolved should be referred to the Corporate Health, Safety, and Environmental Affairs Committee.

B. Responsibilities of the Medical Department

- 1) The Medical Department will be responsible for obtaining and keeping current a list of suspect teratogenic chemicals with their maximum exposure levels as recommended by the Corporate Health, Safety, and Environmental Affairs Department.
- 2) The Medical Department will be a resource to line management for consultation and recommendation