b.c.c. W. Reitze, Denver

Canadian Johns-Manville Co., Limited
Products Division
Toronto Plant
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June 2, 1975.

Mr. Donald Hushion, Executive Director,
Employment Services Division,
Ontario Ministry of Labour,
400 University Avenue,
TORONTO, Ontario. M7A 1T7

Dear Mr. Hushion:

PROPOSED CHANGES IN LEGISLATION RELATING TO ASBESTOS FIBRE

1. Smoking and Asbestos

We concur with the proposal to prohibit smoking in all areas where asbestos is stored, processed or used. A ban on smoking in those areas will be implemented at Toronto Plant on Monday, June 2nd. A letter outlining this new company rule was given to each individual with their May 29th paycheck and posted on all bulletin boards. A copy is enclosed.

2. TLV's for Asbestos Fibre

We are presently operating under a 2.0 F/cc level for all asbestos fibres and have been advised by you that you propose limiting the exposure to airborne fibres of blue asbestos to a maximum level of 0.2 F/cc, and that this will become the future TLV. Dr. Selikoff, and many others in the medical field, have made statements as recently as May 18th at the Montreal Conference of the Canadian Thoracic Society expressing no differentiation between all types of asbestos fibres and their effects on health. We know that at present the U.S. Government standard is 5 F/cc with a proposal to reduce this to 2 F/cc in July of 1976, again with no differentiation for type of fibre. At present, Ontario has the tightest standards of anywhere in the world, and to our knowledge, only in Britain is there a differentiation which is identical to what you propose


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for blue asbestos fibre only. In view of this, we seriously question the need for changing the present standard, and hereby request further explanation of the reasoning necessitating the change and the level proposed. Our J-M corporate policy is to reduce fibre exposure levels to the minimum which are technically possible and financially feasible. We are below the 2.0 F/cc TLV in virtually all of our stations at Toronto Plant.

Only through recently developed techniques using electron microscopy have we been able to differentiate between fibre types. The latest state of the art still requires one to two days per sample for analysis. Due to the large number of sampling stations and number of samples required for representative results, it is our opinion that this present method is for all practical purposes, an impossible method of measuring and controlling. Both the Occupational Health Protection Branch and the Company do not know at present the composition of the airborne dust samples by fibre type and this is certainly a starting point should any such differentiation be required.

For the reasoning outlined above, we do not concur with initiating a separate and reduced standard for blue asbestos fibre, however, at your request for a program to cope with a reduced standard, we submit the following.

From your recent tours of our operations, you can appreciate that improvements to environmental control are an ongoing function and this was well verified by Jim McNair at the May 21st meeting when he pointed out the improvements we have made over the past five years, as the TLV's have been reduced from 12 to 5 to 2 F/cc. It is therefore our conclusion that if a differentiation must be made on fibre types, based on recommendations to you by the Ministry of Health, it be initiated with a 0.5 F/cc standard for blue asbestos fibre.

This would be a 75% reduction from the present 2.0 F/cc level for all fibres, a much greater initial tightening than when previous standards were reduced from 12 to 5 and then to 2 F/cc.


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Despite the lack of scientific and medical evidence in North America and Europe to warrant a reduced TLV for blue, this phased reduction approach would provide a time span for continuing our improvements on various operating centres within the plant, provide for further medical input to better assess the standards required, and allow for improvement of analytical techniques.

To reduce the standard immediately to 0.2 F/cc could necessitate the wearing of respiratory protection by all personnel in the Pipe Department; a possible unnecessary restrictive discomfort to them based on a theoretical TLV. Dependent on the number of work stations affected, alternatives to rearrange work schedules for these employees to reduce their time weighted exposure on the job through hiring relief personnel or job rotation with employees on centres with less exposure might be feasible at a future date.

As pointed out in our meetings the cost of blue fibre alone has warranted many production trials in the past to minimize blue usage in Asbestos Cement Pipe manufacturing at Toronto Plant, and we will continue these trials utilizing other asbestos fibres subject to their availability. Worldwide shortages for all types of asbestos fibres has put asbestos fibre supply on a long term allocation basis and makes arranging for alternative fibres virtually impossible. Due to the current U.S. recession we have, however, been able to arrange for four carloads of Cassiar fibre to be shipped to us from one of our U.S. plant's inventory in June for production trials.

Since our non-domestic fibres are required primarily for couplings, pressure pipe and large diameter sewer pipe we are analyzing our market needs to consider the economics of producing in Canada for a reduced market segment and importing these items. We are pursuing the feasibility of utilizing alternative materials to reduce our future requirements for non-domestic fibre types, such as using P.V.C. fittings and structural foam couplings.

As we have previously pointed out a total ban on blue would eliminate approximately 12,000 tons of coupling production, 25,000 tons of pressure pipe production, and reduce by 25% the remainder of our production at


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the plant from its current 100,000 ton per year level to 50,000 tons per year and make it economically unviable to continue manufacturing A/C pipe in Canada. It is, and will continue to be, the company's intention to comply with, and wherever possible, better the Industrial Hygiene standards and we perceive the current level of 2 F/cc for all fibres to be an adequate standard.

Yours sincerely,

CANADIAN JOHNS-MANVILLE CO., LIMITED

B. C. Machin,
Plant Manager.

cc:

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