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Johns-Manville **Internal Correspondence**

To: G. P. Loubert, ENG, Toronto — Date: January 13, 1978

From: E. G. Strader, Toronto Plant

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Subject: ENGINEERING PROJECT NO. 661-ER-[illegible] S.2

In order to clarify the need for the completion of this project, I wish to re-emphasize certain of the reasons for the request for supplemental funds.

For many years we have opened asbestos fibre bags manually. We have done so because until now there was no equipment suitable to perform this job satisfactorily, and the use of respirators was made compulsory as an interim solution until a permanent means of correction was found. We have, in corporate literature, discussion with the labour union, and the Ontario Department of Labour, given various commitments to solve the problem of exposure to asbestos fibre in order to safeguard the health of employees using the best known available practical and feasible technology, and we believe the Sol-Tyne bag opener meets these parameters.

The only area at Toronto Plant where hygiene surveys continue to be above TLV is at the willows where the operator presently cuts open the bags of fibre and manually dumps the fibre into a chute then rehandles the asbestos-contaminated bag to a disposal area. The degree of asbestos fibres in the air is dependent to a very large extent on the individual employee's work practices as to how carefully he opens the bag, breaks up the fibre, feeds it and shakes clear the bag and disposes of it. The actual control of the fibre levels is therefore dependent on the worker and his job practices and housekeeping which may vary widely from operator to operator and consequently are not maintained at optimia levels. Since final responsibility still rests with the company to ensure workers wear safety equipment and perform their work safely, having to rely on the tidiness and housekeeping of employees does not constitute sufficient, effective control and leaves the company exposed to future compensation

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claims and penalties through workers contracting disease because of their poor work practices. Another consideration is that the willow location is adjacent to a main walk-way in the north end of Transite Pipe where all types of employees, including office staff, walk without respirators. This intermittent exposure to asbestos fibre, at the edge of an area which exceeds the TLV established by the Corporation and the Ontario Government, should be eliminated if possible.

The local member of the Federal Parliament, Mr. Martin O'Connell (M.P. Scarborough East), has expressed a very real interest in this project and wishes to see the opener in action and has advised us he plans to do so this month before sessions resume.

Referring to the probability of success with this equipment, our evaluation is that the equipment will be operational at an 80% level of optimum performance due to the awkwardness in feeding the bags necessitated by the existing fibre mixer location. This means that, as with most equipment, it will do the job but as a first generation opener, it will at times give operational problems. This opinion is based on the various trials already completed and progress accomplished to date. We have spent $83,000 on a concept which has proved to be difficult, but is now in the last stages before becoming a major step forward in the process of protecting our workers and honouring our commitment to "reduce the exposure of our employees to asbestos through engineered control".

This project is not only of Division significance, but also vitally important to any location within our world-wide operations where bags of asbestos fibre must be opened. A working automatic bag opener operating in a 3-M location will also be of significant help to our 3-M fibre sales when we can relieve our customers' concerns for their employees' health knowing we have a safe, efficient method of handling asbestos fibre. We strongly believe that approval of the $12,000 requested will be well spent even if the probability of success was less than that indicated earlier. by confirming to all parties as well as the concerned individuals working in the plant that Johns-Manville is serious in its policy to protect life and improve the environment.

E. O. Strader

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