Johns-Manville

Internal Correspondence

To: T. S. Patterson Toronto

Date: September 11, 1980

From: W. B. Reitze 1-06

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Subject: ONTARIO MINISTRY OF LABOUR
PROPOSED NEW REGULATIONS FOR ASBESTOS
OCCUPATIONAL HEALTH AND SAFETY ACT, 1978

My staff and I have all reviewed these regulations and, generally speaking, we do not see any major problems.

In the case of asbestos, it should be noted that it is proposed to change the TLVs. In the case of the time weighted average, the TLV for chrysotile would be 1.0 f/cc. In the case of amosite, it would be 0.5 f/cc, and in the case of crocidolite it would be 0.2 f/cc. The current TLV in the U.S., of course, is 2.0 f/cc. The proposals made by U.S. government agencies would be far lower than these proposed Canadian TLVs. The ceiling TLV in the U.S. is currently 10.0 f/cc. This Ontario proposal calls for 5.0 f/cc for chrysotile and 2.0 f/cc in the case of amosite and crocidolite. The most significant part of this proposal is that blue and amosite have been singled out for lower TLVs much the same as the countries in Europe have been proposing.

The wording in the asbestos document is somewhat loose, particularly in their "definitions." It appears that this looseness has been written in to allow some flexibility, and if this is the case in actual practice, then we should not be too concerned about the proposal.

The PVC regulations are somewhat less stringent than those that we are currently living with in the U.S. and should not present any problems to any of our operations. The noise proposals, again, should not increase any of our existing noise compliance problems. There is one major difference that should not be overlooked. While in the U.S. we are currently living with a 90 dBA limit, this proposal has lowered that to 85 dBA. This lowering of the noise standard will certainly put us out of compliance in many more noise stations in our Canadian operations. The individual provisions of the noise standard other than the 85 dBA, however, would be rather difficult for us to argue with.

In summation, generally speaking the asbestos, PVC and noise standards proposed are not likely to cause us too many operational problems except those noted above. We should, however,

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take a stand which is consistent with our corporate policy regarding the fact that we feel the 2.0 f/cc TLV for asbestos is safe and we see no need for reducing this level. We should also take exception to their intimation that crocidolite and amosite are far worse than chrysotile. We in HS&E believe that scientific medical data in support of crocidolite-amosite being more hazardous just does not exist.

WBR