



July 28, 1972

Mr. P. C. Milner
Works Manager
Brakeblok - Lindsay

Subject: Lead and Asbestos Study by Ontario Dept. of Health

In view of your letter of July 20, 1972 and the information which was forwarded, additional comments are warranted as you indicated.

Since your last telephone conversation, I have written the Ontario Department of Health to obtain clarification on their Threshold Limit Values as well as sampling techniques for lead and asbestos. It appears, from reviewing their report No. 15007 A, that we are only in non-compliance relative to lead in one location; however, asbestos appears to exceed the TLV in all locations studied according to their data.

In your letter of July 4 you noted eight (8) items which were either under consideration or that you stated you would do at a later date. Have you yet posted notices relative to eating, drinking, etc. in the plant areas? In Item No. 1 you stated these notices would only be posted by the rubber mill and upstairs compound room. However, such a notice should be posted at the entrance to the plant. There should be no eating, drinking, chewing and smoking in the entire plant area. It is possible that these notices, as well as the notice listed on recommendations forwarded by the Ministry of Labor stating dangers involved with lead, etc., could be obtained from the Ministry of Labor. You should inquire of them relative to obtaining these notices.

Also Item No. 4 in the July 4 letter states you are investigating the provisions of double locker accommodations, again on the Ministry of Labor recommendations list. This is apparently mandatory. Also in Item 2 you state, "we are improving our housekeeping where possible", that same notice

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states housekeeping is to be maintained at a high degree and no dry sweeping should be permitted. These items, you should note, are mandatory.

In all cases, whenever urine specimens are forwarded to the Ontario Department of Health, a duplicate sample should be submitted to this office for analysis. You have questioned who are the workers exposed to lead? You should assume that almost all your workers in your plant are potentially exposed to lead. There are, of course, areas in the plant which are more apt to cause a high air-borne concentration but almost all your plant employees are potentially exposed. I think Dr. Blackwell plans to visit your plant to speak to Dr. Wood sometime in the near future. This should assist in clarifying the medical supervision program between you and Dr. Wood.

As soon as is possible, personnel from this office will visit your plant to perform a survey primarily for lead and asbestos, but the entire plant will be covered at that time. If there is anything we can assist you with prior to that time, please do not hesitate to contact me.



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