

Fri 30-Jun-17 2:34 PM

Good afternoon,

I would like to make a recommendation on the way WSH sets TLV's etc. It is written throughout the regulations, 4.12 (a), 18.2 (a), 36.5(1) (a) and (b) to name just a few. I would recommend that we not blindly follow all of ACGIH's set values. I am concerned that their testing methodology is not what it should be, for example, the new manganese levels having received 2 tests (1 controlled in a laboratory and 1 in a welding environment) is not adequate to reach the conclusions they have drawn.

I would like to see Manitoba take what they say under advisement without making it an automatic law. I suggest we set up a steering committee to review the new suggested levels put out by ACGIH to ensure the information has been sufficiently studied and supported coupled with a study on how it would impact Manitoba's industry sectors before making any decision. If it is found that ACGIH's recommendations are accurate and in everyone's best interest to follow them they could develop an implementation plan that Manitoba companies could follow and attain without causing any undue hardship. Some of the cuts to the TLV's they have suggested require a huge cash outlay to become compliant, something most manufacturers cannot achieve overnight. With automatically adopting ACGIH's recommendations that is what is required to be compliant is an overnight change.

With the manganese example, people had called the Manitoba Workplace Safety and Health Branch and asked if they had any time to adapt to the changes and implement the strategies necessary, to which they replied it would be a year or two before they would start to cite people on the new TLV's. A statement which very quickly proved false as people were cited a very short time later. That is, in my opinion, a very unfair system. I do hope something can be done to change this.

Thank you for your consideration.



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