

## **PART 1 – GENERAL**

### **1.1 REGULATORY REQUIREMENTS**

.1 An investigation into the presence of designated substances at the Health Protection Building, 200 Tunney's Pasture Driveway, Ottawa, Ontario was performed in order to meet the requirements of the Canada Labour Code under Part II, section 124 which stipulates that every employer shall ensure that the health and safety at work of every person employed by the employer is protected and those employees are made aware of every "known or foreseeable health or safety hazard" in the work environment. Also, it was performed to meet the requirements of Section 30 of the *Ontario Occupational Health and Safety Act, Revised Statutes of Ontario, 1990, Chapter 0.1*. By having a Designated Substances Report (DSR) conducted, the Departmental Representative will be able to inform his or her employees, contractors, and tenants of any designated substances that may be present and possibly disturbed throughout the duration of the project. The informed Departmental Representative will then be able to impose appropriate health and safety precautions for all applicable personnel as required. The *Guide to Green Government* sets out the policy requirements for the federal government to meet or exceed federal environmental statutes and regulations, and the emulation of best practices from the public and private sector. Within the *Guide to Green Government*, pollution prevention efforts are required in federal projects. Pollution prevention is defined as the use of processes, practices, materials, products or energy that avoid or minimize the creation of pollutants and waste, and reduce overall risk to human health and environment. These policies must be adhered to throughout the duration of the interior doors upgrade project at the Health Protection Building.

.2 The designated substances identified in the *Occupational Health and Safety Act* and its corresponding regulations are:

- .1 **Acrylonitrile:** "Designated Substance – Acrylonitrile" *O.Reg 835* (as amended by *O.Reg 490/09*)
- .2 **Arsenic:** "Designated Substance – Arsenic" *O.Reg 836* (as amended by *O.Reg 490/09*)
- .3 **Asbestos**
  - .1 "The Regulation Respecting Asbestos" *O.Reg 837* (as amended by *O.Reg 490/09*)
  - .2 "General – Waste Management" *O.Reg 347* (as amended by *O.Reg 337/09*)
  - .3 "Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations"



Property Branch, PWGSC, conducted the on-site survey for this report on 2012/11/13.

- .2 The work area is located at the Health Protection Building, 200 Tunney's Pasture Driveway, Ottawa, Ontario. The scope of the work proposed consists of replacing or upgrading select interior doors on the 2<sup>nd</sup> floor, ground floor and basement:
  - .1 The scope of work for this report involved a visual inspection of building materials and contents for the presence of suspected designated substances in the project area.
  - .2 From the visual inspection suspect materials were sampled and analyzed, where appropriate, for the above substances. On the basis of this inspection, a total of nine (9) bulk samples of suspected asbestos-containing materials (ACMs), and three (3) samples of suspected lead-containing paint were collected. ACM samples were collected in order to satisfy the requirements of *O. Reg. 278/05*, as amended.

The samples were then submitted for analysis to the EXOVA Accutest Laboratory (an accredited CAEAL lab) located at 146 Colonnade Road, Nepean, Ontario, K2E 7Y1.

The asbestos samples were analyzed using Polarized Light Microscopy (PLM). This analytical method complies with the United States Environmental Protection Agency (U.S. EPA) Method 600/R-93/116.

The lead analysis of the paint sample was completed using Inductively Coupled Plasma – Mass Spectrometry (ICP-MS) in accordance with U.S. EPA Method 6010-C.
  - .3 The visual inspection and sampling was limited to readily accessible areas. Destructive testing was not included in the investigation, but is recommended prior to any major demolition. Due to the nature of building construction, some inherent limitations exist as to the possible thoroughness of the designated substance survey. The survey did not include the demolition of floors, floor finishes, plaster ceilings or walls or other areas to examine concealed conditions. No confined space was accessed for the purpose of this report.
  - .4 It is possible that the designated substances aforementioned are present in non-accessible areas and concealed spaces (i.e., wall and ceiling cavities), or confined

- spaces. No other areas outside the defined work boundaries have been assessed.
- .5 Prior to beginning work, it must be confirmed with the Departmental Representative that no additional designated substances have been brought to the project area.
  - .6 In addition, the survey refers to PCBs and halocarbons; however, it does not refer to other substances that may be present in the day-to-day usage for specialized equipment or areas in buildings (i.e. lead shields, fume hoods, etc.).
  - .7 There is a possibility that materials which could not be reasonably identified within the scope of this assessment or which were not apparent during previous site visits may exist. Should any designated substance be encountered in the course of demolition, work must be stopped, preventative measures taken, and the Departmental Representative must be notified immediately. **Do not proceed until written instructions have been received.**

## **PART 2 - DESIGNATED SUBSTANCES**

### **2.1 SURVEY RESULTS**

- .1 **ACRYLONITRILE:** Not Identified
- .2 **ARSENIC:** Not Identified
- .3 **ASBESTOS:** Not Identified

Asbestos is a naturally occurring material. In general, it has historically been intentionally added to many building materials in the construction industry to increase thermal or chemical resistance properties. More common uses are thermal insulation for pipes and boilers, structural steelwork fireproofing, floor tiles and in-wall and ceiling plasters. There are two classes of asbestos-containing materials: friable and non-friable. Friable asbestos-containing materials are loose in composition or can be easily crumbled using hand pressure. Non-friable asbestos-containing materials are more durable and are held together by a binder such as cement, vinyl or asphalt.

Representative ACM samples, collected on 2012/11/13 from materials located within the project area have been analyzed for asbestos. No asbestos was detected in the plaster and the drywall joint compound samples collected from the project area. The results are shown in Table 1 below.

**Table 1: Asbestos Sample Results**

Sample ID	Material	Location	Asbestos Type	Asbestos content (%)
HPB-AS-1A	Drywall joint compound	Above the door 2-3, 2nd floor	n/a	n/d
HPB-AS-1B	Drywall joint compound	Above the door 2-3, 2nd floor	n/a	n/d
HPB-AS-1C	Drywall joint compound	Above the door 2-3, 2nd floor	n/a	n/d
HPB-AS-2A	Plaster and cement	Wall beside the door 2-5, 2nd floor	n/a	n/d
HPB-AS-2B	Plaster and cement	Wall beside the door 2-5, 2nd floor	n/a	n/d
HPB-AS-2C	Plaster and cement	Wall beside the door 2-5, 2nd floor	n/a	n/d
HPB-AS-3A	Plaster and cement	Wall beside the door 1-7, 1st floor	n/a	n/d
HPB-AS-3B	Plaster and cement	Wall beside the door 1-7, 1st floor	n/a	n/d
HPB-AS-3C	Plaster and cement	Wall beside the door 1-7, 1st floor	n/a	n/d

n/d = none detected, n/a = not applicable

- .4 **BENZENE:** Not Identified
- .5 **COKE OVEN EMISSIONS:** Not Identified
- .6 **ETHYLENE OXIDE:** Not Identified
- .7 **ISOCYANATES:** Not Identified
- .8 **LEAD: Identified**

Lead is a naturally occurring metal. It was used primarily in paint prior to the 1980's to increase the drying process. Lead in paint becomes a danger when it is old or damaged, as it creates lead dust and chips. Lead can also be found in soldered joints installed on piping up to the mid 1990s and in older cast iron bell and spigot joints.

- .1 According to the Hazard Products Act's *Regulations Amending the Surface Coating Materials Regulations* SOR/2010-224 allowable concentration of lead in surface coatings is 0.009 percent by weight (weight of lead to weight of paint), which is equivalent to 90 parts per million (ppm).
- .2 Representative paint samples, taken on 2012/11/13 from the project area, have been analyzed for lead content. Analytical results indicate that the grey paint sample collected from the wall beside the door 2-5 on the 2nd floor (HPB-Pb-2) and the beige textured paint collected from the wall beside the door 2-6 on the 2nd floor (HPB-Pb-3) in the project area

have lead contents above the 90ppm threshold outlined in the Hazardous Products Act's *Surface Coating Materials Regulations* SOR/2005-109. The results are shown in Table 2 below.

**Table 2: Lead Sample Results**

Sample ID	Description	Location	Lead Content (ppm)
HPB-Pb-1	Grey paint	Wall beside the door 2-4, 2nd floor	<10
HPB-Pb-2	Grey paint	Wall beside the door 2-5, 2nd floor	1590
HPB-Pb-3	Beige textured paint	Wall above the door 2-6, 2nd floor	3980

**HPB-Pb-2** and **HPB-Pb-3** items exceed the 90 ppm limit for lead, as per Hazardous Products Act's *Surface Coating Materials Regulations* SOR/2010-224

- .9 **MERCURY:** Not Identified
- .10 **SILICA: Identified**  
Free crystalline silica is present in concrete, drywall and plaster within the project area.
- .11 **VINYL CHLORIDE MONOMER:** Not Identified
- .12 **POLYCHLORINATED BIPHENYLS (PCBs):** Not Identified
- .13 **HALOCARBONS:** Not Identified

## 2.2 RECOMMENDATIONS

### 1. LEAD

If lead-containing materials are disturbed (i.e. during dry sanding, grinding, polishing and sawing operations), then proper precautions, as outlined under "Designated Substances" *O.Reg 490/09*, as amended, of the Occupational Health and Safety Act, must be followed.

Under Ontario Regulation 490/09, as amended of the Occupational Health and Safety Act, regulatory limits have been established for occupational exposure limits to airborne lead that may be present in a workplace. The Time Weighted Average Exposure Values to airborne lead dust or fumes should not exceed the Ministry of Labour's 0.05 milligram per cubic metre (mg/m<sup>3</sup>) limit during the removal of paints and products containing any concentration of lead. The TWAEV represents the time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, to which it is believed that nearly all workers may be repeatedly exposed, day after day, without adverse health effects.

Contractors performing work that requires disturbance of lead-containing materials are responsible to ensure that the workers are not exposed to airborne lead dust levels in excess of the time-weighted average and Maximum Exposure Concentration for lead-containing paints. It should be noted that the use of mechanically-powered tools or torches on lead-containing materials increases the concentration of airborne lead dust or fumes and thereby requiring more stringent respiratory protection and controlled work procedures.

.1 Ontario Ministry of Labour (MoL) has published the document entitled "*Guideline: Lead on Construction Projects*". This document classifies all disturbances of lead-containing materials as Type 1, Type 2a, Type 2b, Type 3a or Type 3b work, based on presumed airborne concentrations of lead generated during the work each of which will have defined work practices. Although this document is not a regulation, Ministry of Labour Inspectors use it as guidance during site inspections.

.2 The disposal of construction waste containing lead is controlled by "General – Waste Management" *O.Reg 347/09, as amended*, under the *Ontario Environmental Protection Act*. The classification of the waste is dependent upon the result(s) of leachate test(s). The waste can be classified as "hazardous", "non-hazardous" or "registerable solid waste", depending on the results of the leachate test.

Prior to disposal, the concentration of leachable lead must be determined for waste materials with elevated lead contents following the Toxicity Characteristic Leaching Procedure (TCLP).

## 2. SILICA

.1 Silica occurs as crystalline material in cement. Crystalline silica is regulated under "Designated Substance – Silica" *O.Reg 845 (as amended by O.Reg 490/09)* of the *Occupational Health and Safety Act* as a Designated Substance.

.2 Silica dust can be generated through such processes as blasting, grinding, crushing, and sandblasting silica-containing material. Since silica is present in concrete, drywall and plaster within the project area, appropriate respiratory protection and ventilation must be donned during the demolition and modifications of these structures.

.3 The Occupational Health and Safety Branch of the MoL has published the document entitled "*Guideline: Silica on Construction Projects*". This document classifies the disturbance of materials containing silica as Type 1, Type 2 or Type 3 work,

and assigns different levels of respiratory protection and work procedures for each classification. These work procedures should be followed when performing work involving the disturbance of silica-containing materials.

### **3. CONTRACTORS DUTIES**

The contractor must review the designated substance report and take the necessary precautions to protect the health and safety of the workers and the environment. As per Section 30(4) of the *Ontario Occupational Health and Safety Act*, the party hiring the contractor (i.e. Departmental Representative) shall ensure that the contractor and subcontractor (if any) for the project has received a copy of the designated substance report prior to entering a binding contract for the supply of work on the project. As per Section 27(2) (a, b, and c) of the *Ontario Occupational Health and Safety Act*, while onsite, the contractor supervisor shall exercise every reasonable precaution for the protection of a worker. If you have any questions about the designated substance report, please contact the Departmental Representative.

**END OF SECTION**