October 12, 2016

Dear [Redacted] - s.40(1)

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act [Our File #: SNL-049-2016]

On September 15, 2016, Service NL received your request for access to the following records/information:

"All information concerning Transcontinental. Concerning OHS Report reference #520115. I request all OHS follow up information. Inspection reports that show company followed orders to bring building up and was and is still up to code ie "air quality readings" "ventilation reports" and maintenance. And any reports as to why this company was not shut down when it had failed regulations and injured a person. All any papers including charges.

Any and all information OHS has with its dealings with Transcontinental after. OHS’s report Nov 4, 2008 failing Transcontinental reference #520115. And what reasons this company was not shut down. When a person was clearly injured. And why charges were not laid. Also any inspection reports you have before my first call. Report reference #520077. Complete failure that one”

I am pleased to inform you that a decision has been made by Service NL to provide access to the information you requested. However, access to specific text contained within some of the records cannot be provided to you as this is the personal information of identifiable individuals. This is in accordance with the following exceptions to disclosure, as specified in the Access to Information and Protection of Privacy Act (the Act):

Section 40(1): “The head of a public body shall refuse to disclose personal information to an applicant where the disclosure would be an unreasonable invasion of a third party’s personal privacy.”

Further to your request, there are no records of any charges laid against the company by Occupational Health and Safety or any records of a stop work order. As required by 8(2) of the Act, we have severed information that is unable to be disclosed and have provided you with as much information as possible.

In accordance with your request for a copy of the records, the appropriate copies have been enclosed.
Please be advised that you may appeal this decision and ask the Information and Privacy Commissioner to review the decision to provide partial access to the requested information, as set out in section 42 of the Act (a copy of this section of the Act has been enclosed for your reference). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner. Your appeal should identify your concerns with the request and why you are submitting the appeal.

The appeal may be addressed to the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner  
2 Canada Drive  
P. O. Box 13004, Stn. A  
St. John’s, NL A1B 3V8  

Telephone: (709) 729-6309  
Toll-Free: 1-877-729-6309  
Facsimile: (709) 729-6500

You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act (a copy of this section of the Act has been enclosed for your reference).

Please be advised that responsive records will be published following a 72 hour period after the response is sent electronically to you or five business days in the case where records are mailed to you. It is the goal to have the responsive records posted to the Completed Access to Information Requests website within one business day following the applicable period of time. Please note that requests for personal information will not be posted online.

If you have any further questions, please contact me by telephone at 709-729-7437 or by email at ellenhaskell@gov.nl.ca.

Sincerely,

[Signature]

ELLEN HASKELL  
ATIPP Coordinator

Enclosures
Disclosure harmful to personal privacy

40. (1) The head of a public body shall refuse to disclose personal information to an applicant where the disclosure would be an unreasonable invasion of a third party's personal privacy.

(2) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy where

(a) the applicant is the individual to whom the information relates;

(b) the third party to whom the information relates has, in writing, consented to or requested the disclosure;

(c) there are compelling circumstances affecting a person's health or safety and notice of disclosure is given in the form appropriate in the circumstances to the third party to whom the information relates;

(d) an Act or regulation of the province or of Canada authorizes the disclosure;

(e) the disclosure is for a research or statistical purpose and is in accordance with section 70;

(f) the information is about a third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff;

(g) the disclosure reveals financial and other details of a contract to supply goods or services to a public body;

(h) the disclosure reveals the opinions or views of a third party given in the course of performing services for a public body, except where they are given in respect of another individual;

(i) public access to the information is provided under the Financial Administration Act;

(j) the information is about expenses incurred by a third party while travelling at the expense of a public body;

(k) the disclosure reveals details of a licence, permit or a similar discretionary benefit granted to a third party by a public body, not including personal information supplied in support of the application for the benefit;

(l) the disclosure reveals details of a discretionary benefit of a financial nature granted to a third party by a public body, not including

(i) personal information that is supplied in support of the application for the benefit, or

(ii) personal information that relates to eligibility for income and employment support under the Income and Employment Support Act or to the determination of income or employment support levels; or

(m) the disclosure is not contrary to the public interest as described in subsection (3) and reveals only the following personal information about a third party:
(i) attendance at or participation in a public event or activity related to a public body, including a graduation ceremony, sporting event, cultural program or club, or field trip, or

(ii) receipt of an honour or award granted by or through a public body.

(3) The disclosure of personal information under paragraph (2)(m) is an unreasonable invasion of personal privacy where the third party whom the information is about has requested that the information not be disclosed.

(4) A disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy where

(a) the personal information relates to a medical, psychiatric or psychological history, diagnosis, condition, treatment or evaluation;

(b) the personal information is an identifiable part of a law enforcement record, except to the extent that the disclosure is necessary to dispose of the law enforcement matter or to continue an investigation;

(c) the personal information relates to employment or educational history;

(d) the personal information was collected on a tax return or gathered for the purpose of collecting a tax;

(e) the personal information consists of an individual's bank account information or credit card information;

(f) the personal information consists of personal recommendations or evaluations, character references or personnel evaluations;

(g) the personal information consists of the third party's name where

   (i) it appears with other personal information about the third party, or

   (ii) the disclosure of the name itself would reveal personal information about the third party; or

(h) the personal information indicates the third party's racial or ethnic origin or religious or political beliefs or associations.

(5) In determining under subsections (1) and (4) whether a disclosure of personal information constitutes an unreasonable invasion of a third party's personal privacy, the head of a public body shall consider all the relevant circumstances, including whether

(a) the disclosure is desirable for the purpose of subjecting the activities of the province or a public body to public scrutiny;

(b) the disclosure is likely to promote public health and safety or the protection of the environment;

(c) the personal information is relevant to a fair determination of the applicant's rights;

(d) the disclosure will assist in researching or validating the claims, disputes or grievances of aboriginal people;
(e) the third party will be exposed unfairly to financial or other harm;

(f) the personal information has been supplied in confidence;

(g) the personal information is likely to be inaccurate or unreliable;

(h) the disclosure may unfairly damage the reputation of a person referred to in the record requested by the applicant;

(i) the personal information was originally provided to the applicant; and

(j) the information is about a deceased person and, if so, whether the length of time the person has been deceased indicates the disclosure is not an unreasonable invasion of the deceased person's personal privacy.

Access or correction complaint (Section 42)

42. (1) A person who makes a request under this Act for access to a record or for correction of personal information may file a complaint with the commissioner respecting a decision, act or failure to act of the head of the public body that relates to the request.

(2) A complaint under subsection (1) shall be filed in writing not later than 15 business days

a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

b) after the date the head of the public body is considered to have refused the request under subsection 16 (2).

(3) A third party informed under section 19 of a decision of the head of a public body to grant access to a record or part of a record in response to a request may file a complaint with the commissioner respecting that decision.

(4) A complaint under subsection (3) shall be filed in writing not later than 15 business days after the third party is informed of the decision of the head of the public body.

(5) The commissioner may allow a longer time period for the filing of a complaint under this section.

(6) A person or third party who has appealed directly to the Trial Division under subsection 52 (1) or 53 (1) shall not file a complaint with the commissioner.

(7) The commissioner shall refuse to investigate a complaint where an appeal has been commenced in the Trial Division.

(8) A complaint shall not be filed under this section with respect to

a) a request that is disregarded under section 21;

b) a decision respecting an extension of time under section 23;

c) a variation of a procedure under section 24; or
d) an estimate of costs or a decision not to waive a cost under section 26.

(9) The commissioner shall provide a copy of the complaint to the head of the public body concerned.

Direct appeal to Trial Division by an applicant (Section 52)

52. (1) Where an applicant has made a request to a public body for access to a record or correction of personal information and has not filed a complaint with the commissioner under section 42, the applicant may appeal the decision, act or failure to act of the head of the public body that relates to the request directly to the Trial Division.

(2) An appeal shall be commenced under subsection (1) not later than 15 business days

a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

b) after the date the head of the public body is considered to have refused the request under subsection 16 (2).

(3) Where an applicant has filed a complaint with the commissioner under section 42 and the commissioner has refused to investigate the complaint, the applicant may commence an appeal in the Trial Division of the decision, act or failure to act of the head of the public body that relates to the request for access to a record or for correction of personal information.

(4) An appeal shall be commenced under subsection (3) not later than 15 business days after the applicant is notified of the commissioner's refusal under subsection 45 (2).
Arrived onsite for a Follow-Up Inspection to previous OHS Inspection #911527 at Transcontinental Printing, 36 Austin Street, St. John's, and met with Section 40(1) OHS Directive #911527-01: requirement to ensure available emergency eye wash meets or exceeds the flush times stated on the material safety data sheets or other manufacturer's information in use at the workplace.

This Directive has been complied with and is now closed.

Original OHS Inspection #911527 is now closed.

No other Directives issued at this time.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
INSPECTION / OFFICER'S REPORT

TRANSCONTINENTAL PRINTING
35 AUSTIN STREET
ST. JOHN'S
NL
A1B-3T7

Worksite: Office/Production Facility
Location: 36 Austin Street

INSPECTION:
Firm #: 450005
WCC #: 2014540
Tel: 709-722-8500
Fax: 709-722-2228

Employees: 170
NIC: 2841

Insp. Time: 10:00AM

REPORT:

Arrived onsite at Transcontinental Printing, Austin Street, St. John's, and met with [redacted] accompanied me on a Workplace Inspection of the facility.

Business has an Occupational Health and Safety Committee in place and functioning. Last meeting was held in February. Required numbers of first aiders are trained. First aid kits/eyewash bottles are available for workers. Office/Production areas are neat, tidy, and free of obstructions allowing ease of movement throughout. No tripping hazards. Walkways are delineated in the production area. Employee washroom /lunchroom areas were clean and tidy. Fire extinguishers are available throughout the business. A Fire Safety Plan is in place. Emergency exits are clear and marked as required. Electrical panels are accessible. There were no visible issues with the electrical service equipment. Forklift operators onsite are trained. Step ladders onsite appeared fit for duty. Ventilation is in place in the Chemical Room.

[redacted] was very cooperative.

One Directive issued.

Received By: [redacted]
Position: Officer's Name: Pierre Neary

Date: MAR 22,2016
Time: 11:12AM

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

ORDER FORM

Toll Free: 1-800-563-5471

TRANSCONTINENTAL PRINTING
36 AUSTIN STREET
ST. JOHN'S
NL

Firm #: 450005
WCC #: 2014540
Tel: 709-722-8500
Fax: 709-722-2228

A1B-3T7

TAKE NOTICE THAT YOU ARE TO COMPLY WITH THE FOLLOWING ORDER(S) ISSUED UNDER AUTHORITY OF THE OCCUPATIONAL HEALTH AND SAFETY ACT, REVISED STATUTES OF NEWFOUNDLAND AND LABRADOR 1990, CHAPTER 0-3 AS AMENDED AND REGULATIONS PASSED PURSUANT THERETO.

ORDER: 0911527-01

REGULATION: Part VI - Occupational Health Requiremens

63 -a Emergency washing facilities

An employer shall ensure that appropriate emergency washing facilities are provided in a work area where a worker's eyes or skin may be exposed to harmful or corrosive materials or other materials which may burn or irritate;

TO WIT:

As per above, Transcontinental Printing, shall ensure that available emergency eye wash meets or exceeds the flush times stated on the material safety data sheets or other manufacturer's information in use at the workplace.

This Order shall be carried out on or before: APR 22, 2016

YOU ARE TO NOTIFY THE INSPECTOR IN WRITING UPON COMPLIANCE.

FAILURE TO COMPLY WITH THE ABOVE ORDER(S) IS AN OFFENCE UNDER SECTION 67 OF THE OCCUPATIONAL HEALTH AND SAFETY ACT, RSNL 1990, CHAPTER 0-3 AS AMENDED.

AN ORDER MADE BY AN OFFICER MAY BE APPEALED, IN WRITING, TO THE ASSISTANT DEPUTY MINISTER WITHIN 7 DAYS OF THE ORDER.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
Date: May 19, 2011
To/Destinataire: Dawn Higgins
Company/Compagnie: OH&S Inspections Branch, Dept. of Gov. Services
Fax/Télécopieur: 729-3445
From/Expéditeur: [Redacted]@transcontinental.ca

Number of pages including cover page
Nombre de pages incluant la couverture
7

Kindly advise if you do not receive the number of pages indicated above.
S'il vous plaît, nous aviser si vous ne recevez pas le nombre de pages indiqué.

Section 40(1)
Name/Nom: [Redacted] Section 40(1)
Direct line: [Redacted] Cell: [Redacted] Section 40(1)

This facsimile transmission is confidential and strictly intended for use by the addressee only. If these documents were erroneously sent to you, please be advised that any use, reproduction or distribution of such documents is strictly forbidden. In such case, please inform us immediately and destroy all documents received. Thank you.


Message:

Dawn,

I'll give you a call with a few questions.

Transcontinental Printing
36 Austin Street, PO Box 8660
St. John's, NL A1B 3T7

Telephone/Téléphone: (709) 722-8500
Fax/Télécopieur: (709) 722-2228
On April 21, 2011, Industrial Hygienists Dawn Higgins and Nancy Hounsell performed a follow-up inspection at Transcontinental Printing in St. John’s, NL. This inspection was performed to follow up on compliance with Inspection Report 520115 prepared by Tina Murphy on November 4, 2008.

Upon reviewing the Air Quality Report prepared by BAE-Newplan April 2011 and performing a follow-up inspection the following details were noted:

Printing Press 1 has currently has an exhaust rate of 2835cfm. This exceeds the ASHRAE required rate of 2245cfm and is now acceptable.

The Chemical Storage Room has had a louvre installed to ensure adequate supply air.

Web and Sheet Stockroom has an exhaust rate of 1125cfm and is considered acceptable.

Bindery Room exhaust rate is 2327cfm and meets the ASHRAE guideline of 2089cfm.

The digital printing room requires a dedicated supply and exhaust ventilation system with an airflow of 2258cfm. A new dedicated system was added to the area and the exhaust rate was recorded at 178cfm. BAE-Newplan were unable to determine if the existing ventilation in this area was circulating air throughout the rest of the building.

Xerox has published data regarding contaminant concentrations for their equipment. These documents shall be referenced to ensure adequate airflow in the digital printing room. In addition further investigation into the status of the existing ventilation system in this area is required. Order issued.

While performing this inspection workers were observed in the printing press area without hearing protection. Upon speaking to these workers officers were informed that the workers were not wearing hearing protection in assigned areas for safety reasons. The alarm on the printing press could not be heard while hearing protection was being utilized and workers were concerned that they would not hear the alarms if required.

In addition, while audiometric testing was offered by Transcontinental for their workers, this testing was not being enforced on an annual basis. Annual testing is required for a Hearing Conservation Program.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
The responsibility for the protection of workers falls not only upon the employer but the supervisors and workers as well. It was clear during this inspection that while policies were in place regarding hearing protection it was not being enforced.

Orders issued.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Department of Government Services
Occupational Health and Safety Inspections Branch

ORDER FORM

Toll Free: 1-800-663-5471

TRANSCONTINENTAL PRINTING
36 AUSTIN STREET
ST. JOHN'S
NL

A1B-3T7

Firm #: 450005
WCC #: 2014640
Tel: 709-722-8500
Fax: 709-722-2228

TAKE NOTICE THAT YOU ARE TO COMPLY WITH THE FOLLOWING ORDER(S) ISSUED UNDER AUTHORITY OF THE OCCUPATIONAL HEALTH AND SAFETY ACT, REVISED STATUTES OF NEWFOUNDLAND AND LABRADOR 1990. CHAPTER 0-3 AS AMENDED AND REGULATIONS PASSED PURSUANT THERETO.

ORDER: 0830187-01

REGULATION: Part VI - Occupational Health Requirements
45 1-b Ventilation

An employer shall ensure that there is adequate ventilation; and in a workplace in accordance with standards established by ASHRAE and ACGIH.

TO WIT:

The ventilation system in the digital printing room shall be in compliance with the ASHRAE standard and the manufacturers specifications for the equipment being utilized.

This Order shall be carried out on or before: MAY 31, 2011

ORDER: 0830187-02

REGULATION: Part IX - De-Energization and Lockout
129 2- When lockout required

Where machinery or equipment is in use for normal production work, subsection (1) applies where a work activity creates a risk of injury to workers from the movement of the machinery or equipment, or exposure to an energy source, and the machinery or equipment is not effectively safeguarded to protect the workers from the risk.

TO WIT:

The printing press shall be effectively locked out or effective safeguards put in place in accordance with CSAZ432 Safeguarding of Machinery.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
This Order shall be carried out on or before: MAY 31, 2011

ORDER: 0830187-03
REGULATION: Part VIII - Machinery and Equipment
99 - General requirements

Except as otherwise provided in these regulations, an employer shall ensure that machinery and equipment is fitted with adequate safeguards that protect an employee from contact with hazardous power transmission parts:

TO WIT:

The employer shall ensure that the audible alarm on the printing press is loud enough to be heard by workers wearing hearing protection.

This Order shall be carried out on or before: MAY 31, 2011

ORDER: 0830187-04
REGULATION: Part III - General Duties
17 - General duties of workers

A worker shall make proper use of all necessary safeguards, protective clothing, safety devices, lifting devices or aids, and appliances designated and provided for his or her protection by the employer; or

TO WIT:

Workers shall wear hearing protection when working in areas where hearing protection is required.

This Order shall be carried out on or before: MAY 24, 2011

ORDER: 0830187-05
REGULATION: Part III - General Duties
14 - General duties of employers

An employer shall ensure that necessary protective clothing and devices are used for the health and safety of his or her workers.

TO WIT:

The employer shall ensure adequate hearing protection is worn by all workers.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
ORDER FORM

This Order shall be carried out on or before: MAY 24, 2011

ORDER: 0830187- 06
ACT: Occupational Health and Safety
5.2 - c Specific duties of supervisors

A supervisor shall ensure that a worker under his or her supervision uses or wears protective equipment, devices or other apparel that this Act, the regulations or the worker's employer requires to be used or worn.

TO WIT:

Supervisors shall ensure workers use required hearing protection.

This Order shall be carried out on or before: MAY 24, 2011

ORDER: 0830187- 07
REGULATION: Part VI - Occupational Health Requirements
68 2- Noise hazards

Where conditions referred to in subsection (1) exist, an employer shall establish and maintain a hearing conservation program.

TO WIT:

A hearing conservation program in accordance with these regulations shall be developed and implemented.

This Order shall be carried out on or before: JUN 17, 2011

ORDER: 0830187- 08
REGULATION: Part VI - Occupational Health Requirements
68 3-b Noise hazards

A hearing conservation program established under subsection (2) shall comply with the following minimum requirements: hearing tests for every worker exposed to noise levels in excess of permissible levels to be conducted on an annual basis or where recommended by an audiologist or occupational physician;

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
ORDER FORM

TO WIT:

Audiometric testing shall be performed annually.

This Order shall be carried out on or before: JUN 16, 2011

YOU ARE TO NOTIFY THE INSPECTOR IN WRITING UPON COMPLIANCE,
FAILURE TO COMPLY WITH THE ABOVE ORDER(S) IS AN OFFENCE UNDER SECTION 67 OF
THE OCCUPATIONAL HEALTH AND SAFETY ACT, RSNL 1990, CHAPTER 0-3 AS AMENDED.

AN ORDER MADE BY AN OFFICER MAY BE APPEALED, IN WRITING, TO THE ASSISTANT
DEPUTY MINISTER WITHIN 7 DAYS OF THE ORDER.

Section 40(1)

Received By: [Redacted]  
Position: [Redacted]  
Officer's Name: Higgins, Dawn  
Return Address: P.O. Box 8700  
S. John's, NL, A1B 4J6  
Fax: (709) 729-3445  
Date: MAY 18, 2011  
Time: 9:27AM

A copy of this inspection/order report must be provided at the earliest possible opportunity
 to your OHS Committee, Worker Representative or Workplace Designate.
**CONTACT FORM**

TRANSCONTINENTAL PRINTING  
36 AUSTIN STREET  
ST. JOHN'S  
NL  
A1B-3T7  

<table>
<thead>
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Telephone #: 709-722-8500  
Fax #: 709-722-2228
At the request of Reg Bennett, Director, a photo portraying a fan in the loading bay at Transcontinental Printing on Austin St., was investigated to determine the reason for the additional ventilation.

I visited the workplace on Sept. 28, 2009, but they were not operating. A worker, stated that they have a "close-out" day occasionally to save on costs. I returned on Sept. 29, 2009, and met with the cell), who took me down to the production area. There were several of the same portable fans shown in the picture present in the production area. They were used in the summer to increase the air movement when the weather was hot. The air conditioning (cooling) system was broken and needed repair but because there was a nest of seagulls in the unit, they could not proceed with the repairs. There was a significant amount of additional local exhaust ventilation at certain production processes compared to my last visit to this printing plant. stated that the mechanical ventilation system was functioning all summer, that only the cooling system was broken. The cooling system is not fixed yet but will be fixed before next summer.

Approximately 53 workers.

A colour copy of the photo was sent to the registry for filing. No further action required.
Hi Dawn

Thank you for your call this morning with [redacted] and I. As he indicated, we have been working diligently on your recommendations and appreciate the extra time that is required to work on some of the more complex ones. I have attached for you a document from our printing press equipment manufacturer: Heidelberg. This document confirms the Standards that the Speedmaster 74 product line satisfy, this will be valid for all our presses. I have also attached a copy of the Corporate Hearing Conservation Program Outline we spoke about.

As indicated this morning during our call, part of our hearing conservation program requires us to conduct audiometric testing annually on all production employees exposed to 85 dBA and greater. The testing has been completed for 2011 with Beltone and we intend to conduct the testing each year to adhere to the requirements of the program.

If there is any additional information or if you should have any questions regarding the attached, please feel free to contact me at any time.

With kind regards,

Transcontinental Printing
P.O. Box 8660
St. John’s, NL A1B 3T7
ph (709) [redacted] fax (709)722-2228
AUTHORIZATION TO MARK

This authorizes the application of the Certification Marks shown below to the models described in the Products(s) Covered section when made in accordance with the conditions set forth in the Certification Agreement and Listing Report. This authorization also applies to the multiple listee model(s) identified on the correlation page of the Listing Report.

Applicant: Heidelberger Druckmaschinen AG
Kurfuersten-Anlage 52-60
69115 Heidelberg
Germany

Contact: Name: [redacted] Phone: +49 6221-92-1528

Manufacturer: Heidelberger Druckmaschinen AG
Gutenbergstrasse
69186 Wiesloch
Germany

Party Authorized To Apply Mark: Same as Manufacturer

Report Issuing Office: Wiesbaden, Germany

Report No.: 04WI3405-01

Product Covered: The Speedmaster printing press series includes six basic models. These model series are SM 52, SM 74, CD 74, SM 102, CD 102, and XL 105. The designation is followed by a number that corresponds to the number of printing units (colors). A letter or a combination of letters indicate the options and configurations. These letters can be:

- P#, sheet reversing unit in front of the #th printing unit
- L, finishing unit which seals the sheets with a transparent paint
- Y, drying unit in combination with one or more finishing units, i.e. -LYL
- X, extended delivery
- N, other paper pile size
- H, high delivery
- F, other sheet size (605mm by 740mm)
- C, other sheet size (530mm by 740mm)
- D, die cutting

Examples:
SM 102-5-P2-LYLX consists of eight units: five printing units including a sheet reversing unit in front of the 2nd printing unit, a finishing unit, a drying unit, and a second finishing unit. The "X" indicates an extended delivery.
CD 74-7-P2.3-LYX-C consists of nine units: seven printing units including sheet reversing units in front of the second and third printing unit, a finishing unit, and a drying unit. The "X" indicates an extended delivery, the "C" indicates a reduced sheet size.

Description: The products covered by this report are industrial printing presses. The products are intended for indoor use only and are permanently connected.

Standard(s):
- Graphics Arts Equipment, UL 775, 3rd Edition dated February 27, 1998
- Safety of Information Technology Equipment, CAN/CSA-C22.2 No 60950-1-03, 1st Edition dated April 1, 2003

SD 16.3.10a (1/20/03) Mandatory
This document is the property of Intertek Testing Services and is not transferable. Only the Applicant may reproduce this document. The certification mark(s) may be applied only at the above noted location of the Party Authorized To Apply Mark.

Authorized by:  
Date: 1 November 2005

Control Number: 119730

This document supersedes all previous Authorizations to Mark for the noted Report number.

Intertek Testing Services NA Inc.
165 Main Street, Cortland, NY 13045
Telephone 800-345-3851 or 607-753-6711 Fax 607-756-6699

SD 16.3.10a (1/20/05) Mandatory
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Re: ORDER 0830187-01

Ventilation in Digital Room

Hi Dawn,

I had someone on site today from Trane to look at the ventilation requirements for the digital room.

I have attached the safety data sheets for the two pieces of Xerox equipment we operate in this room. These sheets provide information on the emissions from this equipment.

My question relates to the report from the BAE Group that questions whether the ventilation in this room is separated from the office area of the building. Based on the low level of emissions from this equipment, and considering this equipment is frequently used in office environments, why would the ventilation for this room need to be separated from the office ventilation system? The HRV that was installed in this room to increase the ventilation, and which provided the largest portion of the ventilation, is vented directly outside and does not connect to either the plant or the office ventilation systems.

Please let me know what you think. If we have to replace the existing unit with a larger one we will, but I would like to know first if it is necessary?

Thanks,
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Hi [Name],

I will review the information and give you a call tomorrow morning around 10 if that works for you. If not please let me know a better time. I will be in the office all day.

Thanks,

Dawn

Hi Dawn,

We have been working on the orders that were issued. I sent you some information on some of the orders last Thursday.

We would like to speak to you about some of the other orders and the requirements.

Would it be possible to have a telephone conversation with you sometime tomorrow at your convenience?

Thanks,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7
Hi Dawn,

Further to the information I sent you earlier today, I have attached here the decibel levels for the production areas.

Very best regards,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7
<table>
<thead>
<tr>
<th>#</th>
<th>Equipment Name</th>
<th>Function/Equipment</th>
<th>Noise Source</th>
<th>dBA measured</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Heidelberg SM74 (feed end - GTO not running)</td>
<td>6 Color Sheetfed Press with Aqueous Coating Unit.</td>
<td>Compressor, Unit Motors</td>
<td>77-78 dBA</td>
</tr>
<tr>
<td>1</td>
<td>Heidelberg SM74 (feed end - GTO running)</td>
<td>6 Color Sheetfed Press with Aqueous Coating Unit.</td>
<td>Compressor, Unit Motors</td>
<td>78-79 dBA</td>
</tr>
<tr>
<td>1</td>
<td>Heidelberg SM74 (mid press line)</td>
<td>6 Color Sheetfed Press with Aqueous Coating Unit.</td>
<td>Compressor, Unit Motors</td>
<td>78-79 dBA</td>
</tr>
<tr>
<td>1</td>
<td>Heidelberg SM74 (by exhaust hood)</td>
<td>6 Color Sheetfed Press with Aqueous Coating Unit.</td>
<td>Compressor, Unit Motors</td>
<td>86 dBA</td>
</tr>
<tr>
<td>1</td>
<td>Heidelberg SM74 (delivery)</td>
<td>6 Color Sheetfed Press with Aqueous Coating Unit.</td>
<td>Compressor, Unit Motors</td>
<td>82 dBA</td>
</tr>
<tr>
<td>1</td>
<td>Heidelberg SM74 (drive side)</td>
<td>6 Color Sheetfed Press with Aqueous Coating Unit.</td>
<td>Compressor, Unit Motors</td>
<td>82 dBA</td>
</tr>
<tr>
<td>2</td>
<td>Heidelberg GTO (feed end)</td>
<td>2 Color 20&quot; 2 unit sheetfed press</td>
<td>Motor, Grippers</td>
<td>80-81 dBA</td>
</tr>
<tr>
<td>3</td>
<td>Heidelberg Speedmaster SM52 (feed end)</td>
<td>5 Color 20&quot; sheetfed press</td>
<td>Compressor, Unit Motors</td>
<td>79-80 dBA</td>
</tr>
<tr>
<td>3</td>
<td>Heidelberg Speedmaster SM52 (mid press line)</td>
<td>5 Color 20&quot; sheetfed press</td>
<td>Compressor, Unit Motors</td>
<td>77 dBA</td>
</tr>
<tr>
<td>3</td>
<td>Heidelberg Speedmaster SM52 (delivery)</td>
<td>5 Color 20&quot; sheetfed press</td>
<td>Compressor, Unit Motors</td>
<td>78 dBA</td>
</tr>
<tr>
<td>3</td>
<td>Heidelberg Speedmaster SM52 (drive side of delivery)</td>
<td>5 Color 20&quot; sheetfed press</td>
<td>Compressor, Unit Motors</td>
<td>84 dBA</td>
</tr>
<tr>
<td>4</td>
<td>Heidelberg 2 Color (delivery)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors</td>
<td>82-85 dBA</td>
</tr>
<tr>
<td>4</td>
<td>Heidelberg 2 Color (operator controls)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors</td>
<td>81-82 dBA</td>
</tr>
<tr>
<td>Equipment</td>
<td>Description</td>
<td>Noise Level</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td>-------------</td>
<td>-------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Heidelberg 2 Color (feed end operator side)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors, 79-80 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Heidelberg 2 Color (feed end of press)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors, 81-82 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Heidelberg 2 Color (feed end drive side)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors, 81 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Heidelberg 2 Color (mid press line drive side)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors, 82 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Heidelberg 2 Color (delivery drive side)</td>
<td>2 Color 40&quot; sheetfed press</td>
<td>Compressor, Unit Motors, 84 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (at door to room)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, Folder, Conveyor, 81 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (by elec. Room door)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, Folder, Conveyor, 84 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (at unit 1)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, Folder, Conveyor, 86 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (Operator Controls/folder)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, Folder, Conveyor, 90 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (stacking table/folder)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, 90 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (4 High unit)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, 90 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (between folder and roll storage)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, 87 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Web Press (Tool storage)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, 85 dBA</td>
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</tr>
<tr>
<td>Web Press (entrance to bindery)</td>
<td>Goss Community Coldset Web Press</td>
<td>Compressor, Motors, 86 dBA</td>
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</tr>
<tr>
<td>MBO Folder</td>
<td>Large format sheet folder</td>
<td>Rollers, fold plates, various stock weights, 84-89 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>STAHL Folder</td>
<td>Small format sheet folder</td>
<td>Rollers, fold plates, various stock weights, 84-89 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Small Cutter</td>
<td>Guillotine cutter (small sheets)</td>
<td>Compressor, paper clamp, 89 dBA</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Machine</td>
<td>Description</td>
<td>Noise Levels</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>---------------</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Large Cutter</td>
<td>Guillotone cutter (large sheets)</td>
<td>Compressor, paper clamp</td>
<td>89 dBA</td>
</tr>
<tr>
<td>10</td>
<td>Heidelberg SS72</td>
<td>Cylinder Die Cutting Press</td>
<td>Compressor</td>
<td>84 dBA</td>
</tr>
<tr>
<td>11</td>
<td>Muller Stitcher</td>
<td>Saddle Stitching machine</td>
<td>Compressor, conveyor, trimmer, Dust/waste Collection</td>
<td>89 dBA</td>
</tr>
<tr>
<td>12</td>
<td>Wohlenberg Trimmer</td>
<td>3 Knife Trimmer</td>
<td>Compressor, Clamps, Dust/waste Collection</td>
<td>89 dBA</td>
</tr>
<tr>
<td>13</td>
<td>Tigra Perfect Binder (feed end set-up)</td>
<td>Perfect binding machine</td>
<td>Compressor, Grinder, conveyor</td>
<td>81-82 dBA</td>
</tr>
<tr>
<td>14</td>
<td>Tigra Perfect Binder (feed end operation)</td>
<td>Perfect binding machine</td>
<td>Compressor, Grinder, conveyor</td>
<td>83-85 dBA</td>
</tr>
<tr>
<td>15</td>
<td>Tigra Perfect Binder (mid machine at delivery)</td>
<td>Perfect binding machine</td>
<td>Compressor, Grinder, conveyor</td>
<td>79-82 dBA</td>
</tr>
<tr>
<td>16</td>
<td>Tigra Perfect Binder (glue pot)</td>
<td>Perfect binding machine</td>
<td>Compressor, Grinder, conveyor</td>
<td>83-86 dBA</td>
</tr>
<tr>
<td>17</td>
<td>Tigra Perfect Binder (Delivery and stacking table)</td>
<td>Perfect binding machine</td>
<td>Compressor, Grinder, conveyor</td>
<td>80-82 dBA</td>
</tr>
<tr>
<td>18</td>
<td>Tigra Perfect Binder (Feeding stations)</td>
<td>Perfect binding machine</td>
<td>Compressor, Grinder, conveyor</td>
<td>77-78 dBA</td>
</tr>
<tr>
<td>19</td>
<td>Hand Bindery Machines</td>
<td>Various stitching and punching/binding machines</td>
<td>Noise from Tigra, Stitching heads, paper punch</td>
<td>71-72 dBA</td>
</tr>
<tr>
<td>20</td>
<td>Kernic Baler</td>
<td>Dust/Waste collection and baling system</td>
<td>Compressor, Shredder, Cyclone air suction waste collection system</td>
<td>100 dBA</td>
</tr>
</tbody>
</table>
Hi Dawn,

With respect to Orders 0830187-04, 0830187-05 and 0830187-06 please see the attached document that includes:

1. The attendance sheet for a 1-hour presentation on hearing loss from exposure to noise presented by the Canadian Hard of Hearing Association on April 27, 2011.
2. A “Toll Box Talk” presented to press room and bindery employees emphasising requirement to wear hearing protection and the Five Strike Rule along with the attendance sheet.
3. Our Five Strike Rule Policy
4. Letter from Beltone attesting to audiometric testing conducted on May 12, 2011.

Please let me know if this information is sufficient to close these orders.

Very best regards,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7

Section 40(1)
International Noise Awareness Day

Presentation by:
Andrea Augot
Transcontinental

"TOOL BOX TALK"

Tuesday, May 2, 2011

Topic: NAOSH WEEK / HEARING CONSERVATION FOLLOW-UP

- MAY 1-7 is NAOSH – NORTH AMERICAN OCCUPATIONAL SAFETY & HEALTH WEEK
  - Goal is to focus all employers, employees, partners and the public on the importance of
    preventing injury and illness in the workplace, at home and in the community.
  - Events we have planned for this week:
    - Healthy Lunch on Wednesday
    - Paid 30 minute lunch extension to walk as a group around the block
    - “Today, I am committed to health & safety!” Poster introduction

Section 40(1)

- Hearing Conservation Month – April 27th was International Noise Awareness Day
  - Guest Speaker was [redacted] – gave interactive video presentation
  - Hearing protection review – Interest in hearing protection devices?
    Hearing Protection MUST be worn on the shop floor at all times while
    equipment is running. Five Strike Rule shall apply to those who do not.

Five Strike Rule:

Strike One – Verbal Warning

Strike Two – Written Warning

Strike Three – One day suspension

Strike Four – One week suspension

Strike Five - Termination
### Transcontinental

Health, Safety and Wellness "Tool Box Talks"

**Attendance Record**

<table>
<thead>
<tr>
<th>Date:</th>
<th>Topic: NAOH &amp; HEARING CONSERVATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 3/11</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Employee Signature</th>
</tr>
</thead>
</table>

<p>| | |</p>
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<thead>
<tr>
<th></th>
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</tbody>
</table>

*Section 40(1)*
Health and Safety
*Five Strike Safety Policy*

To provide an effective procedure for ensuring that Health & Safety Procedures are followed.

There are three ways to get a Safety Ticket:
1. Ignoring any Transcontinental Safety Procedure that is definitive,
2. Any disregard for Transcontinental Safety Procedures on a continuous basis,
3. Something that is without question an unsafe act even if it is not in the Transcontinental Safety Procedure.

A safety ticket may be appealed at the next scheduled Health and Safety committee meeting only. At that time, the committee will determine if the offence will be a strike.

The following is the progressive discipline process:
- One Strike – verbal warning
- Two Strikes – written warning
- Three Strikes – one day suspension
- Four Strikes – five day suspension
- Five Strikes – termination

Strikes remain valid in your file for two years.
May 26, 2011

Transcontinental
36 Austin Street
St. John’s, NL
A1B 4C2

Attention:

This is to inform you that audiometric testing was performed for the majority of the staff at Transcontinental on May 12th 2011, by Beltone Hearing Service. Audiologist reports to follow.

If you have any questions or concerns please contact me at the above number.

Sincerely

[Redacted]
Hounsell, Nancy

From: Hounsell, Nancy  
To: Higgins, Dawn  
Cc: Rowe, Gerald  
Subject: FW: Report

Hi Dawn,

Here is the report that we spoke about. It is submitted in response to Order # 520115-01 issued by Tina Murphy. Could you please determine if the report complies with what Tina ordered, including the deficiencies she outlined in the text of her report? I had a quick look at the report and it appears to be satisfactory but the numbers need to be looked at in further detail to confirm compliance.

Thanks,
Nancy

From: Hounsell, Nancy  
Sent: April 4, 2011 8:47 AM  
To: Rowe, Gerald  
Subject: FW: Report

Hi Gerald,

Here is the report for Transcontinental Printing.

Nancy
Hi Nancy,

Here is the BAE Newplan report received late Friday afternoon.

Please let me know if this meets your requirements?

Thanks,
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Tina report for transcontinental 520077 addressed that they had done sampling and audiometric testing and they were required to have a HCP. However, she didn’t write an order, that was 2007.

Dawn Higgins, B.Sc., CRSP
Industrial Hygienist
Occupational Health and Safety Division
Department of Government Services
15 Dundee Ave
Mt Pearl, NL
A1N4R6
Telephone 709-729-4455  709-729-6480
Fax 709-729-3445
email: DawnHiggins@gov.nl.ca
Hounsell, Nancy

From: Hounsell, Nancy
Sent: Wednesday, April 20, 2011 2:53 PM
To: Hounsell, Nancy
Subject: Re: OHS Inspection

That's good.

Thanks,

How about 9:30 am?

Hi Nancy,

Yes it will. What time would you like to visit?

Hi [Name]

I would like conduct a follow-up inspection tomorrow morning. Will the plant be in operation?

Thanks,
Nancy

Nancy Hounsell, MHSc, CIH, CRSP
Senior Industrial Hygienist
Department of Government Services
Occupational Health and Safety Branch
15 Dundee Avenue
Hi [Name]

Did someone show up on Monday morning?

Nancy

Hi [Name],

[Name] got back to me and they will have someone here 9:00 am Monday morning to do a site inspection. They expect to provide me with an update report by the end of next week.

Best regards,

[Name]

Thanks [Name]

Hi Nancy,

I made several more calls to [Name] yesterday without success.

This morning I called his boss and he assured me the matter will be looked after.

I expect to hear back from him later today.

As soon as I get more information I will keep you informed.

Best regards,

[Name]
Hounsell, Nancy

From: Hounsell, Nancy
Sent: Thursday, March 17, 2011 11:07 AM
To: [Redacted]
Cc: Rowe, Gerald
Subject: RE: BAE Newplan

Thanks again Could you please send me the report when you receive it from ? Nancy

From: [Redacted]@transcontinental.ca
Sent: March 17, 2011 10:41 AM
To: Hounsell, Nancy
Subject: Re: BAE Newplan

Hi Nancy,

 got back to me and they will have someone here 9:00 am Monday morning to do a site inspection. They expect to provide me with an update report by the end of next week.

Best regards,

Thanks

From: [Redacted]@transcontinental.ca
Sent: March 17, 2011 10:04 AM
To: Hounsell, Nancy
Subject: BAE Newplan

Hi Nancy,

I made several more calls to yesterday without success.

This morning I called his boss and he assured me the matter will be looked after.

I expect to hear back from him later today.

As soon as I get more information I will keep you informed.

Best regards,
Hi Nancy,

We will get this done as quickly as possible.

Thanks,

Hi Nancy,

Yes, you will have to have the work done. Our OHS Regulation, section 45, states that there must be adequate ventilation in a workplace in accordance with standards established by ASHRAE and ACGIH. The only way to verify that is through an engineer. Sorry!

Nancy

Hi Nancy,

I received a reply from [REDACTED] at BAE-Newplan this morning.

To revise his report and provide his engineer's signature the airflow measurements have to be done by a certified TAB (Testing, Adjusting and Balancing) contractor. While Trane Atlantic can accomplish these tasks for their own purposes in maintaining ventilation systems, they are not a certified TAB contractor.

To have this work done again by a certified contractor and obtain an engineer's approval will cost about $3,000.

Please let me know if this is required.

Very best regards,
Hi Nancy,

Here is the report from Dawe Enterprises.

Best regards,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atipoffice@gov.nl.ca.
Hi Nancy,

As promised, attached are the most recent airflow measurements for 36 Austin Street.

So far I have not been able to contact [redacted] at BAE-Newplan.

Very best regards,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7

Section 40(1)
Airflow Measurements

Transcontinental Printing
36 Austin Street
St. John’s

Following are the most recent airflow measurements:

Printing Press #1

Required exhaust rate: 2245 cfm
Actual exhaust rate: 2423 cfm

Web and Sheet Stockroom

Required exhaust rate: 985 cfm
Actual exhaust rate: 1045 cfm

Bindery Room

Required exhaust rate: 2089 cfm
Actual exhaust rate: 2475 cfm

Digital Printing Room

Required exhaust rate: 225 cfm
Actual exhaust rate: 233 cfm

It should be noted that Printing Press #1, Printing Press #2 and Bindery Room as defined in the BAE-Newplan Air Quality Report are not separate confined spaces. There are several very large wall openings between these adjacent areas.

Combined space of these areas is 11,002 sq. ft. requiring an exhaust of 5501 cfm.
Actual combined exhaust from these areas is 6356 cfm.
Hi Bonnie,

Can you get these printed for Nancy?

Thanks,

Charlie Coady
Manager, Prevention Services
Workplace Health, Safety and Compensation Commission
P. O. Box 9000
146-148 Forest Road
St. John's, NL
A1A 388

Tel: 709.778.1588
Fax: 709.776.1564
Cell: 709.682.4183

e-mail: ccoady@whsccl.nl.ca
Web: www.whsccl.nl.ca

Hi,

I received the report and will review this morning. Do you have the OHS Committee minutes for the past 2 years at this workplace? I'd like to review them if possible. Thanks!

Nancy Hounsell, MHSc., CIH, CRSP
Senior Industrial Hygienist
Department of Government Services
Occupational Health and Safety Branch
15 Dundee Ave.
Mt. Pearl, NL A1N 4R6

(709) 729-4450 - office
(709) 687-9188 - cell
(709) 729-3445 - fax

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Hi Nancy,

I found a reference for an architecture/engineering company that may have done the building extension/renovations. I have a message in with them to determine if they did the work. The company AE Consultants Ltd.

The original building, as you know, was done by the Bae Group. My contact there has been

I have a call into Controls and Equipment to see if they can help me determine the air exchange rate.

I spoke with someone at Heidelberg Canada, the press manufacturer, to find out who you can call to get the information you need regarding manufacturer's recommendations for the press environment. I hope to hear back from them soon.

The MSDS sheets for the press room and the plate making area are attached. These are the same documents I sent to Rogers when we asked them to do the air quality testing.

I have also attached our annual VOC calculation which shows the estimated fugitive emissions and the total quantities of substances we use containing VOCs.

As I get more answers I will send them to you.

If you would like to come and take some readings we are running everyday this week. But I can also double check with production if you want to pick a time.

Best regards,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7

Direct: [redacted]
Mobile: [redacted]
### VOC Emissions

<table>
<thead>
<tr>
<th></th>
<th>Fugitive Emissions (tonnes)</th>
<th>Controlled Emissions (tonnes)</th>
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<tbody>
<tr>
<td>Inks</td>
<td>0.04</td>
<td>0.00</td>
</tr>
<tr>
<td>Cleaning</td>
<td>0.11</td>
<td>0.00</td>
</tr>
<tr>
<td>Fountain Solution</td>
<td>0.06</td>
<td>0.00</td>
</tr>
<tr>
<td>Coating</td>
<td>0.03</td>
<td>0.00</td>
</tr>
<tr>
<td>Others (eg: fossil fuel combustion)</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0.24</strong></td>
<td><strong>0.00</strong></td>
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### Greenhouse Gases Emissions

<table>
<thead>
<tr>
<th></th>
<th>Emissions (tonnes)</th>
</tr>
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<tbody>
<tr>
<td>Total equ CO₂</td>
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</tbody>
</table>

### Product Use

<table>
<thead>
<tr>
<th></th>
<th>Quantity Purchased (kg)</th>
<th>Quantity sent for disposal (kg)</th>
<th>Quantity used on site (kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inks</td>
<td>3,286.70</td>
<td>0.00</td>
<td>3,286.70</td>
</tr>
<tr>
<td>Cleaning</td>
<td>719.20</td>
<td>0.00</td>
<td>719.20</td>
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<tr>
<td>Concentrated Fountain Solution</td>
<td>264.00</td>
<td>0.00</td>
<td>264.00</td>
</tr>
<tr>
<td>Coating</td>
<td>2,917.36</td>
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<tr>
<td><strong>Total Printing Chemicals</strong></td>
<td><strong>7,187.26</strong></td>
<td><strong>0.00</strong></td>
<td><strong>7,187.26</strong></td>
</tr>
</tbody>
</table>
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If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Hi

Tina and I will come over in the morning to take some general readings. Then, Tina will drop back over at around 3:45 pm to take some measurements during the cleanup. We'll probably be over around 10:00 am. Is that okay with you? Thanks, Nancy

Hi Nancy,

We will be starting our end-of-day cleanup of the presses around 3:45 pm.

Look forward to seeing you both.

Hi

I have planned to do a few air measurements for VOC's on Tuesday May 6th. Do you know your production schedule for that day? I would like to take measurement when the blanket and ink roller cleaning procedures are being carried out, if possible. Tina Murphy, who you have already met, will be with me.

Thanks,
Nancy

Nancy Hounsell, MHSc., CIH, CRSP
Senior Industrial Hygienist
Department of Government Services
Occupational Health and Safety Branch
15 Dundee Ave.
Mt. Pearl, NL A1N 4R6
We have received the final report from the Office of the Citizens' Representative into allegations that this Division failed to take adequate steps to ensure his occupational health and safety in the workplace.

Citizens' Representative Mr. Barry Fleming stated in his correspondence to Deputy Minister Norman: "Based on a thorough review of the evidence gathered there is insufficient basis to support these allegations. This office considers the investigation into this matter complete with no finding of unreasonable treatment by OHS".

A copy of the full report is in your mail slot and a copy will be placed in Gloria's area for staff.

Great work Tina and Nancy. Danika was also involved in the original complaint as a student.

Gerald

Gerald M. Rowe, B.Tech, CRSP
Manager, Occupational Health
Occupational Health and Safety Division
Department of Government Services
15 Dundee Ave
St. John's, NL
A1N 4R6
telephone 709-729-4455 709-729-5861
fax 709-729-3445
e-mail: geraldrowe@gov.nl.ca
According to Tina’s last follow-up posted on the CIS system, the ventilation that was installed was not acceptable. Does Tina have a file in her office with more up-to-date information? Did she give you a status report on all her files when she went off on sick leave?

Nancy

---

From: Rowe, Gerald  
Sent: January 5, 2010 4:40 PM  
To: Hounsell, Nancy  
Subject: FW: Transcontinental Firm # 2014540

Nancy

This references orders written by Tina. I seem to recall that the ventilation system was installed. Do you know if the orders can be closed?

Thanks

Gerald

Gerald M. Rowe, B.Tech, CRSP  
Manager, Occupational Health  
Occupational Health and Safety Division  
Department of Government Services  
15 Dundee Ave  
Mt Pearl, NL  
A1N4R6  
telephone 709-729-4455  709-729-5861  
fax 709-729-3445  
email: geraldrowe@gov.nl.ca

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From: Coady, Charlie  
Sent: Monday, January 04, 2010 3:55 PM  
To: Rowe, Gerald  
Subject: Transcontinental Firm # 2014540

Hi Gerald,

Happy New Year to you and yours.

Would you be able to tell me if a hygienist has f/u on directives issued on November 4, 2008 to Transcontinental on Austin Street in St. John’s?

Thanks,

Charles Coady
Manager, Prevention Services
WHSCC
P.O. Box 9000
146-148 Forest Road
St. John's, NL
A1A 3B8

T. 709.778.1568
F. 709.778.1564
Web. www.whsccl.nl.ca
E-Mail: ccoady@whsccl.nl.ca

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Hounsell, Nancy

From: Hounsell, Nancy  
Sent: Tuesday, February 02, 2010 10:29 AM  
To:  
Cc: Rowe, Gerald  
Subject: Ventilation

Hi

Further to our telephone conversation this morning, could you please provide an update on each of the following:

1. OHS Inspection Report # 520115 and Order # 520115-01  
2. Recommendations on page 8 of REL report dated February 2008  
4. Discussion items between [redacted] and Tina Murphy at their meeting December 16, 2008

Also, after the exhaust volume is measured by Trane, could you please forward this Department a copy of the report? Thank you for your time.

Regards,
Nancy

Nancy Hounsell, MHSc, CIH, CRSP  
Senior Industrial Hygienist  
Department of Government Services  
Occupational Health and Safety Branch  
15 Dundee Avenue  
Mt. Pearl, NL A1N 4R6  
Phone: (709) 729-4450  
Cell: (709) 687-9188  
Fax: (709) 729-3445
Hi Gerald,

I was speaking with [redacted] at Transcontinental Printing today to get an update. They have done an extensive amount of work with the ventilation system. The most recent was installation of two new larger capacity exhaust fans to replace existing fans. One was replaced last year before seagulls made a nest in the ventilation system and the other was replaced after the baby seagulls were done with the nest. In addition, two new fans were installed. A fan was installed in the press room (by coder) and an air exchanger was installed in the digital room. There is the process of getting Trane to come back and re-measure the exhaust volumes now that all the fans are installed. There were some modifications to the hoods and the exhaust fan in the chemical storage room (now on continuously and two vents installed to the outside). I requested a written update of all the recommendations in various reports and of our Order. He agreed to provide that to us in writing. I said it was okay to wait until Trane re-measures the exhaust volumes and that we would likely require a P. Eng. (i.e. [redacted]) to provide written confirmation that the system now meets the ASHRAE standard as we interpret the standard. He also said that all the recommendations in the REL report were done with the exception of periodic air sampling but he will do that if we require it. I don't think it's something necessary at the moment, but when all the ventilation work is finished, it might be beneficial for us to take a sample or two just to confirm the effectiveness of the ventilation. REL sampled isopropyl alcohol for 60 minutes which is not representative of an 8-hr day. Since that was 2 years ago it's not worthwhile to get into it with them now. Perhaps Tina and Adam can do further work on that when she returns from maternity leave. I'll keep you up to date on the file as I receive new information from [redacted].

Regards,
Nancy

Nancy Hounsell, MHSc, CIH, CRSP
Senior Industrial Hygienist
Department of Government Services
Occupational Health and Safety Branch
15 Dundee Avenue
Mt. Pearl, NL A1N 4R6
Phone: (709) 729-4450
Cell: (709) 687-9188
Fax: (709) 729-3445
Hi Gerald,

Here's an update on the Transcontinental Printing file. When the ventilation is re-measured and I have the report, I'll do a re-inspection to verify everything. At this point, there is no action required as they appear to have complied with all our requirements. Now it's just a matter of verification.

Thanks,
Nancy

---

Hi Nancy,

The update is attached. When you have the opportunity to review the information, please let me know if there is anything else you need.

Also, please let me know if this information serves to close Order #520115-01.

Thanks,

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7

Hi

Further to our telephone conversation this morning, could you please provide an update on each of the following:

1. OHS Inspection Report # 520115 and Order # 520115-01
2. Recommendations on page 8 of REL report dated February 2008
4. Discussion items between Ken Jewer and Tina Murphy at their meeting December 16, 2008

Also, after the exhaust volume is measured by Trane, could you please forward this Department a copy of the report? Thank you for your time.

Regards,
Nancy

Nancy Hounsell, MHSc, CIH, CRSP
Senior Industrial Hygienist
Department of Government Services
Occupational Health and Safety Branch
15 Dundee Avenue
Mt. Pearl, NL A1N 4R6
Phone: (709) 729-4450
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Transcontinental Printing
36 Austin Street
St. John's NL

1. OHS Inspection Report #520115 and Order # 520115-01

1. Printing Press #1: this area also houses the chemical storage room, therefore, the spaces have been separated for the purposes of calculating ventilation rates. The chemical storage room has a volume of 1024 cubic feet and an exhaust rate of 1551 cfm. Therefore this room has 91 air changes per hour. This is far in excess of typical ventilation rates for these types of spaces, of 6-10 air changes per hour.

The press room requires an exhaust rate of 2245 cfm, however, the canopy hood in this room is the only source of exhaust and is removing 696 cfm. Therefore, this room is significantly below the applicable standard.

The exhaust fan in the chemical storage room has been set to run continuously and 2 vents have been installed from the press room to the chemical storage room to allow air from the press room to exhaust through the chemical storage room. In addition, an exhaust hood has been provided in the press area to exhaust air from the area of the coating drums and a capture exhaust directly to the outside has been provided for the fountain solution tank containing the isopropyl alcohol additive.

2. Web and Sheet Stockroom: this area requires 985 cfm exhaust rate but there is only 492 cfm provided. Therefore, this space is below the applicable standard.

The exhaust fan for this area has been replaced with a larger capacity fan and a larger exhaust hood.

3. Bindery Room: this space requires and exhaust rate of 2089 cfm, however, 1513 cfm provided. Therefore, this space is below the applicable standard.

The exhaust fan for this area has been replaced with a larger capacity fan and a larger fan hood.

4. Digital Printing Room: this space requires an exhaust rate of 225 cfm, whereas 68 cfm is provided. Therefore, this room is below the applicable standard. Also, according the report, the ventilation system serving this room appears to be part of the base building air conditioning unit. This must be investigated and a separate exhaust and supply system must be provided for this room.

This space as been provided with an independent exhaust and fresh air supply.
2. Recommendations on page 8 of REL report dated February 2008

1. Periodic sampling should be conducted to ensure that airborne exposure levels remain below the respective Threshold Limit Value (TLV) as established in the most current edition of the American Conference of Governmental Industrial Hygienists Threshold Value booklet.

Further sampling as not been carried out as source capture and direct outside exhaust has been installed for the tank containing the isopropyl alcohol additive.

2. Emergency eyewash stations should be located no more that 10 seconds or less than 25 feet away from the work area. In addition, the eyewash stations should contain enough water to provide for 15 minutes of continuous use.

Necessary eye wash stations are located as required and are maintained on a regular basis by an outside contractor.

3. Cloths or rags used for the maintenance and cleaning of process equipment should be kept covered at all times to prevent unnecessary odours and the release of vapors in the work environment.

All containers have lids that are kept closed. Placards have been posted that warn employees of the potential hazards of volatile organic compounds.

4. Management should ensure that workers follow strict personal hygiene, including washing of hands prior to eating and by utilizing the lunch room on site for eating and drinking. This will ensure that hazardous chemicals are not being ingested.

This issue has been addressed with employees and signage throughout the building reminds employees of the necessity of hand washing before eating and drinking.

5. Respiratory protection with an organic vapour cartridge should be work when completing maintenance and cleaning of the process equipment to protect against accidental exposure by inhalation and ingestion.

This process equipment, which was not in regular use, has been removed.

6. Eye protection should be used when decanting isopropyl alcohol to prevent eye exposure.

Signage is posted in various locations in the building, including the door to the chemical storage room reminding employees of the necessity to use eye protection when decanting isopropyl alcohol.

1. Increase the exhaust airflow rate from F-3 in the Bindery room to ensure that the exhaust rate is equal to or exceeds 0.5 air changes per hour.

Fan F-3 has been replaced with a larger capacity fan and a larger exhaust hood.

2. Increase the setting of the manual fresh air damper on the Bindery room roof top air conditioning unit to equal the exhaust airflow rate from F-3 after the fan has been rebalanced.

The manual fresh air damper on the Bindery roof top air conditioning unit has been adjusted to the maximum air flow position.

3. Investigate the ventilation system serving the Digital Priming room further. If this space is found to be served by the base building ventilation system then it should be removed from same and a dedicated exhaust and fresh air supply should be provided for this space to comply with ASHRAE 62.1-2007

This space as been provided with a dedicated exhaust and fresh air supply.

4. The areas that seem to have the problems with odours are the printing press areas. This is probably due to the open drums of chemical utilized in the printing process located directly adjacent to the press itself and the absence of local source capture exhaust to capture the vapors being released into the air inside the building in the immediate area. Our recommendation related to these areas are as follows:

Provide source capture exhaust hoods around the open chemical drums at each press to take the vapors released form the chemicals directly to the outside instead of being released with the space.

A capture hood has been installed over the open drums with an exhaust fan to the outside and the chemical solution tank vent has been capped and vented directly outside.

5. Discussion items between [redacted] and Tina Murphy at their meeting December 16, 2008.

We are given to understand the discussion was related to the design of the ventilation system and the calculations provided in the BAE-Newplan report. The general conclusion was the ASHRAE 62.1-2007 standard of 0.5 cfm per square foot of floor space should be applied with consideration of the exhaust air rate only, and should not include the fresh air supply from the air conditioning units.
Hi Nancy,

The air flow measurements have been completed, but I don't have the results yet. I made a call earlier this week, but he was out of his office. I will try him again this afternoon to see if he can issue a revised report based on the new results when I get them – which should be later today or Monday.

Thanks for your reply.

Have a good weekend.

Hi -

Sorry for not replying sooner. The information you provided is what we required. I have forwarded it to my manager. To close the Order, I have to do a re-inspection to confirm but before I do that I'll like to see the recent air flow measurements once they are completed. Can you provide that information when it's available and then we can arrange a follow-up inspection?

Thank you,

Nancy

Hi -

The update is attached. When you have the opportunity to review the information, please let me know if there is anything else you need.

Also, please let me know if this information serves to close Order #520115-01.

Thanks,
Hi Nancy,

As promised, attached are the most recent airflow measurements for 36 Austin Street.

So far I have not been able to contact [redacted] at BAE-Newplan.

Very best regards,

[redacted]

Transcontinental Printing
36 Austin Street
St. John's, NL A1B 3T7

Direct: [redacted]
Mobile: [redacted]
Confidential fax: [redacted]
Airflow Measurements

Transcontinental Printing
36 Austin Street
St. John’s

Following are the most recent airflow measurements:

Printing Press #1

Required exhaust rate: 2245 cfm
Actual exhaust rate: 2423 cfm

Web and Sheet Stockroom

Required exhaust rate: 985 cfm
Actual exhaust rate: 1045 cfm

Bindery Room

Required exhaust rate: 2089 cfm
Actual exhaust rate: 2475 cfm

Digital Printing Room

Required exhaust rate: 225 cfm
Actual exhaust rate: 233 cfm

It should be noted that Printing Press #1, Printing Press #2 and Bindery Room as defined in the BAE-Newplan Air Quality Report are not separate confined spaces. There are several very large wall openings between these adjacent areas.

Combined space of these areas is 11,002 sq. ft. requiring an exhaust of 5501 cfm. Actual combined exhaust from these areas is 6356 cfm.