FILE NAME: Rogers Corporation (ROG)

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AUG 20 1973

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This is Rogers Corp's reply to Conn. Dept of Env Protection
JFR

August 17, 1973

Mr. Eckardt C. Beck
Director Air Compliance Unit
State of Connecticut
Department of Environmental Protection
State Office Building
Hartford, Connecticut 06115

Dear Mr. Beck:

In regard to the proposed Air Quality Regulation for asbestos, we have submitted our letter of July 13, 1973 supplemented by our testimony during the hearing held on July 25, 1973. Since the record is open until September 10, 1973, we would like to submit the following data and additional comments.

We feel that the testimony presented during the hearing clearly indicates that further information is necessary in regard to the efficiency obtainable from the EPA specified bag collector.

This is evidenced by the fact that Mr. Bruckman stated that a bag collector of 99.9% efficiency would meet the proposed standard of 25 micrograms per cubic meter.

Mr. Clapp testified that a bag collector of 99.0% efficiency would meet the proposed standard of 25 micrograms per cubic meter.

I, representing Rogers Corporation, submitted calculation showing that at 99.99% efficiency and with only 1 grain per cubic foot loading the discharge would be 229 micrograms per cubic meter, which is well above the proposed standard.

We believe that the State, with its subpoena power, is most likely to be successful in obtaining from the manufacturers of bag dust collectors a figure that they can guarantee in regard to the efficiency of the unit.

To further complicate matters particle size will also have to be considered. It would seem that the efficiency of the bag collector would vary with the particle size.

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The next problem which arises is testing. We have spent a considerable amount of time searching the literature and have come to the conclusion that at this time there is no well accepted method which can reliably test for the amount of asbestos in a sample. The testing also appears to be extremely expensive so that it would at best serve as a last resort referee.

As stated at the hearing we also feel that the hermetically sealed method of disposal is restrictive. We feel that any method that disposes of the asbestos without allowing it to escape should be permitted after approval by the Commissioner.

While the goal being sought is commendable and fully supported by us we feel that lack of sufficient data at this time will prevent its achievement. A program to obtain the necessary data would permit putting a proposed regulatory system on firm ground and assure it of success.

We would be glad to work with your organization to achieve a firmly based regulation supported by firm data.

Very truly yours,

Charles A. Bergheimer
Director of Corporate Engineering

CAB/pvn

Data attached

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DATA

	Micrograms per cubic meter
1. Proposed DEP Standard	25
2. 99.99% Efficient Bag Collector	
a) 10 grains per cubic foot loading	2,290
b) 1 grain per cubic foot loading	229
3. 99.9% Efficient Bag Collector	
a) 10 grains per cubic foot loading	22,900
b) 1 grain per cubic foot loading	2,290

CALCULATIONS

Conversion Figures: 1gm = 15.43 grains
1cu.meter = 35.31cu.ft.

1. Proposed DEP Standards

25 micrograms per cubic meter or 20 grams per day.
25×10^{-6} gms per cubic meter.

2. 99.99% Efficient

a) Loading 10 grains per cu. ft.

$$\frac{10 \text{ grains}}{\text{cu.ft.}} \times \frac{1 \text{ gm.}}{15.43 \text{ grains}} \times \frac{35.31 \text{ cu. ft.}}{1 \text{ cu. meter}} = \frac{22.9 \text{ gms.}}{\text{cu. meter}}$$

22.9 gms per cu. meter x .0001 = .00229 gms/cu. meter
$2,290 \times 10^{-6}$ gms per cubic meter

b) Loading 1 grain per cu. ft.

$$\frac{1 \text{ grain}}{\text{cu. ft.}} \times \frac{1 \text{ gm.}}{15.43 \text{ grains}} \times \frac{35.31 \text{ cu. ft.}}{1 \text{ cu. meter}} = \frac{2.29 \text{ gms.}}{\text{cu. meter}}$$

2.29 grains per cubic meter x .0001 = .000229 gms/cu. meter
or 229×10^{-6} grams per cubic meter

3. 99.9% Efficient

a) Loading 10 grains per cu. ft.
per b-1- 22.9 gms per cubic meter

22.9 gms per cubic meter x .001 - .0229 gms/cu. meter
$22,900 \times 10^{-6}$ gms per cubic meter

b) Loading 1 grain per cu. ft.

$2,290 \times 10^{-6}$ gms per cubic meter

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