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Stating Opposition to Proposed Asbestos Standards



ROGERS CORPORATION

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January 25, 1979

Mr. Leonard Bruckman, Director
Air Compliance Unit
State of Connecticut
Department of Environmental Protection
State Office Building
Hartford, CT 06115

Dear Mr. Bruckman:

Rogers Corporation, headquartered in Rogers, Connecticut, wishes to submit its comments relevant to the proposed asbestos ambient and emissions standards, dated December 11, 1978. Attached is a document detailing our concerns over this proposal.

We are opposed to these proposed standards on the basis that:

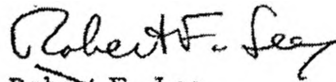
- A) The base line data used to justify this proposal, namely, the "high" rate of mesothelioma incidence in Connecticut and the relationship to increased asbestos consumption is not correlateable.
- B) The assumption that asbestos is the sole cause of mesothelioma is incorrect.
- C) These proposals ignore the significant contribution to ambient air asbestos levels from natural sources.
- D) The proposal of an ambient standard based on weight/unit volume assumes a direct relationship between fiber count and weight. This is not the consensus of the scientific community.
- E) The weight/unit volume standard totally ignores the medically proven concept of a fiber-size relationship to respiratory carcinogenesis.

- F) These proposals are far more stringent than either the existing or proposed EPA and OSHA standards.
- G) The DEP conducted study of ambient air asbestos levels within Connecticut exhibits a number of "errors of omission" which cloud the conclusions drawn.
- H) The emission standard of 24 grams/day/premise is not based on technological capability. In fact, in our opinion, it is not achievable with current state-of-the-art technology.
- I) These proposals lack any consideration of actual benefit versus economic impact.

These are the more important points we elaborate upon in our comments.

We would hope that our concerns are objectively reviewed and that our opinions are evaluated seriously. We strongly urge reconsideration of the original proposals in light of our comments.

Respectfully submitted,



Robert F. Lee
Manager of Environmental Engineering
Rogers Corporation

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Enclosures