UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 14 1997

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Tony Nocito
ABCOV, Inc.
214 Sullivan Street
Suite 3A
New York, New York 10012

Dear Mr. Nocito:

This is in response to your letter of January 15, 1997, requesting two modifications to the Environmental Protection Agency's (EPA's) approval for the construction and use of the ABCOV method for converting asbestos into nonasbestos. This supplements the approval granted to Aberdeen Proving Grounds (APG), Aberdeen, Maryland on March 28, 1995, and our May 31, 1996, response to your letter of May 17, 1996.

Your first requested modification involves increasing the frequency of sample analysis required under §§61.155(c)(3) and (d)(2). Rather than performing analysis on 10-day composite samples during the initial 90 days of operation, or analysis on a monthly composite sample after the initial 90 days of operation, you propose to analyze composite samples every four days or less. Composite samples for fewer than 10 days is currently allowed under §61.155(c)(3). In your case, you may collect one sample every hour after initial discharge of converted material from your process for a daily composite (10-hour shift or less), and then composite daily samples for fewer than 10 days.

After the initial 90 days of operation, you may collect and analyze samples as you proposed: three composite samples of 200 grams or 7 ounces for each shift (10-hours or less) collected at three equal intervals during the shift. The samples and containers they represent shall be stored in a separate, well-defined area of the facility. You may then analyze the daily composite, or make a composite of the daily composites for as many days as you wish up to one-month's production before analyzing the samples as a "lot." When transmission electron microscopy (TEM) analysis confirms the full conversion of any "lot," then the nonasbestos output material is no longer subject

to any of the provisions of the asbestos National Emission Standard for Hazardous Air Pollutants. If TEM analysis does not show complete conversion, the output material shall be recycled through the process or disposed of as asbestos-containing waste material.

Your second requested change involves the use of size reduction equipment to reduce the size of the feed material and to make the feed material more homogeneous. Your proposal to use size reduction equipment is approved with your specified conditions. The size reduction equipment will operate under negative air pressure (6 air changes per hour) with HEPA filters on the exhaust, and shall contain all excess liquid used to adequately wet the asbestos-containing feed material. Finally, there will be no visible air or liquid emissions.

If we can be of further assistance, please contact Tom Ripp of my staff at (202) 564-7003.

Sincerely,

Richard Biondi/F

John B. Rasnic, Director
Manufacturing, Energy and Transportation Division
Office of Compliance