



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

MAR 15 2006

OFFICE OF  
ENFORCEMENT  
COMPLIANCE ASS

Mr. Tony Nocito  
ABCOV, LLC  
149 Church Street, Suite 4S  
New York, New York 10007

Dear Mr. Nocito:

This letter is in response to your request for EPA approval to two modifications to the previously approved ABCOV Method. EPA approved the ABCOV Method as meeting the regulatory requirements of 40 C.F.R. Part 61.155, which apply to owners or operators that convert asbestos-containing material to non-asbestos-containing material. You are seeking permission to build a modular, transportable conversion system using the currently approved ABCOV Method and permission to change the secondary mixing tank from an agitated tank to a rotating tank.

Modular, Transportable Asbestos Conversion System

The staff from EPA's program and technical offices reviewed the proposed modular, transportable asbestos conversion system and approved its use as it applies to the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. It is consistent with the current built-on-site conversion system. You will need to check with the state and/or local air authority if other regulations apply.

Changing Secondary Tanks

The Transmission Electron Microscopy (TEM) data that you submitted using a rotating tank indicates "non-detect" for all asbestos forms regulated under the asbestos NESHAP. These results are consistent with the requirements outlined in Section 61.155. ABCOV, LLC is approved to use the conversion method using a rotating tank as the secondary mixing tank.

The Office of Civil Enforcement, the Office of Air Quality Planning and Standards, and the Office of General Counsel have reviewed this determination. If you have any questions, contact Everett Bishop of my staff. His telephone number is (202) 564-7032 or email at [bishop.everett@epa.gov](mailto:bishop.everett@epa.gov).

Very truly yours,



Michael S. Alushin  
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