



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

MAR 15 1994

Dr. Leon Paretsky
Manager, Asbestos Programs
Consolidated Edison Company of New York
4 Irving Place
Room 300
New York, N.Y. 10003

Re: Request for Approval of Disposal of Chemically Converted
Regulated Asbestos Containing Material.

Dear Dr. Paretsky:

The U.S. Environmental Protection Agency (EPA) has reviewed your request of February 18, 1994 for approval to dispose of chemically converted regulated asbestos material. The asbestos waste, according to your submittal, will be chemically converted using the ABCOV Method of asbestos conversion. EPA Region II has been provided with numerous reports, studies, laboratory data, and other correspondence concerning this process. In addition, EPA representatives from Regions II and III attended separate pilot project demonstrations of the process.

Since Con Edison is not proposing to construct a permanent facility for operations that convert asbestos-containing waste material into non-asbestos (asbestos free) material, then the provisions of 40 CFR Part 61.155(a) do not apply. Therefore, EPA hereby authorizes the disposal of chemically converted regulated asbestos containing material, as identified in your submittal under the following conditions:

1. Consolidated Edison, or its contractor, must provide proper notification to EPA in accordance with 40 CFR Part 61.145(b).
2. Results of analyses conducted by an independent laboratory, using polarized light microscopy, that document the asbestos content of the waste products, shall be submitted to EPA by the laboratory as soon as possible during the operation, as per 40 CFR Part 61.155(g)(1).
3. Consolidated Edison, or its contractor, shall maintain waste shipment records as per 40 CFR Part 61.150(d)(1) for all solid and liquid waste generated from the conversion process.

4. Since the operation included in this request is projected for completion by May 30, 1994, this approval shall only be effective through June 15, 1994.

If you have any questions, please contact Mr. Dan Manasia of my staff at (212) 264-0001.

Sincerely yours,

Original signed by
Conrad Simon

Conrad Simon, Director
Air & Waste Management Division

cc: Frederick Sachs, Director
Bureau of Asbestos Control
New York City Department of Environmental Protection