



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

MAR 30 1999

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Tony Nocito, President
ABCOV/RADCON, Inc.
149 Church Street
Suite 4S
New York, NY 10007-2241

Dear Mr. Nocito:

This is in response to your December 7, 1998, letter and subsequent telephone conversations with Tom Ripp, requesting an additional modification in the use of the ABCOV Method for asbestos conversion under the Environmental Protection Agency's (EPA's) asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). You wish to expand approval of the construction of the ABCOV process (original construction approved under 40 CFR 61.155 in a March 8, 1995, letter from the EPA to Mr. Joseph Craten) to cover the decontamination of materials contaminated with asbestos. You wish to decontaminate a large range of materials from asbestos abatement projects such as plastic bags, plastic from enclosures Tyvek uniforms, respirator cartridges etc., by contacting those materials with ABCOV-C in a mixing drum for approximately one and one-half hours. It is our understanding that this treatment will occur in the same enclosed process/facility with negative pressure and HEPA air filtration as previously approved.

Your request to expand the types of material treated under the ABCOV process is approved as follows:

Initial 90-days operation

Flat surfaced materials (e.g., plastic disposal bags):

- Collect a sample from each batch run by completely wet wiping all flat surfaces of all materials that have been treated;
- The samples may be analyzed as 10-day composite samples;
- Transmission electron Microscopy (TEM) shall be used to analyze the samples.

Bulk, porous materials (e.g., respirator cartridges):

- Collect a bulk sample from each treated item;
- The samples may be analyzed as 10-day composite samples;
- TEM shall be used to analyze the samples.

If the analysis of the samples shows the material to be asbestos-free, the material may then be disposed of as nonasbestos, or sent out to be recycled. The parameters of operation (mixing time, type of asbestos treated, type of contaminated material treated) will be determined during the 90-days of initial operation. You shall maintain records required under 61.155(f) onsite, submit the reports required under 61.155(g), and follow all other requirements under 61.155.

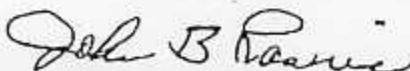
If you wish to establish new operating parameters (treat other materials not included in the original test or alter treatment times), you may simply repeat the initial 90-day testing procedures for the new materials/conditions and meet the record keeping and reporting requirements (61.155(f) & (g)).

Continuing Operations

After the initial 90-days of operation, you shall collect and analyze (using TEM) monthly composite samples (samples collected randomly from each batch, one each for flat surfaced materials and bulk porous materials) of the output material. You shall maintain the records required under 61.155(f) onsite, submit the required reports under 61.155(g), and follow all other requirements under 61.155.

This response was coordinated with EPA's Office of Regulatory Enforcement and the Office of Air Quality Planning and Standards. If you have any questions, please contact Tom Ripp of my staff at (202) 564-7003.

Sincerely,



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