

08/07/2010 01:21 AM

To: Halil Ahmet/Field_Services/VWA@WorkCover

Cc:

Subject:

Re: Fw: ABCOV: THE GREENEST-CLEANEST ASBESTOS DESTRUCTION TECHNOLOGY ---- ELIMINATES ALL FUTURE ASBESTOS LIABILITIES - A CLEANER PLANET IS A BETTER AND SAFER PLANET

Mr. Ahmet -

In regards to your inquiry regarding the ABCOV method for converting asbestos-containing material into non asbestos-containing material, EPA approved this conversion process about 10 years ago. The process takes the asbestos-containing material and mixes it with various acids. Over time, the process breaks down the asbestos fibers. Samples are taken at intervals and analyzed by the TEM method. When the samples return "non-detect." the Agency has determined the resulting material is no longer asbestos-containing material but a solid waste.

I've used your inquiry of questions to provide some additional information.

your involvement with the ABCOV method

Our office is responsible for issuing applicability determinations under the Clear Air Act. 40 Code of Federal Regulations Section 61.155

identifies the requirements for submitting an application for the conversion process. As you see from the regulation, the bottom line is that the process must be 100% efficient at all times in the conversion process. TEM is the only analytical process allowed to make the determination. See attached file. (See attached file: 40cfr61.155.pdf)

The application was reviewed and approved by attorneys and engineers before make the recommendation to management to approve the conversion process.

whether the method can be freely used in your Region/jurisdiction (Country)

While the ABCOV method has federal approval, each time Mr. Nocito operates in a different state, he must contact that state's air program authority to determine if there are any state-specific regulations he must comply with while operating the process within that state. His process is considered a new air source and Mr. Nocito must let the state know of his operation.

have you placed any restrictions/conditions on its use

In our determination letters, we have informed Mr. Nocito that should he change is process, he needs to resubmit an application with the changes and documents verifying the updated process complies with the conversion language. He has applied two times when he want to expand the amount his operation could handle. We approve both requests.

what assessment you have performed of the process

Our assessment was the review of his engineering design and description of the process at each point within the conversion process plus review

of the laboratory analysis of the output material. As you review 61.155 language, it is quite broad with the final determination of whether the process can turn the asbestos-containing material into non asbestos-containing material.

I see your responsibility lies more to occupational health and safety than protection of the environment. In the United States, that responsibility lies with our colleagues in the Department of Labor, the Occupational Safety and Health Administration. We did review the ABCOV process against the requirements of OSHA for asbestos. We found the process complied with the various requirements for worker safety when conducting the conversion process.

I hope this helps. If you have further questions, please contact me.

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