



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960015

Category: Asbestos
EPA Office: METD
Date: 03/21/1995
Title: Mobile Amosite Conversion
Recipient: Gress, Lester
Author: Rasnic, John

Subparts: Part 61, A, General Provisions
Part 61, M, Asbestos

References: 61.08
61.155

Abstract:

Q. Would an application for the construction of a mobile amosite asbestos conversion process be approved?

A. The process may be approved under certain circumstances and is subject to the requirements of the asbestos NESHAP for asbestos conversion process, 40 CFR 61.155.

Letter:

Mr. Lester Gress
Cleveland Fluid Systems Co.
P.O. Box 41070
Cleveland, OH 44141-0070

Dear Mr. Gress:

This is in response to your March 1, 1995 application for the construction of the Plasma Technology Corporation (PTC) Mobile Vitrification Unit for amosite asbestos. This system is subject to the requirements of the asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) for asbestos conversion processes, 40 CFR 61.155.

According to the NESHAP general provisions (specifically 40 CFR 61.08), EPA must notify the applicant of approval or denial of the construction or modification application within 60 days after receipt of sufficient information to evaluate the application. In this case, the application was determined to be complete on March 2, 1995.

After careful review of the application by the Manufacturing, Energy, and Transportation Division and Region V, we are approving PTC's application to construct the mobile amosite asbestos conversion system. We anticipate that PTC's proposed mobile unit will be constructed and operated according to the conditions specified in the application. If any minor modifications (e.g., change in feed rate) are made during the start-up performance test, they will become part of the final operating conditions of the unit. Any proposed major modifications (e.g., different equipment specifications or feed material) will need approval from EPA.

According to the process description, the storage tanks, and conveyor system will operate under negative pressure, and if the negative pressure is not maintained, operations will be stopped. Additionally, there are procedures and mechanisms to shut down the operation if the plasma torch malfunctions or if other "upset" conditions exist in the process. Finally, the description indicates that the equipment will be decontaminated prior to transporting to another site.

The sampling and testing of the end product must be done in accordance with the procedures specified in 61.155 or using an alternative approved by this office. Otherwise, the material must be disposed of as asbestos-containing waste material.

This approval to construct is pursuant to the federal NESHAP requirements. PTC must still comply with any applicable State or local requirements.

This response was coordinated with the 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
Manufacturing, Energy, and Transportation Division Office of Compliance

cc: Robert Cody, Plasma Technology Corporation
Jeff Bratko, Region V (5AT-18J)