



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960006

Category: Asbestos
EPA Office: METD
Date: 03/23/1995
Title: Experimental Conversion Process
Recipient: Craten, Joseph
Author: Rasnic, John

Subparts: Part 61, A, General Provisions
Part 61, B-Asb, Asbestos Demolition/Renovation (Now Sub. M)

References: 61.08
61.55

Abstract:

Q. Will EPA approve an experimental process for converting asbestos to a non-toxic material?

A. The process as described is approved and will be subject to the asbestos NESHAP requirement for asbestos conversion processes, 40 CFR 61.55.

Letter:

Joseph D. Craten, Acting Director
Safety, Health & Environment
U.S. Army
Aberdeen Proving Ground Support Activity
Aberdeen, MD 21005-5001

Dear Mr. Craten:

This letter is in response to your January 11, 1995 correspondence requesting approval for an experimental asbestos conversion to a non-toxic material process referred to as The ABCOV Method. This process is subject to the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) requirement for asbestos conversion processes, 40 CFR 61.55.

According to the NESHAP general provisions (specifically 40 CFR 61.08) the Environmental Protection Agency (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 14, 1995.

After careful review of the application by the Manufacturing, Energy, and Transportation Division and Region III, we are approving the construction of the experimental ABCOV Method for asbestos conversion to a non-toxic material at the Aberdeen Proving Grounds, Aberdeen, Maryland. We anticipate that the ABCOV stationary unit will be constructed and operated according to the conditions and controls specified in the application and supplemental information provided by Anthony Nocito of DSI Industries Consolidated, Inc. 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 entire conversion process will operate under negative pressure and HEPA filters with additional carbon filters in the mixer and processing rooms. The minimum mixing time is expected to be not less than 45 minutes in the primary mixer. The formulas of the ABCOV chemicals will not change. Finally, the end product during the start-up performance testing will be held in sealed storage containers inside the process facility until the sample results are received.

This approval to construct and operate is pursuant to the Federal NESHAP requirements. You must still comply with any applicable state of Maryland and local requirements.

If we can be of further assistance, please contact Tom Ripp at (202) 564-7003.

Sincerely,

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

cc: Anthony Nocito, DSI Ind.
John McQuade, MD Dept. of Env.
John Daley, EPA Region III (3AT11)