



# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

July 20, 2007

Mr. Tony Nocito  
A-Conversion, LLC  
291 Broadway, Suite 1101  
New York, NY 10007

Subject: The ABCOV™ Method of Asbestos Destruction

Dear Mr. Nocito:

This letter is provided in response to your May 22, 2007 correspondence concerning the ABCOV™ Method of asbestos destruction. In your correspondence, you have requested a letter that details the requirements to allow the use of the ABCOV™ process to destroy asbestos or asbestos-containing materials in the State of Connecticut.

Based upon the information provided with your correspondence, it is the understanding of the Connecticut Department of Public Health (DPH) that the ABCOV™ Method involves converting asbestos-containing materials to a non-asbestos form after the removal of from structural components. Given that this conversion process occurs in conjunction with asbestos abatement, as defined by Section 19a-332 of the Connecticut General Statutes, this process must occur within a negative pressure enclosure and in manner that is consistent with the requirements of the *Standards for Asbestos Abatement* regulation (Section 19a-332a-1 to Section 19a-332a-16 of the Regulations of Connecticut State Agencies (RCSA)). In event that one wishes to utilize a work procedure other than those specified by the *Standards for Asbestos Abatement* regulation, an alternative work practice application must be submitted to the DPH for approval, as provided for in Section 19a-332a-11.

Additionally, individuals involved in handling of asbestos-containing materials within the negative pressure enclosure must be certified as asbestos abatement site supervisors or asbestos abatement workers, in accordance with the *Licensing and Training Requirements for Persons Engaged in Asbestos Abatement and Asbestos Consultation Services* regulation (Section 20-440-1 to Section 20-440-9, Section 20-441 of the RCSA). By regulation, these individuals must be employees of an asbestos abatement contractor licensed by the DPH.

As part of its review of your correspondence, the DPH contacted the U.S. Environmental Protection Agency (EPA), Region I. EPA Region I has confirmed that the EPA Office of Compliance approved the ABCOV Method on March 15, 2006 for use as it applies to the NESHAP regulation.

Finally, please be advised that your correspondence has been forwarded to the Connecticut Department of Environmental Protection (DEP) for consideration. The DEP is responsible for compliance assistance and enforcement related to the handling and disposal of waste material. Based upon a preliminary review of your correspondence, the DEP has indicated that a permit may be required for treatment of the waste material by the ABCOV Method™. In addition, the treated asbestos sludge will most likely require a "Special Waste Disposal

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Authorization” in order to be disposed of in a solid waste landfill in Connecticut. It is suggested that you contact Ross Bunnell of the DEP, Bureau of Materials Management and Compliance Assurance by telephone at (860) 424-3274, or by e-mail at [ross.Bunnell@po.state.ct.us](mailto:ross.Bunnell@po.state.ct.us) should you wish to discuss issues related to waste materials associated with the ABCOV Method™.

Please contact me should you wish to discuss further the requirements of the DPH as they apply to the use of the ABCOV Method™ within the State of Connecticut.

Sincerely,



Ronald Skomro  
Supervising Environmental Sanitarian  
Environmental Health Section  
Asbestos Program

cc: Suzanne Blancaflor, Section Chief, DPH, Environmental Health Section  
Ross Bunnell, DEP, Bureau of Materials Management and Compliance Assurance