



Jeb Bush  
Governor

## Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struns  
Secretary

March 17, 2003

Mr. James W. Lynn  
International Environmental Products, LLC  
Trinity Corporate Center  
70-5 East Swedesford Road  
Malvern, Pennsylvania 19355

Re: S-200D  
(also known as SheenClean)  
(also known as BilgePro)

Dear Mr. Lynn:

The Bureau of Petroleum Storage Systems hereby accepts S-200D bioremediation accelerator for the remediation of petroleum and other suitable contaminants in groundwater and soil, in situ and ex situ. S-200D is a mixture of nutrients and a dispersant that stimulate indigenous petrophilic microorganisms already present at a petroleum-contaminated site to aerobically degrade contaminants, ultimately to carbon dioxide and water. Enclosure 1 is a voucher for a confidential disclosure of S-200D's proprietary ingredients' proportions, submitted by International Environmental Products to the Florida Department of Environmental Protection.

This acceptance applies only to the regulatory jurisdiction and the remediation needs of the Bureau of Petroleum Storage Systems, which is primarily the cleanup of subsurface petroleum contamination, pursuant to Chapter 62-770, Florida Administrative Code (F.A.C.). Other state agencies and local governments may choose to recognize this acceptance if their needs and regulations are similar. This bureau, however, is not responsible for applications beyond its jurisdiction.

For vadose remediation, where the underlying groundwater will not be affected by the leaching of S-200D, there are no special concerns beyond those which would normally need to be addressed in preparing a Remedial Action Plan and conducting a cleanup in accordance with Chapters 62-770 and 62-777, F.A.C. However, for injection-type in situ groundwater remediation, via direct injection of S-200D into an aquifer, there are underground injection control (UIC) regulations that must be observed. Since injection-type in situ aquifer remediation is likely to be the most common application of this product, the bulk of the regulatory requirements discussed herein will be directed to that topic.

The bureau recognizes S-200D as a viable product for the bioremediation of petroleum contaminated sites in Florida. There are no objections to its use provided: (a) the considerations of this letter are taken into account; (b) a variance from Rule 62-522.300(3), F.A.C., allowing a temporary zone of discharge for ammonia nitrogen and a specific glycol ether in S-200D is granted by the Department's Division of Water Resource Management; and (c) a site-specific Remedial Action Plan is submitted pursuant to Chapter 62-770, F.A.C., and approved by the Department for each site where the use of S-200D

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is proposed. Some major environmental and regulatory considerations that apply to S-200D are discussed in enclosure 2.

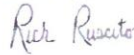
While the Department of Environmental Protection does not provide endorsement of specific or brand name remediation products or processes, it does recognize the need to determine their acceptability from an environmental standpoint with respect to applicable rules and regulations, and the interests of public health, safety and welfare. Vendors must then market the products and processes on their own merits regarding performance, cost, and safety in comparison to competing alternatives in the marketplace. In no way, however, shall this regulatory acceptance letter be construed as Department certification of product or process performance. Additionally, the Department emphasizes a distinction between its regulatory "acceptance" letters and an approval. Products and processes are accepted but they are not approved.

Also, it is not a requirement that a particular remediation product or process have an official acceptance letter in order for it to be proposed in a site-specific Remedial Action Plan. The plan, however, must contain sufficient information about the product or process to show that it meets all applicable and appropriate rules and regulations, especially those of the Florida Administrative Code pertaining to underground injection control.

Those who prepare Remedial Action Plans are advised to include a copy of this letter in the appendix of plans they submit, and call attention to it in the text of their document. In this way, technical reviewers throughout the state will be informed that you have contacted the Department of Environmental Protection to inquire about the environmental acceptability of S-200D. To aid those reviewers, the Bureau of Petroleum Storage Systems provides supplemental information as enclosure 3.

The Department reserves the right to revoke its acceptance of a product or process if its nature, performance, or any other significant aspect has been falsely represented. Additionally, Department acceptance of any product or process does not imply it has been deemed applicable for all cleanup situations, or that it is preferred over other treatment or cleanup techniques in any particular case. A site-specific evaluation of applicability and cost-effectiveness must be considered for any product or process, whether conventional or innovative, and adequate site-specific design details must be provided in a Remedial Action Plan. You may contact me at 850/245-8911 if there are any questions.

Sincerely,



Rick Ruscito, P.E.  
Bureau of Petroleum Storage Systems

c: T. Conrardy - FDEP/Tallahassee  
George Heuler - FDEP/Tallahassee

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