

May 6, 1999

Mr. Mark Ryckman
Remtech Engineers
200 North Cobb Parkway, Suite 208
Marietta, Georgia 30068

Re: HC-2000

Dear Mr. Ryckman:

The Bureau of Petroleum Storage Systems hereby accepts HC-2000 as a product for both in situ and ex situ bioremediation of soil and groundwater at petroleum and other suitable hazardous waste contaminated sites in Florida. As indicated in Remtech's submittal of information, the product is a non-toxic, non-allergenic, biodegradable mixture of proteins, enzymes, micronutrients, and emulsifiers. It does not contain bacteria or other microorganisms but rather stimulates the activity of the indigenous contaminant-degrading microorganisms already present at a remediation site. Enclosure 1 is a proprietary chemical analysis voucher for the product.

For vadose remediation where the underlying groundwater will not be affected by leaching of this product, 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 the petroleum cleanup requirements of Chapter 62-770, Florida Administrative Code (F.A.C.). For ex situ groundwater treatment, where an aboveground treatment system produces effluent meeting the petroleum cleanup criteria of Chapter 62-770, F.A.C., and the drinking water standards of Chapter 62-550, F.A.C., for disposal via recharge gallery or NPDES permit, there are no special concerns. But for in situ groundwater remediation, via injection of products into an aquifer, there are underground injection control (UIC) regulations that must be observed. Since in situ aquifer remediation via injection 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 HC-2000 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 Remedial Action Plan is approved by the Department; and (c) applicable and appropriate underground injection control regulations are observed when the product is used for in situ remediation.

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. Vendor's must then market the products and processes on their own merits

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regarding performance, cost, and safety in comparison to competing alternatives in the marketplace. For HC-2000, the major environmental and regulatory considerations are set forth in enclosure 2.

Preparers of 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 in regard to HC-2000. 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 any product or process if the nature or composition of either or any of its principal and proprietary ingredients, or its performance 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 Remedial Action Plans prescribing the product or process. You may contact me at 850/487-3299 if there are any questions.

Sincerely,

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

c W. Evans - FDEP/Tallahassee
 T. Conrardy - FDEP/Tallahassee

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May 6, 1999

Mr. Mark Ryckman
Remtech Engineers
200 North Cobb Parkway, Suite 208
Marietta, Georgia 30068

Re: Proprietary Chemical Analysis Voucher

Dear Mr. Ryckman:

The Bureau of Petroleum Storage Systems hereby acknowledges receipt of a confidential disclosure dated April 19, 1999, by Remtech Engineers, regarding the proprietary analysis of the remediation product called HC-2000, which is a non-toxic, non-allergenic, biodegradable mixture of proteins, enzymes, micronutrients, and emulsifiers.

Having reviewed the confidential disclosure, we hereby vouch for the analysis, and indicate that none of the measured parameters exceeds a drinking water standard set forth in Chapter 62-550, Florida Administrative Code (F.A.C.), which is referenced by Chapter 62-528, F.A.C., as an underground injection control requirement.

The Bureau of Petroleum Storage Systems assumes that Remtech Engineers, based on knowledge of its own proprietary product, and after reviewing applicable chapters of the Florida Administrative Code, determined that submittal of analytical results for seven specific parameters is an appropriate chemical analysis disclosure. From this, the bureau surmises that no other ingredients, chemical species, or byproducts formed as a result of using the products will result in a violation of any applicable regulations. Regardless of our surmising, it should be clearly understood by Remtech Engineers and users of the product that the obligation to comply with all applicable rules and regulations ultimately rests with them and not the Bureau of Petroleum Storage Systems.

For underground injection control purposes, remediation plans prescribing HC-2000 must disclose the volume and composition of the fluid to be injected into an aquifer. Since the composition is proprietary, it will suffice to indicate the overall concentration of the solution and then provide a footnote indicating that a one-time confidential disclosure of a proprietary analysis has been submitted to the Department and accepted. Reference should be made to the original April 19, 1999 disclosure, and a copy of this voucher should be included as an appendix in the plan.

Remediation plan reviewers for petroleum contaminated site applications involving HC-2000 may contact Rick Ruscito at (850) 487-3299.

Sincerely,

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

ENCLOSURE 2

HC-2000: ENVIRONMENTAL AND REGULATORY INFORMATION

For HC-2000, the major environmental and regulatory concerns are discussed below..

- a. Applicable rules and regulations: The onus shall be on Remtech Engineers and users of HC-2000 to observe all applicable regulations, particularly those regarding underground injection control and groundwater quality. All applicable groundwater contaminant standards shall be met at the time of project completion for the contaminants of concern, any residuals associated with the ingredients of HC-2000, and any byproducts produced as a result of chemical or biochemical reactions involving those ingredients. The following chapters of the Florida Administrative Code are cited as applicable but should not be construed as an exhaustive list: Chapter 62-550, F.A.C., for primary and secondary water quality standards; Chapter 62-520, F.A.C. for groundwater classes and standards; Chapter 62-522, F.A.C., for groundwater permitting and monitoring requirements; Chapter 62-528, F.A.C., for underground injection control, particularly Part V, for Class V, Group 4 aquifer remediation projects; and Chapter 62-770, F.A.C., for petroleum cleanup criteria.

A noteworthy aspect of the minimum criteria set forth in Chapter 62-520, F.A.C., is that it requires groundwater to be free from substances which are harmful to plants, animals, and organisms, and free from substances that are carcinogenic, mutagenic, teratogenic or toxic to human beings. In effect, these “free from” requirements form a catchall. They close what would otherwise be a loophole in the regulations by preventing injection of a potentially harmful product in the event that any of its ingredients is not regulated as a specific primary or secondary drinking water contaminant.

- b. Injection well permit: The issuance of a site specific Remedial Action Plan Approval Order, by either the Bureau of Petroleum Storage Systems or the Bureau of Waste Cleanup, for injection-type aquifer remediation constitutes the granting of a Class V injection well permit.
- c. Groundwater injection standards: For in situ aquifer remediation, the composition of an injected fluid must meet the drinking water standards set forth in Chapter 62-550, F.A.C., pursuant to underground injection control Rule 62-528.600(2)(d), F.A.C. For HC-2000 [which is shipped in a concentrated form with a pH of approximately 3.1 to 6.0, and diluted with water in volumetric ratios of 16:1 (water:concentrate) and greater prior to injection] no exceedance of the primary or secondary drinking water standards, including pH, is expected. At these dilution ratios, it is expected that the pH of the resulting injection mixture will meet the secondary drinking water standard, which is an allowable range from 6.5 to 8.5. However, if there is ever a situation in which injection of a more concentrated form is desired, then it should be first ascertained that the pH of the solution meets the requirement, and that no other drinking water standard, either primary or secondary, or the minimum groundwater criteria, will be exceeded.
- d. Recirculating loop-type injections: The Bureau of Petroleum Storage Systems has no objection to the use of HC-2000 in any type of equipment configuration, provided all applicable and appropriate rules and regulations are observed. System configurations may include direct one-time injection of the

product, or recirculating loop-type injections in which contaminated groundwater is recovered, combined with the product above ground, and either partially or totally treated above ground prior to reinjection into the contaminated zone of a site.

In the case of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) site cleanups, the United States Environmental Protection Agency's (EPA) Office of Solid Waste and Emergency Response, through OSWER Directive No. 9234.1-06, indicates that contaminated groundwater which has been partially treated may be reinjected under certain conditions. The conditions are as follows: (1) the injection is a CERCLA response action or RCRA corrective action; (2) the contaminated groundwater is treated to substantially reduce hazardous constituents prior to each injection; and (3) the response action or corrective action is sufficient to protect human health and the environment upon completion.

For non-CERCLA and non-RCRA cleanup sites, which typically include gasoline stations and dry cleaners, the EPA's directive does not apply. In these cases, in order to operate a recirculating loop-type injection system without violating underground injection control regulations, it will be necessary to totally treat recovered groundwater (above ground) to applicable water quality standards prior to reinjection as a mixture with HC-2000 for in situ remediation. While this may not be as cost-effective as a partial treatment system, it still offers a cost-effectiveness advantage over conventional pump-and-treat systems. Nevertheless, the Bureau of Petroleum Storage Systems encourages the use of the "total treat" approach until changes in rules and regulations allow only a partial treatment prior to reinjection at non-CERCLA and non-RCRA sites.

e. Utilization of wells: If a remediation site happens to have an abundance of monitoring wells, then the Department has no objection to the use of some wells for the application of HC-2000. However, no "designated" monitoring well, dedicated to the tracking of remediation progress (by sampling), shall be used to apply HC-2000. This will avoid premature conclusions that the entire site meets cleanup goals. By making sure that designated tracking wells are not also used for treatment, there will be more assurance that the treatment process has permeated the entire site and that it did not remain localized to the area immediately surrounding each injection well.

f. Groundwater monitoring:

1. Active remediation petroleum monitoring: During the period of active remediation, groundwater shall be monitored for contaminants of concern in accordance with the requirements set forth in Section 62-770.700, F.A.C. Two noteworthy rules within that section are 62-770.700(3)(i), F.A.C., for frequency of sampling, and 62-770.700(5)(f), F.A.C., which requires a sampling schedule for bioremediation. For non-petroleum cleanups, the monitoring should be conducted in accordance with the provisions of an approved Remedial Action Plan.
2. Post remediation petroleum monitoring: At least one (1) year of quarterly post remediation groundwater monitoring for contaminants of concern shall be conducted at a minimum of two (2) wells, one located in the area of maximum petroleum contamination, the other downgradient of the area of maximum petroleum contamination, pursuant to Section 62-770.750, F.A.C. For non-petroleum cleanups, the monitoring should be conducted in accordance with the provisions of an approved Remedial Action Plan.

3. Underground injection control monitoring: Since the injected HC-2000 (which is diluted with water in volumetric ratios of approximately 16:1 and greater prior to injection) does not exceed any primary or secondary drinking water standards, the department, pursuant to underground injection control Rules 62-528.615(1)(b)1 and (2), F.A.C., has determined that no monitoring of its ingredients for the purposes of underground injection control is necessary.
- g. Background samples: Prior to commencement of in situ injection-type aquifer remediation projects, the department recommends the sampling of at least one (1) monitoring well located upgradient of the petroleum contamination plume, or at least one (1) non-upgradient monitoring well, located beyond the edge of the plume, for the background concentration of selected key bioremediation parameters. If more than one well is sampled, then the average value of each parameter can be used as the background value for the site.
 - h. Underground injection control inventory: Remedial Action Plans prescribing in situ aquifer injection-type remediation shall include information pursuant to Rule 62-528.630(2)(c)1 through 6, F.A.C., for the inventory purposes of underground injection control. Per Rule 62-528.630(2)(c), F.A.C., aquifer remediation projects involving injection wells may be authorized under the provisions of a Remedial Action Plan, provided the construction, operation, and monitoring requirements of Chapter 62-528, F.A.C., are met. A memorandum outlining the inventory information about injection-type aquifer remediation plans to be transmitted by department reviewers to the Underground Injection Control Section is provided as enclosure 4.
 - i. Operation:
 1. Avoidance of migration: For in situ injection-type aquifer remediation projects, injection of HC-2000 shall be performed in such a way, and at such a rate and volume, that no undesirable migration of either the product's ingredients or the contaminants of concern in the aquifer results, pursuant to Rule 62-528.630(3), F.A.C.
 2. Underground injection control operating permit: Although an operating permit is not required for aquifer remediation wells pursuant to Rule 62-528.640(1)(b), and 62-528.640(1)(c), F.A.C., since no movement of the petroleum contamination plume is expected to accompany the HC-2000 treatment process, the department requests that the information items listed in Rule 62-528.640(1)(b), F.A.C., be considered and included in Remedial Action Plan proposals as a matter of good and thorough design practice. Briefly summarized, they are: quality of water in the aquifer; quality of the injected fluid; existing and potential uses of the affected aquifer; and well construction details. Additionally, each Remedial Action Plan should clearly indicate the total volume of fluid and the concentration of products that will be injected.
 3. Operating parameter measurements: Rule 62-770.700(9)(h), F.A.C., sets forth frequency requirements for the measurement of bioremediation operating parameters such as dissolved oxygen levels, rates of nutrient addition, temperature, etc. It also includes an option for reduction in the frequency or discontinuation of some measurements in situations when appropriate.
 - j. Abandonment of wells: Upon issuance of a petroleum Site Rehabilitation Completion Order, or a declaration of "No Further Action", injection wells shall be abandoned pursuant to Section 62-528.645, F.A.C. The Underground Injection Control Section of the Department shall be notified so that the injection wells can be removed from the inventory tracking list.

ENCLOSURE 3

HC-2000: SUPPLEMENTAL INFORMATION

The information below, compiled from several sources, may be helpful to reviewers of Remedial Action Plans prescribing bioremediation.

- a. Nature of the product: HC-2000 does not contain bacteria. Instead, it is a formulation which stimulates activity of indigenous bacteria already present at a petroleum or hydrocarbon contaminated site. If sufficient oxygen is not present at a site for aerobic biodegradation, then it may be added artificially, either by air sparging other suitable means for groundwater, or by tilling, in the case of ex situ soil remediation.
- b. Department of Environmental Protection reviewers of in situ injection-type aquifer remediation plans, regardless of whether in Tallahassee or district offices, must fill in the blanks on the enclosure 4 memorandum, whose subject is "Proposed Injection Well(s) for In Situ Aquifer Remediation at a Petroleum Remedial Action Site". The completed form must be submitted to the Underground Injection Control Section at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Only reviewers within the department and its district offices may approve in situ injection-type remediation plans in which the approval constitutes the issuance of a Class V injection permit; local programs are not authorized to grant such approvals. Reason: The reason: although an arrangement between the US Environmental Protection Agency and the department delegates underground injection control authority to the Department, it does not allow the department to delegate that authority any further. This includes delegation to the department's contracted remediation review agencies such as those operated by the counties and other local governments. Injection approval instructions to the local programs can be found in the Bureau of Petroleum Storage Systems guidance document BPSS-10 for in situ chemical additives at web page www2.dep.state.fl.us/waste/programs/pcp/remediation/index.htm.

- c. Pilot study: For bioremediation, per rule 62-770.700(2), F.A.C., a pilot study proposal shall be submitted for review, and a pilot test shall be performed prior to designing a treatment system. If conditions or the situation at a site do not warrant a pilot study, then a proposal explaining the rationale for the decision not to perform a pilot study shall be submitted for review. The state's technical reviewers are encouraged to use judgment in balancing cost and the need for technical information to be obtained from a pilot study. In some cases, only a biotreatability test may suffice. In other cases, perhaps only a sampling of the site for parameters indicative of bioremediation could serve in lieu of a pilot test, to show that some bioremediation is already occurring naturally and that it may be conducive to enhancements. Remtech Engineers, in the case of HC-2000, indicates that pilot tests which determine an effective radius of influence, for the introduction of oxygen into the vadose and groundwater, are important to their design of an effective full-scale system.
- d. Bacteria: It is generally reported (on a total weight basis) that bacteria are approximately 70 to 80 percent water. On a dry weight basis, approximately 95 percent of the composition is represented by 5 elements: carbon, oxygen, nitrogen, hydrogen, and phosphorus. At a petroleum remediation site, it

is intended that the source of carbon for the growth of bacteria will come from the petroleum hydrocarbons themselves. Naturally-occurring organic carbon at a site can also serve as a carbon source for bacteria. Depending on site's specific conditions, the remaining four elements must either be available naturally, or added as macronutrients in order to stimulate bioremediation. Micronutrients must also be present for bacteria to grow.

- e. Degradation products: Carbon dioxide and water are the ultimate products of aerobic and most anaerobic biodegradations of hydrocarbons. In the case of methanogenesis, an anaerobic process, carbon dioxide and methane are produced. The intermediate products of aerobic degradation may include simple acids, alcohols, and fatty acids. Aerobic processes use oxygen as an electron acceptor to produce carbon dioxide and water.
- f. Parameters: The following parameters may be useful in determining the potential for bioremediation at a site, or whether bioremediation is already occurring. They were selected from a list that appears in the publication "In Situ Treatment Technology" by E. Nyer et al., Lewis Publishers, 1996. The parameters are: dissolved oxygen; redox potential; pH; temperature; specific conductance; volatile organic compounds; nitrate; nitrite; ammonia nitrogen; manganese (total and dissolved); iron (total, dissolved, and ferrous); sulfate; sulfide; and total organic carbon. Gaseous parameters include: carbon dioxide, oxygen, nitrogen, and methane. Other parameters that may be helpful are chemical oxygen demand, biochemical oxygen demand, and total organic carbon. Preparers of bioremediation plans and their reviewers should determine which parameters, if any, should be investigated on a site specific basis.
- g. Dosage and application: Information accompanying the submittal of HC-2000 literature from Remtech indicates that the product is typically diluted with water in volumetric ratios of 16:1 or greater. As a rough rule of thumb, the amount of product needed to remediate a given volume of contaminated media is as follows: 1 gallon of concentrate for every 3 to 10 cubic yards of soil; and 1 gallon of concentrate for every 3 to 7 cubic yards of aquifer. The actual amount applied at any given site will depend on site conditions and the mass of contaminants present.

For soil remediation, weekly pulsed applications of 1:16 (concentrate:water) solutions are made, sometimes with two applications during the first two days of the initial application to expedite matters. For remediation of surface soil at depths of 2 feet or less, the product may be applied topically. For depths greater than two feet, infiltration galleries, injection wells, or a device known as Remtech's Underground Mist Applicator may be used. Soil moisture content should be maintained at 70-80 percent of field holding capacity. Depending on the situation, air may be added to the soil via tilling or an in situ bioventing system. For rule of thumb purposes, soil remediation may range from 3 to 16 weeks.

For groundwater remediation, the applications are typically weekly pulsed injections of 1:30 to 1:50 concentrate to water solutions for a period of 12 to 20 weeks. The duration, as a rule of thumb, may range from 12 to 20 weeks.

- h. Limitations: HC-2000 is not recommended for bulk removal of free product. Also, it will not work as a stand alone product at sites where no indigenous bacteria exist, and it will not work at sites where high concentrations of sterilants that inhibit microbial activity exist.

**Florida Department of
Memorandum**

Environmental Protection

TO: Richard Deuerling
Division of Water Facilities
Bureau of Resource Protection
Underground Injection Control Section

FROM: _____ (Local programs
_____ see Note 1.)

DATE: _____

SUBJ Proposed Injection Well(s) for In Situ Aquifer Remediation at a Petroleum Remedial Action Site

This is to notify you of proposed injection well(s) construction for the in situ remediation of ground-water at a petroleum contaminated site. The following is a description of the site location.

Name: _____
Address: _____
City/County: _____
Latitude/Longitude: _____
FDEP Facility Number: _____

The design of the injection-type aquifer remediation system consists of the following:

Areal extent of contamination (square feet): _____
Number of injection wells: _____
Composition of injected fluid (See note 2)
(ingredient, wt. %): _____

Injection volume per well (gallons): _____
Single or multiple injection events: _____
Injection volume total (all wells, all events): _____

Note 1. Local programs are not authorized to approve underground injections into aquifers. Reason: The Department, per agreement with EPA, has been delegated this authority but is not allowed to delegate it any further. Local programs should arrange with either Department district offices or Department headquarters to approve such injections after reviewing the Remedial Action Plan.

Note 2. Complete chemical analysis of injected fluid is required by Chapter 62-528, Florida Administrative Code (no exceptions). Proprietary formulations shall make confidential disclosure. Injected fluids must meet drinking water standards of Chapter 62-550, F.A.C., unless an exemption or variance has been granted.

Richard Deuerling
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Date:_____

A site map showing the areal extent of the groundwater contamination plume and the location and spacing of injection wells is attached.

Excerpts from the remedial action plan which describe the site lithology are attached. The following is a summary description of the affected aquifer:

Name of aquifer:_____
Depth to groundwater (feet):_____
Aquifer thickness (feet):_____

A schematic of the injection well(s) is attached. The following is a summary:

Depth of well (feet):_____
Screened interval:_____ to _____ feet below surface
Well casing diameter (inches):_____
Bore hole diameter:_____
If direct-push type well(s), describe
diameter (inches):_____ and depth (feet):_____

The in situ injection-type aquifer remediation plan for this petroleum contaminated site is a design intended to meet the groundwater petroleum cleanup criteria set forth in Chapter 62-770, F.A.C. Additionally, all other groundwater standards will be met at the time of project completion for any residuals associated with the ingredients of the injected remediation products, and any byproducts or intermediates produced as a result of the chemical or biochemical transformation of those ingredients or the contaminating petroleum during their use. Applicable primary and secondary drinking water standards are set forth in Chapter 62-550, F.A.C., and additional groundwater quality criteria are set forth in Chapter 62-520, F.A.C.

The remedial action plan estimates that the site remediation will take _____ months. We will notify you if there are any modifications to the remediation strategy which will affect the injection well design or the chemical composition and volume of the injected remediation product(s).

The proposed remediation system was approved on _____ by a Remedial Action Plan Approval Order (or other enforceable document) signed by the Director of the Division of Waste Management (copy attached). The remediation system installation is expected to commence within 60 days. Please call me at _____ if you require any additional information.