



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 17, 2003

Mr. Randy Oliver
American Metrecz Corporation
5715 Schneider Road
Metropolis, Illinois 62960

Re: Metrecz Absorbent Media

Dear Mr. Oliver:

The Bureau of Petroleum Storage Systems hereby accepts Metrecz Absorbent Media as a product for the absorption of petroleum contaminants. As the information you provided indicates, the absorbent is 84.5 percent sphagnopsida, hydrophobic, and capable of absorbing petroleum and other organic liquids in quantities up to 10 times its own weight. Enclosure 1 contains additional information about Metrecz that the bureau would like to pass along to readers of this letter.

This acceptance is applicable to the regulatory jurisdiction of this bureau, which is primarily the cleanup of subsurface petroleum contaminants in groundwater and soil, typically from leaking underground storage tanks at gasoline service stations. The regulation that applies to this jurisdiction is Chapter 62-770, Florida Administrative Code (F.A.C.), which is currently available at web page www.dep.state.fl.us, under the heading of "Categories", under "Rules". For applications that are not within our jurisdiction, it is possible that other bureaus within the Florida Department of Environmental Protection, or other state agencies in Florida may honor this acceptance if it meets their needs and regulatory requirements. The Bureau of Petroleum Storage Systems, however, is not responsible for applications beyond its jurisdiction.

For the use of absorbent pads, for the recovery of free petroleum product as a Source Removal effort, it is not necessary, per Rule 62-770.300(1)(b)1, F.A.C., (August 5, 1999 issue) to obtain prior approval from the Florida Department of Environmental Protection or one of its contracted local programs.

Additionally, for Remedial Action pursuant to Section 62-770.700, F.A.C., there is no requirement that a remediation product or process first obtain acceptance (such as this letter) in order to be proposed in a site-specific remediation plan. The Remedial Action Plan, however, must contain sufficient information to show that the product or process meets all applicable and appropriate regulations. For a product such as Metrecz Absorbent Media, it should be relatively easy to address concerns about safe handling, chemical compatibility, and proper disposal.

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While the bureau does not endorse 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 merit 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 certification of product or process performance.

The bureau reserves the right to revoke its acceptance of a product or process if it has been falsely represented. Additionally, bureau 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 proposing the product or process. You may contact me at (850) 245-8911 if there are any questions.

Sincerely,

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

c: Tom Conrardy - PCS3, Tallahassee

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ENCLOSURE 1

ADDITIONAL INFORMATION ABOUT METRECEZ ABSORBENT MEDIA

1. Description: The Material Safety Data Sheet for Metrecz Absorbent Media indicates that it is 84.5% sphagnopsida, 5% moisture, 0.5% miscellaneous inerts, and 10% trade secret. It is available by the jug, drum, or in the form of pads, pillows, booms, or gel.
2. Absorption tests: The Bureau of Petroleum Storage Systems hereby acknowledges information that was submitted by American Metrecz Corporation about tests performed on its product by the Colorado School of Mines in 1998. While the bureau neither certifies nor verifies such tests, it will indicate its opinion that the results appear to substantiate the claims made by American Metrecz Corporation about its product. Under a range of test conditions and test liquids, and exposure times, it was shown that the Metrecz media was capable of absorbing as much as 9.89 grams of test liquid per gram of sorbent. The amount absorbed depends on the type of liquid, which are in order of increasing absorbency as follows: diesel fuel oil (least absorbed), transmission oil, SAE 40 motor oil, and SAE 30 motor oil (most absorbed). The average ash test result was 1.56% (with values ranging from 1.48% to 1.60%).
3. Disposal of spent media: The onus shall be on the user of Metrecz to prevent pollution of air, water and soil by properly disposing of spent Metrecz media, taking into account the physical and chemical properties of the fluid that was absorbed. A list of Class I, Class II (and Class III if lined) landfill sites in Florida that may accept petroleum-contaminated soil for disposal is available at web page www.dep.state.fl.us/waste/categories/pcp/default.htm. Any local requirements that also apply should be observed. And in cases where Metrecz is used to absorb organic liquids other than petroleum, the user is responsible for determining whether the absorbed material meets the definition of a hazardous waste and must manage the waste in accordance with applicable regulations of state and local authorities.

Spent Metrecz media can also be disposed by incineration, provided that incineration of the absorbed liquid does not create a hazard and applicable air emission regulations can be met.

4. An advisory: The manufacturer, in its Material Safety Data Sheet, indicates that unused Metrecz Absorbent Media itself is not hazardous, but that used media should be disposed of according to local regulations. For the sake of safety, the Bureau of Petroleum Storage Systems -- as it has done for another absorbent -- would like to convey some advice to users. The general advice provided by another manufacturer of absorbents was so succinct, and so widely applicable to absorbents in general, that this bureau would like repeat the advice here. If the fluid absorbed is toxic, then the spent media containing that fluid should also be considered toxic. If the fluid is flammable, then the spent media containing that fluid should also be considered flammable. To this the bureau adds that even though the absorbent media has the ability to reduce hydrocarbon vapors below their lower explosive levels (LEL), the user should not construe this to mean that the hydrocarbon has been rendered completely inflammable by the absorbent.

As for the compatibility of the unused Metrecz media itself with other chemicals, the manufacturer advises that strong acids and bases be avoided. For used media, the bureau would like to add that the compatibility of the absorbed organic with other chemicals should be kept in mind. Organic liquids, including petroleum, will react with oxidizing agents.