



Department of Environmental Protection

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

Colleen M. Castille
Secretary

August 17, 2005

Bob Kelley, Ph.D.
Regenesis
1011 Calle Sombra
San Clemente, California 92673-6244

Re: RegenOx™

Dear Mr. Kelley:

The Florida Department of Environmental Protection (Department) hereby accepts RegenOx™ for the remediation of petroleum, chlorinated solvents and other suitable organic contaminants in groundwater and soil, in situ and ex situ, via chemical oxidation. As Regenesis has indicated, RegenOx™ is a two-part system, a solid oxidizer in powdered form that contains sodium percarbonate, and a liquid catalyst that contains aqueous ferrous sulfate. The user mixes the oxidizer and catalyst with additional water to form a slurry that is subsequently applied to the contaminated soil and groundwater in need of remediation. Enclosure 1 is a voucher for the confidential disclosure of the proprietary proportions of RegenOx™ ingredients.

Contaminants are destroyed in three ways: (a) by surface-mediated oxidation; (b) direct oxidation; and (c) by perhydroxyl radicals, hydroxyl radicals, and superoxide radicals. The end products of the oxidation are carbon dioxide and water. In the case of chlorinated hydrocarbon contaminants, the end products include chloride. Additionally, as Regenesis has indicated, RegenOx™ oxidizes contaminants quickly and effectively without a violent reaction.

This acceptance applies only to the regulatory jurisdiction of the Florida Department of Environmental Protection. Other state agencies and local governments may choose to recognize this acceptance if their needs and regulations are similar. The Department, however, is not responsible for applications beyond its jurisdiction.

For soil remediation applications in which the underlying groundwater will not be affected by the leaching of RegenOx™, there are no underground injection control concerns. However, for injection-type, in situ groundwater remediation, via direct injection of RegenOx™ into an aquifer, or injections or other types of applications to soil that could leach or percolate to the water table, there are underground injection control regulations that must be observed. Since injection-type, in situ remediation is likely to be the most common application of RegenOx™, the regulatory requirements discussed in Enclosure 2 have been focused on that topic.

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The Department recognizes RegenOx™ as a viable product for the remediation of contaminated sites in Florida. There are no objections to its use provided: (a) the considerations of this letter are taken into account; (b) a site-specific Remedial Action Plan is approved by the Department for each site where the use of RegenOx™ is proposed; and (c) the Remedial Action Plan specifies the size and duration of the injection zone of discharge for sodium, iron, sulfate, pH and total dissolved solids, and addresses groundwater monitoring of them pursuant to Rule 62-522.300(2)(c), Florida Administrative Code (F.A.C.). It may be necessary to add chloride to this list when chlorinated hydrocarbons are a contaminant of concern, if there is a possibility that the chloride by-products of the oxidation reactions will be produced in significant concentrations.

While the Florida 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 and safety. 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 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, and call attention to it in the text of their document. In this way, technical reviewers will be informed that you have contacted the Department of Environmental Protection to inquire about the environmental acceptability of RegenOx™. To aid those reviewers, supplemental information is provided as Enclosure 3.

The Department reserves the right to revoke its acceptance of a product or process if it 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

Bob Kelley, Ph.D.
August 17, 2005
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innovative, and adequate site-specific design details must be provided in a Remedial Action Plan. You may contact me at (850) 877-1133, extension 29, if there are any questions.

Sincerely,

Rick Ruscito, P.E.
Ecology and Environment, Inc.
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 6

Rebecca S. Lockenbach
FDEP Section Leader
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 6

Enclosures: (1) Voucher for Disclosure of Proprietary Proportions of RegenOx™ Ingredients
(2) Regulatory Information
(3) Supplemental Information
(4) Underground Injection Control Notification Memorandum

c: Tom Conrardy - FDEP/Tallahassee

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Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

August 17, 2005

Bob Kelley, Ph.D.
Regenesis
1011 Calle Sombra
San Clemente, California 92672-6244

Re: **Voucher for Disclosure of Proprietary Proportions of RegenOx™ Ingredients**

Dear Mr. Kelley:

The Florida Department of Environmental Protection (Department) hereby acknowledges a confidential disclosure by Regenesis dated August 12, 2005, regarding the proprietary proportions of the ingredients in RegenOx™, a chemical oxidation-type remediation product for contaminated groundwater and soil. Having reviewed the disclosure, the Department hereby vouches for the proportions of the ingredients in the tables below.

RegenOx™ Part A (Oxidant Complex) (solid)

<u>Ingredient</u>	<u>CAS No.</u>	<u>Concentration</u>
Sodium Percarbonate	15630-89-4	Proprietary
Sodium Carbonate Monohydrate	5968-11-6	Proprietary
Sodium Silicate	1344-09-8	Proprietary
Silica Gel	63231-67-4	Proprietary

RegenOx™ Part B (Activator Complex) (liquid)

<u>Ingredient</u>	<u>CAS No.</u>	<u>Concentration</u>
Sodium Silicate	1344-09-8	Proprietary
Silica Gel	63231-67-4	Proprietary
Ferrous Sulfate	7720-78-7	Proprietary
Water	7732-18-5	Proprietary

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Without this voucher for the proportions of the proprietary ingredients, and advice from the Department based on its review of those proportions, users of RegenOx™ would not know how to comply with Rule 62-522.300(2)(c), Florida Administrative Code (F.A.C.). This rule requires that a Remedial Action Plan for injection-type aquifer remediation indicate the size and duration of the injection zone of discharge for chemical species in the fluid to be injected whose concentrations do not meet their groundwater standards. It also requires that the Remedial Action Plan address groundwater monitoring of those chemical species. For RegenOx™, the Department advises that those chemical species should be sodium, iron, sulfate, pH and total dissolved solids.

For underground injection control purposes, aquifer remediation plans proposing the use of RegenOx™ must indicate the volume and composition of the fluid to be injected. Since the proportion of each ingredient is proprietary, it will suffice to indicate just the overall volume and concentration of RegenOx™ to be injected, and provide a footnote indicating that a one-time confidential disclosure dated August 12, 2005, identifying the proprietary proportions of individual ingredients, is already on file with the Department.

This voucher is issued solely for the purposes of the Florida Department of Environmental Protection. Other state agencies and local governments may choose to recognize it if their needs are similar. The Department, however, is not responsible for applications beyond its jurisdiction. Please direct questions regarding this voucher to Rick Ruscito at (850) 877-1133, extension 29.

Sincerely,

Rick Ruscito, P.E.
Ecology and Environment, Inc.
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 6

Rebecca S. Lockenbach
FDEP Section Leader
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 6

REGULATORY INFORMATION

- a. Groundwater cleanup standards: The onus shall be on users of RegenOx™ to ensure that all applicable groundwater contaminant standards will be met at the time of project completion, for petroleum and other contaminants that may be present, any residuals associated with the ingredients of RegenOx™, and any by-products produced as a result of chemical or biochemical reactions involving those ingredients. The following chapters of the Florida Administrative Code (F.A.C.) are cited: Chapter 62-550, F.A.C., for primary and secondary water quality standards; Chapter 62-520, F.A.C. for groundwater classes and standards, and minimum criteria; 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; Chapter 62-770, F.A.C., for petroleum cleanup criteria; and Chapter 62-777, F.A.C., also for cleanup and minimum groundwater 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 that 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, Bureau of Waste Cleanup, or any other bureau or district office of the Florida Department of Environmental Protection, for remediation via injection of RegenOx™ into an aquifer, constitutes the granting of a Class V injection well permit. [62-528.630(2)(c) and 62-528.640(1)(c), F.A.C.]
- 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., and the minimum groundwater criteria of Chapter 62-520, F.A.C., pursuant to underground injection control Rule 62-528.600(2)(d), F.A.C. Aquifer remediation fluids that do not meet these requirements must seek permission for an injection zone of discharge. Depending on the ingredients of the fluid, it will be necessary to obtain an injection zone of discharge by either one or both of the following methods: by Rule 62-522.300(2)(c), F.A.C., or by variance from Rule 62-522.300(3), F.A.C. For RegenOx™ injection, only Rule 62-522.300(2)(c), F.A.C., needs to be observed in order to be permitted an injection zone of discharge.
- d. Zone of discharge by rule: For the injection of RegenOx™, Rule 62-522.300(2)(c), F.A.C., requires that a site-specific Remedial Action Plan proposing its use must: (a) indicate that the concentrations of sodium, iron, sulfate, and total dissolved solids in the fluid to be injected will be in excess of their groundwater injection standards, and that the pH of the fluid may not be within the required range; (b) specify a temporary zone of discharge size; (c) specify the period of time for which the temporary zone of discharge will be needed; and

- (d) propose groundwater monitoring of sodium, iron, sulfate, pH and total dissolved solids. The current maximum allowable groundwater concentrations for these parameters, and the allowable range for pH are as follows: sodium, 160 milligrams per liter (mg/L); iron, 0.3 mg/L; sulfate, 250 mg/L; pH; range 6.5 to 8.5; and total dissolved solids, 500 mg/L. If a significant amount of chloride by-product could be produced during the course of a chlorinated solvent cleanup project, then the residual concentration of chloride in the groundwater by the time the project is completed should meet its 250 mg/L secondary groundwater standard. If the groundwater's natural-occurring background level for any of these parameters at a specific remediation site does not meet the established standard, then the residual level of that parameter by the time remedial action ends shall be no worse than the pre-existing, pre-injection, natural-occurring background level.
- 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 RegenOx™. However, no "designated" monitoring well, dedicated to the tracking of remediation progress (by sampling) shall be used to apply RegenOx™ reagents. 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: For petroleum remediation projects, during the period of active remediation, groundwater shall be monitored in accordance with the requirements set forth in Section 62-770.700, F.A.C., for the petroleum contaminants of concern. For non-petroleum cleanup projects, the contaminants of concern should be monitored in accordance with the provisions of an approved Remedial Action Plan.
 2. Post remediation petroleum monitoring: For petroleum remediation projects, at least one (1) year of quarterly post remediation groundwater monitoring for the petroleum 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 cleanup projects, the post remediation monitoring of the contaminants of concern should be conducted in accordance with the provisions of an approved Remedial Action Plan.
 3. Underground injection control monitoring: Regardless of whether a cleanup project is for petroleum or non-petroleum contaminants, for Underground Injection Control purposes, when RegenOx™ is injected, the groundwater must be monitored for sodium, iron, sulfate, pH and total dissolved solids pursuant to Rule 62-522.300(2)(c), F.A.C., as discussed above in paragraph *d*.
- g. Underground injection control inventory: Remedial Action Plans prescribing injection-type in situ aquifer 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. Only the Department, including its district offices, may approve in situ injection-type remediation plans in which the approval constitutes a Class V injection permit; local programs are not authorized to grant such approvals. See Enclosure 3.

h. Operation:

1. Avoidance of migration: For injection-type, in situ aquifer remediation projects, injection of the RegenOx™ reagents shall be performed in such a way, and at such a rate and volume, that no undesirable migration of either the reagents or the petroleum contaminants 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 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 the RegenOx™ reagents that will be injected.
- i. 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.
- j. Open-pit applications: While open-pit application of RegenOx™ reagents is not an injection-type application, and notification of the Underground Injection Control Section therefore not required, the user of RegenOx™ must still be mindful of groundwater quality. For open-pit applications, the Department suggests that groundwater in the application area be monitored for the same parameters that would be monitored had the application been an injection.

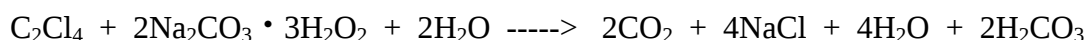
SUPPLEMENTAL INFORMATION

- a. Department of Environmental Protection reviewers of injection-type in situ 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 (Mail Station 3530).

Only the Department and its district offices may approve injection-type in situ 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: Although an arrangement between the 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.

- b. Pilot study: Per rule 62-770.700(2), Florida Administrative Code (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.
- c. Stoichiometry example for direct oxidation: Three types of oxidation occur when RegenOx™ is used: surface-mediated oxidation, direct oxidation, and free radical oxidation. The Department assumes that Regenesis, in its RegenOx™ product bulletin (and its information submitted to the Department as well) has chosen not to complicate matters by attempting to explain the complex way that the three mechanisms interact. Instead, an example of only the stoichiometry for the direct oxidation of perchloroethylene was provided, which the Department will summarize here.

On a molar basis, Regenesis indicates that 0.67 moles of RegenOx™ sodium percarbonate are required to directly oxidize 1 mole of perchloroethylene (PCE). On a weight basis, this is equivalent to 1.3 pounds of RegenOx™ sodium percarbonate per pound of PCE. The stoichiometric equation shown below is reproduced from the RegenOx™ product bulletin for the direct oxidation of PCE. Regenesis indicates that similar chemical equations can be written for other contaminants of concern as well, in order to calculate the total theoretical demand for direct oxidation.



- d. Sodium percarbonate: In a brief literature search for information about sodium percarbonate (CAS No. 15630-89-4) the Department finds most sources describing the atomic composition as $C_2H_6Na_4O_{12}$, with a molecular weight of 314, which is in agreement with the $2Na_2CO_3 \cdot 3H_2O_2$ representation used by Regenes in its stoichiometric example that is reproduced in paragraph *d* above.

For readers who may have noticed that the hydrogen atom balance between the left and right sides of the equation in paragraph *d* above differs by a value of 2, it may be helpful to know that one source reported the molecular weight of sodium percarbonate as 316, for an atomic composition of $C_2H_8Na_4O_{12}$, the difference being 2 hydrogen atoms associated with one of the CO_3 groups. Regenes, having devoted more research time and effort to sodium percarbonate than the Department, may be able to provide more information about this. The Department, however, having done two stoichiometric calculations on Regenes' PCE example as an exercise, using a molecular weight of 314 for the first calculation and 316 for the second, finds that the resulting value of the molar ratio is roughly 0.67, regardless of which molecular weight is used. Given the small effect on this ratio, and that direct oxidation is not the only oxidation process associated with RegenOx™ and the amount of reagents actually needed for the specific conditions at a given cleanup site, the Department finds no reason to dwell on this matter.

- e. Summary of general information from Regenes: Prospective users of RegenOx™ should contact Regenes determine the dosage and application rates of RegenOx™ reagents on a site-specific basis. However, the Department believes it worthwhile to pass along some general information so that prospective users who are not familiar at all with RegenOx™ can acquire a general understanding. Injection techniques, dosages, and application rates that are tailored to site-specific conditions do not necessarily have to be in agreement with the general rule-of-thumb information below.

Determination of RegenOx™ quantity to be applied.	Preferably, base the determination on actual measurements of contaminant mass that is adsorbed to the water table. In the absence of actual measurements, calculate the concentration of each adsorbed contaminant (C_{sorb}) that is in equilibrium with its dissolved counterpart by multiplying the groundwater concentration (C_{gw}) by the fraction of organic carbon adsorbed in the soil (f_{oc}), and the literature value of the organic carbon partition coefficient value (K_{oc}) of the contaminant, i.e. $C_{sorb} = C_{gw} \cdot (f_{oc}) \cdot (K_{oc})$
Consider Total Oxidant Demand (TOD)	A "jar test" on a sample of soil from the site to determine the TOD, which includes other types of organic matter at the site, not just the contaminants.
Typical composition of an injected RegenOx™ mixture.	4 – 7% oxidant (Part A) 4 – 7% activator (catalyst) (Part B) 86 - 92% water
Typical application rate of the mixture.	Maximum of 50 pounds of mixture per vertical foot for permeable sands, less for silts and clays.
Typical injection point spacing.	6 – 12 feet apart

- f. Safety reminders: Even though RegenOx™ is formulated to minimize the amount of heat that is generated, it is still worthwhile to be mindful about safety. Safety considerations to keep in mind include but are not necessarily limited to the items below.
- Use of proper protective clothing.
 - Proper handling and storage of RegenOx™ reagents, and consideration for their compatibility with other chemicals that they may be placed alongside in storage facilities.
 - Use of containers, tanks and piping constructed from materials that are compatible with the oxidizer and catalyst being used.
 - Proper disposal of unused or unwanted RegenOx™.
- g. Additional safety items to consider for chemical oxidation-type remediation processes at petroleum cleanup sites are listed in the Bureau of Petroleum Storage Systems' Remedial Action Plan checklist. A similar checklist exists for non-petroleum cleanup sites.

ENCLOSURE 4

Memorandum

Florida Department of
Environmental Protection

TO: Richard Deuerling, Mail Station 3530
Division of Water Facilities
Underground Injection Control Section
Florida Department of Environmental Protection
2600 Blair Stone Road, Tallahassee, FL 32399-2400

FROM: _____ (Note 1.)

DATE: _____

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

Pursuant to Rule 62-528.630(2)(c), F.A.C, inventory information is hereby provided regarding the proposed construction of temporary injection well(s) for the purpose of in situ aquifer remediation at a petroleum-contaminated site.

Site name: _____
Site address: _____
City/County: _____
Latitude/Longitude: _____
FDEP Facility Number: _____

Site owner's name: _____
Site owner's address: _____

Well contractor's name: _____ (Note 2.)
Well contractor's address: _____

Brief description of the in situ injection-type aquifer remediation project:

Summary of major design considerations and features of the project:

Areal extent of contamination (square feet): _____
Number of injection wells: _____
Composition of injected fluid (Note 3)
(ingredient, wt. %): _____

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

Richard Deuerling
Page Two
Date: _____

Site name: _____
FDEP facility no.: _____

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

The following is a summary description of the affected aquifer:

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

The injection well(s) features are summarized below, and/or a schematic of the injection well(s) is attached.

Direct-push or Conventional (*circle the appropriate well type*)
Diameter of well(s) (i.e., riser pipe & screen)(inches): _____
Total depth of well(s) (feet): _____
Screened interval: _____ to _____ feet below surface
Grouted interval: _____ to _____ feet below surface
Casing diameter, if applicable (inches): _____
Cased depth, if applic.: _____ to _____ feet below surface
Casing material, if applic.: _____

The in situ injection-type aquifer remediation plan for this petroleum contaminated site is 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 by-products 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 remediation plan estimates that 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 plan was approved on _____ by an enforceable approval order. A copy is attached. The remediation system installation is expected to commence within 60 days. Please call me at _____ if you require additional information.

-
- Note 1. Local programs are not authorized to approve underground injections into aquifers. Reason: Per agreement with EPA, the FDEP cannot delegate this authority. Local programs, after reviewing a Remedial Action Plan or an injection proposal document, should arrange for Department headquarters' execution of an approval order, and then complete this form. This form is primarily for use by state and local program technical reviewers, but petroleum remediation contractors may fill in all blanks except those labeled "FROM", "DATE", and "approval date", and "telephone number" blanks in the last paragraph. Those blanks should be completed only by a state or local program reviewer.
- Note 2. If an injection well installation contractor has not yet been selected, then indicate the name and address of the project's general remediation contractor/consultant.
- Note 3. Complete chemical analysis of injected fluid is required by Chapter 62-528, Florida Administrative Code. 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.