



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

July 5, 2011

Roger Kubala
Bio Blend Technologies, LLC
8 East Quintette Road, Suite B
Cantonment, Florida 32533

Re: **Star System**

Dear Mr. Kubala:

The Division of Waste Management (Division) hereby accepts the Star System for the remediation of hydrocarbons, chlorinated hydrocarbons, and other suitable contaminants in soil and groundwater. It is a trailer-mounted treatment and delivery system with a flexible equipment configuration. Although it can be used for direct one-time injections of remediation reagents, most applications are likely to be loop-type re-injections in which recovered groundwater is treated ex situ by process equipment and amended with remediation reagents prior to re-injection in order to continue the treatment in situ.

This acceptance covers the following Star System reagents: **Bio Blend-106** (a mix of anionic and nonionic surfactants), **Bio Blend-108** (a mix of anionic and nonionic surfactants), **Bio-Blend-800** (a mix of nonionic surfactant and bioremediation nutrients), **sodium percarbonate** (an oxidizer), and **zero-valent iron** (a reducing agent).

The five reagents listed above are not used simultaneously, but the three Bio Blend formulations are typically used sequentially during different phases of a Bio Blend cleanup. The selection of which reagent should be used will depend on the type of contaminants being cleaned up and whether the cleanup strategy is soil-washing/biostimulation, oxidation, or reduction. Enclosure 1 is a voucher for the confidential disclosure of the ingredients for Bio Blend-106, Bio Blend-108, and Bio-Blend-800.

Other reagents not covered by this acceptance can be used with this system, and it is not a requirement that they be covered by an acceptance letter; but a site-specific Remedial Action Plan must include all the necessary information about those reagents to comply with applicable regulations, especially those of Underground Injection Control.

The Division does not provide endorsement of specific or brand name remediation products or processes. It does, however, recognize the need to determine their acceptability in the context of environmental regulations, safety and the protection of public health. For that reason, the Division issues an "acceptance" letter, not an approval. In no way shall an acceptance be construed as a certification of performance. Additionally, vendors, upon receipt of an acceptance, must market their product or process on its own merits regarding performance, cost, and safety in comparison to competing alternatives in the marketplace.

Remedial Action Plans that propose the use of an accepted product or process should include a copy of the acceptance letter in the plan's appendix, and reference it in the text of the document. 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 rules and regulations.

The Division reserves the right to revoke its acceptance of a product or process if it has been falsely represented. Additionally, Division 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 submitted for Department review and approval. Enclosure 2 contains regulatory information that is applicable to the Star System; Enclosure 3 contains supplemental information; and Enclosure 4 is an Underground Injection Control Notification. If you have any questions, please contact us at the numbers below.

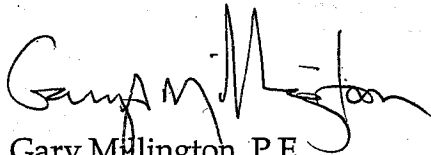
Sincerely,



Rick Ruscito, P.E.
Ecology and Environment, Inc.
Bureau of Petroleum Storage Systems
Petroleum Cleanup Program Section 6
rruscito@ene.com
(850)-877-1133, extension 3722

Roger Kubala
July 5, 2011
Page 3

Star System



Gary Millington, P.E.
Division of Waste Management
Bureau of Waste Cleanup
Program and Technical Support Section
gary.millington@dep.state.fl.us
(850)-245-7502

enc: (1) Proprietary Ingredients Voucher
(2) Regulatory Information
(3) Supplemental Information
(4) Underground Injection Control Notification

c: Tom Conrardy, P.E. – FDEP/Tallahassee
Rob Cowdery, P.E. – FDEP/Tallahassee

History

PPL #425
INN_179 - 7/5/11

PROPRIETARY INGREDIENTS VOUCHER



Florida Department of
Environmental Protection

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July 5, 2011

Roger Kubala
Bio Blend Technologies, LLC
8 East Quintette Road, Suite B
Cantonment, Florida 32533

Re: **Proprietary Ingredients Voucher**

Dear Mr. Kubala:

The Division of Waste Management (Division) hereby acknowledges receipt of a confidential disclosure regarding the proprietary ingredients of Bio Blend-106 (a mix of anionic and nonionic surfactants), Bio Blend-108 (a mix of anionic and nonionic surfactants), and Bio-Blend-800 (a mix of nonionic surfactant and bioremediation nutrients) included in your May 18, 2011 Application for Innovative Technology Evaluation.

Having reviewed the confidential disclosure, the Division hereby vouches for its content, and provides advice in Enclosure 2 on how to comply with applicable regulations of the Florida Administrative Code (F.A.C.) when these three Bio Blend products are used for the cleanup of contamination in accordance with a Department-approved, site-specific Remedial Action Plan. The Department, in offering its advice, has been careful to mention only enough general information about the chemical species and parameters that must be monitored by users in order to comply with Underground Injection Control regulations when the Bio Blend products are used, but not so much information as to compromise the identity of the specific proprietary ingredients.

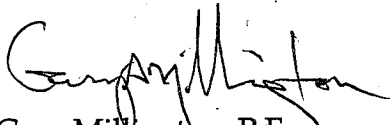
For Underground Injection Control purposes, injection-type aquifer remediation plans must specify both the volume and the complete chemical composition of the fluid to be injected. But since the details of the ingredients and their proportions in the Bio Blend products are proprietary, it will suffice to indicate just the volume of the fluid to be injected, along with the overall concentration of each product in that fluid, and then provide a note that a confidential disclosure of the proprietary details has already been

submitted to the Department and accepted. Reference should be made to this voucher, and a copy of it should be included as an appendix to the plan. If you have any questions, please contact us at the numbers below.

Sincerely,



Rick Ruscito, P.E.
Ecology and Environment, Inc.
Bureau of Petroleum Storage Systems
Petroleum Cleanup Program Section 6
rruscito@ene.com
(850)-877-1133, extension 3722



Gary Millington, P.E.
Division of Waste Management
Bureau of Waste Cleanup
Program and Technical Support Section
gary.millington@dep.state.fl.us
(850)-245-7502

REGULATORY INFORMATION

- a. Regulations: Chapters of the Florida Administrative Code (F.A.C.) that may be applicable, either in part or in their entirety, include but are not necessarily limited to 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 groundwater permitting and monitoring requirements; Chapter 62-528, F.A.C., for Underground Injection Control (UIC), particularly Part V, for Class V, Group 4 aquifer remediation projects; Chapters 62-770, 62-780, 62-782, and 62-785 F.A.C., for cleanup criteria; and Chapter 62-777, F.A.C., for cleanup target levels.

Users of the Star System and its associated remediation reagents shall comply with all applicable regulations. This includes meeting applicable groundwater cleanup target levels for the contaminants of concern, the residual concentrations of ingredients, and any byproducts of concern produced by chemical and biological reactions induced by those ingredients during the timeframe of the cleanup project. For the ingredients of concern that are present in excess of their groundwater standards, the timeframe is that which is permitted for a temporary injection zone of discharge (ZOD) as described below.

- b. UIC and ZOD permits: Per Rule 62-528.630(2)(c), F.A.C., Class V injection-type aquifer remediation wells are exempt from the permitting requirements of Rule 62-528.635, F.A.C., when authorized by a Department-approved Remedial Action Plan or other enforceable mechanism, provided the requirements of the rules governing the remediation project, as well as the construction, operation, and monitoring requirements of Chapter 62-528, F.A.C., are met. Per Rule 62-528.630(2)(c), F.A.C., the issuance of an enforceable, site-specific Remedial Action Plan Approval Order by the Department for injection-type aquifer remediation constitutes the granting of a Class V injection well construction/clearance permit. And per Rule 62-520.310(8)(c), F.A.C., if a temporary ZOD is necessary, and permissible by way of that rule, then the issuance of the site-specific Remedial Action Plan Approval Order also constitutes the granting of permission for the temporary ZOD.
- c. UIC notification: Remedial Action Plans proposing in-situ, injection-type aquifer remediation shall include information pursuant to Rules 62-528.630(2)(c)1 through 6, F.A.C., for the inventory purposes of the UIC program. Reviewers of those plans, upon issuance of an enforceable Remedial Action Plan Approval Order by the Department, must submit a completed copy of the Enclosure 4 UIC inventory notification form to the UIC program in Tallahassee.
- d. General information about temporary ZODs: For in-situ aquifer remediation, the composition of an injected material must meet the primary and secondary 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 UIC Rule 62-528.600(2)(d), F.A.C.

Aquifer remediation products that do not meet these requirements must seek relief from water quality criteria by one of two mechanisms. Permission for a temporary ZOD may be obtained by rule in accordance with Rule 62-520.310(8)(c), F.A.C. If a ZOD cannot be obtained by rule, it will be necessary to seek a variance from Department rules in accordance with Section 120.542, Florida Statutes.

Rule 62-520.310(8)(c), F.A.C., allows for a temporary ZOD for closed-loop re-injection systems, for the prime constituents of the reagents used to remediate site contaminants, and for groundwater secondary standards. In order to obtain permission for a temporary ZOD by rule, a site-specific Remedial Action Plan must indicate: (a) the chemical ingredients of concern in the fluid to be injected that will be present in excess of groundwater standards; (b) the size of the ZOD that is needed; (c) the amount of time that the ZOD will be needed; and (d) a plan for monitoring the injected chemical ingredients of concern. The size of the temporary ZOD will usually be the injection well radius of influence when the treatment system is a single injection point. For a multiple point system, the ZOD can usually be expressed and illustrated as the total area of the cluster formed by all the injection points, located side-by-side with overlapping radii of influence.

e. Specific ZOD information for Star System reagents:

1. Bio Blend-106: The volumetric ratio of Bio Blend-106 to water in the fluid to be re-injected by the Star System will typically be at a ratio between 1:500 and 1:1,000. For this range of ratios, obtain ZOD permission for surfactant (anionic and nonionic) by way of Rule 62-520.310(8)(c), F.A.C., as described in paragraph e above. Per a Division of Waste Management calculation, the dilution ratio at which surfactant ZOD permission is no longer necessary for Bio Blend-106 is 1:414,359, which is so dilute that it is unlikely to ever be re-injected at that concentration.
2. Bio Blend-108: The volumetric ratio of Bio Blend-108 to water in the fluid to be re-injected by the Star System will typically be at a ratio between 1:750 and 1:1,500. For this range of ratios, obtain ZOD permission for surfactant (anionic and nonionic) by way of Rule 62-520.310(8)(c), F.A.C., as described in paragraph e above. Per a Division of Waste Management calculation, the dilution ratio at which surfactant ZOD permission is no longer necessary for Bio Blend-108 is 1:922,319, which is so dilute that it is unlikely to ever be re-injected at that concentration.
3. Bio Blend-800: The volumetric ratio of Bio Blend-800 to water in the fluid to be re-injected by the Star System will typically be at a ratio of 1:500. For this ratio, obtain ZOD permission for surfactant (nonionic) by way of Rule 62-520.310(8)(c), F.A.C., as described in paragraph e above. Per a Division of Waste Management calculation, the dilution ratio at which surfactant ZOD permission is no longer necessary for Bio Blend-800 is 1:2,428.

The Division of Waste Management has done additional calculations for Bio Blend-800, in order to have information ready for users and reviewers in the future, should there ever be a need to re-inject Bio Blend-800 at a higher concentration. At a volumetric ratio of 1:57 Bio Blend-800 to water in the fluid to be re-injected, it will be necessary to obtain ZOD permission by way of Rule 62-520.310(8)(c), F.A.C., for iron and surfactant. And for a ratio of 1:2 it will be necessary to obtain ZOD permission by way of that same rule for ammoniacal nitrogen, iron, and surfactant. As for the heavy metal impurities arsenic, cadmium, and lead that could be present in the nutrient component of Bio Blend-800, there is no need to ever seek ZOD permission since the concentration of each of these impurities in Bio Blend 800, as shipped by Bio Blend Technologies, LLC, is already less than the maximum allowable concentration allowed by Florida drinking water standards in Chapter 62-550, F.A.C.

4. Sodium percarbonate: When the concentration of sodium percarbonate in the fluid to be injected or re-injected by the Star System is greater than or equal to 546 milligrams per liter (mg/L), which is equivalent to 0.0546 percent by weight, it will be necessary to seek ZOD permission by way of Rule 62-520.310(8)(c), F.A.C., for sodium, total dissolved solids, and pH. At sites where Bio Blend 800 has already been introduced to the subsurface during an earlier phase of treatment, the iron already in the subsurface can serve as a catalyst to produce a Fenton reaction. But if a catalyst other than the iron in Bio Blend-800 will be used to activate the sodium percarbonate, then the site-specific Remedial Action Plan shall indicate the following: the concentration of the catalyst in the fluid to be injected or re-injected; the complete chemical composition of the catalyst; and an evaluation of whether or not ZOD permission is needed for the specified concentration of catalyst in the fluid to be injected or re-injected.
5. Zero-Valent Iron: When the concentration of zero-valent iron in the fluid to be injected or re-injected by the Star System is greater than or equal to 0.3 milligrams per liter (mg/L), which is equivalent to 0.00003 percent by weight, it will be necessary to seek ZOD permission by way of Rule 62-520.310(8)(c), F.A.C., for iron. As for the diatomic nitrogen that the Star System also uses when zero-valent iron is injected, no ZOD is needed. But if other chemicals will be injected along with the zero-valent iron, then the site-specific Remedial Action Plan shall indicate the following: the concentration of the chemical in the fluid to be injected or re-injected; the complete chemical composition of the chemical; and an evaluation of whether or not ZOD permission is needed for the specified concentration of that chemical in the fluid to be injected or re-injected.
6. ZOD monitoring notes for the Star System: For the five types of injection fluids discussed above, quarterly monitoring of groundwater should suffice in most cases for the chemicals and parameters that require ZOD permission. The

current groundwater standards for those chemicals and parameters listed above are as follows: ammonia, 2.8 mg/L; iron, 0.3 mg/L; pH, range 6.5-8.5; sodium, 160 mg/L; surfactant, 0.5 mg/L; and total dissolved solids, 500 mg/L. Upon expiration of the time period granted for the ZOD, the concentration of each must meet its respective groundwater standard, or its natural-occurring background value at the specific cleanup site, whichever is less stringent.

- f. Analytical method for surfactants: Per Chapter 62-550, F.A.C., Standard Method 5540 (SM 5540) can be used to determine the concentrations of surfactants in water samples. Method SM 5540 C is for the measurement of anionic surfactant concentrations, and method SM 5540 D is for the measurement of nonionic surfactant concentrations.
- g. Utilization of wells: If a remediation site happens to have an abundance of monitoring wells, then the Division has no objection to the use of some wells for the application of Star System reagents. However, no "designated" monitoring well, dedicated to the tracking of remediation progress (by sampling) shall be used to apply 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.
- h. Avoidance of migration: For injection-type, in-situ aquifer remediation projects, pursuant to Rule 62-528.630(3), F.A.C., injection of Star System reagents shall be performed in such a way, and at such a rate and volume, that no undesirable migration of either the ingredients of concern, site contaminants, or remediation byproducts results.
- i. Abandonment of wells: Upon issuance of a Site Rehabilitation Completion Order, injection wells shall be abandoned pursuant to Section 62-528.645, F.A.C., and the Underground Injection Control Section of the Department shall be notified so that the treatment wells can be removed from the injection well inventory-tracking list.
- j. Open-pit application: In the event that a Star System cleanup in the future should ever involve a direct application of Star System chemicals to an open pit in which the groundwater is exposed, then it should be noted that open-pit application is not an injection, and notification of the UIC Section is not required, but the user must still be mindful of groundwater quality. Therefore, for open-pit applications, the groundwater in the application area should be monitored for the same parameters that would have required ZOD monitoring, had the application actually been an injection.

SUPPLEMENTAL INFORMATION

- a. Free product: If a high level of free product is present at a cleanup site, then the Star System makes use of an oil/water separator (OWS) as the first step in its aboveground treatment part of the process.
- b. Pre-treatment: The Star System actually makes use of two equipment trailers. When a high level of free product is present at a site, a pre-treatment trailer is used, containing an OWS to remove and collect bulk free product from recovered groundwater, before the free product can travel any further through the Star System equipment train.

The pre-treatment trailer also contains a 500-gallon sludge treatment tank for the batch treatment of any sludge that may settle in the OWS. Bio Blend-108 is added to each batch of sludge in the volumetric ratio of approximately 1:1,000. Water exiting the OWS and the sludge treatment tank is then passed through a set of organoclay filters before it is sent along to the injection trailer, where it is amended with either Bio Blend, sodium percarbonate, or zero-valent iron prior to re-injection. Water passed from the pre-treatment trailer to the injection trailer does not contain residual Bio Blend-108.

- c. Air: The Star System equipment trailers contain air compressors. On the pre-treatment trailer, the batch treatment sludge tank is air-agitated. On the injection trailer, compressed air is used drive a pneumatic pump, and to provide oxygen for aerobic treatment processes. When the Star System needs to introduce air to the subsurface for an aerobic process, the compressed air and the fluid to be injected or re-injected, while both are still aboveground, are combined in a mixing manifold and then directed to the subsurface.
- d. Nitrogen: The Star System injection trailer also carries a supply of pure diatomic nitrogen (N_2) that is used when zero-valent iron (a reducing agent) is being injected. It serves to prevent the zero-valent iron from oxidizing before it has a chance to reach its target contaminants in the subsurface.

Memorandum**Florida Department of
Environmental Protection**

{This version of UIC Notice memo is for use by staff of the BPSS, BWC, and District offices}

TO: Cathy McCarty, P.G.
Florida Department of Environmental Protection
Bureau of Water Facilities Regulation
Underground Injection Control Section – MS 3530
2600 Blair Stone Road, Tallahassee, Florida 32399-2400

FROM: _____
(An employee of Div. of Waste Management or DEP District Office)

DATE: _____

SUBJECT: **Remediation Product Injection Well(s) for In Situ Aquifer
Remediation at a Contaminated Site**

Reminder: This memorandum must be completed by an FDEP employee of the Bureau of Petroleum Storage Systems, the Bureau of Waste Cleanup, or an FDEP District Office. A person working for a consultant company preparing a RAP may complete some portions of this memo to expedite the FDEP's review but if so, the "From" and "Date" blanks and the date of RAP approval and phone number should be left blank for the FDEP technical reviewer to complete after verifying other information in the memo is accurate and conforms to applicable rules and procedures.

oOo

Please remove this message box prior to submittal of this memorandum to the Underground Injection Control Section.

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

Facility name: _____

Facility address: _____

City/County: _____

Latitude/Longitude: _____

FDEP Facility Number: _____

Facility owner's name: _____

Facility owner's address: _____

Well contractor's name: _____

Well contractor's address: _____

AFFECTED AQUIFER

Name of aquifer: _____
Depth to groundwater (feet): _____
Aquifer thickness (feet): _____
Areal extent of contamination (square feet): _____

INJECTION WELLS

A site map showing the location and spacing of injection wells, the areal extent of the groundwater contamination plume, and associated monitoring wells is attached. The injection well(s) features are summarized below, and/or a schematic of the injection well(s) is attached.

Direct-push or HSA/Mud rotary (*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 land surface
Grouted interval, if applicable: _____ to _____ feet below land surface
Casing diameter, if applicable (inches): _____
Cased depth, if applicable: _____ to _____ feet below land surface
Casing material, if applicable: _____
If a remediation product will be injected as a DP rod is inserted, indicate injection interval: _____ to _____ feet below land surface.

PROJECT DESCRIPTION

The in situ, injection-type aquifer remediation product/process remediates contaminants by:
(check those that apply)

- ☐ use of a bioremediation product,
- ☐ use of a chemical oxidation product,
- ☐ recirculation of partially treated contaminated groundwater, or
- ☐ other (describe) _____

Brief description of the project: _____

Summary of major design considerations and features of the project:

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

For continuous recirculation of partially treated water, indicate total daily design flow rate: _____ gallons per day

FLUID TO BE INJECTED

Brand name of remediation product(s): _____

Has an innovative technology acceptance letter been issued for this product by the BPSS:
__ yes __ no (Note: it is not required that an innovative technology acceptance letter be issued for the technology or product to be proposed in a RAP)

If product formula is proprietary then non-disclosure of the formula to the PE reviewing the RAP for the Department is only acceptable if there is an innovative technology acceptance letter issued by the Department with an attached proprietary voucher of confidential disclosure and it is verified that the proposed application rates (dosage) is limited to the rates specified in the innovative technology acceptance letter.

Is product formulation proprietary? __ yes __ no.

If product formulation is proprietary are proposed application rates limited to that indicated in innovative technology acceptance correspondence? __ yes __ no __ N/A

Composition of injected fluid (e.g. ingredient, wt. %): _____

TEMPORARY INJECTION ZONE OF DISCHARGE (ZOD)

(check those that apply)

- ☐ No ZOD needed. The fluid to be injected meets the primary and secondary groundwater standards of Chapter 62-550, F.A.C., and the minimum groundwater criteria of Chapters 62-520 and 62-777, F.A.C. _____
- ☐ ZOD permission by rule 62-520.310(8)(c) [†], F.A.C., for reagent chemical species and/or parameter(s) in the fluid to be injected (or re-injected) that exceed secondary groundwater standards. ZOD permission by this rule also applies to chemical species in the fluid to be injected that exceed primary groundwater standards or minimum groundwater criteria, provided those species are prime constituents of the reagents used to remediate site contaminants. The chemical species and parameters for which the approved Remedial Action Plan identifies zone size and duration, and addresses groundwater monitoring are summarized below.

Chemical species & parameters: _____

Zone size (sq. ft.) _____ Duration (mos.) _____ Yes, monitoring addressed. ☐

- ☐ ZOD permission by rule 62-520.310(8)(c) [†], F.A.C., for the following contaminants of concern that exceed their groundwater standards in the fluid to be re-injected as part of a closed-loop re-injection system for which the approved Remedial Action Plan identifies zone size and duration, and groundwater monitoring:

Contaminants of concern: _____

Zone size (sq. ft.) _____ Duration (mos.) _____ Yes, monitoring addressed. ☐

- ☐ ZOD permission by variance because the fluid to be injected contains the following impurities that are not prime constituents of the reagents used to remediate the site's contaminants, and the concentrations of those impurities in the fluid to be injected are in excess of their primary groundwater standards:

Impurities regulated as primary groundwater contaminants: _____

Zone size (sq. ft.) _____ Duration (mos.) _____ Yes, monitoring addressed. ☐

- ☐ A variance needs to be granted before the remediation can be conducted.

- ☐ A variance has already been granted for the impurities listed above:

Date variance granted: _____

Zone size (sq.ft.): _____

Duration (mos.): _____

- ☐ If ZOD permission by rule 62-520.310(8)(c) [†], F.A.C., or by variance is checked above, then a figure that delineates the ZOD is attached. (Use the lines below to more fully describe the ZOD if a figure alone will not suffice).

CLEANUP CRITERIA AND ENFORCEABLE APPROVAL ORDER

The in situ injection-type aquifer remediation plan for this contaminated site is intended to meet the groundwater cleanup criteria set forth in Chapter 62-777, 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 reactions induced by those ingredients or the contaminants of concern during their use. Applicable primary and secondary groundwater standards are set forth in Chapter 62-550, F.A.C., and minimum groundwater 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.

[†] Effective July 12, 2009, rule 62-522.300(2)(c), Florida Administrative Code (F.A.C.), was relocated to Chapter 62-520, F.A.C., and renumbered as rule 62-520.310(8)(c), F.A.C.