



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wether
Secretary

January 27, 1998

Mr. William Baugh
Custom Biologicals, Inc.
902 Clint Moore Road, Suite 208
Boca Raton, Florida 33487

Re: Custom HC-100

Dear Mr. Baugh:

The Bureau of Petroleum Storage Systems hereby accepts Custom HC-100 as an innovative product for the remediation of petroleum contamination in groundwater and soil, both in situ and ex situ. Per chemical analysis shown in enclosure 1 and your indication, the product contains only de-ionized water and American Type Culture Collection Class 1 bacteria.

For soil remediation, in situations where groundwater will not be affected by the use of the 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 a recharge gallery or NPDES permit, there are no special concerns. But for in situ groundwater remediation, via direct injection of Custom HC-100 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 a common application of this product, the bulk of the regulatory requirements discussed herein will be directed to that topic.

The Bureau recognizes Custom HC-100 as a viable bioaugmentation product for the remediation 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

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the product is used for in situ aquifer remediation via injection.

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 regarding performance, cost, and safety in comparison to competing alternatives in the marketplace. For Custom HC-100, the major environmental and regulatory considerations are set forth in enclosure 2.

Preparers of Remedial Action Plans may include a copy of this letter in the appendix of plans they submit, and call attention to it in the text of their document. In this way, technical reviewers throughout the state will be informed that you have contacted the Department of Environmental Protection to inquire about the environmental acceptability of this product or process. To aid those reviewers, the Bureau of Petroleum Storage Systems provides supplemental information in enclosure 3.

The Department reserves the right to revoke its acceptance of a product or process if the nature or composition of either or any of its principal and proprietary ingredients, or the 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

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