Department of
Environmental Protection

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

Jeb Bush
Governor

Colleen M. Castille
Secretary

August 29, 2005

Mr. Charles A. Sheffield
Alabaster Corporation
6921 Olson Lane
Pasadena, Texas 77505

Re: **Petro Clean**

Dear Mr. Sheffield:

The Bureau of Petroleum Storage Systems hereby accepts Petro Clean for the remediation of petroleum and other suitable contaminants in groundwater and soil, in situ and ex situ. Petro Clean is a pH-neutral blend of nonionic surfactants and emulsifiers. It is listed as a surface washing agent on the United States Environmental Protection Agency's National Oil and Hazardous Substances Pollution Contingency Plan. The Bureau, having examined its ingredients, believes it has the potential to also be useful in the cleanup of subsurface petroleum pursuant to Chapter 62-770, Florida Administrative Code (F.A.C.). As you have indicated in correspondence dated July 8, 2005 and August 5, 2005, the blend of Petro Clean marketed in Florida contains natural-occurring, non-pathogenic microorganisms, and that additional dehydrated microorganisms are available, so that users can add more for the cleanup of higher concentrations of petroleum. Enclosure 1 is a voucher for a confidential disclosure of the proprietary ingredients submitted by Alabaster Corporation.

This acceptance applies only to the regulatory jurisdiction and the remediation needs of the Bureau of Petroleum Storage Systems, which is primarily the cleanup of petroleum contamination pursuant to Chapter 62-770, F.A.C. Other government agencies and local governments may choose to recognize this acceptance if their needs and regulations are similar. This Bureau, however, is not responsible for applications beyond its jurisdiction.

For vadose remediation, where the underlying groundwater will not be affected by the leaching of Petro Clean, there are no special concerns beyond those that would normally be addressed in preparing a Remedial Action Plan and conducting a cleanup in accordance with Chapters 62-770 and 62-777, F.A.C. However, for injection-type and in situ groundwater remediation, there are groundwater and underground injection control (UIC) regulations that must be observed. Since UIC and groundwater regulations usually receive the greater amount of attention when a chemical product is used to clean up petroleum pursuant to Chapter 62-770, F.A.C., the bulk of the discussion herein will be directed to those regulations.

The Bureau recognizes Petro Clean 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) Rule 62-522.300(2)(c), F.A.C., is observed with respect to sodium, ammonia nitrogen, and nonionic surfactants; and (c) a site-specific Remedial Action Plan is submitted pursuant to Chapter 62-770, F.A.C., and approved by the Department for each site

where the use of Petro Clean is proposed. Some major environmental and regulatory considerations that apply are discussed in enclosure 2.

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. 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 product or process 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 of the 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 Petro Clean. 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 a product or process if it has been falsely represented. Also, 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 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) Proprietary Ingredients Voucher for Petro Clean
(2) Regulatory Information
(3) Supplemental Information
(4) Underground Injection Control Notification Memorandum

c: T. Conrardy – FDEP MS 4530/Tallahassee

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Colleen M. Castille
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August 29, 2005

Mr. Charles A. Sheffield
Alabaster Corporation
6921 Olson Lane
Pasadena, Texas 77505

Re: **Proprietary Ingredients Voucher for Petro Clean**

Dear Mr. Sheffield:

The Bureau of Petroleum Storage Systems hereby acknowledges receipt of a confidential disclosure dated August 5, 2005, submitted by Alabaster Corporation, regarding the proprietary ingredients and their proportions in the remediation product known as Petro Clean, for petroleum cleanup pursuant to Chapter 62-770, Florida Administrative Code (F.A.C). Petro Clean is a pH-neutral blend of nonionic surfactants, emulsifiers and non-pathogenic microorganisms. Alabaster Corporation indicates that the standard dilution of the product, prior to application by the user, is (9) parts water to one (1) part Petro Clean. It is the concentrations of ingredients in this 9 to 1 mixture to be applied (not the full-strength product) that the Bureau has compared to groundwater and underground injection control regulations.

Having reviewed the disclosure, the Bureau hereby vouches for the composition of Petro Clean. Without divulging any of the proprietary ingredients and their proportions, we provide information to potential users of Petro Clean, and reviewers of plans proposing it, in order for them to comply with Florida's underground injection control and groundwater regulations. This is done by separating the Petro Clean ingredients into two (2) categories, each of which is labeled in bold-faced type below. By reading the information that the Bureau has provided for each category, users and reviewers will know whether there is an obligation to comply with a regulation.

Surfactants. The surfactants in Petro Clean are predominantly the nonionic type. The balance, present in much lower concentration, are amphoterics. Surfactants are regulated by the secondary drinking water standards set forth in Chapter 62-550, F.A.C., which describes them as "foaming agents". The standard set for them by Chapter 62-550, F.A.C., is 0.5 milligrams per liter (mg/L) maximum. The Bureau agrees with a suggestion by the University of Florida Center for Environmental and Human Toxicology that surfactants should not be used in significant amounts when potable water wells are very close by. The total residual concentration for all surfactants combined should not exceed 0.5 mg/L in the groundwater by the time an in situ aquifer remediation project is completed.

FDA EAFUS-listed ingredients. There are several proprietary ingredients in Petro Clean that are listed in the U.S. Food and Drug Administration (FDA) food additive inventory database that is often referred to as "Everything Added to Food in the United States" (EAFUS). The Bureau of Petroleum Storage Systems, without divulging the proprietary identity of these ingredients,

would like to indicate that the magnitude of the concentrations of these EAFUS-listed ingredients in the fluid to be injected at the 9:1 dilution ratio is relatively low. Given that these ingredients are present in low concentrations, and listed in EAFUS as well, the Bureau of Petroleum Storage Systems judges that they should be of minimal toxicological and environmental concern. However, should the EAFUS status of these ingredients change in the future, or should a valid toxicological or environmental issue be raised about any of them, then minimum groundwater criteria may have to be developed and imposed.

There is, however, one particular EAFUS-listed ingredient that deserves further attention. For a 9 parts water, 1 part Petro Clean mixture that is injected or introduced to an aquifer for remediation purposes, it may be possible, given the atomic constituents of one particular ingredient, that the concentrations of sodium and ammonia nitrogen in the mixture may exceed their injection standards. For sodium, the standard is 160 milligrams per liter (maximum) which is set forth in the primary drinking water standards in the current issue of Chapter 62-550, F.A.C. For ammonia, the standard is a "minimum groundwater criterion" of 2.8 mg/L (maximum) which is set forth in the current issue of Chapter 62-777, F.A.C.

For underground injection control purposes, remediation plans proposing Petro Clean must provide 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 volume of Petro Clean solution to be injected (at the 9:1 dilution strength) and provide a footnote indicating that a one-time confidential disclosure regarding the proprietary composition has been submitted to the Department. Reference should be made to the original August 5, 2005 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 Petro Clean may contact 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

ENCLOSURE 2

REGULATORY INFORMATION

For Petro Clean (Petro Clean) applications, the major environmental and regulatory considerations are listed below.

a. Groundwater cleanup standards: The onus shall be on users of Petro Clean to ensure that all applicable groundwater contaminant standards will be met at the time of project completion, for petroleum, other contaminants that may be present, any residuals associated with the ingredients of Petro Clean, 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: 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 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 the Bureau of Petroleum Storage Systems, the Bureau of Waste Cleanup or a district office of the Florida Department of Environmental Protection, for remediation via injection of Petro Clean into an aquifer, 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.

d. Zone of discharge by rule: For the injection-type, in situ aquifer remediation using Petro Clean, 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, ammonia nitrogen, and nonionic surfactants in the fluid to be injected could be in excess of their groundwater injection standards; (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, ammonia nitrogen and the surfactants. The current maximum allowable groundwater concentrations for these parameters are as follows: sodium, 160 milligrams per liter (mg/L); ammonia nitrogen, 2.8 mg/L; and surfactants (regulated as "foaming agents"), 0.5 mg/L. 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.

In Chapter 62-550, F.A.C., surfactants are referred to as "foaming agents" and are regulated as secondary drinking water contaminants. The maximum allowable concentration (i.e. the sum of all the individual surfactant concentrations) is 0.5 mg/L. Method SM 5540 is a recognized laboratory method for the measurement of their concentration in water samples, and is published in *Standard Methods for the Examination of Water and Wastewater*. Method SM 5540 D is for nonionics.

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 Petro Clean. However, no "designated" monitoring well, dedicated to the tracking of remediation progress (by sampling) shall be used to apply Petro Clean. 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. Additives: If, in the future, either Alabaster Corporation or a user of Petro Clean decides to augment it with nutrients and/or chemicals, the injection of such nutrients and chemicals into an aquifer must also be in accordance with the underground injection control requirements of Chapter 62-528, F.A.C., which require that substances injected meet the drinking water standards set forth Chapter 62-550, F.A.C., and the minimum groundwater criteria of Chapter 62-520, F.A.C. Additionally, minimum groundwater criteria for specific chemicals are listed in Chapter 62-777, F.A.C.

g. Groundwater monitoring:

1. Active remediation petroleum monitoring: 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. 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.

2. Post remediation petroleum monitoring: At least one (1) year of quarterly post remediation groundwater monitoring 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.

3. Underground injection control monitoring: For Underground Injection Control purposes, when Petro Clean is injected, the groundwater must be monitored for sodium, ammonia nitrogen and surfactants, pursuant to Rule 62-522.300(2)(c), F.A.C., as discussed above in paragraph d.

h. 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 reviewers within 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.

i. Operation:

1. Avoidance of migration: For injection-type, in situ aquifer remediation projects, injection of Petro Clean 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 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 Petro Clean 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 Petro Clean 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

SUPPLEMENTAL INFORMATION

The information below has been compiled from several sources.

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.

   Only reviewers within 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: 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.

c. Dosage and application rate: Alabaster Corporation has provided information about the dosage and application rate of Petro Clean for the treatment of soil via surface application, and for the treatment of petroleum on water surfaces. Dosage and application rates were not provided for in situ aquifer remediation, but the Bureau believes it would be logical to assume that a dosage for soils below the water table would be similar to those above it. Still, it may be worth the user's while to contact Alabaster Corporation for dosage advice if the use of Petro Clean is contemplated for the remediation of groundwater, and soil below the water table. The Bureau of Petroleum Storage Systems reproduces in its entirety, in italic below, the information provided by Alabaster Corporation.

> *Petro Clean is a surface washing agent but may also be applied for the remediation of petroleum product contamination in the soil. The amount per cubic yard of media to be remediated depends on the amount of refined petroleum contamination in the soil. Standard dilution is 1 part Petro Clean to 9 parts water for each cubic yard of light fuel spills. For heavier fuel and oil, add one-quarter (1/4) pound of A+ microbes for each gallon of concentrated Petro Clean. Please note that the soil should be tilled or raked, much as a garden, so that the solution can penetrate into the spill on the soil. The soil should be kept between 20% and 30% moisture content throughout the remediation. For petroleum product contamination to the water, Petro Clean may*

be applied as a spray. For light fuel slicks on the water, this same blend may be sprayed on the slick at the rate of 1 gallon of Petro Clean for every 400 square feet of surface area. For heavier oils, use 1 gallon of Petro Clean, with the addition of ¼ pound of microbes, for every 200 square feet of surface area.

d. Oxygen: Alabaster Corporation indicates that tilling and central spray aerators should be sufficient for the supply of oxygen to Petro Clean's aerobic microbes for surface applications, but did not discuss the supply of oxygen for subsurface applications. The Bureau of Petroleum Storage Systems would therefore like to advise user's of Petro Clean, for subsurface applications, especially those below the water table, to take into consideration the need to supply sufficient oxygen. Options for the introduction of oxygen below the water table include but are not necessarily limited to the following: air sparging, direct injection of pure oxygen, the use of chemicals that release oxygen upon contact with water, or dilute hydrogen peroxide.

e. Degradation products: Carbon dioxide and water are the ultimate products of aerobic and most anaerobic biodegradations of petroleum hydrocarbons. The intermediate products may include simple acids, alcohols, and fatty acids. Aerobic processes use oxygen as an electron acceptor to produce the 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. Those who prepare bioremediation plans, and their reviewers, should determine which parameters, if any, should be measured on a site-specific basis.

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): _____

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 follow the instructions in a March 16, 2000 memorandum to 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.