

July 10, 1998

Ms. Tami Maddox
Oil Gator Product Services
20354 Empire Ave. #D-1
Bend, OR 97701

Re: Oil Gator

Dear Ms. Maddox:

We are in receipt of your Innovative Technology Application for Oil Gator. It is our understanding that Oil Gator consists of a naturally occurring neutralized cotton based product that is used to absorb oil or oil-based products and facilitates the natural attenuation process. According to the information submitted by your company, Oil Gator can also be used in a staged approach with several applications to remediate chlorinated hydrocarbons, but our review of Oil Gator considers petroleum contamination only.

The Bureau has no objection to the use of Oil Gator for the absorption and bioremediation of hydrocarbon contaminated soil on an in-situ or ex-situ basis, provided no specific environmental rules within the Florida Administrative Code are violated. The following conditions must be met when Oil Gator is used in Florida for the remediation of petroleum contaminated sites:

1. Cotton dust contaminated with certain bacterial endotoxins has been correlated to a lung disease, Byssinosis, for some cotton mill workers inhaling the dust. In addition, the same endotoxin can cause a fatal disease called Endoximia if exposure occurs when the receptor has a serious lung disease caused by other types of illness. Because of this, workers applying Oil

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Gator and anyone that can be exposed to the cotton dust during the application must not have a lung infection and must adhere to all the requirements listed in the Material Safety Data Sheet which includes the use of a dust mask.

2. Although rarely used in pesticides anymore, some cotton plants, and possibly imported cotton, may contain arsenic or other heavy metals. According to a Waste Reduction Fact Sheet created by the North Carolina Department of Environment, Health, and Natural Resources, levels of arsenic as high as 28 parts per million has been tested in cotton waste due to arsenic-containing defoliants. Defoliants containing arsenic have been eliminated in recent years; thus, this concern should not be viable in the near future. As a precaution only, Oil Gator should be tested for RCRA metal concentrations prior to mixing when in-situ use is planned. If Oil Gator will be used ex-situ, it is acceptable to perform a RCRA metals TCLP test on the soil after Oil Gator has been mixed with the soils but before the soil is returned to the excavation.

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 market-place.

In cases where preparers of remedial action plans recommend the use of encapsulating and natural attenuation facilitating products for state-funded cleanups, the selection of those products should be based on ability to meet the site specific conditions and performance requirements, and any capital, operating and maintenance cost advantages offered in comparison to other methods of cleanup.

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Preparers of remedial action plan documents for state-funded cleanups may wish to 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 and its contracted local reviewing programs will be informed that you have contacted the Department of Environmental Protection in regard to this product. You may contact me at 850/922-9125

Sincerely,

Steven W. Reecy, P.E.
Bureau of Petroleum
Storage Systems

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