

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Spill Prevention & Response, 11th Floor
625 Broadway, Albany, New York 12233-7020
Phone: (518) 402-9543 • FAX: (518) 402-9577
Website: www.dec.state.ny.us



April 26, 2002

Joe Dougherty
International Environmental Products, LLC
Trinity Corporate Center
70-5 E. Swedesford Road
Malvern, Pennsylvania 19355

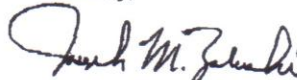
Re: SheenClean

Dear Mr. Dougherty:

The Bureau of Spill Prevention and Response has received the marine and freshwater toxicity testing reports that you forwarded for the spill product SheenClean and will update our files. As stated in our letter dated March 7, 2002, SheenClean can be considered for the remediation of petroleum sheens on surface water on a case-by-case basis. Please refer to our March 7, 2002 letter for conditions that shall apply to the use of SheenClean on surface water in New York State.

If you have any questions, please contact me at (518) 402-9543. Please contact the Regional Spill Engineers listed on the enclosed sheet, to discuss any site-specific issues regarding the use of SheenClean within their region of responsibility.

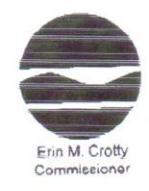
Sincerely,



Joseph M. Zalewski
Environmental Engineer I
Site Remediation Section

Enclosure

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March 7, 2002

Joe Dougherty
 International Environmental Products, LLC
 Trinity Corporate Center
 70-5 E. Swedesford Road
 Malvern, Pennsylvania 19355

Re: SheenClean Spill Product Review

Dear Mr. Dougherty:

The Bureau of Spill Prevention and Response (BSPR) and the Spill Product Evaluation Group (SPEG) have reviewed the additional information which you submitted regarding your spill cleanup product called SheenClean. This information was submitted to support your January 17, 2002 request to evaluate the use of SheenClean for the remediation of petroleum product releases on surface water.

The data submitted shows that the mixture of the active ingredients in SheenClean and No. 2 fuel oil are more toxic than the No. 2 fuel oil alone. However, the information also shows that the active ingredients in SheenClean alone are generally not as toxic to aquatic or marine life as No. 2 fuel oil and there may be instances where its use is appropriate.

Therefore, SheenClean may be considered on a case-by-case basis for the remediation of petroleum product releases on surface water. Where SheenClean is being considered for use on surface waters, the Division of Fish, Wildlife, and Marine Resources must provide site specific approval. Factors to be considered include, but are not limited to, application rates, proximity to areas of sensitive habitat, size of the spill; size of the water body, dilution availability, flushing rate, etc.

The following conditions shall apply to the use of SheenClean on surface water in New York State:

1. All free product shall be physically removed to the maximum extent feasible before the use of SheenClean is considered.
2. The product label for SheenClean does not provide any information on product handling and usage. Without proper instructions for use the possibility for misuse increases. Since application rates will vary based on the degree of contamination, the SheenClean product label provided should be revised to include this information.

3. It is expected that the owner or manufacturer of the product will be filing the necessary information for listing on the NCP Product Schedule.
4. The user of SheenClean shall be liable for any environmental or other damages which may result from its use.
5. As appropriate, the BSPR and the SPEG may add or delete any requirements for SheenClean based on any future data evaluations.

The review by the BSPR and the SPEG does not include an assessment of the product's effectiveness, nor does it constitute any approval, endorsement, or recommendation of any commercial product or proprietary process. The review results only in the consideration of a product for use in petroleum cleanups on a case-by-case basis, depending on the sensitivity of the environmental resources affected, and the appropriateness of its use under the physical circumstances of the spill. No implied or implicit endorsement by the New York State Department of Environmental Conservation is to be made by any sales promotion, or on any label, advertisement, or technical literature.

Any reference to this letter or its contents must include the previous paragraph or this letter in its entirety. If you have any questions, please contact me at (518) 402-9543. Please contact the Regional Spill Engineers listed on the enclosed sheet, to discuss any site specific issues regarding the use of SheenClean within their region of responsibility.

Sincerely,



Joseph M. Zalewski
Environmental Engineer I
Site Remediation Section

Enclosure

cc (w/o encl.): Regional Spill Engineers
G. Recer - NYSDOH

cc (via e-mail): F. Peduto
T. Plesnarski
T. Sinnott - DFWMR