TANK FOAM
UST ABATEMENT™

Tank Foam UST Abatement™

- Non-Corrosive to Metal Tanks
- Safe, Inert and Environmentally Green
- No Site Excavation Necessary
- Seals All Voids

Tank Foam by cfiFOAM is an inert, lightweight, pre-expanded foam designed for permanently closing in-place existing underground storage tanks. Tank Foam is an excellent alternative to conventional materials such as sand, gravel and concrete because it is a lightweight material that is easy and inexpensive to install.

Chemically, Tank Foam is a foamed tri-polymer, spray-dried, aminoplast resin. Since it is pre-expanded, there is no danger of doing irreparable harm from in-situ expansion of foam in the tank.

Tank foam is approved in many states such as Arizona, New Jersey, North Carolina, Idaho, and Nevada by virtue of its solid, inert composition, as verified by the attached independent laboratory test . A handful of states, i.e., Florida and California, list Tank Foam by name as an approved tank closure product. (California and Florida approvals attached.)

The tank closure process is simple:

1. Any remaining oil and sludge are removed from the tank.
2. Tank Foam is injected through the fill pipe or a hole cut into the top of the tank.
3. Tank Foam will conform to the shape of the tank and fills all the voids and pipelines.
4. The soil over the fill pipe/access hole is replaced and the landscaping is restored.

CFI FOAM, INC.
INJECTION FOAM PRODUCTS

P.O. Box 10393 • Knoxville, TN 37939 • 800.656.FOAM • Fax: 865.588.6607 • www.cfifoam.com

ANALYTICAL INDUSTRIAL RESEARCH LABORATORIES, INC.

Tennessee Certification #02034
Georgia / Louisiana Certification #04006
Alabama Certification #40780
Kentucky Certification #90040
Accreditation: NELAP / LELAP #AI85697

1550 37TH STREET, NE
CLEVELAND, TENNESSEE 37312
(423) 476 - 7766 Fax: (423) 476-7714

Scope of Accreditation:
Wastewater, Surface Water, Ground Water, Drinking Water, Solids, Hazardous Waste, Soils, Sediments, and Sludges.

Lab Report 196288

5369
CFI Foam
Attention: Richard Porter
P.O. Box 10393
Knoxville, TN 37939

Date Received	3/27/2007
Date Sampled	3/26/2007
Time Sampled	16:00
Date Requested	4/ 3/2007
Rush Status	ASAP
Phone	(865) 588-4464
Extension	
✓ *Fax*	(865) 588-6607
Under NELAC Certification	
PO#	

Sample Information

Project # 32707 CFI Insulation
Tank Foam - 1

Lab Report	196288	*Result*	*MDL*	*Method*	*Date*	*Time*	*Analyst*
	Research Standards						
*See Attached	Research/Standards	*Pass	NA	STM	4/ 3/07	9:20	SAG

QA/QC Procedures required by the Method(s) were followed unless otherwise noted. Performance and acceptance standards for required NELAC QA/QC procedures were achieved unless otherwise noted. No significant modifications have been made to the Method(s). I attest that, based upon my inquiry of those individuals immediately responsible for reviewing the information, the material contained in this report is, to the best of my knowledge and belief, accurate and complete.

These results relate only to the items tested. This report shall not be reproduced except in full and with permission of this laboratory. The laboratory retains sole ownership of data until full reimbursement has been made.

Report approved by: Roy R. Patterson

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Lab #196288 - Attachment

Reactivity to Kerosene, Gasoline and Diesel Fuel

Solvent	Visual	Particle Separation	Inert or Non-Reactive
Kerosene	No Matrix Deterioration	Minimum	Pass
Gasoline	No Matrix Deterioration	Minimum	Pass
#2 Diesel Fuel	No Matrix Deterioration	Minimum	Pass

Approximately 1 cubic inch of the foam was submerged in 100 ml of each solvent at 25 C (+/- 1 C) for 24 hours. At the end of the test period, the samples were visually examined for comparative matrix decomposition, corner deformation and particle loss. ***The inert or non-reactive classification was based on a retention of physical comparative properties similar or identical to the pre-solvent state***.

State Water Resources Control Board

Linda S. Adams
Acting Secretary for Environmental Protection

Division of Water Quality
1001 I Street, Sacramento, California 95814 ♦ (916) 341-5782
Mailing Address: P.O. Box 100, Sacramento, California 95812-0100
FAX (916) 341-5463 ♦ Internet Address: http://www.waterboards.ca.gov

Edmund G. Brown Jr.
Governor

MAY 20 2011

Mr. Richard Porter
cfiFOAM, Inc.
PO Box 10393
Knoxville, TN 37939

Dear Mr. Porter:

UNDERGROUND STORAGE TANK IN-PLACE CLOSURE INQUIRY

This letter is in response to your request for the State Water Resources Control Board's (State Water Board) review and approval of Tank Foam for in-place closure of underground storage tanks (USTs). The State Water Board does not have authority to approve tanks, piping, or other components and products, including materials used for in-place UST closure. Title 23, California Code of Regulations (CCR), Section 2672 however, requires owners and operators of USTs to obtain approval from the local implementing agency for permission to close USTs, including closure in-place. Therefore, cfiFOAM will need to contact and obtain closure permits from the local implementing agency for each project and to determine if closure in-place is allowed by the local implementing agency. A list of the local implementing agencies can be found at www.calepa.ca.gov/CUPA/Directory/default.aspx.

Please note that if an UST is approved by the local implementing agency for closure in-place all provisions of Chapter 6.5 and 6.7 of Division 20 of the California Health and Safety Code and Title 23, CCR, Section 2672 shall be met; 1) all liquid, solids, sludges shall be removed and handled as hazardous waste or recyclable materials, 2) if the UST contained a hazardous substance that could produce flammable vapors at standard temperature and pressure shall be inerted to levels that shall preclude explosion or to lower levels as required by the local implementing agency, 3) all piping associated with the UST shall be removed and disposed of unless removal might damage structures or other pipes that are being used and that are contained in a common trench, in which case the piping to be closed shall be emptied of all contents and capped, 4) the tank is completely filled with an inert solid, and 5) soil sample analysis and/or water analysis is completed to determine if an unauthorized release has occurred during the operation of the UST.

If you have questions or need additional information please contact Laura Fisher, Acting UST Program Manager at (916) 341 – 5870 (lfisher@waterboards.ca.gov).

Sincerely,

Victoria A. Whitney
Deputy Director
Division of Water Quality

Florida Department of
Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 2, 2007

Certified Mail
Return Receipt Requested: 7005 0390 0002 1979 0454

Mr. Richard Porter
cfiFoam, Inc.
P.O. Box 10393
Knoxville, TN 37939

RE: DEP Approval of the Tank Foam, File No. EQ-672

Dear Mr. Porter:

The Bureau of Petroleum Storage Systems has concluded its review of the Equipment Approval requests dated April 16, and April 27, 2007, that were submitted for the above referenced equipment pursuant to Rule 62-761.850, Florida Administrative Code (F.A.C.).

Based on the information provided by the cfiFoam, Inc., the Department finds that applicant's Tank Foam will provide environmental protection substantially equivalent to that provided by compliance with the requirements established in Rule 62-761.800(3), F.A.C.

Pursuant to Rule 62-761.850, F.A.C., the request for the use of the above referenced product is approved as a method for closure of underground storage tanks in-place in the State of Florida, provided the following conditions are met:

A. If a storage tank system is partially or fully submerged in water or is located in a 100 year flood plain, a floatation calculation must be provided to demonstrate that the storage tank system will remain stationary after being filled. If the floatation calculation indicates that ballast is required to overcome the uplift forces, then the tank must be secured in place. The calculation must be made and signed by a Certified Contractor as defined in Rule 62-761.200(11), F.A.C., or by a professional engineer registered in the State of Florida. These calculations shall be kept with the records of the facility; and

B. The foam closure method shall only be used for underground storage tank systems that formerly contained petroleum products.

Please be advised that the above referenced DEP rules are subject to change. If the above rule standards are modified in the future, this Order may be modified or rescinded for future upgrades and installations. Additionally, if the product(s) shows a consistent pattern of failure(s), and therefore does not provide substantially equivalent environmental protection, the Department may rescind this Order.

The Department's Order shall become final unless a timely petition for an administrative hearing is filed under sections 120.569 and 120.57, Florida Statutes ("F.S."), within 21 days of receipt of this Order. Persons who have filed such a petition may seek to mediate the dispute, and choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing and pursuing mediation are set forth below.

Persons affected by this Order have the following options:

If you choose to accept the above decision by the Department about equipment approval, you do not have to do anything. This Order is final and effective as of the date on the top of the first page of this Order.

If you choose to challenge the decision, you may do one of the following:

1. File a petition for administrative hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order;

OR

2. File a request for an extension of time to file a petition for hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order; such a request should be made if you wish to meet with the Department in an attempt to resolve any disputes without first filing a petition for hearing or negotiate an agreement to mediate.

OR

3. In addition to requesting an administrative hearing, any petitioner may elect to pursue mediation under section 120.573, F.S., and must negotiate an

agreement to mediate within 10 days after the deadline for filing a petition.

How to Request an Extension of Time to File a Petition for Hearing

For good cause shown, pursuant to Rule 62-110.106(4), Florida Administrative Code ("F.A.C."), the Department may grant a request for an extension of time to file a petition for hearing. Such a request must be filed (received) with the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from the applicant, shall mail a copy of the request to the applicant at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for administrative hearing must be made.

How to File a Petition for Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Department's Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from the applicant, shall mail a copy of the petition to the applicant, at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under sections 120.569 and 120.57, F.S.

Pursuant to subsections 120.54(5)(b)4 and 120.569(2), F.S. and rule 28-106.201, F.A.C., a petition for administrative hearing shall contain the following information:

a) The name, address, and telephone number of each petitioner, the name, address, and telephone number of the petitioner's representative, if any, the name, address of the applicant if different from petitioner;
b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
c) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;

d) A statement of the material facts disputed by the petitioner, or a statement that there are no disputed facts;
e) A statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
f) A statement of the specific rules or statutes the petitioner contends requires reversal or modification of the Department's action or proposed action; and
g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

How to Pursue Mediation

In addition to requesting an administrative hearing, any petitioner may elect to pursue mediation. The election may be accomplished by filing with the Department a mediation agreement with all parties to the proceeding (i.e., the applicant, the Department, and any person who has filed a timely and sufficient petition for hearing). The agreement must contain all the information required by rule 28-106.404, F.A.C. The agreement, signed by all parties, must be received by the Department's Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000 within 10 days after the deadline for filing a petition, as set forth above. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement.

Pursuant to rule 28-106.404, F.A.C., an agreement to mediate must include the following:

(i) The name, address, and telephone number of the persons who may attend the mediation (also the DEP file number, and the name and address of the applicant);
(ii) The name, address, and telephone number of the mediator agreed to by the parties;
(iii) How the costs and fees associated with the mediation will be allocated (the Bureau of Petroleum Storage Systems will not pay any of the costs of mediation);
(iv) The agreement of the parties regarding the confidentiality of discussions and documents introduced during mediation to the extent authorized by law;

(v) The date, time, and place of the first mediation session;
(vi) The name of the party's representative who shall have authority to settle or recommend settlement; and
(vii) The signature of the parties.

As provided in section 120.573, F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57, F.S., for holding an administrative hearing and issuing a final order. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons seeking to protect their substantial interests that would be affected by such a modified final decision must file their petitions within 21 days of receipt of this notice, or they shall be deemed to have waived their right to a proceeding under sections 120.569 and 120.57, F.S. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57, F.S., are resumed.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or mediation settlement.

Judicial Review

Any party to this Order has the right to seek judicial review of it under section 120.68, F.S., by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the Agency Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within thirty days after this order is filed with the clerk of the Department (see below).

Questions

Any questions regarding the Department's review of your equipment approval should be directed to Farid Moghadam at (850)245-8848. Questions regarding legal issues should be referred to the Department's Office of General Counsel at (850)245-2242. Contact with any of the above does not constitute a petition for administrative hearing (or time extension) or agreement to mediate.

Sincerely,

Michael E. Ashey, Chief
Bureau of Petroleum Storage Systems

MEA/fm

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Cheryl Stafford 5/2/07
Clerk (or Deputy Clerk) Date