

HUMA-CLEAN, L.L.C.

4416 STEFFANI LN. ~ HOUSTON, TEXAS 77041 ~ TEL. 713/856-7000 ~ FAX. 713/856-8444
email: humaclean@aol.com

TO : Alison Hess/Doug Tomchuk
Hudson River PCBs Public Comment
U.S. Environmental Protection Agency
FROM : Mickey Cox
DATE : January 2, 2001

RE: DISCHARGE INTO 'HUDSON RIVER'

Dear Ms Hess/Mr. Tomchuk;

I noticed the situation, which has occurred involving PCBs contamination in Hudson River. Therefore I would like to forward a company profile for your review.

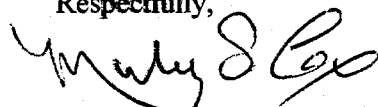
We have been extremely successful in the degradation and total remediation of these hazardous chemicals. In the Pacific where a company had problems with DDT, DDE the EPA has tested capping and spent 7.5 million dollars where our bench tests and certified lab results showed total elimination. Or bid was for 40% less with only half mobilization fee with the balance only if work was successful. (we can not compete with the high priced big boys, however, we do guarantee the results and a minimum of 30% savings to the customer.

We are bonded, hold all OSHA requirements for safety (never a claim) we have some of the leading chemist as partners and consultants.

Enclosed I have included some of our successful projects both in the United States and Korea. Our belief is that we can clean the problem in place and eliminate the dredging, trucking and tipping fees related to disposal. More important is that the problem does not pose problem for future life or environmental regulations, which may be even more strict. (we do not take the cancer off the foot and put it on the arm) Also, I will send our company profile for your review.

I hope that we can be of assistance to you and your situation. Please call if we can be of help. I remain

Respectfully,



Mickey S. Cox

Encl.

BASIC ADVANTAGES

VS.

DISADVANTAGES

HUMA-CLEAN ADVANTAGE

1. IT WORKS
2. Total degradation of contaminants
3. Length of time to complete
4. Safety to public & environment
5. 30% to 40% savings in Cost
6. Low Key, No public protesting
7. No future liability to customer

ALTERNATE METHOD

1. It is a temporary "Band-Aid"
2. Dredge Expenses & Disposal
3. Trucking & manifesting
4. Liability of truck spill
5. Dredge, trucks, personnel disposal and future monitors
6. Very visible to public with all of the equipment needed
7. Future monitoring to water table at disposal site

2,600,000cy = 173,333 15cy trucks of wet mud. 173,333 chances of spill on streets or passing cars, which will have to be repainted, or suites settled.

One big problem is the disturbing existing material which would be carried by the currents to an area 100 times greater than present. The Huma-Clean system will encapsulate the material preventing it from moving and getting into the currents.

All products are safe and have been approved for food processing facilities by USDA. There are no man made enzymes, which are affected by environment. This method will also improve the water condition of the river and improve the aquatic life and vegetation for improved conditions.

HUMA-CLEAN PROPOSAL

First priority is to control the "Heart" of contamination. Based on information available to this company is the PCB is leaching from the cavities in the bedrock at the plant where the material was originally generated.

- 1. At the tunnel which has been installed would serve as 1st collection point prior to discharging into the river. An injection of H-101 would be constantly monitored for neutralizing the trimesoyl trichloride.**
- 2. In the "Hot Spots" Huma-Clean would utilize the underwater tiller and injection of the H-1012 for the in-situ remediation.**
- 3. The encapsulation of H-101 on to the sediment area, we will contain the PCB from dispersing into the flow of the river and further contamination of the area.**
- 4. This action will stimulate the natural aquatic forage, producing more oxygen and improving the environment for the wildlife as well as human exposure.**
- 5. Management feels the optimum time for treatment should be in late Spring to early Fall while the temperature is more beneficial to the bacteria.**

Our H-101 attacks all the eleven elements in the PCB Molecules by generating an anaerobic and aerobic reaction at one time. The system is similar to a "wet burn" of the atoms in the contamination. As the gases release to the surface they are converted to oxygen and the Ultra Violet Rays completely destroy any molecules in the atmosphere.

This method eliminates any future concerns, it actually stimulates the environment for the river and its life along with the wildlife's additional benefits. The surrounding area is not subjected to spills from handling the material, nor is the liquid from de-watering a concern.

The H-101 will also reduce the sediment by removing the protective barrier, which has held the contaminant, and allowing seepage into the river over the past. The cleaned sediments will disperse into the body of the river and eventually be a food source for the fish (nutritional rather than harmful. The development of aquatic forage will supply additional oxygen for the river, which creates a healthy environment for all wildlife and human benefits.

HUMA-CLEAN REMEDIATION SYSTEM RESULTS

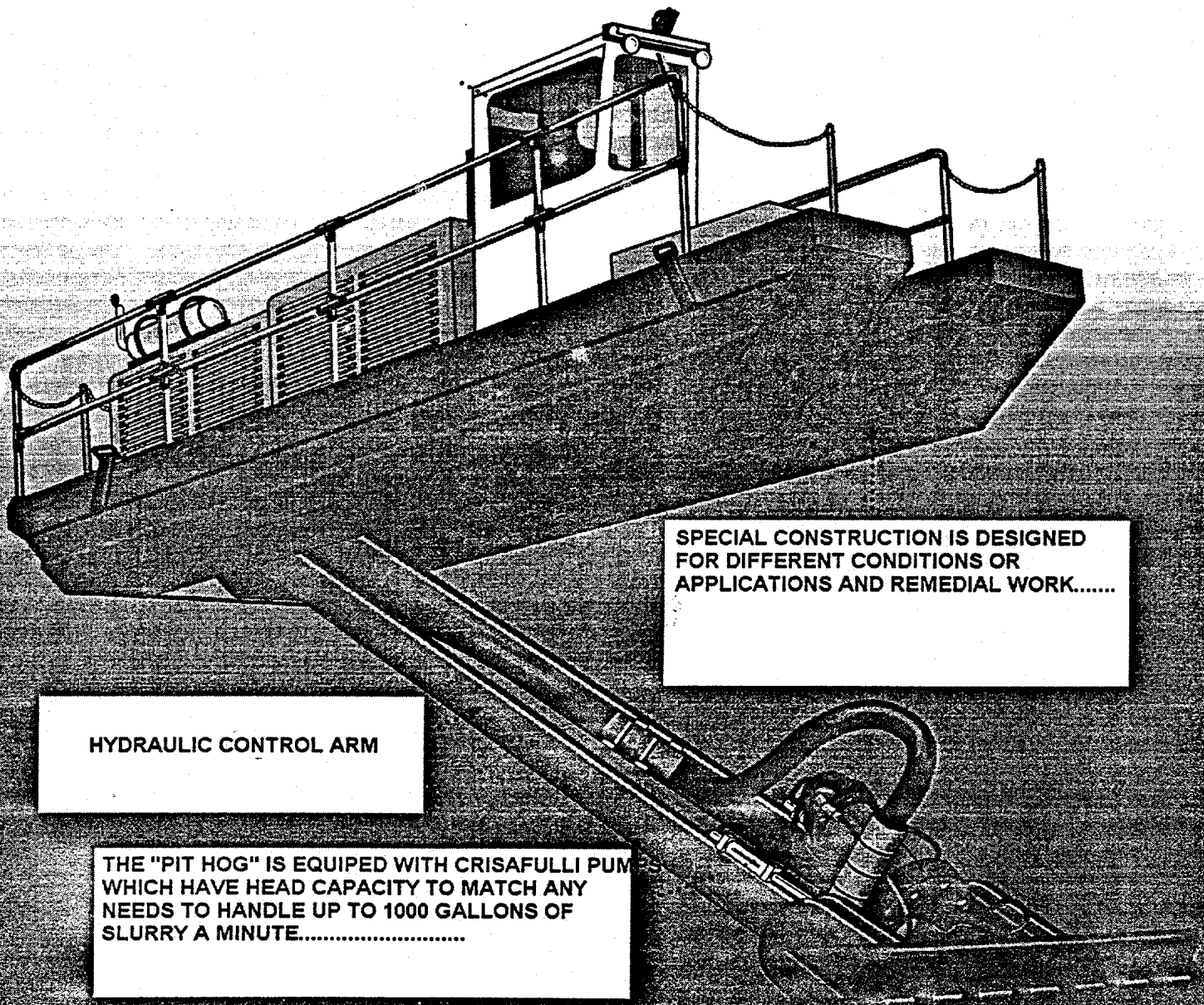
Overall Soil Treatment Process: Treatment involves site assessment to the degree of corrective action necessary for clean closure. The remediation process is completed by using H-101 natural bacteria which we refer to as "Mother Nature's Solution to a Clean Environment". These successful projects were caused by prior ownership and/or accidental spills with hazardous chemicals.

JOB IDENTIFICATION	TIME LINE	AMT./TYPE SOIL TREATED	CONTAMINANT TREATED	CONTAMINANT (avg. levels)	SUCCESS INDICATORS
El Paso, Texas SALVAGE YARD	120 days	15,000cu.yds.	Diesel	80,000ppm.	Reduced to Non-Detectable
El Paso, Texas LIVESTOCK QUARANTINE	180 days	14,000cu.yds.	Toxaphene	857,000ppm.	Cleaned to Non-Detectable
El Paso, Texas COTTON FIELD	60 days	20,000cu.yds.	Toxaphene, DDT	80ppm.	Cleaned to Non-Detectable
Houston, Texas WOOD TREATMENT	90 days	80,000gals. liquid, 1,200cu.yds.	Sulfur, Cyanide, Diesel, Ammonia	1,000mg/l. 1,650ppm.	Cleaned to below EPA and TNRCC acceptable levels
Birmingham, Alabama KOCK, CHEMICAL W/W	Maintenance	Wastewater 2mil.gal. system	Phenols, cyanide, ammonia, solids	above state limits for discharge	Got system into compliance
South Korea 25,000 HEAD HOG FARM	90 days & daily maint.	Lagoon, solid, nitrates, sodium	Nitrate, salt, manure	dormant	Got system activated and safe Odor was eliminated
Fitzgerald, Georgia 30,000 HEAD HOG FARM	15 days & daily maint.	Parlors, lagoon & irrigation system	Nitrate, salt, ammonia fly control	dormant	Increased production of feeders Eliminated nitrates and sodium
Gilbert, California GARLIC PLANT & FARM	Preventative Maint. W/W	300,000gal. system	BOD, COD, Solid		Acceptable system Utilized discharge for orchards

HUMA-CLEAN

"PIT HOG"

THE "PIT HOG" IS DESIGNED TO REACH THE BOTTOM WHILE INJECTING THE "H-101" FOR A MORE EFFICIENT REMEDIATION OF ALL CONTAMINATES.....



HYDRAULIC CONTROL ARM

SPECIAL CONSTRUCTION IS DESIGNED FOR DIFFERENT CONDITIONS OR APPLICATIONS AND REMEDIAL WORK.....

THE "PIT HOG" IS EQUIPED WITH CRISAFULLI PUMPS WHICH HAVE HEAD CAPACITY TO MATCH ANY NEEDS TO HANDLE UP TO 1000 GALLONS OF SLURRY A MINUTE.....

THE SPECIAL DESIGNED CUTTERHEAD IS DESIGNED TO HANDLE THE CONTAMINATED SEDIMENT WHICH CONTAINS THE "TOXIC WASTE".....

TYPICAL APPLICATION FOR H-101

