



Charlie Crist
Governor

Ana M. Viamonte Ros, M.D., M.P.H.
State Surgeon General

May 8, 2009

Dr. Daniel Wickham
SludgeHammer Group Ltd.
336 S. Division Road
Petoskey, MI 49770

Dear Dr. Wickham:

This letter is in response to your request to utilize the "SludgeHammer" as an alternative repair method in onsite sewage treatment systems in Florida. You provided information that this alternative repair method will include the following:

1. Installation according to your instructions by an installer certified by you of a device that you manufacture and refer to as an aerobic bacterial generator. The part of this device in contact with wastewater consists of concentric cylinders with a 12" diameter at the top; 15" diameter at bottom, and a total length of approximately 36". The installer positions this part on the bottom of the first compartment of a dual-compartment septic tank or toward the inlet side of a single-compartment septic tank. A diaphragm air pump included with the device supplies air to the center of the cylinders through a 1/2" PVC pipe installed through a riser. The air pump runs continuously.
2. Addition of the "SludgeHammer blend" bacterial additive for which the department has reviewed compliance with 381.0065(4)(m) and issued a letter of no-objection on September 19, 2008. This additive is packaged in a bag with assembly parts and inserted into the device. This package will be replaced by the installer as needed, which is expected to be yearly.
3. You distinguish between two devices: The S-46 for single family residences with up to four bedrooms and septic tanks with an effective capacity between 500 and 1,500 gallons. The S-86 for larger residences, commercial applications and septic tanks with an effective capacity between 800 and 2,500 gallons. The devices differ in labels and in the air pump supplied by you.
4. You require a maintenance contract between the owner and the installer certified by you. The maintenance contract includes twice yearly inspections by the maintenance provider. Please note that the department has no authority to enforce such a requirement.



Environmental Health is Core Public Health at your Service!
Division of Environmental Health
Bureau of Onsite Sewage Programs
4052 Bald Cypress Way, Bin #A08, Tallahassee, Florida 32399-1713

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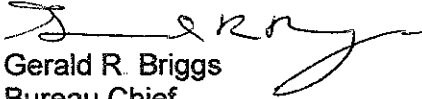
The department has no objection to the use of your product subject to the terms below:

1. No structural modifications to the existing tank or lid are allowed beyond installation of a riser.
2. Installation of your unit shall be considered an alternative repair subject to s. 64E-6.015(3), FAC. Please note that alternative repair methods cannot be used where the absorption surface of the drainfield is within six inches of the wet season water table.
3. Installation and use shall be as detailed in the Florida supplement to your installation manual dated 12/20/2008 and the installer's maintenance procedures submitted 02/11/2009. Any changes to the manual must be reviewed by the department prior to distribution in Florida.
4. The unit may be installed in all septic tank applications (new, modification, repair).

Be advised that the department is not a testing agency. This determination reflects only a review of the information submitted by you for compliance with Florida Statutes and Florida Administrative Code. The product evaluation does not investigate the validity of performance claims. The department's acceptance must not be interpreted as certifying effectiveness, endorsing or recommending use of an additive. The product cannot be advertised as "state approved". The Florida Department of Health also does not assume liability for any promise, guarantee, or expectation from purchasing or using an additive. The department reserves the right to withdraw acceptance if the product is modified to differ from what was considered in this evaluation or if the product is subsequently found to not be in compliance with the rule.

This letter of no-objection is limited to Department of Health jurisdictional circumstances as defined in Chapter 64E-6, Florida Administrative Code and Chapter 381 0065, Florida Statutes. If we may be of further assistance or should you have any additional questions regarding this letter, please contact Eberhard Roeder at (850) 245-4070.

Sincerely,


Gerald R. Briggs
Bureau Chief

GRB/er