



# FLORIDA DEPARTMENT OF Environmental Protection

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

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

August 7, 2024

Via email: [clark@imet.net](mailto:clark@imet.net)

Mr. Clark Langmack  
IMET Corporation  
P.O. Box 470812  
Cleveland, OH 44147

Dear Mr. Langmak,

This letter is in response to your request to use the BioRemediation IMET Drop-in modules as an alternative repair method when used in a vault toilet. The Department has no objection to the use of this alternative repair method. Note that this non-objection does **not** recognize any treatment effectiveness and does not allow the product to be used as an aerobic treatment unit (ATU) or as a component of a performance-based treatment system (PBTS). This non-objection is subject to the conditions below:

The proposed alternative repair method is under the scope of rule 62-6.015(3), Florida Administrative Code (F.A.C.). You provided information that this alternative repair method will include the following:

1. Installation of two aeration modules within the CXT vault toilet holding tank (70-119-V1S-C3; 70-119-V2S-C3);
2. Installation of the air pump and housing on the concrete pad behind the vault toilet as shown in the *IMET Modules Drop-in Installation Details* documents.
3. Installation of solar panels and connection of the modules with the air pump via the air hose infeed through the vent pipe.
4. Filling the vault with water to approximately 2 inches over the top of the modules within the vault tank.

### **Conditions of Use**

1. No structural modifications to the existing tank or lid are allowed. The airline of the unit must be installed through the vent stack approved in the vault toilet lid as described in the *IMET Modules Drop-in Installation Details* documents.
2. Inspection frequency is to be twice weekly.
3. Maintenance (including pump-outs) must be in accordance with the vault toilet product manual (15,000 uses).
4. Installation of the product shall be considered an alternative repair subject to rule 62-6.015(3), F.A.C.
5. Installation and use shall be as detailed in the Florida installation documentation submitted to the Department by IMET on May 8, 2024.
6. Any change to the design drawings and installation documentation must be reviewed by the department prior to distribution in Florida.
7. The unit may be installed in all system construction applications (new, modification, repair).
8. Per rule 62-6.0101, F.A.C. vault toilets can only be installed in remote locations where water and electricity are not available.

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

This letter of no objection is limited to Department of Environmental Protection jurisdictional circumstances as defined in Chapter 62-6, 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 Debby Tipton at 850-245-8629.

Mr. Langmack  
IMET Corporation-Total Water Reuse  
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Sincerely,

A handwritten signature in black ink, appearing to read "Eberhard Roeder".

Eberhard Roeder, PhD, PE, CPM  
Program Administrator  
Onsite Sewage Programs

ER/tw  
Enclosure