



Charlie Crist  
Governor

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

November 24, 2008

Mr. James L. Lapin  
Total Enviro Services, Inc.  
3003 W. 40<sup>th</sup> Street  
Orlando, FL 32839

Dear Mr. Lapin:

This letter is in response to your request to utilize the "Jaws-a Total Solution to Drain field Pollution" 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 of a device that you manufacture and refer to as an aerobic bacteria generator. This device is cylindrical with a length of approximately 30" and a diameter of 12". You propose to position this device on the bottom of generally the second, or at the discretion of the installer the first, compartment of a septic tank. Air supply to a diffuser in this device will be accomplished through tubing passing through a riser.
2. Addition of a bacterial additive manufactured by others which the Department has reviewed for compliance with 381.0065(4)(m) and issued a letter of no-objection. Specifically, at this time, you intend to use the Pro-pump additive at the manufacturer's recommended and Department-reviewed application rates.
3. You recommend but do not require a service agreement.

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. The unit must be installed through the manholes in the treatment unit.
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 installation manual submitted with your request on May 19, 2008 and the maintenance manual submitted on August 26, 2008. Any changes to the manual must be reviewed by the Department prior to distribution.
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 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,



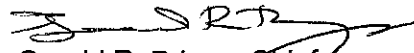
**Environmental Health is Core Public Health at your Service!**  
Division of Environmental Health  
Bureau of Onsite Sewage Programs  
4052 Bald Cypress Way, Bin #A08, Tallahassee, Florida 32399-1713

Mr. James L. Lapin  
November 24, 2008  
Page 2

guarantee, or expectation from purchasing or using an additive. The department reserves the right to withdraw acceptance if the product is modified after evaluation by the department or subsequently found not to 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, Chief  
Bureau of Onsite Sewage Programs



May 19, 2008

Mr. Gerald Briggs Chief  
Division of Environmental Health  
Bureau of Onsite Sewage Programs  
4052 Bald Cypress way, Bin #A 08  
Tallahassee, Florida 32399

RCVD MAY 27 2008 PM 1:51  
ON SITE SEWAGE PROGRAM

Dear Sir.

Please recognize this correspondence as our reply to your letter dated 03-26-2008. We wish to utilize our "Jaws-The Total Solution to Drain field Pollution" (an Aerobic Bacteria Generator), to Remediate failing or failed Drain fields in the State of Florida.

The enclosed attachments include product description, installation guidelines, and general information.

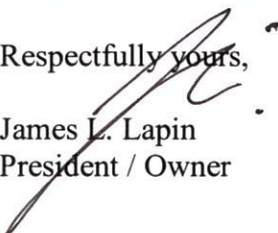
We intend to inject air via a pistons pump into a fine bubble diffuser which is housed in a "widget" which contains concentric tubes of HDPE for bacteriological contact surface area. We intend to utilize bacteriological products on the approved additive list in conjunction with the Drain Lazer product which we have entitlement.

We Request an approval including use in new, modified and repair on the Onsite Sewage Systems similar to the Pirana ABG and Infiltrator Aquaworx Remediator as soon as possible.

The installation instructions attached indicates installation to be performed identical to existing ABG's {aerobic bacteria generator. The Bacteriological products to be added will be dispensed into the septic tank itself or into the center 4" core. Tank lids will be modified only if required to support a sealed riser as do existing ABG systems. A maintenance manual will be supplied which will recommend two follow-up inspections, a six month inspection and a year end inspection. A maintenance agreement will be recommended to delineate the previously suggested maintenance parameters.

Thank you in advance for your immediate approval of this product and for an inclusion in the States approved additive listing.

Respectfully yours,

  
James L. Lapin  
President / Owner



**JAWS- “The Total Solution for Septic Pollution”**

Total Enviro Services Inc.,  
dba; Total Septic Services  
3003 West 40<sup>th</sup> Street  
Orlando, Florida 32839

**Installation Instructions**

Expose top of septic tank to obtain access and accommodate riser and unit

Plumb air flow line from unit to riser

Plumb center 4” core from unit to riser

Confirm outlet device or filter as per Health Department Requirements

Insert unit into tank

Plumb air flow line through sidewall of riser

Connect airflow line to pump assembly

Insert Bacteria component and/or drain Lazer into center 4” core- cap core

Tie-the excess rope to air tube

Connect air pump to air tube assembly

Install pump housing if required



## **-JAWS “The Total Solution for Septic Pollution”**

### **Components / Construction Details**

12” x 32” exterior housing SDR35

Perforated with 2” holes 2 rows- 4ea / per row

Top and bottom end caps 12” hope alliance plastic

8”& 6” HDPE inner core concentric pipes for Bacterial contact surface

4” SDR center core to contain Bacterial Additive and/or Drain Lazer products

10-63” fine bubble diffuser – Flex-air™

6” pvc base and plate for diffuser

½” pvc air tube apparatus

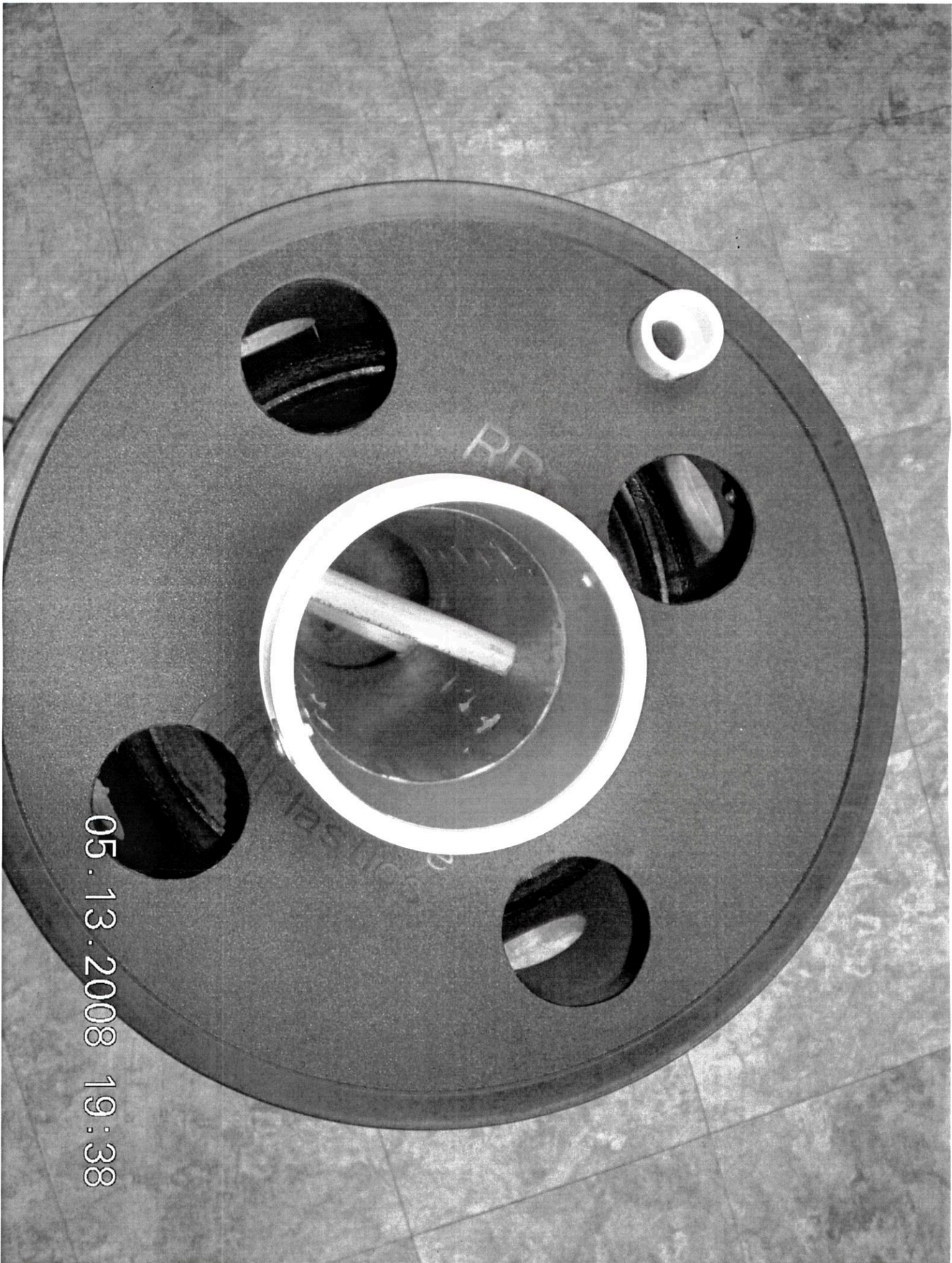
Linear hp air pump capable of max. 5 CFM

Inner core brace ½” pvc

Eyebolts & rope- inspection and removal apparatus

Bacteria Source either FBK # 58 pro pump # 2

Drain Lazer #56 on State Approved List of Additives



05.13.2008 19:38



05.13.2008 19:36



August 26, 2008

Gerald R. Briggs, Chief  
Bureau of Environmental Onsite Sewage Program  
Division of Environmental Health  
4050 Balb Cypress Way , Bin# A08  
Tallahassee, Florida 32399

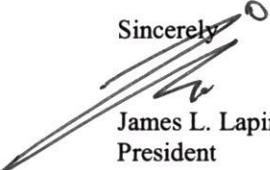
Re: Jaws- A Total Solution to Drain field Pollution

Dear Sir,

In response to your letter dated June 11, 2008 requesting for additional information, we offer the following;

1. The Flex-air pump is to be located on the exterior of the septic tank either in a protected house area or within an installed exterior container vented and protected from the weather similar to other products as approved.
2. We recommend that ABG preferably be installed in the second chamber of a dual compartment tank but reserve the right of an installer to inspect that ABG in either compartment. Our unit is 30" tall and rests on the bottom of the tank therefore the tank liquid level will generally be 10-12" above the ABG device.
3. Regardless of the number of the listing on the approved product list of products meeting chapter 381.0065FS we intend as stated previously to use an approved product in addition to our ABG and recommend the same process for other contractors. The proposed control of additive use will be as dictated by the Manufacture as approved with the application quantity and frequency as recommended by the Manufacturers. Specifically at this time, we are intending to use the ProPump additive and will use the Manufacturer's recommended dose quantity and frequency for an initial purge application as well as a maintenance rate and frequency while acknowledging the additional benefits of the ABG process. A service agreement is recommended but not required by the manufacture for the installer. The installation instructions are to indicate the specific manufacture recommendations. We remind you that the ABG would function on its own merits and the additives also function on their own merits- a merging of which is simply a additive support for either function.
4. The maintenance manual / recommendation are provided herein and are similar to the existing approved ABGS see attached. We hope this information will lead to a formal approval of our proposed ABG device. We wish it be added to the approved list as soon as possible and wish it to be considered approved for new, modification, and repair applications. Thank you for your immediate attention to this matter.

Sincerely,



James L. Lapin  
President

407 841-0400  
ENVIRONMENTAL ONSITE SEWAGE PROGRAM



## Maintenance of The Jaws/ABG System

### **ABOUT THE JAWS ABG UNIT**

THE UNIT IN THE SEPTIC TANK HAS NO MOVINGS PARTS TO WEAR OUT. THE HARD WATERIALS USED IN THE CONSTRUCTION OF THE JAWS UNIT ARE NON-REACTIVE PVC AND PLASTIC AND DO NOT DETERIORATE. THE DIFFUSER MATERIAL SHOULD LAST TWENTY {+/-} YEARS BEORE REPLACEMENT.

### **CLEANING THE JAWS ABG UNIT**

CONTINUED VIRGOROUS AGITATION OF THE EFFLUENT OVER THE JAWS UNIT INDICATES THE JAWS UNIT IS OPERATING AS DESIGNED. SHOULD THE AGITATION DRASTICALLY DIMINISH OVER TIME, IT MAY BE NECESSARY TO REMOVE CLOGGING MATERIAL FROM INSIDE THE JAWS UNIT. IT IS SIMPLE AND REQUIRES NO SPECIAL TOOLS OR SKILLS.

- 1] **IT IS IMPORTANT TO WEAR PROTECTIVE EYE WEAR, GLOVES AND CLOTHING**  
CUT THE PVC AIR SUPPLY LINE AND PULL OUT THE ABS UNIT BY THE ATTACHED ROPE. SET THE UNIT UPRIGHT NEXT TO THE RISER OPENING.
- 2] SPRAY OFF LOOSE ORGANIC MATERIAL FROM THE OUTER SURFACE OF THE ABS UNIT FOR EASIER HANDLING. USE A CONVENTIONAL WATER HOSE WITH A "JET" SPRAY NOZZEL CONNECTED TO THE LOCAL WATER SUPPLY.
- 3] LAY THE ABS UNIT ON ITS SIDE AND WASH OFF THE BOTTOM. REMOVE ALL BUT ONE OF THE SCREWS AND WASHERS FROM THE BOTTOM PLATE OF THE UNIT. SET THEM ASIDE FOR RE-ASSEMBLY.
- 4] WASH THE CLOGGING MATERIAL OUT OF THE ABS BY JET SPRAYING INTO THE CORE MATERIAL FROM THE TOP OF THE UNIT AND JET SPRAYING THROUGH THE BOTTOM OF THE UNIT. JET SPRAYING THROUGH THE EXPOSED INLET WILL CLEAN THE "MIXING CHAMBER" ABOVE THE DIFFUSER SCREW HOLES.
- 5] RE-INSTALL THE BOTTOM PLATE WITH THE SAVED SCREWS AND WASHERS.
- 6] RE-INSTALL THE UNIT, AND CONNECT THE PVC AIR SUPPLY LINE WITH A PVC COUPLING AND GLUE. REMEMBER TO RE-TIE THE ROPE TO THE AIR SUPPLY LINE FOR FUTURE REMOVAL.
- 7] RE-INSTALL THE BACTERIA / ADDITIVE
- 8] REPLACE THE RISER COVERS. MAKE CERTAIN ARE SECURE AND TAMPER PROOF.

### **LINEAR AIR PUMP**

ATTENTION: LINEAR AIR PUMPS OPERATE AT HIGH TEMPERATURES. YOU CAN BE BURNED. BEFORE HANDLING AN OPERATING LINEAR AIR PUMP, UNPLUG OR TURN OFF THE AIR PUMP AND ALLOW IT TO COOL TO A SAFE TEMPERATURE. THE SYSTEM OPERATOR WILL HAVE TO DETERMINE HOW FREQUENLY THE AIR FILTER WILL NEED CLEANING AFTER THE START UP OF THE JAWS UNIT, SCHEDULE A ROUTINE SERVICE VISIT TO EXAMINE THE FILTER UNTIL THE FILTER APPEARS TO NEED CLEANING. TO ACCESS THE FILTER, REMOVE THE BLACK KNOB ON THE TOP OF THE OUTER HOUSING AND REMOVE THE TOP COVER. THE WOVEN FILTER WILL BE EXPOSED. TO CLEAN THE FILTER, SIMPLY WASH IT OFF WITH CLEAN WATER. SHAKE VIGOROUSLY AND REPLACE.

IF POSSIBLE, PERFORM ALL INTERNAL MAINTENANCE ON THE AIR PUMPS ON A WORK BENCH IN A SHOP ENVIRONMENT.

THERE ARE NO FRICTIONAL MOVING PARTS TO WEAR OUT IN A LINEAR AIR PUMP. THE ONLY MOVING PARTS WITHIN THE LINEAR AIR PUMP ARE THE MAGNET CARRIER AND THE DIAPHRAGMS ATTACHED BY A SMALL BOLT AND NUT AT EACH END OF THE MAGNET CARRIER.

### **AIR COOLING FANS**

A GENERAL LOOK AT THE FANS IS ALL THAT IS NEEDED. SHOULD THEY CEASE OPERATION, CONTACT THE MANUFACTURE FOR INFORMATION ON REPLACEMENTS.

APPROVED BACTERIA ADDITIVES ARE TO BE UTILIZED AS PER MANUFACTURERS RECOMMENDATION.