



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

May 26, 2005

Mr. Robert W. Teets, Vice President
Environmental Affairs and Risk Management
Cooper Industries
Post Office Box 4446
Houston, Texas 77210

Mr. Luis Del Valle
Global Marketing Manager
Cargill Industrial Oils and Lubricants
Post Office Box 5700, MS 66
Minneapolis, Minnesota 55440-5700

RECEIVED

MAY 31 2005

R. W. TEETS

Dear Mr. Teets and Mr. Del Valle:

Thank you for your March 11 letter regarding reporting requirements in the event of a release of Cooper Envirotemp® FR3™ to the environment. Based on the information provided with your letter and via the Cooper Industries web site, we concur that there are no current Florida Department of Environmental Protection reporting requirements applicable to such a release of unaltered, uncontaminated FR3 fluid.

You also mentioned in your letter that you will advise users of the product to take precautions to avoid releases to the environment and to clean up any discharges. We support those principles and emphasize that any discharge, especially of used FR3 fluid that may have become altered or contaminated through use or by contact with a transformer that previously contained PCBs, should be evaluated to determine whether cleanup pursuant to Department rules is necessary.

Please contact Doug Jones, Chief of the Bureau of Waste Cleanup at 850/245-8927 if you have any questions.

Sincerely,

Mary Jean Yon, Director
Division of Waste Management

MJY/dj
cc: Tom Maurer
Doug Jones

"More Protection, Less Process"

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