9140000 STABILIZATION MATERIALS COMMENTS FROM INTERNAL/INDUSTRY REVIEW Larry Jones Larry.Jones@dot.state.fl.us

Comment: (9-18-13)

It looks like the text could be misinterpreted to allow FFCPs deeper than 3 feet below the DHGWT, therefore, the following revision is recommended (highlighted text):

FFCPs may be used provided they meet the requirements of 403.7047, F.S., are not used outside the paved area or within and are not less than 3 feet of above the design high groundwater table. All materials for stabilizing must meet all applicable air or water quality standards or criteria in Florida Department of Environmental Protection (FDEP) rules.

Response: Agree, the change will be incorporated in the language.

Powell, Jr., Rudy

Comment: (9-23-13) Why are the last 3 sentences being deleted?

Response: Replaced by "All materials for stabilizing must meet all applicable air or water quality standards or criteria in Florida Department of Environmental Protection (FDEP) rules."[dt1]

Comment: (10-3-13)

The proposed revision mentions the use of Fossil Fuel Combustion Products, but does not define specific materials. Being from Michigan originally we used quite a bit of coal blast furnace slag as aggregate in concrete and occasionally in roadways. Are FFCP's similar to this? I would assume that these would be locally available materials as it would not be practical to rail from another state a material specific for stabilizing. Understanding that it may not be practical to specifically note materials, it would be helpful to contractors if the revision also mentioned "FFCP's from xxxx" That way a contractor could call the local "xxxx" and inquire as to the availability of the material. Without being proprietary, I think there needs to be something that describes exactly what a FFCP is.

Response:

Steven Buck, EI steven.buck@dot.state.fl.us

Comment: (10-8-13)

1) After talking with a few of our environmentalist in the office we were thinking we could limit the use of the material around coastal waters. I realize the spec states that FDEP rules must be met, but keeping this material away from coastal waters would be the safest option.

Response:

2) Also, on RRR projects, the water table is rarely obtained. I realize it is the Contractor's responsibility to ensure the 3' minimum is met however, he/she will be working with limited information. I believe consideration should be given on RRR project or projects where the design water table is not established in the plans.

Response:

Shailesh Patel 386-943-5347 shailesh.patel@dot.state.fl.us

Comment: (1-22-13)

Section 914-2.2, Local Materials

With so much limitations on the use of Fossil Fuel Combustion Products (FFCPs) based on Florida Statute 403.7047 and FDEP, why are we even considering this product given the statute's cautions?

Some points from Florida Statute 403.7047

- The fossil fuel combustion product is not placed within 3 feet of groundwater or 15 feet of wetlands or natural water bodies, or within 100 feet of a potable well that is being used or might be used for human or livestock water consumption;
- Placement of the structure or pavement must be completed as soon as practicable after placement of the fossil fuel combustion product;
- The fossil fuel combustion product is not placed so that such product, or any constituent thereof, may enter other lands or be <u>emitted into the air</u> or <u>discharged into</u> <u>any waters</u>, including groundwater's, or otherwise enter the environment in a manner that causes a significant <u>threat to public health</u> or contamination in excess of applicable department standards and criteria; and
- Moreover, if we have an existing roadway for reconstruction and FFCP was incorporated in the roadway stabilization, special consideration will now have to be given for disposal.

Response: