9140000 STABILIZATION MATERIALS COMMENTS FROM INTERNAL/INDUSTRY REVIEW

Larry Jones
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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: The first sentence in the second paragraph of 914-2.2 was changed to: "FFCPs may be used provided they meet the requirements of 403.7047, F.S., are used under the paved area, and are a minimum of 3 feet above the design high groundwater table."

Powell, Jr., Rudy

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

Response: The last 3 sentences were replaced by the new language to be consistent with 403.7047, F.S. No Change Made.

Neil Monkman neil.monkman@wrightg.com

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: FFCP's are defined by 403.7047, F.S. No change made.

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: 403.7047, F.S. is responsible for limiting use of FFCP's Language will be added to Section 160 requiring a specialty engineer to sign and seal that any usage of FFCPs will meet the requirements of 403.7047F.S". Spec change to Section160 has been started. Change Made.

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: See above.

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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 emitted into the air or discharged into
 any waters, including groundwater's, or otherwise enter the environment in a manner
 that causes a significant threat to public health 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:

The Department's objective is to create additional specifications for recycled resources and to remove restrictions that may prevent the use of these materials in existing specifications. 403.7047 F.S. is the document that defines placement of this material. No Change Made.
