Response To Comments Received From Industry Review

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Lowell Barden

File: 1040600 - Prevention, Control and Abatement of Erosion and Water Pollution
Username: Lowell Barden
UserEmail: LBarden55@cs.com
UserTel: 863-669-9631
UserFAX: 863-669-9632
Date: Monday, January 30, 2006
Time: 11:31:50 AM

Comments:

Being the first erosion control company in the state to use the synthetic hay bales (2000) we found that the synthetic bales do what they are designed to do, are easy to install, and fairly easy to rotate once they become saturated with silt. We also found that the bales were somewhat expensive to purchase and required a substantial area in which to store them when they were not being used. The unused bales had to be stored in a dry environment or allowed to dry prior to being loaded for use on a project. The cleaning of the bales after use on a project was fairly simple with the exception of an area in which to store them while cleaning and again, a place to allow the bales to dry prior to being stored until their next use.

Response:
The same issues for storing bales can be made for “natural bales”. Another issue with “natural bales” are the weather issues that determine the availability of the amount of “natural” hay on the market, versus synthetic bales that are made in a facility.

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Missy Hollis

File: 1040600 - Prevention, Control and Abatement of Erosion and Water Pollution
Username: Missy Hollis
UserEmail: Melissa.Hollis@dot.state.fl.us
Date: Monday, January 30, 2006
Time: 09:06:38 AM

Comments:

Please contact me so that we can coordinate blocking the old pay item and opening the new item. Implementation date set at meeting with David O'Hagen: JANUARY 07 letting.

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Bob Schafer

File: 1040600 - Prevention, Control and Abatement of Erosion and Water Pollution
Username: Bob Schafer
UserEmail: bschafer@rangerconstruction.com
UserTel: 772-464-6460
UserFAX: 722-466-9559
Date: Monday, January 30, 2006
Time: 04:50:56 PM

Comments:

The proposed Pay Item is "per each". From the literature I've seen, Synthetic or Geo-Bales come in several different sizes (lengths, diameters and shapes). Is this unit of pay the most accurate? Maybe a "per linear foot" unit would be more appropriate.

Response:
Yes, they do come in different lengths. Need to discuss…..
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Jo Moore

COMMENTS:
104-6.4.4 Temp Mulch: Straw / hay can be tacked with liquid "tackifiers" instead of being "cut into the soil" as a means of securing product.

104-6.4.9 Synthetic Bales: No consideration is provided for alternative products such as wood fiber tubes by Profile Products (Terra Tubes) or straw wattles (by several vendors) which can also be used in lieu of hay bales to achieve filtration in channels or swales – or around inlets. Terra tubes also include a generic polyacrylimide that provides for treatment to drop turbidity out of the water. See www.profileproducts.com or www.terratubes.com . www.ultratech.com has straw wattles.

Submitted by: Jo Moore, Environmental Director, Ranger Construction Industries, Inc.
Phone #: 772-464-6460

Response:
The department is currently overhauling all policy and procedure involving Sediment and Erosion Control, including new BMP's or QPL items. Many of the type of items mentioned above will be added or tested. It is worth noting, that a Polyacrylamide (PAM) spec will require a certain type of PAM, a toxicity test and that each PAM product have specific soil-site requirements.
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Maria Tegeler

File: 1040600 - Prevention, Control and Abatement of Erosion and Water Pollution

Username: Maria Tegeler
UserEmail: mtegeler@nagreen.com
UserTel: 800-772-2040
UserFAX: 812-867-0247
Date: Wednesday, February 15, 2006
Time: 10:45:41 AM

Comments:

Removing hay and straw bales from section 104 and limiting this section to only synthetic bales, the State of Florida is removing the option of choosing an organic form of sediment control. We agree that traditional straw and hay bales are not adequate forms of sediment control because they do not filter runoff and act more as a barrier than a filtration system. Although there are many economical sediment control BMP's that incorporate straw and hay in their sediment control structures and by the phrasing of synthetic bales limits a wide range of readily available organic sediment filtration systems.

The removal of hay and straw organic materials diminishes a category of products such as: straw and hay wattles, sediment logs, and rolled straw sediment filtration systems. Many of these products are equivalent to synthetic bales and often provide outstanding characteristics that prove to be better in many project applications. The future trend of the industry is to utilize more fiber rolls to replace traditional synthetic practices. We ask that possible future changes to Section 104 eliminate only straw and hay bales, but do not eliminate organic materials incorporated into sediment control BMP's.

Response:
The intent of this spec change is to remove "natural hay bales" from use on department projects for the reasons on performance listed above, and to stop the spread of noxious weeds on our roadsides. Not remove products that are made of organic materials.
In the upcoming revisions to the department policy and procedure involving Sediment and Erosion Control, many or the methods mentioned above will be included in some form or another as acceptable BMP"s. It is worth noting, as of right now in the current specs, none of the above mentioned BMP's are listed as acceptable to use.
**** It is very important to note******* The department is removing "natural hay bales" from the Sediment and Erosion Control BMP "toolbox", if you will. It so happens that there is a synthetic hay bale on the QPL that could be used instead under virtually the same applications.
***But, this change is not as simple as removing Product #1, to be replaced with Product #2. Example: We are not saying stop using steel pipe and only use PVC pipe.
This change is based on the design technique that there needs to typically be many BMP's used together to accomplish effective sediment and erosion control on a job site. Now, one of the old BMP's (natural hay bales), is no longer an available tool in the box.

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Jennifer Taylor

File: 1040600 - Prevention, Control and Abatement of Erosion and Water Pollution
Username: Jennifer Taylor
UserEmail: jennifer.taylor@dot.state.fl.us
Date: Tuesday, February 14, 2006
Time: 01:26:49 PM

Comments:

104-6.4.4 Add removal of the "temporary mulch materials" as an acceptable method in conjunction with the ground prep. in the last sentence.

1. I understand synthetic hay bales are manufactured from recycled carpet. Please confirm the market supply of synthetic hay bales is sufficient to meet the demand of FDOT construction projects and that there will not be any additional consumption of petroleum.

2. Please identify the Water Quality Section of the Design Standards as the 'Erosion Control and Water Quality' section.

Response:
The manufacturer has indicated that there will be plenty of product.
The bales are made from post-consumer product as well as scrap carpet from the carpet manufacturing plant that would ordinarily be disposed of in a landfill.
As far as petroleum consumption, how about the reduction in the amount of diesel used to harvest, fertilize and deliver “natural hay”.
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