

**9010102-DELETERIOUS SUBSTANCES
COMMENTS FROM INDUSTRY REVIEW**

FTBA Bob Burleson
(Internal Review comment)

Comments:

Have they thought about looking at Florida Limestone for the same consideration?

What is considered a granitic source? 100% granite? 50% granite? What about Gneiss? Are fines generated by production of granitic aggregate superior to fines generated by processing non-granitic material? This specification will allow some producers to unfairly increase their -#200 at the point of production effectively increasing the -#200 at the point of use. The current specifications for source and point of use were probably developed at a time when most aggregate materials were shipped directly from the source to the point of use. In the current atmosphere of importation of aggregates from outside the state and movement of aggregate from areas of competent aggregate to the point of use more aggregate are being moved through a terminal. The current requirements of the Construction Aggregate Manual require that the terminal maintain the same specification for -#200 as the source (1.75% max). This requires the source to produce aggregate well below the 1.75% specification. Our experience indicates 1.00% or less at the source to keep the terminal comfortably within the required 95 percent within specification (PWS) of 1.75%. This unnecessarily increases the amount of fines retained at the source as a waste product and decreases the amount of material processed through a given system in a given time. Assuming there are no granitic sources in Florida, this specification change unfairly penalizes native limestone sources.

A more equitable proposal for all producers would be to maintain the current specification for source and point of use 1.75% & 3.75% respectively and introduce a specification somewhere between the two (say 2.5%) for terminals to allow for breakdown during additional handling. Looking at data between one native Florida limestone source and terminal the -#200 test data year to date exhibit a sample size of 38 and 71, variance of 0.23 and 0.17, and mean of .83 and 1.29 respectively. Given this data one might expect a difference of -#200 from source to terminal of between 0.3 and 0.6. In fact the difference in this case is 0.46. Let's assume the source-produced material at the specification limit of 1.75% (this is highly unlikely for a source with continual approval because of the requirement of 95 PWS). The expected range of difference at the terminal would be 2.05 to 2.35. Well below the point of use 3.75%.

In the absence of data for point of use, let's assume the same expected range of variability between the terminal and point of use. The range of expected values for -#200 at the point of use would then be 2.65 to 2.95. Again well below the point of use specification of 3.75%. And this is native Florida limestone aggregate. This is one non-statistical persons attempt at analyzing the data however we could use Departments expertise to analyze existing producer, terminal and department data to develop this specification. Industry would be glad to assist in this effort.

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Comments:

I don't agree with this change. I don't think this will be beneficial to the F.D.O.T.

Jim Farmer
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Comments:

I think the source/terminal requirements should be separated so that we have the existing 1.75% at the source and an intermediate requirement at the terminal of 2.5%. The 3.75% point of use should stay the same.

I believe this would take care of the issue with granatic materials coming into the state through the terminals. It would also give the in-state producers a little relief and a fair playing field as well. We currently have to produce limestone material well below the 1.75% in order to ensure that it is still below that upon arrival at the terminal. By changing the granatic source requirement to 2.5%, you have given them an advantage over the native limestone materials.

If the DOT is not inclined to come up with an intermediate spec for the terminal, I disagree with the increased source limit for a ganatic or other type of non-native material.