

## RESPONSE TO 9010102 INDUSTRY REVIEW COMMENTS

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**FTBA Bob Burlison**  
(Internal Review comment)

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

**Response:** Yes. We are open to looking at an analysis of degradation from Miami to terminals.

**Comment:** What is considered a granitic source? 100% granite? 50% granite? What about Gneiss?

**Response:** In keeping with standard US Bureau of Geology definitions, the major component of the material would be greater than 50%. Metamorphosed igneous rocks, like Gneiss whose parent rock is Granite would be considered granitic.

**Comment:** Are fines generated by production of granitic aggregate superior to fines generated by processing non-granitic material?

**Response:** No. The specification looks at the propensity of the parent rock to generate additional fines in transit to a point of use.

**Comment:** 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.

**Response:** We will be happy to look at existing limestone data for future changes. This current effort was in response to Asphalt Contractor requests, and the Department has issued a joint Materials Bulletin 07/06, Construction Memorandum 17-06 in response. (see <http://www.dot.state.fl.us/statematerialsoffice/administration/resources/library/materialsbulletins/topics/2006/mb07-06.pdf> ) The specification change is necessary to carry out the procedural change initiated in the joint memo.

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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.

**Response:** The intent of the specification is to ensure that construction aggregates for plant mix production, that will meet the point-of-use specification 95% of the time, does not get penalized at the aggregate source. The 1.75% maximum minus 200 was derived for Florida Limestone material. Granite does not have as much breakdown as Limestone.

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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.

**Response:** The Department is willing to come up with an intermediate spec for the terminal after a study of the data. An additional step that must be taken is that Hot-Mix Asphalt (HMA) Contractors will have to specify the Terminal source in the mix design when requesting approval. This is not always done now. A mix with a Miami mine source that shows the minus

200 at say 0.6, should not be used for a HMA plant in Jacksonville that received the aggregate from a Redistribution Terminal in Jacksonville, where the minus 200 is say 1.2, or double that of the mine in Miami. The HMA Contractors will have to become familiar with the distinctions of mine and terminal and designate them accordingly on the mix designs.