



PASCO COUNTY, FLORIDA

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August 14, 2014

Mr. John Coates, P.E.
Deputy Program Administrator
Division of Waste Management
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Request for Approval of Standing Beneficial Use Encapsulated Bottom Ash Generated by the Pasco County Resource Recovery Facility

Dear Mr. Coates:

Pasco County has been examining the recycling of bottom ash from the Pasco County Resource Recovery Facility for road construction applications. We have been working with the University of Florida to develop the appropriate processes to implement our recycling objectives and the necessary data to support that these activities can be conducted in a manner that is safe for human health and the environment. This past year we constructed several on-site road segments using bottom ash as a construction material (under a Department-approved permit) and these roads are actively being utilized for heavy truck traffic. Through this experience the County has developed construction specifications and management practices to recycle our bottom ash, and the research has produced a large amount of environmental testing data. Pasco County appreciates the Department's participation and guidance throughout this project.

As discussed with you and other representatives of the Department, Pasco County, Florida desires to continue their recycling efforts and to beneficially utilize bottom ash generated by the Pasco County Resource Recovery Facility in county-wide road construction projects. Section 403.7045(5) of the Florida Statutes authorizes the Department to allow beneficial reuse of ash residue when an applicant demonstrates that "no significant threat to public health will result and that applicable Department standards and criteria will not be violated." At our request, the University of Florida has prepared a technical report entitled "Pasco County Use Case Scenarios to Examine the Recycling of Waste to Energy Bottom Ash in Road Construction Applications" using data from the existing research work and

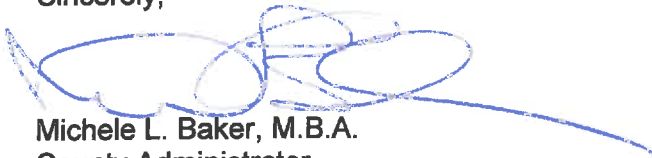
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additional engineering analysis and modeling. This document is attached here for your review. This report presents the results of their assessment on the suitability of utilizing waste-to-energy bottom ash as a road construction material in Pasco County. The document demonstrates that properly managed bottom ash utilized in the manner(s) described presents minimal risk to human health and the environment, and is consistent with the Department's goals of maximizing recycling and minimizing waste disposal.

By way of submittal of the attached document, Pasco County, Florida formally requests standing Departmental authorization to utilize bottom ash as: 1) an aggregate in hot-mix asphalt; 2) an aggregate in Portland-cement concrete; and, 3) as a road base course. The County is committed to adhering to the standards and techniques utilized in the construction of the demonstration road segments (as summarized in the attached report); adhering to construction, processing, and location constraints identified in the UF report; and limiting use of the bottom ash to Pasco County Road and Bridge projects (or those projects under the direct supervision of the Pasco County Road and Bridge Department).

Thank you for your consideration of this request. We look forward to implementing this important project and continuing to work with the Florida Department of Environmental Protection to identify ways of maximizing recycling in Pasco County.

Sincerely,



Michele L. Baker, M.B.A.
County Administrator

Attachment


MLB/BEK/JPP/utadmin/recyclingofbottomash_ltr

cc: The Honorable Senator Wilton Simpson, Post Office Box 787, New Port Richey, FL 34656
Timothy G. Townsend, Ph.D., University of Florida, 333 New Energy Building, Post Office
Box 116450, Gainesville, FL 32611-6450
Bruce E. Kennedy, P.E., Assistant County Administrator (Utilities Services)
John J. Power, Solid Waste Director