



# FLORIDA DEPARTMENT OF Environmental Protection

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Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

August 23, 2019

Transmitted via E-Mail only to: [jroessler@pascocountyfl.net](mailto:jroessler@pascocountyfl.net)

Pasco County Utilities Solid Waste & Resource Recovery Department  
14230 Hays Road  
Spring Hill, Florida 34610

Attn: Mr. Justin Roessler, PhD., P.E., Assistant Solid Waste Director

RE: Beneficial Use Request to Conduct A Pilot Test of WTE Bottom Ash as a Kiln Feed Ingredient  
Pasco County Resource Recovery Facility  
Facility ID No. 45799, COC PA 87-23D

Dear Mr. Roessler:

This is in response to your request on August 2, 2019, concerning conducting a pilot test of 500 tons of waste-to-energy (WTE) bottom ash to explore its use as a kiln feed ingredient in cement production. The following items were indicated in your request:

- a. Approximately 500 tons of WTE bottom ash from the Pasco County Resource Recovery Facility is being stockpiled and aged at the existing ash monofill at the Pasco County Resource Recovery Facility.
- b. Once sufficiently weathered, the WTE ash will be transported to the Argos cement manufacturing facility located at 4000 County Rd 235, Newberry, Alachua County, Florida. At the Argos site, it will be stored in a covered storage area before being incorporated as a raw ingredient in cement production.
- c. The pilot test will involve incorporating multiple replacement percentages of WTE ash, with a maximum of approximately 8% by mass of traditional materials. The pilot test is expected to last an entire day, and it may extend into a second day.
- d. Care will be taken to minimize the amount of time between the delivery of the WTE ash to Argos and its incorporation into cement production. Representatives from Argos have also been in contact with the Department's Air Permitting Division to notify them of this trial.

Section 403.7045(5), Florida Statutes (F.S.) specifies the following:

Ash residue generated by a solid waste management facility from the burning of solid waste must be disposed of in a properly designed solid waste disposal area that complies with standards developed by the department for the disposal of such ash residue. The department shall work with solid waste management facilities that burn solid waste to identify and develop methods for recycling and reuse of ash residue or treated ash residue, and the department may allow such recycling or reuse by an applicant who demonstrates that no significant threat to public health will result and that applicable department standards and criteria will not be violated.

Based on review of the information submitted, the Department has determined that the proposed beneficial use request concerning conducting a pilot test of 500 tons of WTE bottom ash to explore its use as a kiln feed ingredient in cement production meets the criteria specified in Section 403.7045(5), F.S.

As a result, the Department has no objections to the beneficial use request submitted on August 2, 2019, concerning conducting a pilot test of 500 tons of WTE bottom ash to explore its use as a kiln feed ingredient in cement production.

Please be aware that neither this letter nor the statutory exemption releases any person from liability for causing pollution or violating any other state or federal regulations or local ordinances. If you have any questions, please contact Cory Dilmore at (850) 245-8712.

Sincerely,



Tim J. Bahr, P.G., Director  
Division of Waste Management

Copies furnished to:

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