



To: Tom Atkins, MDT Specifications Bureau
From: Cary Hegreberg, MCA Executive Director
RE: June specification comment period

Below are specific comments on the proposed specs:

701.02.4 Crushed Base course Type “A” increase fracture to 50%.

Contractor 1 states: The proposed increase in fracture would eliminate some gravel pits and reduce the life of other gravel sources by causing Contractors to reject a significant portion of the material in the pit when making base gravel. For pits in Western Montana, Contractors do not currently reject any material when producing CBC. We suspect this change is proposed because the MDT suspects that lower fracture in the base gravel may lead to making it a little more difficult to compact the first lift of plant mix. We maintain that whether or not these suspicions are correct, there is no evidence that compaction difficulty on first lift is detrimental to the life or performance of the road. The proposed changes would increase costs and cause faster depletion of the available gravel resources with little or no tangible benefits.

Contractor 2 states: This is a substantial increase from the old spec of 25 or 35%, depending on Grade. In many pits, this will substantially increase the costs of product; this is especially true in areas with smaller pit run. In order to get fracture that high, some pits will require rejecting up to 50 or 75% of the material in order to “harvest” enough large rock to process (crush) for the fracture. Gravel is a finite resource. The costs of locating, developing, permitting and reclaiming these sites are getting tougher under current regulations and the contest of environmental advocacy groups. Pits will be depleted quicker, costs of royalties to landowners will increase substantially, and costs of handling and wasting all the reject material will have to be passed on to the end user. Reject fines will have to be spread back on pit floors or wasted in some other manner. Every time material is picked up and moved, costs are incurred. Rejecting 50 % of a pit means it has to be handled once to put it through the screens and again to stockpile. That large of a reject percentage will usually require a machine just to stockpile off the belt. It will then be handled again to spread it on the pit floor prior to reclamation. Overall costs of the finished product will increase dramatically and our resources will be depleted that much sooner.

Contractor 3 states: The proposed increase of fracture would be very detrimental to our gravel pits, especially in eastern Montana. MDT's assumption is that higher fracture in base course will help the first lift of plant mix adhere to the base surface and improve compaction. [Contractor] does approximately 6-8 projects a year and about 50% of these projects have base gravel that has 60-70% fracture in the CAC because of the nature of the gravel resource. The other 50% of projects have about 25-35% fracture. We see absolutely no difference in laying the first lift of plant mix if the base gravel contains a higher or lower percentage of fracture. This is an unnecessary costly expense and a waste of our natural resources.

701.02.7 Crushed Top Surfacing Type B:

Contractor 1 states: Our concerns are the same as above with the additional objection that it may not be possible to meet the PI requirement. Rejecting natural fines and achieving higher fracture tends to produce more crushed fines which in turn reduce the PI test result in the material. We would be working against ourselves with regard to achieving the desired PI result in the material.

Contractor 2 states: The proposed changes will eliminate most pits from the ability to produce this material. First, as in our comments above, increasing fracture from 20% to 50% will have the same impacts as stated there. Increasing the PI spec range and increasing the fracture spec contradict the mechanics of crushing. Crushing to produce fracture increases the amount of crushed fines that are produced. More crushed fines, less PI. In order to achieve all the desired spec changes that are proposed, material will have to be prescreened with a high percentage of reject. Material that is crushed will have to be separated into piles by sizing and then re-blended together with bin splits to produce the desired final product. In order to hit the PI required, bentonite will often have to be imported and blended in. This will become a highly specialized product, limited in geographic areas, and very expensive to produce. In some cases, it will require too much equipment to produce locally and will have to be hauled long distances from the locations that can produce it. Some crusher subs have already said they will not bid this item in the future. We urge the department to reconsider [both of] the proposed changes.

Concerning Both of the Specifications:

Contractor 4 states:

I cannot express it any better than Contractor 1 and Contractor 2. I am in total agreement with them and Contractor 3, from our previous conversations.