

**From:** [Morgan, Steve](#)  
**To:** [Ramirez, Javier](#)  
**Subject:** Fw: 307\_17\_24 CEMEX Brooksville RAI for Tire Processing Renewal Application  
**Date:** Tuesday, January 09, 2018 6:17:53 AM  
**Attachments:** [307\\_17\\_24\\_RAIResponse\\_2018\\_01\\_08\\_Final.pdf](#)

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**From:** Tammy Reed <[treed@kooglerassociates.com](mailto:treed@kooglerassociates.com)>  
**Sent:** Monday, January 8, 2018 3:05 PM  
**To:** Morgan, Steve  
**Cc:** Brent C Steele ([brentc.steele@cemex.com](mailto:brentc.steele@cemex.com)); Dr. Max Lee; Robin G Simons ([robing.simons@cemex.com](mailto:robing.simons@cemex.com))  
**Subject:** 307\_17\_24 CEMEX Brooksville RAI for Tire Processing Renewal Application

Steve,

Please find attached the response to the RAI dated October 13, 2017 for CEMEX Brooksville South, DEP Application No. 22787-005-WT/02. If you have any questions, or require any further information, please contact me.

Thank you,  
Tammy



Tammy Reed, Environmental Scientist II  
***Koogler and Associates, Inc.***  
[www.kooglerassociates.com](http://www.kooglerassociates.com)

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[Koogler & Associates, Inc.](http://www.kooglerassociates.com)

[www.kooglerassociates.com](http://www.kooglerassociates.com)

At Koogler & Associates we enjoy working with clients to maintain a positive relationship with regulatory agencies through our environmental services.

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Mail: PO Box 5127 |Gainesville, FL 32627-5127  
Physical: 4014 NW 13<sup>th</sup> Street |Gainesville, FL 32609  
Office: 352 377 5822 x27 |Direct: 352 792 1104

Fax: 352 377 7158 | Mobile: 352 339 0448  
[treed@kooglerassociates.com](mailto:treed@kooglerassociates.com)

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9675 Range Line Road  
Port Saint Lucie, FL 34987  
Ph (772) 465-0477  
Fax (772) 489-2124

January 8, 2018

Mr. Brent Steele  
Environmental Manager  
Cemex  
10311 Cement Plant Road  
Brooksville, FL 34601

Subject: Site Closure

Dear Mr. Steele,

As I indicated, Liberty Tire Recycling is prepared to load, transport, process and dispose of up to 300 tons in the event of site closure. This proposal pertains to whole passenger tires but does not cover truck or off road tires (forklift, tractor, loader, grader etc.).

- The cost to load, transport, process and dispose would be One Hundred twenty five dollars per ton. Please note that this proposal covers the entire cost of handling the subject tires. This proposal covers the cost of disposal from either of Cemex's Brooksville cement kilns.

If you have any further questions or need any additional information please let me know.

Sincerely,

A handwritten signature in blue ink that reads "Phil Tuohy". The signature is written in a cursive, flowing style.

Phil Tuohy  
Region Manager - FL

Cell (863) 860-2436



KOOGLER & ASSOCIATES, INC.  
4014 NORTH WEST 13<sup>th</sup> STREET  
GAINESVILLE, FL 32609-1923  
[www.kooglerassociates.com](http://www.kooglerassociates.com)

ATTACHMENT C

307-17-24  
September 29, 2017

**CEMEX Construction Materials of Florida, LLC  
Brooksville South Cement Plant – Waste Tire Processing Facility  
FDEP Permit No. 22787-003-WT/02  
Revised Closing Cost Estimate  
September 2017**

*Note: Rule 62-711.700(2) and (3) was repealed on February 16, 2012. Therefore this section addresses the required closing cost estimates and financial assurance as required by the applicable sections of the current Rule 62-711.500(3).*

The purpose of this submittal is to fulfill the requirements of Rule 62-711.500(3) F.A.C., to provide a re-estimate of the annual closing costs for waste tires for permit renewal. Koogler and Associates, Inc. is providing this revised closing cost estimate for the cost to remove, process, and dispose of the maximum amount of waste tires that is permitted to be stored at the facility at any time.

**ESTIMATED CLOSING COSTS:**

**Waste Tire Disposal**

The estimated cost to remove, process, and dispose of the maximum permitted amount of waste tires stored at the facility at any time (30,000 tires/300 tons) is as follows:

**300 tons @ \$125/ton = \$37,500**

This cost estimate is backed by a third party cost estimate from Liberty Tire Recycling, dated January 23, 2017 (attached).

**Professional Engineer Certification**

Signature

Date

Maxwell R. Lee, Ph.D., P.E.  
Koogler and Associates, Inc.

4014 NW 13<sup>th</sup> Street  
Gainesville, FL 32609

352-377-5822

Seal: STATE OF  
FLORIDA  
No. 58091

PROFESSIONAL ENGINEER



February 3, 2017

Electronic Submittal

Ms. Melissa Madden  
Environmental Specialist  
Solid Waste  
Florida Department of Environmental Protection  
Southwest District Office  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637

Re: CEMEX Construction Materials Florida, LLC – Brooksville **South** Cement Plant  
Waste Tire Processing Facility, **2017** Financial Assurance Cost Estimate  
FDEP Permit No. 22787-003-WT/02, Site Certification PSA 82-17

Dear Ms. Madden:

The above referenced facility has experienced no changes the management of waste tires and is operating in compliance with the permit requirements. The maximum quantity of tires allowed to be stored on site is 300 tons. The anticipated disposal cost for the maximum storage quantity is calculated as follows:

**2016 Disposal Cost Estimate = \$35,211.47**  
**FDEP Inflation Multiplier 2017 = 1.009**  
**2017 Disposal Cost Estimate (1.009 x \$35,211.47) = \$35,528.37**  
**Current Bond Amount - \$58,440.00, Travelers Bond No. 105316798**

Should you have any questions and/or comments or require additional information, please contact me at 352-799-7881, ext. 109, or [brentc.steele@cemex.com](mailto:brentc.steele@cemex.com).

Respectfully,

A handwritten signature in black ink, appearing to read "Brent Steele".

Brent Steele  
Environmental Manager

pc: Alberto Calleros, Plant Manager

**Brooksville South Plant**

10311 Cement Plant Rd, Brooksville, FL 34601, (352) 799-7881, (352) 799-6088



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(28), F.A.C.

Form Title: Closure Cost Estimating Form  
For Solid Waste Facilities

Effective Date: January 6, 2010

Incorporated in Rule 62-701.630(3), F.A.C.

## CLOSURE COST ESTIMATING FORM FOR SOLID WASTE FACILITIES

Date of DEP Approval: \_\_\_\_\_

### I. GENERAL INFORMATION:

Facility Name: CEMEX Brooksville South Cement Tire Processing Facility WACS ID: 40778

Permit Application or Consent Order No.: Renewal of 22787-003-WT/02 Expiration Date: 12/03/2017

Facility Address: 10311 Cement Plant Road; Brooksville, FL 34601

Permittee or Owner/Operator: CEMEX Construction Materials Florida, LLC

Mailing Address: 10311 Cement Plant Road; Brooksville, FL 34601

Latitude: 28° 35' 00" Longitude: 82° 25' 53"

Coordinate Method: Degrees/Minutes/Sec Datum: WGS84 (assumed)

Collected by: source: GoogleEarth 3/17/2017 Company/Affiliation: N/A

Solid Waste Disposal Units Included in Estimate:

Phase / Cell	Acres	Date Unit Began Accepting Waste	Active Life of Unit From Date of Initial Receipt of Waste	If active: Remaining life of unit	If closed: Date last waste received	If closed: Official date of closing
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Total disposal unit acreage included in this estimate: Closure: N/A Long-Term Care: N/A

Facility type: ☐ Class I ☐ Class III ☐ C&D Debris Disposal  
(Check all that apply) ☐ Other: N/A

### II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check type)

- ☐ Letter of Credit\*      ☐ Insurance Certificate      ☐ Escrow Account  
☐ Performance Bond\*      ☐ Financial Test      ☐ Form 29 (FA Deferral)  
☒ Guarantee Bond\*      ☐ Trust Fund Agreement

\* - Indicates mechanisms that require the use of a Standby Trust Fund Agreement

Northwest District  
160 Government Center  
Pensacola, FL 32502-5794  
850-595-8360

Northeast District  
7825 Baymeadows Way, Ste. B200  
Jacksonville, FL 32256-7590  
904-807-3300

Central District  
3319 Maguire Blvd., Ste. 232  
Orlando, FL 32803-3767  
407-894-7555

Southwest District  
13051 N. Telecom Pkwy.  
Temple Terrace, FL 33637  
813-632-7600

South District  
2295 Victoria Ave., Ste. 364  
Fort Myers, FL 33901-3881  
239-332-6975

Southeast District  
400 N. Congress Ave., Ste. 200  
West Palm Beach, FL 33401  
561-681-6600

### III. ESTIMATE ADJUSTMENT

40 CFR Part 264 Subpart H as adopted by reference in Rule 62-701.630, Florida Administrative Code, (F.A.C.) sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closure in current dollars. Select one of the methods of cost estimate adjustment below.

☐ (a) Inflation Factor Adjustment

☒ (b) Recalculated or New Cost Estimates

Inflation adjustment using an inflation factor may only be made when a Department approved closure cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste website [www.dep.state.fl.us/waste/categories/swfr](http://www.dep.state.fl.us/waste/categories/swfr) or call the Financial Coordinator at (850) 245-8706.

This adjustment is based on the Department approved closing cost estimate dated: \_\_\_\_\_

Latest Department Approved Closing Cost Estimate:	Current Year Inflation Factor, e.g. 1.02		Inflation Adjusted Closing Cost Estimate:
_____	_____	×	_____
		=	_____

This adjustment is based on the Department approved long-term care cost estimate dated: \_\_\_\_\_ N/A

Latest Department Approved Annual Long-Term Care Cost Estimate:	Current Year Inflation Factor, e.g. 1.02		Inflation Adjusted Annual Long-Term Care Cost Estimate:
_____	_____	×	_____
		=	_____
Number of Years of Long Term Care Remaining:		×	_____
		=	_____
Inflation Adjusted Long-Term Care Cost Estimate:			_____

Signature by: ☐ Owner/Operator

☒ Engineer (check what applies)

\_\_\_\_\_  
Signature

4014 NW 13th Street  
\_\_\_\_\_  
Address

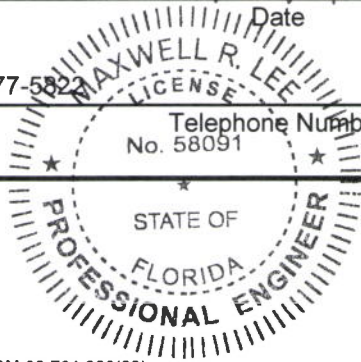
Mawell R. Lee, Ph.D., P.E.  
\_\_\_\_\_  
Name & Title

Gainesville, FL 32609  
\_\_\_\_\_  
City, State, Zip Code

mlee@kooglerassociates.com  
\_\_\_\_\_  
E-Mail Address

9/29/17  
\_\_\_\_\_  
Date

352-377-5822  
\_\_\_\_\_  
Telephone Number





**IV. ESTIMATED CLOSING COST (check what applies)**☒ **Recalculated Cost Estimate**☐ **New Facility Cost Estimate**

- Notes: 1. Cost estimates for the time period when the extent and manner of landfill operation makes closing most exp  
2. Cost estimate must be certified by a professional engineer.  
3. Cost estimates based on third party suppliers of material, equipment and labor at fair market value.  
4. In some cases, a price quote in support of individual item estimates may be required.

Description	Unit	Number of Units	Cost / Unit	Total Cost
<b>1. Proposed Monitoring Wells (Do not include wells already in existence.)</b>				
	EA	_____	_____	_____
			Subtotal Proposed Monitoring Wells:	_____
<b>2. Slope and Fill (bedding layer between waste and barrier layer):</b>				
Excavation	CY	_____	_____	_____
Placement and Spreading	CY	_____	_____	_____
Compaction	CY	_____	_____	_____
Off-Site Material	CY	_____	_____	_____
Delivery	CY	_____	_____	_____
			Subtotal Slope and Fill:	_____
<b>3. Cover Material (Barrier Layer):</b>				
Off-Site Clay	CY	_____	_____	_____
Synthetics - 40 mil	SY	_____	_____	_____
Synthetics - GCL	SY	_____	_____	_____
Synthetics - Geonet	SY	_____	_____	_____
Synthetics - Other (explain) _____	_____	_____	_____	_____
			Subtotal Cover Material:	_____
<b>4. Top Soil Cover:</b>				
Off-Site Material	CY	_____	_____	_____
Delivery	CY	_____	_____	_____
Spread	CY	_____	_____	_____
			Subtotal Top Soil Cover:	_____
<b>5. Vegetative Layer</b>				
Sodding	SY	_____	_____	_____
Hydroseeding	AC	_____	_____	_____
Fertilizer	AC	_____	_____	_____
Mulch	AC	_____	_____	_____
Other (explain) _____	_____	_____	_____	_____
			Subtotal Vegetative Layer:	_____
<b>6. Stormwater Control System:</b>				
Earthwork	CY	_____	_____	_____
Grading	SY	_____	_____	_____
Piping	LF	_____	_____	_____
Ditches	LF	_____	_____	_____
Berms	LF	_____	_____	_____
Control Structures	EA	_____	_____	_____
Other (explain) _____	_____	_____	_____	_____
			Subtotal Stormwater Control System:	_____



Subtotal of 1-11 Above: \_\_\_\_\_

12. Contingency        0   % of Subtotal of 1-11 Above      \_\_\_\_\_

Subtotal Contingency: \_\_\_\_\_

Estimated Closing Cost Subtotal: \_\_\_\_\_

Description	Total Cost
13. Site Specific Costs	
Mobilization	_____
Waste Tire Facility	_____ \$37,500.00
Materials Recovery Facility	_____
Special Wastes	_____
Leachate Management System Modification	_____
Other (explain) _____	_____
_____	Subtotal Site Specific Costs: _____ \$37,500.00

TOTAL ESTIMATED CLOSING COSTS (\$): \_\_\_\_\_ \$37,500.00

## V. ANNUAL COST FOR LONG-TERM CARE

See 62-701.600(1)a.1., 62-701.620(1), 62-701.630(3)a. and 62-701.730(11)b. F.A.C. for required term length. For landfills certified closed and Department accepted, enter the remaining long-term care length as "Other" and provide years remaining.

(Check Term Length) ☐ 5 Years ☐ 20 Years ☐ 30 Years ☐ Other, \_\_\_\_ Years

Notes: 1. Cost estimates must be certified by a professional engineer.

2. Cost estimates based on third party suppliers of material, equipment and labor at fair market value.

3. In some cases, a price quote in support of individual item estimates may be required.

**All items must be addressed.** Attach a detailed explanation for all entries left blank.

Description	Sampling Frequency (Events / Year)	Number of Wells	(Cost / Well) / Event	Annual Cost
<b>1. Groundwater Monitoring [62-701.510(6), and (8)(a)]</b>				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Subtotal Groundwater Monitoring:				_____
<b>2. Surface Water Monitoring [62-701.510(4), and (8)(b)]</b>				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Subtotal Surface Water Monitoring:				_____
<b>3. Gas Monitoring [62-701.400(10)]</b>				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Subtotal Gas Monitoring:				_____
<b>4. Leachate Monitoring [62-701.510(5), (6)(b) and 62-701.510(8)c]</b>				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Other (explain) _____	_____	_____	_____	_____
Subtotal Leachate Monitoring:				_____

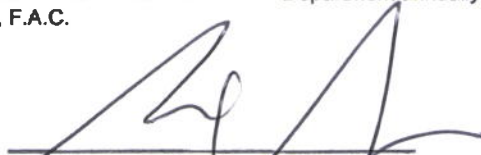
Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
<b>5. Leachate Collection/Treatment Systems Maintenance</b>				
<b>Maintenance</b>				
Collection Pipes	LF	_____	_____	_____
Sumps, Traps	EA	_____	_____	_____
Lift Stations	EA	_____	_____	_____
Cleaning	LS	1	_____	_____
Tanks	EA	_____	_____	_____

Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
<b>5. (continued)</b>				
<u>Impoundments</u>				
Liner Repair	SY	_____	_____	_____
Sludge Removal	CY	_____	_____	_____
<u>Aeration Systems</u>				
Floating Aerators	EA	_____	_____	_____
Spray Aerators	EA	_____	_____	_____
<u>Disposal</u>				
Off-site (Includes transportation and disposal)	1000 gallon	_____	_____	_____
			Subtotal Leachate Collection / Treatment Systems Maintenance:	_____
<b>6. Groundwater Monitoring Well Maintenance</b>				
Monitoring Wells	LF	_____	_____	_____
Replacement	EA	_____	_____	_____
Abandonment	EA	_____	_____	_____
			Subtotal Groundwater Monitoring Well Maintenance:	_____
<b>7. Gas System Maintenance</b>				
Piping, Vents	LF	_____	_____	_____
Blowers	EA	_____	_____	_____
Flaring Units	EA	_____	_____	_____
Meters, Valves	EA	_____	_____	_____
Compressors	EA	_____	_____	_____
Flame Arrestors	EA	_____	_____	_____
Operation	LS	<u>1</u>	_____	_____
			Subtotal Gas System Maintenance:	_____
<b>8. Landscape Maintenance</b>				
Mowing	AC	_____	_____	_____
Fertilizer	AC	_____	_____	_____
			Subtotal Landscape Maintenance:	_____
<b>9. Erosion Control and Cover Maintenance</b>				
Sodding	SY	_____	_____	_____
Regrading	AC	_____	_____	_____
Liner Repair	SY	_____	_____	_____
Clay	CY	_____	_____	_____
			Subtotal Erosion Control and Cover Maintenance:	_____
<b>10. Storm Water Management System Maintenance</b>				
Conveyance Maintenance	LS	<u>1</u>	_____	_____
			Subtotal Storm Water Management System Maintenance:	_____
<b>11. Security System Maintenance</b>				
Fences	LS	<u>1</u>	_____	_____
Gate(s)	EA	_____	_____	_____
Sign(s)	EA	_____	_____	_____
			Subtotal Security System Maintenance:	_____

Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
<b>12. Utilities</b>	LS	1		
			Subtotal Utilities:	
<b>13. Leachate Collection/Treatment Systems Operation</b>				
<u>Operation</u>				
P.E. Supervisor	HR			
On-Site Engineer	HR			
Office Engineer	HR			
OnSite Technician	HR			
Materials	LS	1		
			Subtotal Leachate Collection/Treatment Systems Operation:	
<b>14. Administrative</b>				
P.E. Supervisor	HR			
On-Site Engineer	HR			
Office Engineer	HR			
OnSite Technician	HR			
Other _____				
			Subtotal Administrative:	
<b>Subtotal of 1-14 Above:</b>				
<b>15. Contingency</b>		% of Subtotal of 1-14 Above		
			Subtotal Contingency:	
Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
<b>16. Site Specific Costs</b>				
			Subtotal Site Specific Costs:	
<b>ANNUAL LONG-TERM CARE COST (\$ / YEAR):</b>				
Number of Years of Long-Term Care: _____				
<b>TOTAL LONG-TERM CARE COST (\$):</b>				

## VI. CERTIFICATION BY ENGINEER

This is to certify that the Cost Estimates pertaining to the engineering features of this solid waste management facility have been examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing and/or long-term care of the facility and comply with the requirements of Rule 62-701.630 F.A.C. and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Cost Estimates shall be submitted to the Department annually, revised or adjusted as required by Rule 62-701.630(4), F.A.C.

  
Signature

4014 NW 13th Street

Mailing Address

Maxwell R. Lee, Ph.D., P.E.

Name and Title (please type)

Gainesville, FL 32609

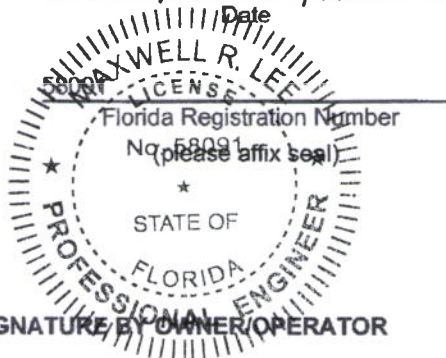
City, State, Zip Code

9/29/17

Date

mlee@kooglerassociates.com

E-Mail address (if available)



Telephone Number

## VII. SIGNATURE BY OWNER/OPERATOR

  
Signature of Applicant

10311 Cement Plant Road

Mailing Address

Alberto Calleros - Plant Manager

Name and Title (please type)

Hernando, FL 34601

City, State, Zip Code

E-Mail address (if available)

352-799-7881

Telephone Number