



**Regulatory and Economic Resources**  
Environmental Resources Management  
701 NW 1st Court • 7th Floor  
Miami, Florida 33136-3912  
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**miamidade.gov**

January 12, 2018

Joanne Montenegro, President  
Econotires, Inc.  
7140 NW 42 ST  
Miami, FL 33166

CERTIFIED MAIL NO. 7017 2400 0000 7830 0865  
RETURN RECEIPT REQUESTED

Re: Closure Cost Estimate dated December 14, 2017 submitted by Econotires, Inc. in support of a Waste Tire Processing Facility permit for the facility located at, near, or in the vicinity of 7140-7134 NW 42 Street, Miami, Miami-Dade County, Florida; FDEP Permit No. 325377-001-WT / WACS No. 101786 / DERM File No. SW-1860.

Dear Ms. Montenegro:

The Environmental Permitting Section (EPS) of the Department of Regulatory and Economic Resources (DER) - Division of Environmental Resources Management (DERM), under delegation by the Florida Department of Environmental Protection (FDEP), is in receipt of the referenced closure cost estimate on January 10, 2018. The EPS has completed the review of said cost estimate and hereby disapproves it for the following reason:

1. The applicant shall provide a revised closure cost estimate in accordance with the requirements of Rule 62-711.500(3), F.A.C. that addresses the following:
  - (a) The estimate shall be based on the cost that would be expended to remove, process, transport and dispose of the maximum amount of waste tires (including used tires) that is permitted to be stored at the facility at any time (i.e., 5,000 tires).
  - (b) The cost estimate shall be based on a third party, who is not a subsidiary or parent company of the permittee that is able to provide services for the proper closure of the referenced facility (as noted above).
  - (c) The cost estimate shall be reported on a per unit (tire) basis and certified by a State of Florida registered Professional Engineer.

The above requested information shall be submitted to the EPS within thirty (30) days of receipt of this letter. Be advised that failure to provide a timely response may result in enforcement action.

If you have any questions regarding this letter, please contact Francisco T Calleja, P.E. or Johnny Vega, P.E. of the EPS at (305) 372-6600 or via email respectively at [callef@miamidade.gov](mailto:callef@miamidade.gov) and [vegajo@miamidade.gov](mailto:vegajo@miamidade.gov).

Sincerely,

Rashid Z. Istambouli, P.E., Chief  
Pollution Regulation Division

ec: Patti Emad, Johnny Vega, P.E, Francisco Calleja, P.E. – DERM  
Joanne Montenegro – Econotires, Inc. (via e-mail: [econotires1@aol.com](mailto:econotires1@aol.com))  
Oculus (WACS No. 101786) \ DERM File No. SW-1860