

Tift, Rachel

From: Tift, Rachel
Sent: Wednesday, February 7, 2018 5:46 PM
To: 'John Arnold'
Cc: Financial Assurance Working Group; Morgan, Steve (Steve.Morgan@dep.state.fl.us); Tafuni, Steven; Black, Alexis; Madden, Melissa; 'GBleau@angelosrm.com'; 'jcummins@cantwellcummins.com'
Subject: 2018 Cost Estimate Approval, Enterprise Class III Landfill & Waste Tire Processing Facility, WACS ID No. 87895
Attachments: Revised 2018 Enterprise CLIII Closure and Long Term Care Update Package WACS 87895.pdf

Dear Mr. Arnold:

This correspondence is to acknowledge receipt of the inflation-adjusted cost estimates, dated and received February 7, 2018, for closure and long-term care of Enterprise **Class III Landfill**. The cost estimates received February 7, 2018, (total for closing \$3,414,199.88 and long-term care \$94,865.01/year x 30 years = \$2,845,950.30) are **APPROVED for 2018**. The approved cost estimates are for closing and long-term care of 67 acres (Cells 1-7, 15 & 16). The next update (revised estimates) is due with the upcoming permit renewal application. A permit renewal reminder will follow this e-mail.

This correspondence is also to acknowledge receipt of the inflation-adjusted cost estimates, dated and received February 6, 2018, for closure of the Enterprise **Waste Tire Processing Facility**. The cost estimates received February 6, 2018 (total for closing \$144,337.23) are **APPROVED for 2018**. The approved estimates are for a total of approximately 2,028 tons of waste tires at the site at any time. The next annual update (revised or inflation-adjusted estimates) is due no later than **March 1, 2019**.

A copy of these estimates is forwarded, via this email, to the Solid Waste Financial Coordinator at Financial.Assurance.Working.Group@dep.state.fl.us. Financial assurance documents can be sent to: Solid Waste Section, FDEP, 2600 Blair Stone Road MS 4548, Tallahassee, Florida 32399-2407. Please work with the coordinator directly to assess the facility's compliance with the funding mechanism requirements of Rule 62-701.630, F.A.C.

Further information about Solid Waste Financial Assurance can be found at the Department's website at: <https://floridadep.gov/waste/permitting-compliance-assistance/content/solid-waste-financial-assurance>.

Best Regards,

Rachel Tift
Engineering Specialist II
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926
Rachel.Tift@floridadep.gov
Direct line: 813.470.5755
Fax: 813.470.5996

Permitting Consistency Initiative: The Florida Department of Environmental Protection is committed to providing efficient, consistent and quality service to the citizens of Florida. In keeping with these objectives, we continue to identify ongoing improvements to our permitting process by standardizing and simplifying our documents.

From: John Arnold [<mailto:john.phillip.arnold@gmail.com>]
Sent: Wednesday, February 7, 2018 2:58 PM

To: Financial Assurance Working Group <Financial.Assurance.Working.Group@dep.state.fl.us>; SWD_Waste <SWD_Waste@dep.state.fl.us>; Glen Bleau <GBleau@angelosrm.com>; James Cummins <jcummins@cantwellcummins.com>
Subject: Revised WACS 87895 2018 Financial Assurance Update

--
John Arnold, P.E.
Ph. (813) 477-1719

From: Tift, Rachel
Sent: Wednesday, February 7, 2018 3:08 PM
To: 'john.phillip.arnold@gmail.com' <john.phillip.arnold@gmail.com>
Cc: Financial Assurance Working Group <Financial.Assurance.Working.Group@dep.state.fl.us>; 'lisa@locklearconsulting.com' <lisa@locklearconsulting.com>; 'john@locklearconsulting.com' <john@locklearconsulting.com>; Morgan, Steve (Steve.Morgan@dep.state.fl.us) <Steve.Morgan@dep.state.fl.us>; Madden, Melissa <Melissa.Madden@dep.state.fl.us>
Subject: RE: WACS 87895 - Enterprise CLIII and Waste Tire Processing Facility 2018 Financial Assurance Update

Good afternoon Mr. Arnold,

Based on Ms. Baker's letter dated January 30, 2017 regarding the closure cost estimates for the Class III Landfill, it appears that the starting figures used in the 2018 Closure Cost Estimating Form should be \$3,370,384.88 for closing costs and \$93,647.59 (\$2,809,427.72 / 30 years) for long term care costs before applying the inflation factor of 1.013. A highlighted excerpt from the letter is included below for convenience. The values currently used in the Closure Cost Estimating Form are from 2016 and were not adjusted using the 2017 inflation factor. Please review and revise the Closure Cost Estimating Form for the Class III Landfill as appropriate.

Mr. Steve Morgan
January 30, 2017
Page 2 of 4

TABLE 1 – Closure Costs

Closure cost for Cells 1-7, 15 & 16 from July 31, 2016	\$3,340,321.98
Closure cost for Cells 1-7, 15 & 16 after applying inflation factor	\$3,370,384.88
Total area of Cells 1-7, 15 & 16	67.0 acres
Closure cost per acre	\$50,304.25
Cell 16 area	5.82 acres
Closure costs associated with Cell 16	\$292,770.75
Closure costs associated with Cells 1-7 and 15	\$3,077,614.13

TABLE 2 – Long Term Care Costs

LTC cost for Cells 1-7, 15 & 16 from July 31, 2016	\$2,784,368.40
LTC cost for Cells 1-7, 15 & 16 after applying inflation factor	\$2,809,427.72
Total area of Cells 1-7, 15 & 16	67.0 acres
LTC cost per acre	\$41,931.76
Cell 16 area	5.82 acres
LTC costs associated with Cell 16	\$244,042.83
LTC costs associated with Cells 1-7 and 15	\$2,565,384.89

Thanks & Best Regards,

Rachel Tift
Engineering Specialist II
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926
Rachel.Tift@floridadep.gov
Direct line: 813.470.5755
Fax: 813.470.5996

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From: John Arnold [<mailto:john.phillip.arnold@gmail.com>]
Sent: Tuesday, February 6, 2018 1:14 PM
To: SWD_Waste <SWD_Waste@dep.state.fl.us>
Cc: Financial Assurance Working Group <Financial.Assurance.Working.Group@dep.state.fl.us>; Glen Bleau <GBleau@angelosrm.com>; ljbaker23@outlook.com <lisa@locklearconsulting.com>; John Locklear <john@locklearconsulting.com>; James Cummins <jcummins@cantwellcummins.com>
Subject: Re: WACS 87895 - Enterprise CLIII and Waste Tire Processing Facility 2018 Financial Assurance Updatee

Consolidated PDF with 2018 Class III and WTPF update (inflation factor used).

On Tue, Feb 6, 2018 at 1:03 PM, John Arnold <john.phillip.arnold@gmail.com> wrote:
The 2018 financial assurance updates for the Class III landfill and Waste Tire Processing Facility located in Dade City, Pasco County, Florida area attached.

Please let me know if you have any questions, or if you need any additional information.

Sincerely,

--

John Arnold, P.E.
Ph. [\(813\) 477-1719](tel:8134771719)

--

John Arnold, P.E.
Ph. (813) 477-1719



ANGELO'S RECYCLED MATERIALS

855 28th Street South
St. Petersburg, Florida 33712
Telephone (727) 581-1544
Fax (727) 586-5676
www.angelosrm.com

February 7, 2018

Mr. Steve Morgan
Air and Solid Waste Permitting
Florida Department of Environmental Protection - Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

RE: Angelo's Recycled Materials
Largo Materials Processing Facility
WACS No.: 49239
Financial Assurance Annual Adjustment

Dear Mr. Morgan,

It has come to my attention that the financial assurance estimate I submitted to the FDEP on February 6th did not use the correct 2017 numbers for closure and long-term care. The corrected financial assurance update for 2018 is attached. Please let me know if you have any questions, or if you need any additional information.

Sincerely,

John Arnold, P.E.
Project Manager



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: Enterprise Class III Recycling and Disposal Facility WACS ID: 87895
 Permit Application or Consent Order No.: 177982-020-SO/T3 Expiration Date: July 9, 2018
 Facility Address: 41111 Enterprise Road, Dade City, FL 33525
 Permittee or Owner/Operator: Angelo's Aggregate Materials, LTD
 Mailing Address: 855 28th Street South, St. Petersburg, FL 33712

Latitude: 28 ° 19 ' 53 " Longitude: 82 ° 8 ' 06 "
 Coordinate Method: State Plane Datum: NGVD 29
 Collected by: _____ Company/Affiliation: Pickett Surveying

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
1-7, 15, and 16	67	2004	22	12	N/A	N/A

Total disposal unit acreage included in this estimate: _____ Closure: _____ Long-Term Care: _____

Facility type: ☐ Class I ☒ Class III ☐ C&D Debris Disposal
 (Check all that apply) ☐ Other: _____

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 Pky.
Tempe 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

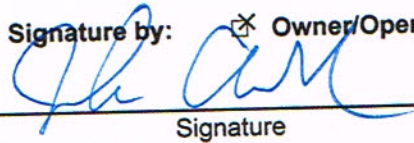
Inflation adjustment using an inflation factor may only be made when a Department approved closure cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price 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 or call the Financial Coordinator at (850) 245-8706.

This adjustment is based on the Department approved closing cost estimate dated:		2017
Latest Department Approved Closing Cost Estimate:	Current Year Inflation Factor, e.g. 1.02	Inflation Adjusted Closing Cost Estimate:
\$3,370,384.88	x 1.013	\$3,414,199.88

This adjustment is based on the Department approved long-term care cost estimate dated:		2017
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:
\$93,647.59	x 1.013	\$94,865.01
Number of Years of Long Term Care Remaining:	x	30
Inflation Adjusted Long-Term Care Cost Estimate:	=	\$2,845,950.30

Signature by: ☒ Owner/Operator

☐ Engineer (check what applies)


Signature

41111 ENTERPRISE ROAD

Address

JOHN ARNOLD, MANAGER

Name & Title

DADE CITY, FL 33525

City, State, Zip Code

2/7/18

Date

JOHN.PHILLIP.ARNOLD@GMAIL.COM

E-Mail Address

813-477-1719

Telephone Number



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

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CLOSURE COST ESTIMATING FORM FOR SOLID WASTE FACILITIES

Date of DEP Approval: _____

I. GENERAL INFORMATION:

Facility Name: Enterprise Class III Recycling and Disposal Facility WACS ID: 87895
 Permit Application or Consent Order No.: 303741-003-WT/02 Expiration Date: May 27, 2021
 Facility Address: 41111 Enterprise Road, Dade City, FL 33525
 Permittee or Owner/Operator: Angelo's Aggregate Materials, LTD
 Mailing Address: 855 28th ST. S., St. Petersburg, FL 33712

Latitude: 28 ° 19 ' 53 " Longitude: 82 ° 8 ' 06 "
 Coordinate Method: State Plane Datum: NGVD 29
 Collected by: _____ Company/Affiliation: Pickett Surveying

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
Waste Tire Processing	10	2013	5	N/A	N/A	N/A

Total disposal unit acreage included in this estimate: _____ Closure: _____ Long-Term Care: _____

Facility type: ☐ Class I ☒ Class III ☐ C&D Debris Disposal
 (Check all that apply) ☐ Other: _____

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check type)

- ☒ Letter of Credit* ☐ Insurance Certificate ☐ Escrow Account
☐ Performance Bond* ☐ Financial Test ☐ Form 29 (FA Deferral)
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* - Indicates mechanisms that require the use of a Standby Trust Fund Agreement

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Jacksonville, FL 32256-7590
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☒ (a) Inflation Factor Adjustment

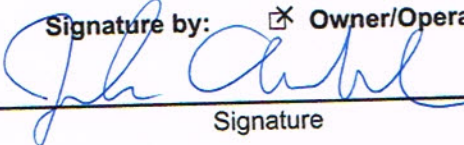
☐ (b) Recalculated or New Cost Estimates

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 or call the Financial Coordinator at (850) 245-8706.

This adjustment is based on the Department approved closing cost estimate dated:		2017
Latest Department Approved Closing Cost Estimate:	Current Year Inflation Factor, e.g. 1.02	Inflation Adjusted Closing Cost Estimate:
142484.93	x 1.013	\$144,337.23

This adjustment is based on the Department approved long-term care cost estimate dated:		
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:
	x	
Number of Years of Long Term Care Remaining:	x	
Inflation Adjusted Long-Term Care Cost Estimate:	=	

Signature by: ☒ Owner/Operator


Signature

John Arnold, Manager
Name & Title

2/6/18
Date

813-477-1719
Telephone Number

☐ Engineer (check what applies)

41111 Enterprise Road
Address

Dade City, FL 33525
City, State, Zip Code

John.Phillip.Arnold@gmail.com
E-Mail Address



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road MS 4548
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan Matthews
Interim Secretary

February 14, 2017

Mr. John Iafrate
Owner
Angelo's Aggregate Materials, Ltd.
1755 20th Avenue SE
Largo, Florida 33771

Re: WACS 87895 – Enterprise Class III Landfill (cells 1-7, 15 and waste tire facility)

Dear Mr. Iafrate:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is acceptable as to form and content. Comerica Bank amendment number 19, dated February 1, 2017, increases the aggregate amount of letter of credit number 586961-04 to \$5,800,000.00. This covers the Department approved closure cost estimates totaling \$5,642,999.02, dated January 31, 2017 (cells 1-7 & 15) plus the estimate of \$142,484.93, dated January 31, 2017 (waste tire facility) that has not yet, apparently, been reviewed by the Department. Your Comerica Bank & Trust, National Association standby trust fund agreement (account number 3085000936) remains acceptable. If the Southwest District office approves this waste tire cost estimate, Enterprise Class III Landfill will be in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code (F.A.C.), at that time.

The financial assurance on file covers the disposal units identified above. The permittee must comply with the requirements of Rule 62-701.630(2)(c), F.A.C. before receiving waste in any other disposal area. Please contact me at (850) 245-8743 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Tor JM Bejnar".

Tor JM Bejnar
Environmental Specialist
Financial Assurance Working Group

cc: Steve Morgan, DEP/Southwest District



Locklear
& Associates

TEL (352) 672-6867
FAX (352) 692-5930

4140 NW 37th Place, Suite A,
Gainesville, FL 32606
www.locklearconsulting.com

January 30, 2017

Mr. Steve Morgan
Florida Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RE: Angelo's Aggregate Materials, Ltd.
Enterprise Road Class III Recycling & Disposal Facility, Pasco County
WACS Facility ID: 87895
WACS No.: SWD/29/41084

Dear Mr. Morgan,

As part of the current permit modification application (Cell 16 horizontal expansion), Locklear & Associates (L&A) submitted the long-form financial assurance cost estimates on July 31, 2016 (copy is attached). The July 2016 estimates included Cell 16 but also included a revision to the number of groundwater monitoring wells associated with the construction of Cell 7. Specifically, two of the existing groundwater monitoring wells were abandoned and three new wells were installed for a net gain of one well. The applicant would like to utilize the date estimates to fulfill the financial assurance requirements for Cell 7. Based on our discussions with the Department, it is acceptable to exclude the portion of the cost estimates associated with Cell 16, until such time as Cell 16 is constructed and ready to be placed into operation. It is also our understanding that the Department is willing to allow us to apply the 2017 inflation factor to the previously calculated (July 2016) cost estimates now in lieu of a separate submittal prior to the April 1, 2017 deadline. Tables 1 and 2 detail the proposed calculations for closure and long term care, respectively.

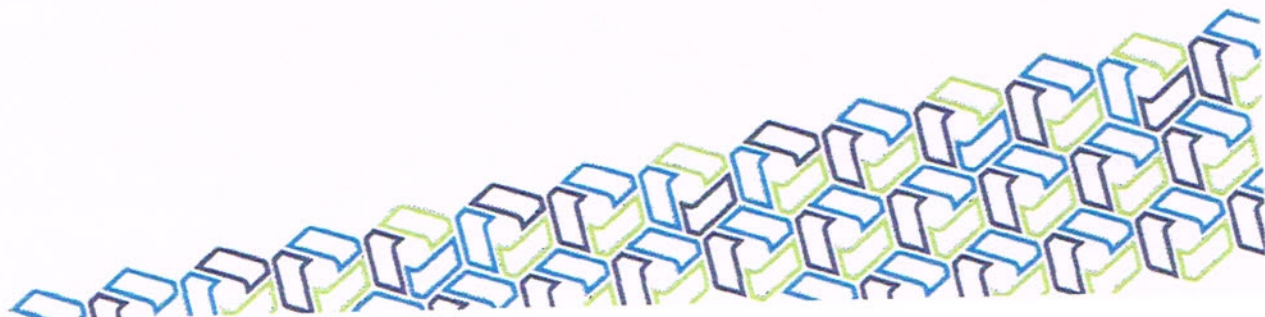


TABLE 1 – Closure Costs

Closure cost for Cells 1-7, 15 & 16 from July 31, 2016	\$3,340,321.98
Closure cost for Cells 1-7, 15 & 16 after applying inflation factor	\$3,370,384.88
Total area of Cells 1-7, 15 & 16	67.0 acres
Closure cost per acre	\$50,304.25
Cell 16 area	5.82 acres
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Closure costs associated with Cells 1-7 and 15	\$3,077,614.13

TABLE 2 – Long Term Care Costs

LTC cost for Cells 1-7, 15 & 16 from July 31, 2016	\$2,784,368.40
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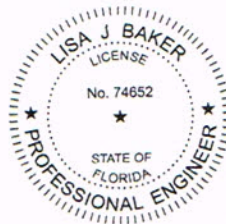
As you can see from the tables, the closure and long term care financial assurance estimates for Cells 1-6, 7 and 15 (excluding Cell 16) are \$3,077,614.13 and \$2,565,384.89, respectively. Prior to commencing activities in Cell 16 and as part of the Cell 16 Certification of Construction Completion, the applicant will update the financial assurance estimates to include Cell 16.

Please contact me at (352) 672-6867 if any questions or comments regarding this submittal.

Sincerely,

Lisa Baker

Lisa Baker, P.E.
Locklear & Associates, Inc.



Digitally signed
by Lisa J Baker
Date: 2017.01.30
16:11:55 -05'00'

Enclosures

Xc: John Arnold, Angelo's Aggregate Materials, Ltd.