

August 25, 2022

VIA ELECTRONIC DELIVERY

Mr. Jeremy Hart
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Second Request for Additional Information (RAI)
Osceola County- Solid Waste
Facility Name: Tire Recycling Corp.
Facility ID: 96128
DEP Application No.: 0400495-002-WT-02
HSA Golden Project Number: 22-1039.001

Dear Mr. Hart:

On behalf of Tire Recycling Corp., HSA Golden is submitting this response to the Florida Department of Environmental Protection (FDEP) May 31, 2022 request for additional information (RAI) regarding the above-referenced permit application. Hereafter, we restate FDEP's comments in italics, followed by our responses.

Comment 1. The closure costs estimate needs to be submitted on Form 62-701.900(28). Please include the closure costs estimate table submitted on May 25, 2022. Please also include documentation of third party estimates as justification for disposal rates. Rule 62-701.630(3), Florida Administrative Code (F.A.C.).

Response 1. The estimate on form 62-701.900(28) is attached with the appropriate backup.

Comment 2. Please provide proof of financial assurance issued in favor of the State of Florida in the amount of the closing cost estimate for the facility. This proof, along with the closing cost estimate, shall be submitted to the Department as part of the permit application for the facility. Proof of financial assurance shall consist of one or more of the following financial instruments: surety bonds, including performance bonds or financial guarantee bonds; irrevocable letters of credit; insurance; and trust funds. Forms 62-701.900(5)(a), (b), (c), (d), (g), and (h) are required when submitting proof of financial assurance. The Department recommends submitting the requested information in Comment #1 and confirming approval of the document before proceeding with submittal of documents requested in this comment. Please submit these documents to Financial.Assurance.Working.Group@floridadep.gov. and Susan Eldredge at Susan.Eldredge@dep.state.fl.us . Please contact Susan Eldredge with any



questions concerning financial assurance at Susan.Eldredge@dep.state.fl.us or (850) 245-8740.

Response 2. This will be provided under separate cover.

Comment 3. Please provide specifications of the super bags that will be containing the processed tires including dimensions, storage capacity, and material. Also include how the super bags will be staged indoors and outdoors. Rule 62-7011.540(2) and (3), F.A.C.

Response 3. The specifications for the Super Sack bags are as follows:

The Super Sack® container construction, made with tubular fabric eliminates side seams, resulting in a bulk bag with sift and moisture resistance. The strap design allows for easy forklift access improving the overall mobility of this FIBC.

35" x 35" x 30" (H) Super Sack® Container
Capacity: 2200 lbs, 24 Cubic Feet
Fabric: Uncoated
Lift Loops: 4 - 10"
Top: 14" D x 19" L, Web Tie Closure
Bottom: 14" D x 19" L, Web Tie Closure, Petal Style Closure
Liner: None
Doc Pouch: (1) 10" x 12"
Print: None
Bale Count: 335

All BAG Corp bags will meet and/or manufacture to the following standards: NEL, CFR 49, British Standard 1898, CONEG, SARA legislation, ISO 21898, or UN Packaging Groups I, II, and III. BAG Mexico has a Superior rating in AIB audits; and a Quality System certified to ISO 9001:2008.

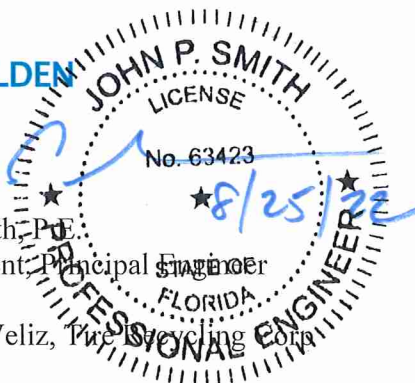
We appreciate your review and trust that you will be able to approve the subject permit application. Please call or email (jsmith@hsagolden.com) if you have any questions.

Sincerely,

HSA GOLDEN

John P. Smith, P.E.
Vice President, Principal Engineer

cc: Frank Veliz, Tire Recycling Corp.





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: Tire Recycling Group WACS ID: 96128
 Permit Application or Consent Order No.: 0400495-002-WT-02 Expiration Date: _____
 Facility Address: 4925 Industrial Lane, Suite 101, Kissimmee, FL 34758
 Permittee or Owner/Operator: Tire Recycling Corp.
 Mailing Address: 4925 Industrial Lane, Suite 101, Kissimmee, FL 34758

Latitude: 28 ° 15' 6.78 " Longitude: -81 ° 28' 49.32 "
 Coordinate Method: Google Maps Datum: WGS84
 Collected by: J. Smith Company/Affiliation: HSA Golden

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

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: Waste Tire Recycling Facility

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.
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 Deflatory 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: _____

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: _____

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

Address

Name & Title

City, State, Zip Code

Date

E-Mail Address

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

Description	Unit	Number of Units	Cost / Unit	Total Cost
7. Passive Gas Control:				
Wells	EA	_____	_____	_____
Pipe and Fittings	LF	_____	_____	_____
Monitoring Probes	EA	_____	_____	_____
NSPS/Title V requirements	LS	1	_____	_____
Subtotal Passive Gas Control:				_____
8. Active Gas Extraction Control:				
Traps	EA	_____	_____	_____
Sumps	EA	_____	_____	_____
Flare Assembly	EA	_____	_____	_____
Flame Arrestor	EA	_____	_____	_____
Mist Eliminator	EA	_____	_____	_____
Flow Meter	EA	_____	_____	_____
Blowers	EA	_____	_____	_____
Collection System	LF	_____	_____	_____
Other (explain) _____	_____	_____	_____	_____
Subtotal Active Gas Extraction Control:				_____
9. Security System:				
Fencing	LF	_____	_____	_____
Gate(s)	EA	_____	_____	_____
Sign(s)	EA	_____	_____	_____
Subtotal Security System:				_____
10. Engineering:				
Closure Plan Report	LS	1	_____	_____
Certified Engineering Drawings	LS	1	_____	_____
NSPS/Title V Air Permit	LS	1	_____	_____
Final Survey	LS	1	_____	_____
Certification of Closure	LS	1	_____	_____
Other (explain) _____	_____	_____	_____	_____
Subtotal Engineering:				_____

Description	Hours	Cost / Hour	Hours	Cost / Hour	Total Cost
11. Professional Services					
	<u>Contract Management</u>		<u>Quality Assurance</u>		
P.E. Supervisor	_____	_____	_____	_____	_____
On-Site Engineer	_____	_____	_____	_____	_____
Office Engineer	_____	_____	_____	_____	_____
On-Site Technician	_____	_____	_____	_____	_____
Other (explain) _____	_____	_____	_____	_____	_____

Description	Unit	Number of Units	Cost / Unit	Total Cost
Quality Assurance Testing	LS	1	_____	_____
Subtotal Professional Services:				_____

Subtotal of 1-11 Above: _____

12. Contingency _____ % of Subtotal of 1-11 Above
Subtotal Contingency: _____

Estimated Closing Cost Subtotal: _____

Description	Total Cost
13. Site Specific Costs	
Mobilization	
Waste Tire Facility	\$55,993.50
Materials Recovery Facility	
Special Wastes	
Leachate Management System Modification	
Other (explain) _____	
Subtotal Site Specific Costs:	\$55,993.50

TOTAL ESTIMATED CLOSING COSTS (\$): _____ \$55,993.50

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
1. Groundwater Monitoring [62-701.510(6), and (8)(a)]				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Subtotal Groundwater Monitoring:				_____
2. Surface Water Monitoring [62-701.510(4), and (8)(b)]				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Subtotal Surface Water Monitoring:				_____
3. Gas Monitoring [62-701.400(10)]				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Subtotal Gas Monitoring:				_____
4. Leachate Monitoring [62-701.510(5), (6)(b) and 62-701.510(8)c]				
Monthly	12	_____	_____	_____
Quarterly	4	_____	_____	_____
Semi-Annually	2	_____	_____	_____
Annually	1	_____	_____	_____
Other (explain) _____	_____	_____	_____	_____
Subtotal Leachate Monitoring:				_____

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

Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
5. (continued)				
<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:				_____
6. Groundwater Monitoring Well Maintenance				
Monitoring Wells	LF	_____	_____	_____
Replacement	EA	_____	_____	_____
Abandonment	EA	_____	_____	_____
Subtotal Groundwater Monitoring Well Maintenance:				_____
7. Gas System Maintenance				
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:				_____
8. Landscape Maintenance				
Mowing	AC	_____	_____	_____
Fertilizer	AC	_____	_____	_____
Subtotal Landscape Maintenance:				_____
9. Erosion Control and Cover Maintenance				
Sodding	SY	_____	_____	_____
Regrading	AC	_____	_____	_____
Liner Repair	SY	_____	_____	_____
Clay	CY	_____	_____	_____
Subtotal Erosion Control and Cover Maintenance:				_____
10. Storm Water Management System Maintenance				
Conveyance Maintenance	LS	<u>1</u>	_____	_____
Subtotal Storm Water Management System Maintenance:				_____
11. Security System Maintenance				
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
12. Utilities	LS	1		
			Subtotal Utilities:	
13. Leachate Collection/Treatment Systems Operation				
<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:	
14. Administrative				
P.E. Supervisor	HR			
On-Site Engineer	HR			
Office Engineer	HR			
OnSite Technician	HR			
Other _____				
			Subtotal Administrative:	
Subtotal of 1-14 Above:				
15. Contingency		% of Subtotal of 1-14 Above		
			Subtotal Contingency:	

Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
16. Site Specific Costs				
			Subtotal Site Specific Costs:	

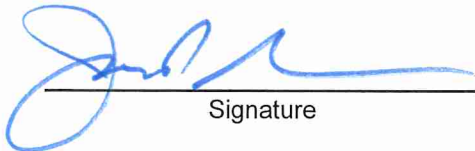
ANNUAL LONG-TERM CARE COST (\$ / YEAR): _____

Number of Years of Long-Term Care: _____

TOTAL LONG-TERM CARE COST (\$): _____

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

HSA Golden, 11 Lake Gatlin Road

Mailing Address

John P. Smith, P.E.

Name and Title (please type)

Orlando, FL 32806

City, State, Zip Code

6/30/2022
Date No. 63423

jsmith@hsagolden.com

E-Mail address (if available)

63423

Florida Registration Number of
(please print clearly)

407-649-5475

Telephone Number



VII. SIGNATURE BY OWNER/OPERATOR

Signature of Applicant

4925 Industrial Lane, Suite 101

Mailing Address

Frank Veliz, Director

Name and Title (please type)

Kissimmee, FL 32758

City, State, Zip Code

frank@tirerecyclingcorp.com

E-Mail address (if available)

407-552-8887

Telephone Number

Estimated Closing Cost										
Material Stored	Volume (Cubic Yards)	Density (ton/CY)	Estimated Tons	Loading Cost (\$/Cubic Yard)	Total Loading Cost	Hauling Cost (\$/Cubic Yard)	Total Hauling Cost	Disposal Cost (\$/Ton)	Total Disposal Cost	Total Cost
Tires	550	0.20	110	\$1.00	\$550.00	\$25.00	\$13,750.00	\$163.00	\$17,930.00	\$32,230.00
Processed Tires (Class I Waste)	250	0.40	100	\$1.00	\$250.00	\$50.00	\$12,500.00	\$37.10	\$3,710.00	\$16,460.00
Total	800		210							\$48,690.00
Contingency (15%)										\$7,303.50
Grand Total										\$55,993.50

- Notes:
1. Disposal rates for tires and class I waste are based on current Orange County Landfill rates.

2. Hauling cost is from facility to Orange County Landfill (60 miles round trip).

3. Cost per hauling whole tires is \$1.25 per tire. Based on 20 pounds per tire, cost is \$125/ton, or \$25/CY

**ORANGE COUNTY
SOLID WASTE
DISPOSAL RATES**

*Approved by the Board of
County Commissioners*

Effective October 1, 2021

The minimum charge is \$6.00

Fee Category	Landfill	Porter Transfer Station	McLeod Road Transfer Station
Class I Garbage, putrescible waste	\$37.10/ton	\$37.10/ton	\$37.10/ton
Construction & Demolition Debris (C&D) Clean fill, asphalt, broken concrete, wood, nonputrescible or water soluble waste, furniture, etc. (Class III)	\$28.20/ton	Only accepted at the Landfill	Only accepted at the Landfill
Yard Waste Vegetative landscape materials including tree and shrub clippings, etc.	\$32.00/ton	\$37.10/ton <i>accepted only on Saturdays</i>	\$37.10/ton <i>accepted only on Saturdays</i>
Asbestos (by appointment only) Must be packed according to FDEP and Orange County specifications	\$122.00/ton	Only accepted at the Landfill	Only accepted at the Landfill
Tires Loads of 25+ tires are only accepted at the Landfill and require a one-time variance or waste tire transporter license issued by Orange County	\$163.00/ton	\$163.00/ton <i>fewer than 25 passenger car tires accepted; no large or off-road</i>	\$163.00/ton <i>fewer than 25 passenger car tires accepted; no large or off-road</i>

- Yard waste materials delivered to a transfer station will be charged the Class I Solid Waste rate.
- If you fail to weigh out, your fee will be calculated to the amount of the deposit collected.
- Uncovered loads will be charged a double fee.
- Any mixed loads will be charged the higher tonnage rate.
- Bulk loads of tires accepted only at the Landfill, Monday through Friday, 8:00 a.m. to 4:00 p.m.
- Forms of payment accepted include check, cash, and all major credit cards.



2363 Fortune Rd. Kissimmee, FL 34744
P: 407-344-8381 F: 407-344-2380

To whom it may concern,

The fees for tire pick up is as follows:

Shredded tires 125.00 Ton

Non shredded tires 1.25 per tire

Any questions do not hesitate to call Maggie at Action Tire and Auto Service Inc.
at 407-344-8381.

Sincerely,

A handwritten signature in blue ink, consisting of several fluid, overlapping strokes.

Rafael Figueroa