

December 28, 2009


Ms. Nancy Gaskin
Solid Waste Section
FDEP, Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637

**RE: Closure Plan Revision 12-28-2009
American Cement Company, LLC
Waste Tire Facility, Pending Permit No.: 297136-001-WT/02
WACS ID#: 98523**

Please find enclosed the revised Closure Plan showing calculation and financial document information for the closure of up to 80.4 tons of waste tires.

If you have any questions, please contact me at (352) 569-2217.

Best Regards,
American Cement Company, LLC



Charles Robertson
Environmental Manager

Copies to: Mr. Cary Cohrs
Mr. William Wall

Enclosure: Revised Closure Plan

CLOSING PLAN

This section provides a completed closing plan for the facility as required by Rule 62-711.700(2) and (3), F.A.C.

Proof of financial responsibility as required by Rule 62-711.500(3) sufficient to assure closing of the waste tire site will be provided for the removal of up to 80.4 tons of waste tires. ~~after final storage quantities are established through this permitting process.~~

When the facility is no longer going to function as a waste tire facility, the plant personnel will deny access of waste tire collectors to the facility. ~~A notice will be posted at the entrance to the property indicating that the waste tire processing facility is closed and giving the phone number of the county solid waste authority.~~ Prior to ceasing operation, notification will be provided to the Department, county government, and contracted waste tire generators of the intent to close and the expected time frame. Prior to closing the waste tire facility, any remaining waste tires will be combusted in the cement kiln or up to five (5) trailers, plus the amount of tires in the Tire Feed System when full, or 80.4 tons of tires will be removed from the facility by a registered waste tire collector. ~~and taken to a waste tire processing facility, solid waste management facility authorized to accept waste tires, or a legitimate user of waste tires. Any solid waste associated with the waste tire processing facility will be taken to a permitted solid waste management facility.~~

Closure Cost Estimate

The cost estimate is the amount that would be expended to load, transport, and dispose of waste tires on the site. The costs are based on a third party, who is not a subsidiary or parent company, performing the work. See page 47 of the November 19, 2009 submission of RAI information for closure cost quote.

$$80.4 @ \$50.00/\text{ton} = \$4,020$$

~~Additional closure costs are for a post-closure inspection by a professional engineer registered in Florida, for spills and grading work. Costs for manual labor to clean up the waste tire processing facility and to regrade the facility are also included.~~

Site inspection by professional engineer, 4 hours @ \$137/hour = \$548.00

Report and managing closure, 4 hours @ \$137/hour = \$548.00

\$1096

The cost estimates are not required to be certified by a Professional Engineer since the cost is based only on a quote to remove the tires. The cost estimate is re-estimated at least annually and submitted to the Department at least 60 days prior to the anniversary date of the instrument.

~~For the purposes of cost estimating, the manual cleanup is specified as one man-week of continuous cleanup by a General Purpose Laborer, as a Prime Contractor Field Expense. This is \$1068¹.~~

~~For the purposes of cost estimating, the grading will be specified as rough grading with a D6 bulldozer, for the trailer storage area assumed as ¼ acre (1210 square yards). This is \$4465².~~

~~The facility will secure a bond for the amount of \$4,020, \$10,649, or appropriate amount based on final storage quantities established through this permitting.~~

Closure Scheduling

At the time a decision is made to close the facility, it is estimated that the total time necessary for closure will be as follows:

- a) Notification Period 1 week 2 months

To allow ample time for waste tire collectors to change their routing and notify the generators.

- b) Combust All Waste Tires at Facility 1 week 2 months

~~After the 2 month Notification Period ends, the facility will be closed to incoming waste tires. As the facility will be managed to ensure that somewhat less than 30 times the~~

¹ RS Means 99-04-1401.

² RS Means 17-03-0101.

~~daily capacity of the equipment is stored, approximately 30 days of normal operations are necessary to combust all remaining waste tires. To cover any unforeseen circumstances, i.e., down time, this phase of closure is estimated to be 60 days. —~~

c) Removal of Waste Tires Residues 1 week 15 days

~~Although significant quantities are not expected, any Up to five (5) trailer loads, plus the amount of tires if the tire feed system is completely full of waste tires residues at the facility will be loaded into trailers or roll-off containers and transported to a Department-approved waste tire processing facility, or other solid waste management facility for disposal. This will take approximately one (1) week~~15 days.

d) Restore Facility to its Pre-Permit Condition will be accomplished when the waste tires are removed from the facility.

~~If, as called for in 62-711.700(3)(c), facility rehabilitation is deemed necessary by the Department, American Cement Company, LLC will work together with the Department to develop and implement a plan for action. Part of the plan development will address adequate time for completion. Without a Scope of Work it is unknown how long this work will take if deemed necessary.~~

~~This section provides specific procedures for spill cleanup, if necessary after closure. A professional engineer, registered in Florida, will visit the waste tire processing facility to determine if there are spills of any solid wastes. This inspection will occur after the~~

~~removal of residues described above. The engineer will provide an inspection report detailing findings and directing spill cleanup if necessary. The closure cost estimate includes costs for the inspection, and also includes costs for manual labor to clean up the waste tire processing facility.~~

~~For the purposes of cost estimating, the manual cleanup is specified as one man-week of continuous cleanup by a General Purpose Laborer, as a Prime Contractor Field Expense.~~

~~This section provides specific procedures for regrading the waste tire processing facility after closure. The professional engineer's inspection described above will also include a visual evaluation of facility elevations. The inspection report will detail these findings and direct regrading if necessary. The closure cost estimate includes costs for the inspection, and will also include costs for regrading the waste tire processing facility.~~

~~For the purposes of cost estimating, the grading will be specified as rough grading with a D6 bulldozer, for the trailer storage area.~~