

Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

June 5, 2006

Mr. R. Shawn McCash
Taft Recycling, Inc.
5002 T-Rex Avenue, Suite 200
Boca Raton, Florida 33431

Re: WACS 00087104 – Taft Recycling, Inc.

Dear Mr. McCash:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Ohio Indemnity Company performance bond number 300267, effective April 12, 2006, with increase rider and attached Notification Agreement dated May 31, 2006, demonstrates adequate financial assurance. As required, the financial assurance covers the higher of the closing costs associated with the approved Orange County and Department of Environmental Protection estimates: \$127,068.68 for closing. In addition, SunTrust Bank standby trust fund agreement, entered into as of June 2, 2006, is acceptable. Therefore, Taft Recycling, Inc. is 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 and the terms of the Orange County Interlocal Agreement, at this time.

If you have any questions, please contact me at (850) 245-8745.

Sincerely,

Frank Hornbrook
Environmental Specialist
Solid Waste Section

FH

cc: Fred Wick, DEP/TLH
James Bradner, DEP/ORL
David Bromfield, Orange County



225 East Robinson Street, Suite 100
Orlando, Florida 32801
Phone: 407 649-5475
Fax: 407 649-6582
Web: www.hsagolden.com

May 11, 2006

via hand delivery

Mr. David Broomfield, P.E.
Environmental Protection Division
800 Mercy Drive, Suite 4
Orlando, Florida 32808-7896

RECEIVED
MAY 15 2006
Central Dist - DEP

Re: Taft Recycling, Inc., Material Recovery Facility and Proposed Transfer Station
Response to Comments for Financial Assurance Estimate & Interlocal Form
Project No. 04-297.013

Dear Mr. Broomfield:

On behalf of Taft Recycling, Inc. (TRI), HSA Golden is responding to your letter dated May 5, 2006 on the subject issue. Please accept our responses as submitted below.

Comment 1: The Environmental Protection Division (Division) has received your correspondence dated April 20, 2006, which included revised financial assurance information as part of the permit application process. At the request of the Florida Department of Environmental Protection, we have revised the interlocal "Notification and Agreement" form. Please complete the enclosed revised form and return 3 signed originals to the Division. In addition, a miscalculation has been noted on the table entitled, "OPINION OF PROBABLE CLOSURE COSTS." Please review this table and revise as necessary, particularly the number of truckloads, hauling cost, and resulting total cost for the first row, labeled Unprocessed Class I waste.

Response: The revised interlocal agreement form will be executed by a TRI representative and forwarded to you. A revised closure cost estimate table is enclosed. Please let us know the approved closure cost amount so that a revised bond certificate can be sent to the FDEP.

Sincerely,

HSA GOLDEN

James E. Golden, P.G.
Vice President, Principal Hydrogeologist

Attachments

cc: Shawn McCash, WSI
James Bradner, P.E., FDEP

Environmental and Engineering Consultants

OPINION OF PROBABLE CLOSURE COSTS

TAFT RECYCLING, INC.

May 2006

Processed Material Stored	Quantity (yds ³)	Estimated Density (lb/yds ³)	Quantity (tons)	Loading Costs* (\$/yd ³)	Total Loading Cost (\$)	Estimated Truck Loads (18 yds ³)	Cost per Load*(\$)	Total Hauling Cost (\$)	Disposal (\$/ton)	Total Disposal Cost**(\$)	Total: All Costs (\$)
Unprocessed Class I Waste	1,200	400	240	2.60	3,120.00	67	235.00	15,745.00	30.65	7,356.00	26,221.00
Unprocessed Class III	700	630	221	2.60	1,820.00	39	235.00	9,165.00	17.20	3,792.60	14,777.60
Yard Trash	200	400	40	2.60	520.00	12	235.00	2,820.00	28.35	1,134.00	4,474.00
Recovered Concrete	200	2,596	259.6	1.58	316.00	12	235.00	2,820.00	0.00	0.00	3,136.00
Asphaltic Concrete	200	2,596	259.6	1.58	316.00	12	235.00	2,820.00	0.00	0.00	3,136.00
Roofing Tiles	200	2,000	200	2.09	418.00	12	235.00	2,820.00	17.20	3,440.00	6,678.00
Recovered Cardboard	60	350	10.5	1.58	94.80	5	235.00	1,175.00	17.20	180.60	1,450.40
Paper	60	400	12	2.09	125.40	5	235.00	1,175.00	17.20	206.40	1,506.80
Glass	60	600	18	2.09	125.40	4	235.00	940.00	17.20	309.60	1,375.00
Ferrous Metals	60	550	16.5	1.58	94.80	4	235.00	940.00	17.20	283.80	1,318.60
Aluminum	60	300	9	1.58	94.80	4	235.00	940.00	17.20	154.80	1,189.60
Plastic	60	150	4.5	2.09	125.40	5	235.00	1,175.00	17.20	77.40	1,377.80
Recovered Wood & Mulch	1,000	1,000	500	1.33	1,330.00	56	235.00	13,160.00	17.20	8,600.00	23,090.00
Tires	30	400	6	2.09	62.70	2	235.00	470.00	99.00	594.00	1,126.70
Class I Reject	700	400	140	2.60	1,820.00	39	235.00	9,165.00	30.65	4,291.00	15,276.00
RSM	100	1,000	50	0.56	56.00	6	235.00	1,410.00	17.20	860.00	2,326.00
Hazardous Materials*	55-Gal Drum			None		1	235.00	235.00	300.00	300.00	535.00
Sampling / Analysis*											1,500.00
Total											110,494.50
Contingency (15%)											16,574.18
Grand Total											127,068.68

*Actual costs based on 2004-2005 operating year adjusted for inflation (1.020 multiplier as per FDEP).

**Assumes waste other than concrete to be disposed at Orange County Class I (\$30.65/ton) and Class III landfill (\$17.20/ton). If all is disposed at a Class I landfill, the cost would increase significantly.

(1) Vendors agreed to purchase all recovered concrete upon closure, letters previously submitted to the department.

The above referenced Opinion of Probable Closure Costs is an Engineer's opinion of probable costs for the facility, based upon number of assumptions. These costs may vary due to specific decisions made by the contractor including cost and extent of labor, equipment and materials, and market conditions, and a variety of other conditions over which the engineer and/or HSA Golden have no control.

HSA GOLDEN

225 East Robinson Street, Suite 100
Orlando, Florida 32801

James T. Show
James T. Show, P.E.
5/10/06 Florida Registration #34361



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

March 3, 2006

Mr. Bill Condron
Regional Manager
Taft Recycling, Inc.
148 Baywood Avenue.
Longwood, Florida 32750

Re: WACS 00087104 - South Orlando Materials Recovery Facility

Dear Mr. Condron:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Carolina Casualty Insurance Company guarantee bond increase rider dated February 24, 2006 for bond number 097944 and in the amount of \$121,891.71 adequately covers the Department approved cost estimate dated December 15, 2005 and the recently submitted inflation adjusted estimate dated February 14, 2006. Therefore, South Orlando Materials Recovery Facility is 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, at this time. If you have any questions, please contact me at (850) 245-8745.

Sincerely,

Frank Hornbrook
Environmental Specialist
Solid Waste Section

FH

cc: Fred Wick, DEP/TLH
James Bradner, DEP/ORL.

Visit our Web Site: <http://www.dep.state.fl.us/waste/categories/swfr/>

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RECEIVED
FEB 17 2006
Central Dist.-DEP

DEP Form # 62-701.90028
Form Title Financial Assurance Cost Estimate Form
Effective Date 05-27-01
DEP Application No. _____
(Filled by DEP)

Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

FINANCIAL ASSURANCE COST ESTIMATE FORM

Date: 2/14/06

Date of DEP Approval: _____

I. GENERAL INFORMATION:

Facility Name: South Orlando Materials Recovery Facility WACS or GMSID #: _____

Permit / Application No.: S048-173968-002 Expiration Date: 12/18/05

Facility Address: 375 W. 7th Street, Taft, Orange County, Florida

Permittee: Taft Recycling, Inc.

Mailing Address: 2401 S. Laflin St. Chicago, IL 60608

Latitude: 28-25-33 Longitude: 81-22-59 or UTM: _____

Solid Waste Disposal Units Included in Estimate:

Phase / Cell	Acres	Date Unit Began Accepting Waste	Design Life of Unit From Date of Initial Receipt of Waste
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Total Landfill Acreage included in this estimate. _____ Closure _____ Long-Term Care _____

Type of landfill: _____ Class I _____ Class III _____ C&D Debris

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

_____ Letter of Credit* _____ Insurance Certificate
_____ Surety Bond* _____ Escrow Account
_____ Trust Fund Agreement _____ Financial Test

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

Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. B200
Jacksonville, FL 32256-7590
904-448-4300

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

Southwest District
3804 Coconut Palm Dr.
Tampa, FL 33619
813-744-6100

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33901-3881
941-332-6975

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

CC G. DEPRADINE - FILE
F. HORN BROOK

III. ESTIMATE ADJUSTMENT

40 CFR Part 264 Subpart H as adopted by reference in Rule 62-701.630, Florida Administrative Code 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

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 Financial Coordinator at (850)-245-8732.

This adjustment is based on the Department approved closure cost estimate dated: _____

Latest Department Approved Closure Cost Estimate:		Current Year Inflation Factor		Inflation Adjusted Closure Cost Estimate:
\$119,501.68	X	1.020	=	\$121,891.71

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		Inflation Adjusted Annual Long-Term Care Cost Estimate:
	X	1.020	=	\$0.00
Number of Years of Long Term Care Remaining:			X	
Inflation Adjusted Long-Term Care Cost Estimate:			=	0.00

☐ (b) Recalculate Estimates (see section V)

IV. CERTIFICATION BY ENGINEER

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

Signature of Engineer

Name & Title (please type)

Florida Registration Number (affix seal) & Date

Mailing Address

Telephone Number


Signature of Owner/Operator

Jeff Godfrey-General Manager
Name & Title (please type)

(312) 942-0042
Telephone Number


Memorandum

**Florida Department Of
Environmental Protection**

CENTRAL DISTRICT

TO: Financial Coordinator
Solid Waste Section
MS-4565
Division of Waste Management

OCD-SW-06-0010

FROM: James N. Bradner, P.E. 
Program Manager
Solid and Hazardous Waste

DATE: January 11, 2006

SUBJECT: Orange County – SW
Taft Recycling, Inc. TS/MRF-WPF
Review of Closure Cost Estimate

We have reviewed the enclosed closure cost estimate dated December 2005, for the subject facility and believe that it is adequate for the site at this time. The signed and sealed original cost estimates are in the Central District's file.

Please feel free to contact me if you need any additional information.


JNB/gc/ew

Enclosure

cc: Frank Hornbrook – DEP – Tallahassee – MS-4565

OPINION OF PROBABLE CLOSURE COSTS

TAFT RECYCLING, INC.

DECEMBER 2005

Processed Material Stored	Quantity (yds ³)	Estimated Density (lb/yds ³)	Quantity (tons)	Loading Costs* (\$/yd ³)	Total Loading Cost (\$)	Estimated Truck Loads (18 yds ³)	Cost per Load* (\$)	Total Hauling Cost (\$)	Disposal (\$/ton)	Total Disposal Cost** (\$)	Total: All Costs (\$)
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RSM	100	1,000	50	0.56	56.00	6	235.00	1,410.00	17.20	860.00	2,326.00
Hazardous Materials*	55-Gal Drum			None		1	235.00	235.00	300.00	300.00	535.00
Sampling / Analysis*											1,500.00
Total											103,914.50
Contingency (15%)											15,587.18
Grand Total											119,501.68

*Actual costs based on 2004-2005 operating year adjusted for inflation (1.020 multiplier as per FDEP).

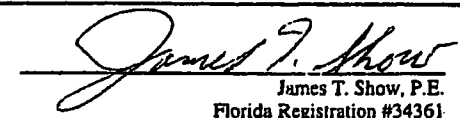
**Assumes waste other than concrete to be disposed at Orange County Class I (\$30.65/ton) and Class III landfill (\$17.20/ton). If all is disposed at a Class I landfill, the cost would increase significantly.

(1) Vendors agreed to purchase all recovered concrete upon closure, letters previously submitted to the department.

The above referenced Opinion of Probable Closure Costs is an Engineer's opinion of probable costs for the facility, based upon number of assumptions. These costs may vary due to specific decisions made by the contractor including cost and extent of labor, equipment and materials, and market conditions, and a variety of other conditions over which the engineer and/or HSA Golden have no control.

HSA GOLDEN

225 East Robinson Street, Suite 100
Orlando, Florida 32801


James T. Show, P.E.
Florida Registration #34361

12/15/05