

**ROBAYNA**  
**AND ASSOCIATES INC.**  
ENGINEERS - PLANNERS - SURVEYORS

December 8, 2014

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MAR 31 2015

POLLUTION REGULATION  
DIVISION

Mr. Rashid Z. Istambouli, PE, Chief  
Department of Regulatory and Economic Resources  
Pollution Regulation Division, 7<sup>th</sup> Floor  
701 NW 1<sup>st</sup> Ct.  
Miami, FL 33136

Re.: TM TIRES INC.  
Revised Update of Financial Responsibility Cost Estimates  
For 2014  
FDEP File No. 307803-001-WT / DERM SW1761  
5555-5575 NW 36 Ave. Miami, FL 33169

Dear Mr. Istambouli:

As per my meeting with Johnny Vega on September 15, 2014, we are hereby offering the following update as requested.

Closure plan disposal estimate.

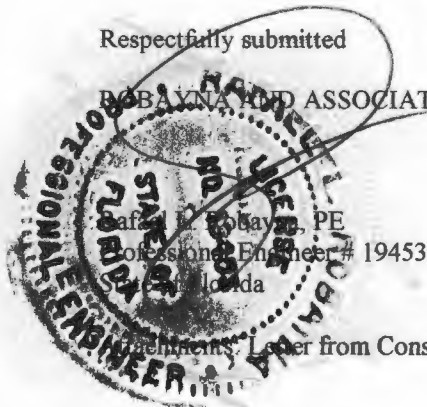
There are no modifications to the closure plan, but based on the number of tiers sown on the permit issued by the agency we have reduced the number of tires approved amount for the FDEP of 15,000 maximum number of tires. The average weight of the tires remains as 20 pounds per tire.

We had originally provided the attached June 10, 2014 letter from Consolidated Tire Processing LLC with an estimate of \$40 per ton based on removal and disposal of all tires, but this estimate was rejected by Miami-Dade DERM/RER based on been lower than the average state fees for tire disposal. As a result based on the provided research done by DERM/RER we have changed the rate used to \$1.00 per tire. It is our professional opinion that this disposal rate is not in keeping with the market rates in the geographical area, nonetheless we are basing this estimate on this rate to obtain approval. We mentioned that the State law did not say that we have to use average rate but an estimate from a reliable source.

Estimate for loading and disposing of these remaining tires is as follows:  
15,000 Used and waste tires @ \$1.00/Tire = \$15,000.00

Respectfully submitted

ROBAYNA AND ASSOCIATES, INC.



Attachments: Letter from Consolidate Tire Processing LLC, dated June10, 2014



**CONSOLIDATED  
TIRE PROCESSING**

**CONSOLIDATED TIRE PROCESSING LLC**

3100 S. Ridgewood Avenue, Unit 190

South Daytona, FL 32119

Ph: 386-212-2048

Email: consolidatedtire@aol.com

June 10, 2014

TM Tires Inc.  
5555 NW 36 Ave  
Miami, FL 33142

We at Consolidated Tire Processing LLC provide prompt and dependable recycling services. Our commitment is to you, your business, and the environment. Per your request, Consolidated Tire Processing, LLC is pleased to provide the following proposal for waste tire removal and disposal in the event of site closure at your facility in Miami Florida.

Consolidated Tire Processing, LLC will load, transport and properly dispose of whole tires from your facility located at 5555 NW 36 Ave, Miami, Florida for a price of \$40 per ton.

Thank you in advance for the opportunity to be of service to you and hope that this proposal follows a favorable reply.

Best Regards,

Dennis Mulberger, MGRM

**RECYCLING FOR A CLEANER TOMORROW**

**WASTE TIRE PROCESSING FACILITY**

State of Florida Department of Environmental Protection

Notice of Permit No. WT64-0310464-001