



October 8, 2020

VIA ELECTRONIC MAIL: wkissel@titanamerica.com

William Kissel, Sr. Env. Mgr.  
Titan Florida LLC  
11000 NW 121<sup>st</sup> Way  
Miami, FL 33178

Re: 2020 cost estimate dated September 23, 2020 for the Titan Florida LLC – Pennsuco Complex facility located at, near, or in the vicinity of 11000 NW 121<sup>st</sup> Way, Medley, Miami-Dade County, Florida; FDEP Permit No. 0314354-002-WT / FDEP WACS No. 100946; DERM No. SW-1289.

Dear Mr. Kissel:

The Environmental Permitting Section (EPS) of the Department of Regulatory and Economic Resources - Division of Environmental Resources Management (DERM), under delegation by the Florida Department of Environmental Protection (FDEP), is in receipt of the referenced cost estimate on September 30, 2020. DERM has completed the review of said estimate and hereby approves it in the amount of **\$ 38,137.50**.

In accordance with the provisions of Rule 62-711.500(3)(a), Florida Administrative Code (F.A.C.), you are required to provide the FDEP with proof of financial assurance issued in favor of the State of Florida in the amount of **\$ 38,137.50**. All required documentation shall be submitted to FDEP within sixty (60) days of this letter. Failure to meet this deadline may result in the referral of this case for enforcement action by DERM.

Please contact the FDEP Solid Waste Financial Coordinator in Tallahassee at (850) 245-8732 concerning compliance with financial assurance requirements. All financial assurance documents shall be sent to the address below for review and processing.

Florida Department of Environmental Protection  
Solid Waste Financial Coordinator  
2600 Blair Stone Road MS 4548  
Tallahassee, FL 32399-2400

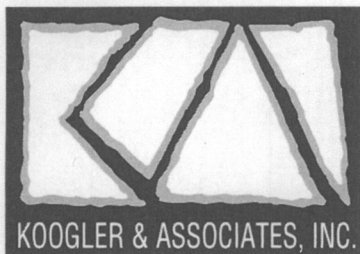
For additional information pertaining to the preparation and submittal of applicable financial assurance documents, please visit <https://floridadep.gov/waste/permitting-compliance-assistance/content/solid-waste-financial-assurance> or contact Mr. Tor Bejnar of the FDEP Solid Waste Financial Assurance section at (850) 245-8743 or via email at [Tor.Bejnar@FloridaDEP.gov](mailto:Tor.Bejnar@FloridaDEP.gov).

If you have any questions regarding this letter, please contact Bruce Coward or Johnny Vega of the EPS at (305) 372-6600 or via email respectively at ([Bruce.Coward@miamidade.gov](mailto:Bruce.Coward@miamidade.gov)) and ([Johnny.Vega@miamidade.gov](mailto:Johnny.Vega@miamidade.gov)).

Sincerely,

Johnny Vega, P.E., Manager  
Environmental Permitting Section  
Pollution Regulation Division

ec: Danielle Jimenez, Patti Emad, Bruce Coward, P.E., Johnny Vega, P.E., Eric Miller – DERM  
SW Financial Coordinator – FDEP (via e-mail: [Solid.Waste.Financial.Coordinator@FloridaDEP.gov](mailto:Solid.Waste.Financial.Coordinator@FloridaDEP.gov))  
Tor Bejnar – FDEP (via email: [Tor.Bejnar@FloridaDEP.gov](mailto:Tor.Bejnar@FloridaDEP.gov))  
Maxwell R. Lee, Ph.D., P.E. – Koogler and Associates, Inc. (via email: [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com))  
Tammy L. Garcia – Koogler and Associates, Inc. (via email: [tgarcia@kooglerassociates.com](mailto:tgarcia@kooglerassociates.com))  
Camren Richter – Titan Florida LLC (via email: [crichter@titanamerica.com](mailto:crichter@titanamerica.com))  
DERM No. SW-1289 / Oculus (WACS No. 100946)



KOOGLER & ASSOCIATES, INC.  
 Mailing: Post Office Box 5127  
 Gainesville, FL 32627-5127  
 Physical: 4014 NW 13<sup>th</sup> Street  
 Gainesville, FL 32609-1923  
[www.kooglerassociates.com](http://www.kooglerassociates.com)  
 352.377.5822

654-20-09

August 25, 2020

Revised September 18, 2020

**Titan America - Pennsuco Tire Processing Facility**  
**FDEP File No. 0314354-002-WT/WACS No. 100946**

**Closing Cost Estimate - August 2020**

The purpose of this submittal is to fulfill the requirements of Rule 62-711.500(3) F.A.C., to provide a re-estimate of the annual closing costs for tires at the Titan American Pennsuco tire Processing Facility. Koogler and Associates, Inc. is providing this closing cost estimate for the cost to remove, process, and dispose of the maximum amount of waste tires that is permitted to be stored at the facility at any time.

*I hereby confirm that the quantity of waste tires at the site has been verified to be within the quantity limits (maximum of 300 tons) as stipulated in the facility's existing FDEP Permit No. 0314354-002 and that the estimate is based on said permit limits.*

Estimated Closing Costs for:

**Waste Tire Disposal**

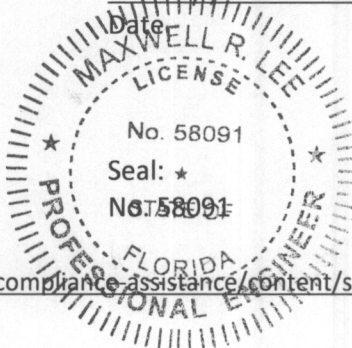
The estimated cost to remove, transport, process, and dispose of the maximum permitted amount of waste tires stored at the facility at any time (30,000 tires/300 tons) is as follows:

Load, Transport, Process & Dispose of 300 tons of tires at \$125 per ton = **\$37,500.00**  
 Plus the FDEP annual inflation factor of 1.017<sup>1</sup> = **637.50**  
**TOTAL: \$38,137.50**

Professional Engineer Certification:

Signature

Maxwell R. Lee, Ph.D., P.E.  
 Koogler and Associates, Inc.  
 PO Box 5127  
 Gainesville, FL 32627-5127  
 352-377-5822



9/23/2020

**RECEIVED**

**SEP 30 2020**

**R.E.R.**  
**POLLUTION REGULATION**

<sup>1</sup> <https://floridadep.gov/waste/permitting-compliance-assistance/content/solid-waste-cost-estimates>



## Florida Department of Environmental Protection

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

Print Form

Reset Form

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: Titan America - Pennsuco Tire Processing Facility WACS ID: 100946

Permit Application or Consent Order No.: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Facility Address: 11000 NW 121 Way

Permittee or Owner/Operator: Titan America, LLC

Mailing Address: 11000 NW 121 Way, Medley, FL 33178

Latitude: 25° 52' 26" Longitude: 80° 22' 20"

Coordinate Method: Degrees/Minutes/Sec Datum: NAD83 (assumed)

Collected by: Unknown Company/Affiliation N/A

#### 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
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Total disposal unit acreage included in this estimate: \_\_\_\_\_ Closure: N/A Long-Term Care: N/A

Facility type: ☐ Class I ☐ Class III ☐ C&D Debris Disposal  
(Check all that apply) ☐ Other: N/A

#### II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check type)

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Letter of Credit*          | <input type="checkbox"/> Insurance Certificate | <input type="checkbox"/> Escrow Account        |
| <input type="checkbox"/> Performance Bond*          | <input type="checkbox"/> Financial Test        | <input type="checkbox"/> Form 29 (FA Deferral) |
| <input checked="" type="checkbox"/> Guarantee Bond* | <input type="checkbox"/> 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 Pkwy  
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](http://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:	
\$37,500.00	x	1.017	=	\$38,137.50

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

☒ Engineer

(check what applies)

Signature

PO Box 5127

Address

Maxwell R. Lee, Ph.D., P.E.

Name & Title

Gainesville, FL 32627-5127

City, State, Zip Code

Date

mlee@kooglerassociates.com

E-Mail Address

352-377-5822

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
<b>1. Proposed Monitoring Wells (Do not include wells already in existence.)</b>				
	EA			
Subtotal Proposed Monitoring Wells:				
<b>2. Slope and Fill (bedding layer between waste and barrier layer):</b>				
Excavation	CY			
Placement and Spreading	CY			
Compaction	CY			
Off-Site Material	CY			
Delivery	CY			
Subtotal Slope and Fill:				
<b>3. Cover Material (Barrier Layer):</b>				
Off-Site Clay	CY			
Synthetics - 40 mil	SY			
Synthetics - GCL	SY			
Synthetics - Geonet	SY			
Synthetics - Other (explain)				
Subtotal Cover Material:				
<b>4. Top Soil Cover:</b>				
Off-Site Material	CY			
Delivery	CY			
Spread	CY			
Subtotal Top Soil Cover:				
<b>5. Vegetative Layer</b>				
Sodding	SY			
Hydroseeding	AC			
Fertilizer	AC			
Mulch	AC			
Other (explain)				
Subtotal Vegetative Layer:				
<b>6. Stormwater Control System:</b>				
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
<b>7. Passive Gas Control:</b>				
Wells	EA	_____	_____	_____
Pipe and Fittings	LF	_____	_____	_____
Monitoring Probes	EA	_____	_____	_____
NSPS/Title V requirements	LS	1	\$0.00	_____
Subtotal Passive Gas Control:				_____
<b>8. Active Gas Extraction Control:</b>				
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:				_____
<b>9. Security System:</b>				
Fencing	LF	_____	_____	_____
Gate(s)	EA	_____	_____	_____
Sign(s)	EA	_____	_____	_____
Subtotal Security System:				_____
<b>10. Engineering:</b>				
Closure Plan Report	LS	1	\$0.00	_____
Certified Engineering Drawings	LS	1	\$0.00	_____
NSPS/Title V Air Permit	LS	1	\$0.00	_____
Final Survey	LS	1	\$0.00	_____
Certification of Closure	LS	1	\$0.00	_____
Other (explain) _____	_____	_____	_____	_____
Subtotal Engineering:				_____

Description	Hours	Cost / Hour	Hours	Cost / Hour	Total Cost
<b>11. Professional Services</b>					
	<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        0   % of Subtotal of 1-11 Above

Subtotal Contingency: \_\_\_\_\_

Estimated Closing Cost Subtotal: \_\_\_\_\_

Description	Total Cost
<b>13. Site Specific Costs</b>	
Mobilization	_____
Waste Tire Facility	<u>\$38,137.50</u>
Materials Recovery Facility	_____
Special Wastes	_____
Leachate Management System Modification	_____
Other (explain) _____	_____
	Subtotal Site Specific Costs: <u>\$38,137.50</u>

**TOTAL ESTIMATED CLOSING COSTS (\$):** \$38,137.50



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

Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
<b>5. Leachate Collection/Treatment Systems Maintenance</b>				
<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
<b>5. (continued)</b>				
<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:	_____
<b>6. Groundwater Monitoring Well Maintenance</b>				
Monitoring Wells	LF	_____	_____	_____
Replacement	EA	_____	_____	_____
Abandonment	EA	_____	_____	_____
			Subtotal Groundwater Monitoring Well Maintenance:	_____
<b>7. Gas System Maintenance</b>				
Piping, Vents	LF	_____	_____	_____
Blowers	EA	_____	_____	_____
Flaring Units	EA	_____	_____	_____
Meters, Valves	EA	_____	_____	_____
Compressors	EA	_____	_____	_____
Flame Arrestors	EA	_____	_____	_____
Operation	LS	1	_____	_____
			Subtotal Gas System Maintenance:	_____
<b>8. Landscape Maintenance</b>				
Mowing	AC	_____	_____	_____
Fertilizer	AC	_____	_____	_____
			Subtotal Landscape Maintenance:	_____
<b>9. Erosion Control and Cover Maintenance</b>				
Sodding	SY	_____	_____	_____
Regrading	AC	_____	_____	_____
Liner Repair	SY	_____	_____	_____
Clay	CY	_____	_____	_____
			Subtotal Erosion Control and Cover Maintenance:	_____
<b>10. Storm Water Management System Maintenance</b>				
Conveyance Maintenance	LS	1	_____	_____
			Subtotal Storm Water Management System Maintenance:	_____
<b>11. Security System Maintenance</b>				
Fences	LS	1	_____	_____
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

#### Operation

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 (\$): \_\_\_\_\_



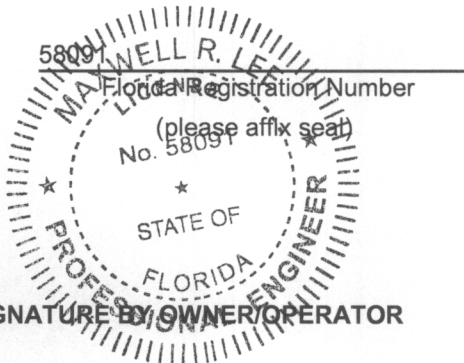
## VI. CERTIFICATION BY ENGINEER

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.

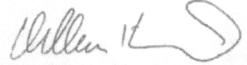
  
\_\_\_\_\_  
Signature

Maxwell R. Lee, Ph.D., P.E.  
\_\_\_\_\_  
Name and Title (please type)

9/23/2020  
\_\_\_\_\_  
Date



## VII. SIGNATURE BY OWNER/OPERATOR

  
\_\_\_\_\_  
Signature of Applicant

William Kissel, Sr. Env. Manager  
\_\_\_\_\_  
Name and Title (please type)

wkissel@titanamerica.com  
\_\_\_\_\_  
E-Mail address (if available)

PO Box 5127  
\_\_\_\_\_  
Mailing Address

Gainesville, FL 32627-5127  
\_\_\_\_\_  
City, State, Zip Code

mlee@kooglerassociates.com  
\_\_\_\_\_  
E-Mail address (if available)

\_\_\_\_\_  
Telephone Number

455 Fairway Drive Suite 200  
\_\_\_\_\_  
Mailing Address

Deerfield Beach, FL 33441  
\_\_\_\_\_  
City, State, Zip Code

954-425-4210  
\_\_\_\_\_  
Telephone Number