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Gainesville, FL 32627-5127
Physical: 4014 NW 13th Street
Gainesville, FL 32609-1923
www.kooglerassociates.com
352.377.5822

654-21-10
August 30, 2021

Sent via Email: Rashid.Istambouli@miamidade.gov

Rashid Z. Istambouli, P.E., Chief
Department of Regulatory and Economic
Resources
701 NW 1st Ct., 7th Floor
Miami, Florida 33136

RECEIVED

SEP 14 2021

R.E.R.
POLLUTION REGULATION

Scan/m

RE: Annual Cost Estimate for Titan America – Pennsuco Tire Processing Facility, FDEP
File No. 0314354-002-WT/WACS No. 100946

Dear Mr. Istambouli:

On behalf of Titan America, Koogler and Associates, Inc., is submitting the enclosed annual cost estimate update for the Titan America Pennsuco Tire Processing Facility as required by permit 0314354-002-WT, Section 2. B. G. 2 – Annual Cost Estimates and Chapter 62-711.500 F.A.C., Waste Tire Site Notification and Requirements.

Enclosed with this submittal are the following documents:

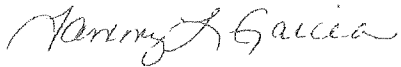
- Closing cost estimate signed and sealed by a Florida licensed Professional Engineer; and
- Third Party Estimate from Liberty Tire.

The third-party estimate from Liberty Tire was provided for another cement plant in Miami for their prior closing cost estimates in 2019. This same estimate was provided for the Titan 2019 and 2020 closing cost estimate update and was subsequently approved by Miami Dade County Department of Environmental Resource Management and the Florida Department of Environmental Protection (FDEP). Koogler has been unable to locate a third party that is willing to continue to provide these estimates. Therefore, the FDEP inflation factor for September 2021 was used to update the third-party estimate obtained from Liberty Tire in 2019. In 2019, the FDEP informed Koogler that using the inflation factor was acceptable.

This updated closing cost estimate is \$38,595.15, which is less than the current Guarantee Bond secured by a Trust Fund Agreement – Bond Rider of \$43,000 which became effective on November 1, 2020.

If you have any questions regarding this submittal, please contact me at (352) 377-5822 or tgarcia@kooglerssociates.com.

Best regards,

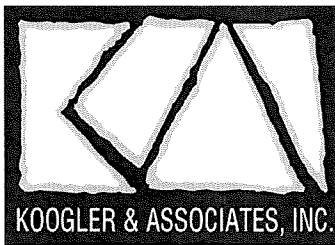
A handwritten signature in cursive script, appearing to read "Tammy L. Garcia".

Tammy L. Garcia
Environmental Scientist II

/tlg

Enclosures

cc: Johnny Vega and Bruce Coward - DERM (*Email*)
Tor Bejnar – FDEP Financial Assurance Subsection (*Email*)
Maxwell R. Lee – Koogler and Associates, Inc. (*Email*)
Camren Richter– Titan America (*Email*)



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

Closing Cost Estimate - August 2021

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

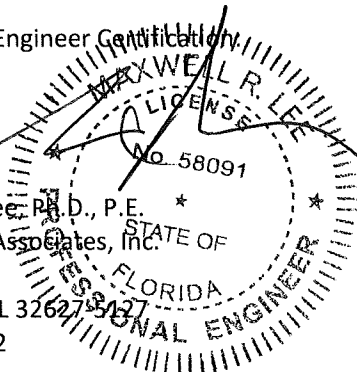
The estimated cost to remove, transport, process, and dispose of the maximum permitted amount of waste tires stored at the facility at any time (300 tons) is as follows:

The closure amount approved in the 2020 cost estimate:	\$38,137.50
Multiplied by the FDEP annual inflation factor of 1.012 ¹ =	TOTAL \$38,595.15

Professional Engineer Certification

Signature

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



Date

9/13/21

Seal:
No. 58091

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



9675 Range Line Road
Port Saint Lucie, FL 34987
Ph (772) 465-0477
Fax (772) 489-2124

February 18, 2019

Mr. M. Roger Hogg
Environmental Manager
Cemex Miami
1200 NW 137th Avenue
Miami, FL 33182

Subject: Site Closure

Dear Mr. Hogg,

I am pleased to provide this proposal as follow up to our discussion of Friday, February 15th. As I indicated, Liberty Fire Recycling is prepared to load, transport, process and dispose of up to 300 tons of whole tires in the event of site closure. This proposal pertains to whole passenger tires but does not cover off road tires (forklift, tractor, loader, grader etc.)

- The cost to load, transport, process and dispose would be One Hundred twenty five dollars per ton. Please note that this proposal covers the entire cost of handling the subject tires.

If you have any further questions or need any additional information please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phil Tuohy".

Phil Tuohy
Region Manager

Mobile (863) 860-2436