



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Memorandum

TO: John Sego, Professional Geologist
Permitting and Waste Cleanup Program, SWD

THROUGH: Brian Dougherty, Program Manager
District & Business Support Program, DWM X

BID

FROM: Jason French, Engineering Specialist
District & Business Support Program, DWM X

SUBJECT: **Site Rehabilitation Completion Report Response to Comments**, March 31, 2020
Coca-Cola Foods (Former Minute Maid – Dunedin Plant)
427 San Christopher Drive, Dunedin, Pinellas County, Florida
Site ID: COM_228580

DATE: April 29, 2020

The District and Business Support Program (DBSP) has reviewed the Site Rehabilitation Report (SRCR) Response to Comments (RTC), dated March 31, 2020, submitted by Gannett Fleming, Inc. for Coca-Cola Foods (Former Minute Maid – Dunedin Plant) (site).

An Amendment to the Natural Attenuation Monitoring (NAM) Plan Approval Order for this site, which alters the Agency ordered action levels, or record of such an amendment being issued could not be located. Please provide a copy of the NAM Order Amendment that redefines the action level for arsenic in well MW-8D to 205 micrograms per liter. Please be advised that an informal communication such as an email or documentation of verbal approval to change the action levels are insufficient to alter an agency order.

A minimum of two groundwater monitoring events must be performed to demonstrate that groundwater contaminant concentrations remain below action levels and satisfy the conditions for closure. An event in which a contaminant concentration exceeds an action level in the NAM Order cannot be considered as one of the two consecutive events used to demonstrate that the plume is stable or shrinking; therefore, at least one more sampling event must be completed in order to satisfy the February 5, 2019 NAM Plan Approval Order and the conditions of Rule 62-780.690(8)(g), Florida Administrative Code.

If you have any questions, please contact me at jason.french@floridadep.gov or (850)-245-8880.

From: [ODBS_Review](#)
To: [Sego, John R.](#)
Cc: [French, Jason T](#); [Herring, Vanessa](#)
Subject: FW: DBSP Review Request for COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT), Site ID: COM_228580
Date: Wednesday, April 29, 2020 8:31:38 AM
Attachments: [2020_04_29 - Coca-Cola Refreshments - COM_228580 - SRCR RTC 2 Review.pdf](#)

John,

Please see attached review memo from the District and Business Support Program.
Contact the reviewer with any questions or follow up.

Vanessa, please log out.



Thanks.
Brian Dougherty
Program Manager
District and Business Support Program

From: French, Jason T <Jason.French@floridadep.gov>
Sent: Wednesday, April 29, 2020 7:43 AM
To: ODBS_Review <ODBS_Review@dep.state.fl.us>
Subject: Re: DBSP Review Request for COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT), Site ID: COM_228580

Finalized.

From: ODBS_Review <ODBS_Review@dep.state.fl.us>
Sent: Tuesday, April 28, 2020 3:56 PM
To: French, Jason T <Jason.French@floridadep.gov>
Subject: RE: DBSP Review Request for COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT), Site ID: COM_228580

Couple of minor edits.

From: French, Jason T <Jason.French@floridadep.gov>
Sent: Tuesday, April 28, 2020 7:51 AM
To: ODBS_Review <ODBS_Review@dep.state.fl.us>; Herring, Vanessa <Vanessa.Herring@FloridaDEP.gov>
Subject: Re: DBSP Review Request for COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT), Site ID: COM_228580

Brian,

I think they make a fair point in that they responded to the action level exceedance with one NAM event, and (including the event with the action level exceedance) they have at least two consecutive events demonstrating closure conditions are satisfied. What this boils down to is, can that event with an action level exceedance be considered one of the two consecutive events required for closure.

-Jason

From: ODBS_Review <ODBS_Review@dep.state.fl.us>
Sent: Wednesday, April 1, 2020 1:13 PM
To: French, Jason T <Jason.French@floridadep.gov>; Herring, Vanessa <Vanessa.Herring@FloridaDEP.gov>
Cc: Sego, John R. <John.R.Sego@FloridaDEP.gov>
Subject: FW: DBSP Review Request for COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT), Site ID: COM_228580

Jason, for your review.

Vanessa, please log in.

Thanks.

Brian

-----Original Message-----

From: Sego, John R. <John.R.Sego@FloridaDEP.gov>
Sent: Wednesday, April 1, 2020 9:33 AM
To: ODBS_Review <ODBS_Review@dep.state.fl.us>
Subject: DBSP Review Request for COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT), Site ID: COM_228580

Please see attached review request for the COCA-COLA FOODS (FORMER MINUTE MAID - DUNEDIN PLANT) site, Response to DBSP Comments. A Conditional Site Rehabilitation Completion review is being requested. Thank you.