



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

March 24, 2022

Doug Maier, Vice President  
SLG Management Services LLC  
4200 Marsh Landing Boulevard Suite 100  
Jacksonville, Florida 32250  
[dmaier@arendale.com](mailto:dmaier@arendale.com)

**Re: Former Ponce de Leon Resort – AKA Madeira Property  
4000 US Highway 1 North, St. Augustine, Florida  
Site #: ERIC\_13653  
BF Site ID # 550601001  
St. Johns County – Waste Cleanup**

Dear Mr. Maier:

The Florida Department of Environmental Protection (DEP) has received the “Engineering Control Maintenance Plan Modification – Revised Pools Protocol,” dated January 27, 2022, completed in response to DEP’s January 7, 2022 comments, and prepared by SCS Engineers for the above-referenced site. This Engineering Control Maintenance Plan (ECMP) includes engineering controls for areas covered by 2 feet of clean fill and impervious surfaces providing caps to prevent direct exposure to remaining soil that exceeds the arsenic residential soil cleanup target level (SCTL) (2 feet of clean fill over residential lots) or soils that exceed the commercial/industrial SCTL (placed under impervious asphalt roadways).

Also included in the ECMP are specific procedures and instructions for the installation of swimming pools since pool construction will breach the 2-foot clean fill cap when installed. The construction of pools will also require the management and disposal of contaminated soils and potentially contaminated groundwater.

The pool installation requirements will be managed by the subdivision’s Homeowner’s Association (HOA). Prior to commencing pool construction, the proposed pool design will be reviewed and approved by the HOA Architectural Review Board (ARB) for compliance with the HOA requirements, the Declaration of Restrictive Covenant, and the Pool Installation Protocol. The pool contractor will need to follow all of these requirements. Subsequently, the homeowner will provide written notification to DEP and allow DEP access for inspection throughout the construction period.


In Summary, the modifications to the ECMP, based on DEP’s January 7, 2022 comments were included and these changes are adequate. The revised ECMP appears to be adequate for its intended purpose.

Doug Maier, Vice President  
SLG Management Services LLC  
March 24, 2022

Please notify me in writing (via e-mail) within five days prior to initiating any field activity. Should you have any questions, you may contact me at [darrin.mckeehen@dep.state.fl.us](mailto:darrin.mckeehen@dep.state.fl.us) the letterhead address or at 904.256.1545.

Sincerely,



 Darrin A. McKeehen, P.G.  
Waste Cleanup Section

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