



May 9, 2022

Marinette Marine Corp.
Attn: Makayla Jacobs
1600 Ely Street
Marinette, WI 54143
Via Electronic Mail Only to Makayla.Jacobs@us.fincantieri.com

Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
Marinette Marine - # 10 Bldg Expansion, 1600 Ely Street, Marinette, Wisconsin
DNR BRRTS Activity # 02-38-555082
FID #: 438005480

Dear Ms. Jacobs:

On April 20, 2022, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). As discussed with your consultant, Andrea Lorenz of Foth Infrastructure & Environment, LLC, on April 25, 2022, case closure is not recommended because additional legal requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with the information requested or your written response regarding the necessary work and a schedule for completion of this work.

Additional Requirements Needed for Case Closure Under Wis. Admin. Code ch. NR 726

As noted above, additional work is necessary to meet the requirements for case closure because the potential for vapor intrusion has not been adequately investigated in the vicinity of both underground storage tank (UST) locations. Additionally, soil and groundwater sampling should be conducted in the vicinity of the northeast gasoline UST as the depth of the residual contamination above groundwater pathway residual contaminant levels (RCLs) was not documented and groundwater samples have not been collected. Since this site is located on the Menominee River, an evaluation on whether sediment should be sampled must also be submitted.

Need to Define the Degree and Extent of Contamination

Additional soil, groundwater, and vapor sampling is needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11.

Need to Complete a Vapor Investigation

Additional site investigation, per Wis. Admin. Code § NR 716.11 (5), is needed to determine whether vapor intrusion is a completed pathway at this site, or if there is a risk of future vapor exposure due to residual contamination. If vapor intrusion is an issue at this site, document all source control actions taken under Wis. Admin. Code § NR 726.05 (8). High concentrations of petroleum volatile organic

compounds and naphthalene (PVOC+N) are present in soil within the 2-4' interval at the soil sampling location P-41, which is located directly adjacent to the south wall of building 10. Sub-slab vapor sampling is required in order to assess if vapor intrusion could be a concern. Additionally, sub-slab sampling may be required in the northeast UST area. Vapor screening criteria in DNR guidance document RR-800 should be assessed once the depth of residual soil contamination is known and if groundwater contamination is present.

Need to Conduct Additional Groundwater Monitoring

Additional groundwater monitoring is needed to establish compliance with the closure criteria of Wis. Admin. Code § NR 726.05 (6). Groundwater in the northeast UST area needs to be assessed for PVOC+N due to the presence of residual soil contamination above residual contaminant levels at an unknown depth. While installing a monitoring well, soil samples should be collected and analyzed for PVOC+N.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements. A workplan should be submitted at that time as per Wis. Admin. Code § NR 716.09 (1). The planned work should begin within 90 days of the approval of that workplan, per Wis. Admin. Code § NR NR 716.11 (2g).

Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the newly assigned DNR project manager, Dave Neste, at david.neste@wisconsin.gov or (920) 362-2072. For more information on the closure reconsideration process, please see DNR publication, RR-102, “Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process” by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation & Redevelopment Program

cc: Tom Carrow, Marinette Marine Corp. (Tom.Carow@us.fincantieri.com)
Andrea Lorenz, Foth Infrastructure & Environment, LLC (Andrea.Lorenze@foth.com)