

## Neste, David E - DNR

---

**From:** Neste, David E - DNR  
**Sent:** Wednesday, March 1, 2023 2:30 PM  
**To:** Lorenz, Andrea  
**Cc:** Meller, Bob; Frozena, Michele L; Jacobs, Makayla; Carow, Tom  
**Subject:** RE: Marinette Marine Building #10 Closure

Andrea,

The DNR has reviewed the information submitted and concurs that additional data collection at the site would not be feasible at this time.

Please submit a revised closure request which cites the pavement as a structural impediment to completing the investigation. The structural impediment will be added as a continuing obligation at closure – if the pavement is removed in the future, the investigation can be completed.

If you have any questions, please feel free to contact me.

Thanks,  
Dave

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Dave Neste

Cell Phone: (920) 362-2072  
david.neste@wisconsin.gov

---

**From:** Lorenz, Andrea <Andrea.Lorenz@foth.com>  
**Sent:** Friday, January 20, 2023 4:15 PM  
**To:** Neste, David E - DNR <David.Neste@wisconsin.gov>  
**Cc:** Meller, Bob <Bob.Meller@Foth.com>; Frozena, Michele L <Michele.Frozena@Foth.com>; Jacobs, Makayla <Makayla.Jacobs@us.fincantieri.com>; Carow, Tom <Tom.Carow@us.fincantieri.com>  
**Subject:** Marinette Marine Building #10 Closure

**CAUTION: This email originated from outside the organization.  
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear David,

As you know, Foth submitted a case closure request on behalf of Marinette Marine for the Building #10 Expansion (BRRS #02-38-555082). Case closure was subsequently not recommended by the Wisconsin Department of Natural Resources (WDNR) in a letter dated May 9, 2022. As we discussed on a phone call, specific site characteristics are relevant with regard to the additional requirements referenced in the WDNR closure “not recommended” letter, which are discussed below.

Additional requirements needed for case closure according to the WDNR letter include:

- Define degree and extent of contamination for the area of the former northeast tank. Conduct groundwater sampling in the area of the former northeast tank
- Investigate the potential for vapor intrusion in the areas of both former tanks (northeast and southwest). Complete subslab vapor sampling
- Evaluate the potential for impacts to sediment based on the proximity of the site to the river

The site investigation completed for the site utilized soil and groundwater sampling conducted in 2010. The contaminants identified near the former tanks were petroleum volatile organic compounds (PVOCs). Remedial actions were completed during construction including soil management and closure of the tanks. Due to ready nature of PVOCs to biodegrade and the completed remedial actions, it is likely/possible that the soil concentrations would be less than originally detected.

Building #10 and its surrounding pavement have been built to meet specifications and certifications from the U.S. Navy for the purpose of building the U.S. Navy class vessels which are manufactured at the site. The U.S. Navy specifies requirements for building foundations and pavement that will support these vessels. The U.S. Navy requires the floor and surrounding pavement to maintain structural integrity to ensure the safety of the ships as they are constructed, assembled, transported, and launched. As a result, the foundations and pavement are not allowed to be compromised; therefore, additional environmental work is not feasible at these locations. It should be noted that due to the NAVSEA certification requirements, the foundations and pavement design is more robust than standard construction (e.g. pavement sections are 22 inches thick). During internal discussions following submittal of the case closure request, it was determined that the former northeast tank was identified at a location within the current exterior of Building #10, which is in the footprint of the heavy pavement sections, which will be further enhanced during current construction.

Based on this information, the WDNR requirements referenced above are discussed as follows:

- *Define degree and extent near former northeast tank.* This definition is not warranted because:
  - Much of the area near the former northeast tank was excavated for the construction of Building #10 and the shiplift. It is unlikely that residual contaminated soil is present.
  - The water table is relatively high due to the adjacent river and vadose zone soils may not be present, preventing collection of soil samples.
  - Due to the restrictions on pavement penetrations to maintain pavement integrity, soil sampling and groundwater monitoring wells are not feasible.
  - Collecting samples in this area may not be safe for the sampler.
- *Vapor intrusion potential.*
  - The potential for vapor intrusion is unlikely due to relatively low concentrations of contaminants, the thick floor profile preventing the completed pathway, and the source (former northeast tank) located on Building #10's exterior.
  - Current conditions indicated that vapor intrusion is not occurring. FMM conducted indoor air sampling (see attached map) and volatile organic compounds were not detected. Additionally, Building #10 contains air exchange units to maintain a healthy work environment and the concentrations, however low, of potential vapor compounds intruding from the subslab would be managed with this system.
  - Due to the restrictions on pavement penetrations, subslab vapor sampling is not feasible.
- *Sediment.* During the construction of the shiplift, sediment was dredged to bedrock to achieve the required depths. Therefore, any sediment that may have been impacted has been removed.

In general, the low potential residual contamination is not a threat to human health or the environment and if present is encapsulated by the thick pavements. Due to the above information, Foth, on behalf of FMM, requests that the case closure be reviewed. Please let us know if you have any questions.

Thank you,

**Andrea Lorenz, PE, PG**  
Licensed in IA, IL, MN and WI  
Lead Environmental Engineer



**Foth Infrastructure & Environment, LLC**

Ballpark Commons Office Building

7044 South Ballpark Drive, Ste 200

Franklin, WI 53132

Office: (414) 336-7900

Direct: (414) 336-7921

Cell: (414) 458-8573

[foth.com](http://foth.com)