



August 31, 2021

Fincantieri Marinette Marine, LLC
Mr. Thomas Carow
Environmental Safety and Health Director
1600 Ely Street
Marinette, WI 54143
Via Electronic Mail Only to Tom.Carow@us.fincantieri.com

Subject: Review of Site Investigation Work Plan
Marinette Marine Bldg 34
1600 Ely Street, Marinette, Wisconsin
BRRTS #: 02-38-587281

Dear Mr. Carow:

On July 23, 2021, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Work Plan* (Report) prepared for Fincantieri Marinette Marine, LLC (FMM) by AECOM Technical Services, Inc. (AECOM). The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

Beginning in the 1880's through the mid-1900's some of the riverfront areas along the Menominee River were used as dump sites for sawmill and municipal waste. Historic records indicate a former municipal dump may have existed in the southwestern corner of the FMM employee parking area, to the west of the building 34 footprint. The exact location of the former dump is not known. In relation to the construction of buildings 34 and 35 on the southern portion of the FMM property, an assessment of subsurface soils and groundwater was conducted for characterization purposes related to soil management and disposal. Laboratory analytical results for soil and groundwater samples as part of the assessment indicated volatile organic compound (VOC), polycyclic aromatic hydrocarbons (PAHs), metals, and per- and polyfluoroalkyl substances (PFAS) impacts were present at the property. A responsible party notification letter was issued on March 9, 2021.

SIWP Summary

The Report is an initial work plan which proposes a two-phase approach. The initial phase involves a review of historic records for the general area to create a historic site map. The map will include any historic structures and/or fill areas that could serve as potential sources for the contaminant impacts documented at the property.

The secondary phase of the work plan includes initial field work scheduled to begin summer/fall 2021. To delineate the environmental impacts of the reported discharge, the Report recommended completion of the following activities:

- Installation of sixteen (16) soil borings advanced to 12 to 20 feet below ground surface (bgs). These borings will then be converted into NR 141-compliant monitoring wells.
 - One (1) soil sample from above the observed water table and/or highest PID reading for petroleum volatile organic compounds (PVOCs), PAHs, Resource Conservation and Recovery Act (RCRA) metals, and PFAS compounds.
 - Following development, groundwater monitoring wells are proposed to be sampled for PVOCs, polychlorinated biphenyl (PCBs), PAHs, and RCRA metals. Metals samples will be field filtered.
- Due to the on-going construction activities in the areas of buildings 34 and 35, perimeter borings/wells located along the west and east property boundaries will be installed in the summer/fall 2021. Construction activities are expected to conclude in the spring of 2022. Additional borings/monitoring wells in the central portion of the property will be installed after construction is complete.

DNR Review of the SIWP

Following the DNR's review of the Report, the DNR concurs that the proposed work can proceed.

Other DNR Comments

1. Collect a sample from each soil boring for laboratory analysis for PCBs. Results of the November 25, 2020 Phase II Environmental Site Assessment (ESA) indicated the presence of total PCBs in concentrations greater than NR 720 residual contaminant level (RCL) based on the protection of groundwater. Additional soil analytical data will be necessary to determine if this is a property-wide issue derived from the presence of historic fill material.
2. The work plan proposes the analysis of collected soil and ground samples for PVOCs. Based on the anticipated presence of historic fill of unknown origin, the DNR recommends these samples be analyzed for VOCs.
3. Based on laboratory analytical results, additional assessment may be required.

Schedule

The submitted Report does include a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). Furthermore, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Cod § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 day of submittal of the work plan.
- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.

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- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me at (920) 362-2072 or david.neste@wisconsin.gov.

Sincerely,



David Neste
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Mark Sericati, Fincantieri Marinette Marine (Mark.Sericati@us.fincantieri.com)
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