DRAFT
November 7, 2002

Mr. _____
Wisconsin Department of Natural Resources.
_____
_____, WI _____

Subject: **First Semi-Annual Progress Report**
Interim Remedial Measure Implementation
PPG Industries, Inc. Oak Creek, Wisconsin Facility

Dear Mr. _____:

This letter is being submitted to fulfill the progress reporting requirements for a remedial action taken under Wisconsin Administrative Code (WAC) NR 700 at the PPG Industries, Inc. (PPG) Site (Site) located at 10800 South 13th Street in the City of Oak Creek, Wisconsin. This report presents the activities that have been undertaken by PPG in order to address a spill of xylene and naptha reported to the WDNR on February 12, 2002. Additionally, this letter presents the anticipated activities that will occur during the next six months.

Activities Undertaken Since February 2002

Immediately after the spill, PPG initiated an emergency remedial action and removed visibly contaminated soil from the spill area. PPG then initiated recovery activities by installing an interim recovery well into the backfill of the abandoned fire water line that is present in the spill area. This well has been pumping continuously in an effort to hydraulically contain the spill. The volume of water pumped varies depending on precipitation recharge but averages less than 2,000 gallons per day. Laboratory analysis of system influent indicates that concentrations in the recovered groundwater have ranged from 0.341 to 73.0 mg/l of xylene. Since the emergency remedial actions were initiated in March of 2002, PPG has estimated that approximately 90 pounds of xylene has been recovered (including both the soil excavation and groundwater extraction).

Groundwater recovered from the spill area is containerized in an onsite fractionation tank until full, at which time the water is run through an oil/water separator and then an air stripper prior to discharge to the POTW. Prior to treatment, the water is sampled to determine xylene concentration. After treatment, the water is discharged to the Publicly Owned Treatment Works (POTW) via sewer lines under a sewer discharge permit.

In June of 2002, PPG contracted MFG, Inc. (MFG) of Pittsburgh, PA to investigate the extent of subsurface migration of the spill, and to design and install an interim action remedial system to remove the residual xylene and naptha from soil and groundwater. The subsurface investigation was conducted to define the nature and extent, and the potential migration pathways of the spilled material.

The investigation consisted of drilling seventeen Geoprobe® soil borings in the vicinity of the PPG RAX Building to collect soil and groundwater samples. Additionally, six 4" ID monitoring wells were installed utilizing a rotary drill rig. The wells were constructed such that the well screens were in

communication with the water table surface and approximately 2-3 feet of the well screen was installed above the water table to facilitate detection of light non-aqueous phase liquid (LNAPL), if present. During the investigation, soil and groundwater samples were collected and analyzed for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH). Four of the wells (MW-1, 2, 3 and 4) had measurable LNAPL on the groundwater surface.

As an interim measure, MFG conducted four dual-phase extraction (DPE) events on July 2, 19, 26 and August 8, 2002 using a vacuum truck to recover the xylene/naptha solvent observed adjacent to the RAX Building. These DPE events had several objectives: (1) remove available LNAPL; (2) volatilize and recover available adsorbed-phase hydrocarbons, (3) evaluate the effectiveness of further DPE events using a vacuum truck; and, (4) obtain field data necessary to design a semi-permanent DPE recovery system, if deemed necessary. Based on analytical samples collected during the DPE events, the four vacuum extraction events removed an estimated 1,125 pounds of xylene/naptha from the soil and groundwater. The four DPE events reduced the LNAPL thickness to approximately ½-inch.

Future Activities

PPG is anticipating performing additional DPE events at monitoring wells MW-1 through MW-4 to remove measurable LNAPL adjacent to the RAX Building. The effectiveness of the product removal will be evaluated after each DPE event, to determine recovery efficiency from the monitoring network and the necessity for additional events.

Upon the removal of LNAPL, water level measurements will be taken from the monitoring wells to ensure that a "rebound" of LNAPL does not occur due to water level fluctuation or desorption from soil. Upon confirming the absence of LNAPL, water quality samples from monitoring wells MW-1 through MW-6 will be obtained to evaluate site-specific groundwater concentrations relative to WAC groundwater quality standards. Based upon these results, a long-term remedial strategy for the site will be developed. The remedial strategy will evaluate the potential to incorporate passive remedial technologies such as natural attenuation as a final corrective measure for the site.

Closing

If you have any questions regarding this submittal, or require any further information, please contact me at (412) 492-5512.

Sincerely,
PPG Industries, Inc.

Brian McGuire, P.E.
Senior Engineering Associate