



PPG Industrial Coatings

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Mr. Scott Ferguson
Wisconsin Department of Natural Resources.
2300 North Dr. Martin Luther King Drive
P.O. Box 12436
Milwaukee, WI 53212

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

Dear Mr. Ferguson:

This letter is being submitted to fulfill the progress reporting requirements under Wisconsin Administrative Code (WAC) NR 700 at the PPG Industries, Inc. site located at 10800 South 13th Street in Oak Creek, Wisconsin. This report describes continuing activities undertaken by PPG to address a spill of xylene and naphtha initially 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 November 2002

Environmental contractor MFG Inc. continues to assist in the monitoring and remediation activities. MFG conducted a dual-phase extraction (DPE) event on December 5, 2002. Prior to the extraction, product thickness was evaluated at all six monitoring wells. Free product was observed at three of the six wells (MW-1, MW-3 and MW-4). These three wells were then used as extraction points for the DPE event. Water extracted from the wells was collected in a holding tank prior to treatment and discharge to the POTW. Based on a conservative estimate of a 1/16" thick product layer on the surface of the water in the holding tank (only a sheen was actually observed), and measured vapor concentrations, an estimated 7.3 gallons of xylene/naphtha product was removed from the soil and groundwater. The extracted material from the DPE event was treated through the same separation and treatment process described in the previous report.

PPG has continued to pump groundwater in order to maintain containment in the vicinity of the release. In late December, the oil/water separator and air stripper system was replaced with a two-stage carbon filtration system. This utilizes a level-activated pump in well MW-1, and the water is treated through a carbon filter prior to discharge to the POTW in accordance with the facility's sewer discharge permit. The volume of water pumped varies depending on precipitation recharge but has averaged approximately 1,500 gallons per day. Based on periodic sampling, it is estimated that an additional 10-15 gallons of product have been removed in this manner.

On March 4, 2003, monitoring wells were again sampled and the results compared to previous sampling events. On this occasion, LNAPL was present in wells MW-1, MW-2 and MW-3 but not in MW-4 (as observed previously), MW-5 or MW-6. Samples were collected from monitoring wells without LNAPL. The analytical data showed a general decline in organic concentrations from previous samples as summarized in the following table:

	NR-140 Criteria		MW-4		MW-5		MW-6	
	Preventive Action Level	Enforcement Standard	6/21/2002	3/4/2003	6/21/2002	3/4/2003	6/18/2002	3/4/2003
Ethylbenzene	140	700	NA ⁽¹⁾	1100	510	230	0.28	<0.53 ⁽²⁾
Xylene	1000	10000	NA	9200	2550	677.4	1.05	<1.83

(1) NA = Not Analyzed, due to presence of free product in the well

(2) "<" = Less than reporting limit

(3) All concentrations are in µg/L

PPG has installed hydrocarbon-absorbent "socks" into wells MW-2, 3, and 4. These serve to scavenge the small amounts of organic contamination in these wells. The socks are replaced periodically to ensure their effectiveness.

Planned Activities

The dramatic reduction in the volume of product recovered during the December 2002 extraction event indicates that free product has been removed to the point where Dual Phase Extraction is no longer effective, and should be discontinued unless conditions change in the future. PPG will continue to pump groundwater through the existing treatment system until treatment is no longer required to comply with permit discharge limitations. PPG will continue to utilize hydrocarbon-absorbent socks in wells MW-2, 3, and 4. Product thickness measurements and groundwater sampling will be completed in early June to evaluate the impact of recent rainfall. Future product thickness measurements and groundwater sampling will be conducted on a semi-annual basis beginning in October 2003. Water quality samples from monitoring wells MW-1 through MW-6 will be evaluated relative to WAC groundwater quality standards and treatment options adjusted based upon the results.

Closing

PPG will submit semi-annual progress reports to WDNR and advise immediately if there is any significant change in conditions at the site. If you have any questions regarding this submittal, or require any further information, please contact me at (414) 571-2590.

Sincerely,



David Thaman.
Manager, Plant Services

cc: Jason Chapelle – WDNR S.E. Region, Water Division
Brian McGuire – PPG EHS, Allison Park

Summary of Groundwater Analytical Results for Xylene Spill Area
PPG Oak Creek, Wisconsin

	Units	NR-140 Criteria		MW-4		MW-5		MW-6	
		Preventive Action Limit	Enforcement Standard	--	3/4/2003	6/21/2002	3/4/2003	6/18/2002	3/4/2003
Ethylbenzene	µg/l	140	700	NA ⁽¹⁾	1100	510	230	0.28	<0.53 ⁽²⁾
Xylene	µg/l	1000	10000	NA	9200	2550	677.4	1.05	<1.83
1,2,3-Trimethylbenzene	µg/l			NA	300		33		<0.66
1,2,4-Trimethylbenzene	µg/l	96 ⁽³⁾	480 ⁽⁴⁾	NA	1300	61	180	0.29	<0.69
1,3,5-Trimethylbenzene	µg/l			NA		17		<0.08	

(1) "NA" indicates not analyzed due to the presence of free product on the surface of the water.

(2) "<" indicates less than the reporting limit.

(3) The Preventive Action Limit is the sum of both the 1,2,4- and 1,3,5-isomers.

(4) The Enforcement Standard is the sum of both the 1,2,4- and 1,3,5-isomers.

Carbon filter samples:

*- significant reduction of influent concentration
(maybe due to rainfall)*

*Absorbent Socks in wells 2, 3 and 4
4 smell to no odor*