

PPG Industries, Inc. 10800 S. 13th Street, Oak Creek WI 53154 (414) 764-6000

November 28, 2006

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

Subject:

Ninth 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 Wisconsin Department of Natural Resources (WDNR) on February 12, 2002. Additionally, this letter presents the anticipated activities that will occur during the next six months.

Activities Undertaken Since May 2006

Environmental contractor MFG Inc. continues to assist in the monitoring and remediation activities. PPG has continued to pump groundwater from well MW-1 in order to maintain containment in the vicinity of the release. The water is pumped through a two-stage carbon filtration system from a level-activated pump in well MW-1. Water passing through the carbon filter is discharged 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 500 gallons per day.

On November 9, 2006, the monitoring wells were checked for light nonaqueous phase liquid (LNAPL); water levels were measured and groundwater samples were collected. On this occasion, LNAPL was not present in any of the wells. Note that MW-1 had the pump installed, but no free product was observed. Samples were collected from monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5 and MW-6. The sample collected from MW-1 was collected through the existing pump, at the sampling port, prior to the water entering the treatment system.

The analytical data showed an increase in both ethylbenzene and xylene at wells MW-2 and MW-3, and values similar to or lower than those observed in May 2006 from well MW-1. The concentrations in wells MW-4, MW-5 and MW-6 were all non-detect for both ethylbenzene and xylene for the fourth consecutive sampling event. The following table provides a summary of the results of the November sampling from the wells on the Site; Table 1 provides a summary of the results of all of the sampling events.

		Ethylbenzene	Xylenes	
	Preventive Action Level:	140	1,000	
	Enforcement Standard:	700	10,000	
Well Number	Date		1	
MW-1	11/09/06	430	1,520	
MW-2	11/09/06	14,000	110,000	
MW-3	11/09/06	12,000	99,000	
MW-4	11/09/06	<0.4 (1)	<1.1	
MW-5	11/09/06	<0.4	<1.1	
MW-6	11/09/06	<0.4	<1.1	

Notes:

All concentrations in µg/l.

Planned Activities

PPG will continue to pump groundwater through the existing treatment system until treatment is no longer required to comply with permit discharge limitations. Product thickness measurements and groundwater sampling will continue on a semiannual basis. Water quality samples from monitoring wells MW-1 through MW-6 will be evaluated relative to WAC groundwater quality standards and alternative treatment options will be evaluated if results indicate a significant increase or decrease in concentrations. The next sampling event is scheduled for May 2007.

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) 764-6000 x439.

Sincerely,

Steve Fedewa.

Manager, Environmental Health & Safety

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

Robert Crowley - MFG Inc.

^{(1) &}quot;<" indicates less than reporting limit.

TABLE 1 **Summary of Historical Groundwater Sample Results** PPG Inc., Oak Creek, Wisconsin Facility

	MW-1		MW-2		MW-3		MW-4		MW-5		MW-6	
Date	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene
6/21/02	N/S ⁽¹⁾	N/S	N/S	N/S	N/S	N/S	N/S	N/S	510	2,550	0.28	1.05
3/4/03	N/S	N/S	N/S	N/S	N/S	N/S	1,100	9,200	230	677.4	< 0.53	<1.83
11/04/03	940	10,600	N/S	N/S	N/S	N/S	N/S	N/S	< 0.54(2)	<2.63	< 0.54	< 2.63
4/29/04	N/S	N/S	10,000	89,000	6,000	49,000	1.9	72	< 0.54	<2.63	< 0.54	<2.63
11/03/04	1,400	12,200	3,900	47,000	3,500	39,000	4.6	310	< 0.54	<2.63	< 0.54	<2.63
05/04/05	400	2,000	11,000	99,000	10,000	81,000	< 0.54	<2.63	< 0.54	<2.63	< 0.54	<2.63
12/22/05	480	3,420	15,000	123,000	11,000	97,000	< 0.54	<2.63	< 0.54	<2.63	< 0.54	<2.63
5/30/06	310	2,460	6,600	61,000	2,000	18,700	< 0.54	<2.63	< 0.54	<2.63	< 0.54	<2.63
11/09/06	430	1,520	14,000	110,000	12,000	99,000	<0.4	<1.1	<0.4	<1.1	<0.4	<1.1

Notes:

All concentrations in µg/l.

⁽¹⁾ N/S indicates not sampled.
(2) "<" indicates less than reporting limit.