



November 26, 2008

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

**Subject: Thirteenth 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 13<sup>th</sup> 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 2008**

Environmental contractor Tetra Tech 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 410 gallons per day.

On November 12, 2008, 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 in the pumped water effluent. 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 at the base of the first bag filter inside the PPG plant.

The analytical data showed an increase in both ethylbenzene and xylene at wells MW-2 and MW-3 compared to the concentrations observed in May 2008. Ethylbenzene and xylene were detected above their respective Enforcement Standard at MW-2 and MW-3 however, the concentrations resemble the historical results observed at these monitoring points since April 2003. The concentrations in wells MW-5 and MW-6 were all non-detect for both ethylbenzene and xylene. The analytical results at MW-5 have been non-detect for the eleventh consecutive sampling event. Ethylbenzene concentrations in MW-4 have also been historically non-detect, however, xylene was detected in this well at a concentration below the laboratory reporting limit. The following table provides a summary of the November 2008 sampling results from the Site wells; Table 1 provides a historical 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		
MW-1	11/12/08	54.6	380
MW-2	11/12/08	10,200	79,200
MW-3	11/12/08	8210	65,900
MW-4	11/12/08	<0.4 <sup>(1)</sup>	0.80 J
MW-5	11/12/08	<0.4	<1.1
MW-6	11/12/08	<0.4	<1.1

Notes:

All concentrations in µg/l.

"J" indicates estimated concentration below laboratory quantitation level.

(1) "<" indicates less than reporting limit.

**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. Groundwater sampling will continue on a semiannual basis and the wells will be checked for the presence of LNAPL. 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 in concentrations. The next sampling event is scheduled for May 2009.

**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 x374.

Sincerely,



Tom Tersine.  
Manager, Environmental Health & Safety

cc: Jason Chapelle – WDNR S.E. Region, Water Division  
Brian McGuire – PPG EHS, Allison Park  
Jason Trentini – Tetra Tech NUS, Inc.

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 <sup>(1)</sup>	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 <sup>(2)</sup>	<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
05/10/07	1,400	7,800	11,000	82,000	8,800	71,000	<1.1	<5.3	<0.54	<2.63	<0.54	<2.63
11/20/07	1,200	6,550	47,100	371,000	14,800	112,900	<0.50	1.04 J	<0.50	<0.62	<0.50	1.23 J
5/28/08	26.5	97.6	105	1,045	332	2,868	<0.4	1.70 J	<0.4	<1.1	<0.4	<1.1
11/12/08	54.6	380	10,200	79,200	8210	65,900	<0.4	0.80 J	<0.4	<1.1	<0.4	<1.1

Notes:

All concentrations in µg/l.

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