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

August 5, 2010

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

Subject: **Sixteenth 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 for the PPG Industries, Inc. facility 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 November 2009

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 200 gallons per day.

On May 24, 2010, the monitoring wells were checked for light non-aqueous 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, pre-treatment, inside the PPG plant.

The analytical data showed a decrease in both ethylbenzene and xylene at monitoring well MW-3 compared to the concentration observed in November 2009. The data also showed an increase of both ethylbenzene and xylene at monitoring well MW-2. The concentrations of ethylbenzene and xylene were detected above their respective Enforcement Standard at MW-2 and MW-3; however, continue to show a fluctuating but overall downward trend since April 2004. The concentrations in wells MW-1, MW-5 and MW-6 were all non-detect for both ethylbenzene and xylene. This is the first sampling event where MW-1 has been below the reporting limit for both ethylbenzene and xylene. The analytical results at MW-5 have been non-detect for the fourteenth consecutive sampling event and non-detect for ethylbenzene at MW-6 for the fifteenth consecutive sampling event. Ethybenzene concentrations in MW-4 were below the laboratory reporting limit; however, an estimated low level concentration of xylene was detected in

this well. The following table provides a summary of the May 2010 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	5/24/10	<0.41[1]	<0.87
MW-2	5/24/10	7,930	63,000
MW-3	5/24/10	1,020	8,030
MW-4	5/24/10	<0.41	0.41J
MW-5	5/24/10	<0.41	<0.87
MW-6	5/24/10	<0.41	<0.87

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 November 2010.

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) 571-2501.

Sincerely,

Jeffrey L. Bence
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[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
5/04/05	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
5/10/07	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
5/6/09	22.9	186.9	2,030	17,030	1,490	12,220	<0.4	0.42 J	<0.4	<1.1	<0.4	<1.1
11/3/09	16.6	72	6,280	50,400	3,310	27,510	0.68 J	9	<0.4	<1.1	<0.4	<1.1
5/24/10	<0.41	<0.87	7,930	63,000	1,020	8,030	<0.41	0.41 J	<0.41	<0.87	<0.41	<0.87

Notes:
All concentrations in µg/l.

[1] N/S indicates not sampled.
[2] "<" indicates less than reporting limit.