



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

June 24, 2011

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

**Subject: Eighteenth 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 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 November 2010**

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 Publicly Owned Treatment Works (POTW) in accordance with the facility's sewer discharge permit. The volume of water pumped varies depending on precipitation recharge but has averaged approximately 234 gallons per day.

On May 26, 2011, 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. A plan view map showing the monitoring well locations is provided in Attachment 1. 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 following table provides a summary of the May 2011 sampling results from the Site wells; Table 1 provides a historical summary of the results of all of the sampling events.

### Summary of May 2011 Results

		Ethylbenzene	Xylenes
Preventive Action Level:		140	1,000
Enforcement Standard:		700	10,000
Well Number	Date		
MW-1	5/26/2011	<0.41 <sup>(1)</sup>	0.42 J
MW-2	5/26/2011	583	4770
MW-3	5/26/2011	98.6	796
MW-4	5/26/2011	<0.41	<0.87
MW-5	5/26/2011	<0.41	<0.87
MW-6	5/26/2011	<0.41	<0.87

Notes:

All concentrations in µg/l.

(1) "<" indicates not detected at the reporting limit.

Ethylbenzene and xylene were either not detected or detected at concentrations below their respective Enforcement Standard at all wells. The analytical data shows a significant decrease in both ethylbenzene and xylene concentrations at monitoring well MW-1, MW-2, and MW-3 compared to November 2011 results. Groundwater samples from MW-1, MW-4, MW-5, and MW-6 were below detection limits for both ethylbenzene and xylene. Ethylbenzene and xylene were not detected at MW-5 for the sixteenth consecutive sampling event. At MW-6, ethylbenzene was not detected for the seventeenth consecutive sampling event and xylene was not detected for the seventh consecutive event.

### 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 2011.

### 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,



Jeffrey L. Bence

Manager, Environmental Health & Safety

*Mr. Scott Ferguson*

*June 24, 2011*

*Page 3*

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

Attachments

ATTACHMENT 1  
SITE PLAN



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 <sup>(1)</sup>	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene	Ethylbenzene	Xylene
6/21/02	N/S <sup>(2)</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>(3)</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
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
11/17/10	17.7	92.3	10,000	79,600	8,750	72,600	<0.41	<0.87	<0.41	<0.87	<0.41	<0.87
5/26/2011	<0.41	0.42J	583	4770	98.6	796	<0.41	<0.87	<0.41	<0.87	<0.41	<0.87

Notes:

All concentrations in µg/l.

(1) Xylene concentrations are the total concentration for m, o, and p isomers and for non-detections the greater of the detection limits for each isomer.

(2) N/S indicates not sampled.

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