



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

August 31, 2012

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

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**Subject: Twentieth 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 2011

Environmental contractor Tetra Tech continues to assist in the monitoring and remediation activities. PPG 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 pump in MW-1 was repaired following the November 2011 sampling event and was functioning at the time of the June 2012 sampling event. The volume of water pumped varies depending on precipitation recharge but has averaged approximately 735 gallons per day.

PPG also performed remediation activities this period on MW-2 and MW-3, the only well locations with concentrations of ethylbenzene and xylene remaining at concentrations exceeding the Preventive Action Level (PAL) of 140 ug/l, and 1,000 ug/l, respectively. On June 5, 2012, mobile vacuum recovery was performed on MW-2 and MW-3 using a combination of a vacuum truck and drum vacuum systems. The wells were checked for the presence of light non-aqueous phase liquid (LNAPL) prior to the vacuum event; none was identified. The primary objective was to accelerate the remediation of groundwater in the area of these wells showing levels of ethylbenzene and xylene at concentrations exceeding the Wisconsin standards through enhanced vacuum removal. Vacuum was applied to MW-2 for 2.5 hours and to MW-3 for 2 hours. During the vacuum event, a total of 18 gallons of water was removed from MW-2 and MW-3, combined approximately 15 gallons were collected using the vacuum truck for both wells and 3 gallons were collected from MW-2 using the drum vacuum. The relatively low recovery indicates low permeability and limited groundwater migration potential in the areas of these wells.

On June 17, 2012, the monitoring wells were checked for light non-aqueous phase liquid (LNAPL), water levels were measured, and groundwater samples were collected. LNAPL was not present in any of the wells. This marks the 17<sup>th</sup> consecutive round and 8 years where no LNAPL was detected. A plan view map showing the monitoring well locations is provided in Attachment 1. No free product was observed in the water collected from the well. 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 directly from MW-1 using a bailer to ensure a representative sample.

The following table provides a summary of the June 2012 sampling results from the Site wells; Table 1 provides a historical summary of the results of all of the sampling events.

Summary of June 2012 Results

		Ethylbenzene	Xylenes
Preventive Action Level:		140	1,000
Enforcement Standard:		700	10,000
Well Number	Date	µg/l	µg/l
MW-1	06/17/2012	<0.41 <sup>(1)</sup>	<0.87
MW-2	06/17/2012	3080	27,740
MW-3	06/17/2012	540	4,980
MW-4	06/17/2012	<0.41	11.1
MW-5	06/17/2012	<0.41	<0.87
MW-6	06/17/2012	<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 ES at all wells, except MW-2. Ethylbenzene and xylene concentrations at MW-2 exceeded the ES for both analytes. The analytical data shows a decrease in both ethylbenzene and xylene concentrations in MW-2 and MW-3 compared to the November 2011 results. Ethylbenzene was not detected in groundwater samples from MW-1, MW-4, MW-5, and MW-6 and xylene was not detected in samples from MW-1, MW-5, and MW-6. Xylene was detected in MW-3 and MW-4 but at concentrations below the PAL. Ethylbenzene and xylene concentrations have been either not detected or at concentrations below PAL in MW-1 for nine consecutive events (4 years) and in MW-4 for 16 consecutive events (7.5 years). Ethylbenzene and xylene were not detected at MW-5 for the 18th consecutive sampling event (8 years). At MW-6, ethylbenzene was not detected for the 19th consecutive sampling event (9 years) and xylene was not detected for the 9th consecutive event (4 years).

#### Planned Activities

PPG proposes to discontinue pumping of groundwater from MW-1 on October 1, 2012 because no LNAPL has been observed in the well for 17 consecutive semi-annual events (8 years) and concentrations of ethylbenzene and xylene have been non-detect or at concentrations far below the PAL since May 2008 (4 years). PPG is currently evaluating options to reduce concentrations in MW-2 and MW-3, including repeating the vacuum recovery event. However, given the relatively low recovery rate of groundwater during the previous vacuum event, it is apparent the formation in the area of these wells has a relatively low permeability and there is limited groundwater migration potential.

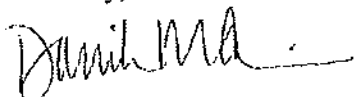
PPG also proposes to discontinue monitoring of MW-1, MW-4, MW-5 and MW-6 at this time because ethylbenzene and xylene concentrations have been either non-detect or at concentrations far below the PAL at both wells for many years. Ethylbenzene and xylene concentrations have been below the PAL at MW-1 since May 2008 (4 years) and MW-4 since April 2004 (8 years). MW-5 concentrations of ethylbenzene and xylene have not been above the PAL since November 2003 (8.5 years). In MW-6, ethylbenzene and xylene has never been detected above the Preventive Action Level since sampling began in 2002 (10 years).

Groundwater sampling will continue on a semiannual basis for MW-2, and MW-3 and the wells will be checked for the presence of LNAPL. Water quality samples from the MW-2 and MW-3 will be evaluated relative to WAC groundwater quality standards. The next sampling event is scheduled for November 2012.

### 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 the recommendation to cease pumping of MW-1 or modifications to the sampling program presented in this submittal, please contact me at (414) 764-6000 x555.

Sincerely,



Danielle Chikar  
EHS Engineer, PPG Industries Oak Creek

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

Attachments

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