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

December 3, 2012

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

**Subject:** **Twenty-First 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 June 2012

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 was pumped through a two-stage carbon filtration system from a level-activated pump in well MW-1. Water passing through the carbon filter was 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 had averaged approximately 711 gallons per day. As proposed in the 20th Annual Progress Report dated August 31, 2012, the pump was shut down on November 30, 2012. The MW-1 pump was removed from service because no LNAPL has been observed in the well for 18 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).

On November 8, 2012, the monitoring wells were checked for light non-aqueous phase liquid (LNAPL). LNAPL was not present in any of the wells nor was free product observed in the water collected from the wells. This marks the 18th consecutive round and 8 years where no LNAPL was detected. A plan view map showing the monitoring well locations is provided in Attachment 1. As proposed in the 20th Annual Progress Report dated August 31, 2012, samples were collected from monitoring wells MW-2 and MW-3, only, because ethylbenzene and xylene concentrations have been either non-detect or at concentrations far below the Preventive Action Level (PAL) for many years in wells MW-1, MW-4, MW-5, and MW-6. 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 PAL since sampling began in 2002 (10 years).

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

**Summary of November 2012 Results**

| | | Ethylbenzene | Xylenes |
|---|---|---|---|
| Preventive Action Level: | | 140 | 1,000 |
| Enforcement Standard: | | 700 | 10,000 |
| Well Number | Date | µg/l | µg/l |
| MW-2 | 11/8/2012 | ***4,840*** | ***42,000*** |
| MW-3 | 11/08/2012 | **559** | **4,700** |

Notes:
All concentrations in µg/l.

(1) MW-1, MW-4, MW-5, and MW-6 sampling was discontinued following the June 2012 sampling event.
(2) Bold indicated exceedance of the Preventative Action Level
(3) Italic indicates exceedance of the Enforcement Standard

Ethylbenzene and xylene concentrations at MW-2 exceeded the PAL and Enforcement Standard (ES) for both analytes. The analytical data shows an increase in both ethylbenzene and xylene concentrations in MW-2 compared to the June 2012 results. Ethylbenzene and xylene were detected in MW-3 at a concentration exceeding the PAL but below the ES. Ethylbenzene shows a slight increase in concentration and xylene shows a slight decrease in concentration in monitoring well MW-3, compared to the June 2012 results.

**Planned Activities**

Groundwater sampling will continue on a semiannual basis for MW-2, and MW-3 and all 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 May 2013.

**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 plans to cease pumping of MW-1, please contact me at (414) 764-6000 x555.

Sincerely,

Danielle Chikar
Manager, Environmental Health & Safety

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

**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[1] | Ethylbenzene | Xylene | Ethylbenzene | Xylene | Ethylbenzene | Xylene | Ethylbenzene | Xylene | Ethylbenzene | Xylene |
| 6/21/02 | N/S[2] | 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[3] | <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 |
| 5/26/11 | <0.41 | 0.42J | 583 | 4,770 | 98.6 | 796 | <0.41 | <0.87 | <0.41 | <0.87 | <0.41 | <0.87 |
| 11/1/11 | <0.41 | 4.3 | 5,580 | 45,100 | 8,000 | 66,200 | <0.41 | 2.6 | <0.41 | <0.87 | <0.41 | <0.87 |
| 6/17/2012 | <0.41 | <0.87 | 3,080 | 27,740 | 540 | 4,980 | <0.41 | 11.1 | <0.41 | <0.87 | <0.41 | <0.87 |
| 11/8/2012 | N/S | N/S | 4,840 | 42,000 | 559 | 4,700 | N/S | N/S | N/S | N/S | N/S | N/S |

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.

ATTACHMENT 1
SITE PLAN