



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

August 22, 2013

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

**Subject: Twenty-Second 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 2012**

Environmental contractor Tetra Tech continues to assist in the monitoring and remediation activities. 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). A plan view map showing the monitoring well locations is provided in Attachment 1.

On July 26, 2013, all 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 sample water collected from MW-2 or MW-3. This marks the 19<sup>th</sup> consecutive round and 8.5 years where no LNAPL was detected.

As proposed in the 20<sup>th</sup> Annual Progress Report dated August 31, 2012, samples were collected only from monitoring wells MW-2 and MW-3. Concentrations of ethylbenzene and xylene in wells MW-1, MW-4, MW-5, and MW-6, were either non-detect or at concentrations far below the PAL; MW-1 and MW-4 were below the PAL between May 2008 and June 2012 (4 years); MW-5 was below the PAL between November 2003 and June 2012 (8 years); and MW-6 was non-detect from 2002 to June 2012 (10 years).

The following table provides a summary of the July 2013 sampling results from the Site wells; Table 1 provides a historical summary of the results of all of the sampling events.

**Summary of July 2013 Results**

		Ethylbenzene	Xylenes
Preventive Action Level:		140	1,000
Enforcement Standard:		700	10,000
Well Number	Date	µg/l	µg/l
MW-2	7/26/2013	<b>186</b>	<b>1,864</b>
MW-3	7/26/2013	<b>558</b>	<b>6,130</b>

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 (PAL)

(3) Italic indicates exceedance of the Enforcement Standard (ES)

Ethylbenzene and xylene concentrations at MW-2 exceeded the PAL for both analytes but did not exceed the Enforcement Standard (ES) for xylenes. The analytical data shows a significant decrease in both ethylbenzene and xylene concentrations in MW-2 compared to the November 2012 results. These results are similar to results from May 2008. Ethylbenzene and xylene were detected in MW-3 at a concentration exceeding the PAL but less than the ES. Ethylbenzene shows a slight decrease in concentration and xylene shows an increase 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. All the wells will be checked for the presence of LNAPL on a semiannual basis. 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 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, please contact me at (414) 574-7501.

Sincerely,



Maritsa Goan

Manager, Environmental Health & Safety

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

Attachments

**TABLE 1**  
**Summary of Historical Groundwater Sample Results**  
**PPG Inc., Oak Creek, Wisconsin Facility**

Date	MW-1		MW-2		MW-3		MW-4		MW-5		MW-6	
	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	6,530	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
7/26/2013	N/S	N/S	186	1,864	558	6,130	N/S	N/S	N/S	N/S	N/S	N/S

Notes:

All concentrations in  $\mu\text{g/l}$ .

<sup>(1)</sup> 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.

<sup>(2)</sup> N/S indicates not sampled.

<sup>(3)</sup> “<” indicates less than reporting limit.

**ATTACHMENT 1**  
**SITE PLAN**

