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September 2, 2020

Ms. Jody Overmyer
Senior Remediation Project Manager
PPG EHS, Monroeville, PA
440 College Park Drive
Monroeville, PA 15146

Subject: Letter for Clarifying Site Investigation Report Requirements, PPG Industries Tank Farm
10800 South 13th Street, Oak Creek, WI 53154
FID #: 241014620; BRRTS #: 02-41-241728

Dear Ms. Overmyer:

In our letter to PPG Industries (PPG) dated June 26, 2020, the Wisconsin Department of Natural Resources (WDNR) requested a "stand-alone" comprehensive site investigation report (SIR) to comply with Wis. Admin. Code ch. NR 716 and to provide the information necessary to develop continuing obligations (COs) for residual contamination at the site. During our conference call on the same day, representatives from PPG, Tetra Tech Inc. (Tetra Tech), the U.S. Environmental Protection Agency (EPA) and WDNR discussed the content and format of the SIR.

The WDNR recommended use of the site investigation checklists (Forms 4400-316 and 4400-317) to ensure that a complete SIR is developed in a format that meets regulatory requirements and supports preparation of a case closure request under Wis. Admin. Code ch. NR 726. The WDNR recognized the investigative, remedial, and monitoring activities performed and documented to date, and encouraged PPG to use specific information from this work to develop a complete SIR.

Further discussion went on to consider whether it would be appropriate to develop an executive summary and attach past submittals to meet the requirements of Wis. Admin. Code ch. NR 716. Considering the format and content of previous submittals, the WDNR does not recommend this approach. Information required for the SIR including summary background information, investigative results defining the nature and extent of contamination in all media, and visual aids (figures and tables) may or may not exist in past submittals. We encourage PPG to review the checklists and past submittals to determine what to include in the SIR, and to develop those elements that are missing.

Again, the WDNR appreciates your efforts to investigate and restore the environment at this site. If you have any questions regarding this letter, please don't hesitate to reach out to me, Eric Amadi, at 414.263.8639 or eric.amadi@wisconsin.gov.

Sincerely,

Eric Amadi

Eric Amadi - Hydrogeologist
Remediation & Redevelopment Program
SER - Milwaukee Service Center

cc: Jim Chojnacki - PPG EHS, Oak Creek (electronic)
Shawn Mendt - PPG EHS, Oak Creek (electronic)
Erica Love - Tetra Tech, Inc. (electronic)
Mark Manthey - Tetra Tech, Inc. (electronic)
Angela Carey - WDNR RR Program (electronic)
Zachary Sasnow - US EPA Region 5 (electronic)
William Stanhope - APTIM (electronic)
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