State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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April 2, 2025

Ms. Maggie Pittman
Remediation Project Manager
PPG - Monroeville Business & Technology Center, PA
440 College Park Drive
Monroeville, PA 15146
Via Electronic Mail to: mpittman@ppg.com

Subject: Review of Site Investigation Report, Revision 2, and Request for Additional Information
PPG Industries Tank Farm
10800 South 13th Street, Oak Creek, WI 53154
FID #: 241014620; BRRTS # 02-41-241728

Dear Ms. Pittman:

On December 20, 2024, the Wisconsin Department of Natural Resources (DNR) received a Site Investigation Report, Revision 2 (SI Report, Rev. 2), prepared on behalf of PPG Industries (RP) by Tetra Tech, Inc. (Tetra Tech), for the Former Tank Farm Area (TFA) and RAX Building (informally standing for "Rest of the Acrylic") at the PPG Oak Creek, Wisconsin Facility. The SI Report, Rev. 2 was prepared to determine whether the site activities in the TFA and the RAX Building meet the requirements of Wis. Admin. Code ch. NR 716, and address comments in the DNR's February 1, 2023, letter to PPG.

As outlined in the USEPA Final Remedy in the *Final Decision and Response to Comments, Groundwater Monitoring and Institutional Controls Remedy for PPG industries* (USEPA, 2019), PPG will submit a Groundwater Monitoring Work Plan for DNR approval for a 2-year period of quarterly groundwater monitoring.

The primary analyte list consists of USEPA-required analytes based on current site conditions and includes the following:

- BTEX
- Select metals: aluminum, arsenic, iron, and manganese.
- Select geochemical parameters: pH and oxidation-reduction potential (ORP).

The secondary analyte list includes the following:

- Historical VOCs analytes: 1,1,2,2, Tetrachloroethane (1,1,2,2-PCA), 1,1,2-TCA, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, chlorobenzene, methylene chloride, PCE, TCE, and vinyl chloride.

DNR Comments
Based on the review of the SI Report, Rev. 2, and previously submitted information, the DNR has determined that additional information or documentation is necessary for compliance with Wis. Adm. Code ch. NR 716. The necessary information or documentation are outlined below:

Soil
A. Degree and Extent of Soil Contamination
Degree and extent of contamination (Wis. Admin. Code § NR 716.11(3)(a))
Extent of contamination (Wis. Admin. Code § NR 716.11(5)(e))

1. TFA:
    - Figure 11A
        - Place dashed iso-concentration lines (for total xylenes - the red lines) between the two larger plumes.
        - Connect the western plume and the contamination surrounding B2 based on groundwater flow direction. With this delineation and/or changes on the figure, additional sampling will not likely be required and the degree and extent could meet the needs for actions and closure (e.g. barrier cap, and continuing obligations (COs)). The changes could affect other figures including cross sections. Thus, we recommend that you update the figures and cross sections as needed or as applicable.
        - It appears some data on the figures are from saturated zones and should not be used to evaluate direct contact RCLs.

    - Figure 11B
        - Thank you for updating this figure. No changes are needed currently.

2. RAX Building
    - Figures 12
        - We recommend connecting the northern plume, southern plume (MW2-MW3, and the area surrounding GP-16) with dashed lines for total xylenes and ethylbenzene. With this delineation and/or changes on the figure, additional sampling will not likely be required and the degree and extent could meet the needs for actions and closure (e.g. barrier cap, and COs). The changes could affect other figures including cross sections. Thus, we recommend that you update the figures and cross sections as needed or as applicable

Groundwater

B. <u>Degree and Extent of Groundwater Contamination</u>
Degree and extent of contamination (Wis. Admin. Code § NR 716.11(3)(a))
Extent of contamination (Wis. Admin. Code § NR 716.11(5)(e))
Extent of groundwater contamination (Wis. Admin. Code § NR 716.11(5)(f))

1. TFA:
    - Figure 13
        - Thank you for updating this figure. No changes are needed currently. However, additional groundwater monitoring will occur as proposed but with a minimum of eight (8) quarterly rounds.

2. RAX Building:
    - Figure 14
        - Thank you for updating this figure. No Changes are needed currently. However, additional groundwater monitoring will occur as proposed but with a minimum of eight (8) quarterly rounds.

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Vapor

C. Vapor Impacts

Degree and extent of contamination (Wis. Admin. Code § NR 716.11(3)(a))
Extent of contamination (Wis. Admin. Code § NR 716.11(5)(g))

1. TFA:
   - Thank you for performing an evaluation of the potential for current or future on-site vapor intrusion impacts. No changes are needed currently. However, COs will be required for future vapor risk.

2. RAX Building:
   - Thank you for performing the vapor intrusion investigation. No changes are needed currently. However, COs will be required for future vapor risk.

Other

Receptors - Utilities

Potential or known impacts to receptors - Utilities (Wis. Admin. Code § NR 716.07(7))
Potential hazardous substance migration pathways - Utilities (Wis. Admin. Code § NR 716.09(2)(e)6)

- Thank you for providing this information. No additional information is needed currently.

Next Steps

- Submit a revised SI Report, Rev. 2, that addresses the comments in this letter and any other applicable criteria.
- Groundwater monitoring is proposed as part of the site remedy as indicated above. Thus, please design and submit a groundwater monitoring plan to help evaluate the effectiveness of natural attenuation.
- We are pausing the review while the figures are being updated. However, the groundwater monitoring plan (as indicated above) can be submitted separately for our review.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this letter, please contact me at 414.405.0752 or at eric.amadi@wisconsin.gov.

Sincerely,

Eric Amadi

Eric Amadi - Hydrogeologist
Remediation & Redevelopment Program
Southeast Region, Milwaukee

cc: Erica Love - Tetra Tech, Inc. (electronic)
Mark Manthey - Tetra Tech, Inc. (electronic)
WDNR SER Case File: FID #: 241014620; BRRTS #: 02-41-241728