DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: **PPG Industries, Inc.**
Facility Address: **1300 PPG Drive, P.O. Box 1000, Lake Charles, LA 70602**
Facility EPA ID #: **LAD 008086506**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

   __X__ If yes - check here and continue with #2 below.

   _____ If no – re-evaluate existing data, or

   _____ If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land-or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

~~EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e.,~~ RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are **groundwater**, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	X			See Table 1
Air (indoors)[2]		X		See Table 1
Surface Soil (e.g., <2 ft)	X			See Table 1
Surface Water		X		See Table 1
Sediment	X			See Table 1
Subsurf. Soil (e.g., >2ft)	X			See Table 1
Air (outdoors)		X		See Table 1

____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__X__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Supporting information is provided in Table 1, (Appendix A) which presents a summary of the following: (a) conclusions of risk evaluation for constituents reported in site media (soil, ground water, surface water, sediment, air), (b) identification of media/areas subject to risk management, (c) corrective measures applicable to the areas subject to risk management, and (d) a pathway evaluation that incorporates the corrective measures.

The information provided in Table 1 was obtained from the May 2002 Draft Corrective Measures Study (CMS) Report and the June 2004 Supplement to the Draft Corrective Measures Study Report. The referenced reports provide detailed evaluation of constituent concentrations reported in site media in accordance with the Louisiana Department of Environmental Quality Risk Evaluation Corrective Action Program (RECAP). Corrective Action Objectives (CAOs) were identified in the CMS based upon RECAP and other evaluation results. Corrective measure alternatives were evaluated based upon compatibility with site conditions and ability to address the CAOs, and final corrective measures were identified for media and constituents subject to risk management per RECAP.

Footnotes:

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food [3]
Groundwater	No	No	No	No			No
~~Air (indoors)~~	___	___	___			(Media not contaminated)	
Soil (surface e.g., >2 ft)	No	No	No	No	No	No	No
Surface Water	No	No			No	No	No
Sediment	No	No			No	No	No
Soil (subsurface e.g., >2 ft)				No			No
~~Air (outdoors)~~	___	___	___	___	___	(Media not Contaminated)	

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

__X__ If no (pathways are not complete for any contaminated media-receptor combination) -skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Table 1 provides supporting information. A pathway evaluation is summarized in Table 1 for media identified as potentially 'contaminated' in Question #2; these are the media identified as subject to risk management in Table 1. Both natural and man-made conditions, in the form of corrective measures, are identified as reasons that potential exposure pathways are incomplete.

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

   _____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

[4]If there is any question on whether the identified exposures are "significant" (i.e., potentially unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

   _____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

   _____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

   _____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

_X_ Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the PPG Industries, Inc. facility, EPA ID # LAD 008086506, located at 1300 PPG Drive, Lake Charles, LA under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

_____ NO - "Current Human Exposures" are NOT "Under Control."

_____ IN - More information is needed to make a determination.

Completed by (signature) [signature] Date 6/30/04
(print) William H. Schramm
(title) Geologist III

Supervisor (signature) [signature] Date 7/7/04
(print) LEWIS A. DONLON II
(title) GEOLOGIST SUPERVISOR
(EPA Region or State) RC

Locations where References may be found:

Louisiana Department of Environmental Quality Records File Room
PPG Industries, 1300 PPG Drive, Lake Charles, LA
McNeese University Library, Lake Charles, LA
Bibliography in Appendix C lists all pertinent documents

Contact telephone and e-mail numbers

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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name:	**PPG Industries Inc.**
Facility Address:	**1300 PPG Drive, P.O. Box 1000, Lake Charles, LA 70602**
Facility EPA ID #:	**LAD 008086506**

1.Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

__X__ If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ If data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future. _

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

Yes If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

_____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): The following is a list of primary constituents found in the November 2003 semi-annual sampling event report for the Aquitard Containment System. It contains results from the most highly contaminated areas and is representative of the majority of constituents found.

Volatile constituents	Range (ppb)	Regulatory Limit (ppb)
Benzene	3-6	5
Chlorobenzene	1-93	100
Chloroethane	2-68	10
Chloroform	26-2,800J	100
1,1-Dichloroethane	2-8,000J	81
1,2-Dichloroethane	2,800-150,000	5
1,1-Dichloroethene	2-13,000	7
1,2-Dichloroethene	3-71,000	70
Ethylbenzene	4-8	700
1,1,2,2-Tetrachloroethane	3,800-77,000	.05
Tetrachloroethene	2-6,300J	5
Toluene	1-54J	1000
1,1,1-Trichloroethane	10-26,000	200
1,1,2-Trichloroethane	2-160,000	5
Trichloroethene	1-35,000	5
Vinyl Chloride	1-120,000	2
Xylene (total)	10-18	10000

Semi-volatile constituents	Range (ppb)	Regulatory Limit (ppb)
Acenaphthalene	0.9-2J	37
Bis(2-Chloroethyl)ether	2-200	10
2-Chlorophenol	2J	3
Dibenzofuran	0.4-6J	2.4
1,2-Dichlorobenzene	1-31J	600
1,3-Dichlorobenzene	2-9J	10
1,4-Dichlorobenzene	3-57	75
2,4-Dimethylphenol	7J	73
Hexachlorobenzene	27-1,600J	1
Hexachlorobutadiene	1-27,000	0.73
Hexachloroethane	102-540J	0.61
2-Methylnaphthalene	0.6-3J	0.62

Naphthalene	3-26J	10
Pentachlorophenol	5J	1
Phenol	21-2,200	370
1,2,4-Trichlorobenzene	1-420J	70

This constituent list was compiled from the November 2003 Sitewide Monitoring Report prepared by Arabie Environmental Solutions. Additional References include the 2003 Annual Report for the WTU Surge Pond and the March 2004 Sitewide Groundwater Model Update and Chicot Stabilization System Evaluation. The LDEQ October 20, 2003 RECAP document provided the regulatory limits for available constituents. Additional sources of information for reference are the May 2002 Draft Corrective Measures Study Report, the 1999 Phase II Sitewide RFI Report Addendum and the 1995 Phase II Draft Sitewide RFI Report. Maps showing the extent of contamination by zone are provided in Appendix B, in Figures 20-27.

Footnotes:

[1]"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

Yes If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):_

The ongoing Semi-annual Sitewide Groundwater Monitoring Reports, the Semi-annual WTU Surge Pond Reports and the Annual Chicot Monitoring Reports all evidence the effective control of lateral migration onsite. Horizontal migration is being controlled by the Chicot Containment System. The latest Sitewide Groundwater Model Update and Chicot Stabilization System Evaluation uses state of the art modeling to evaluate the effectiveness of groundwater capture under current operating conditions. The results of the model simulations indicate that plume migration within the 200-Foot Sand is predominantly horizontal and that plumes are contained horizontally by the Chicot Stabilization System, controlling offsite impact. However modeling does indicate the potential for downward migration through the 200 Foot Sand into the 500 Foot Sand. Through modeling and potentiometric mapping, PPG shows that their industrial supply wells in the 500' zone provide capture to control horizontal migration of future contaminated groundwater offsite. See Appendix B, Figures 5-8 and 7-1. The latest map showing PPG property boundaries shows newly acquired land expanding the boundaries that provides a larger buffer to offsite contamination. See Appendix B, Figure 1. The most recent Groundwater Model has been peer reviewed by Dr. Bernard Kueper. He states: " These (model) objectives have been met. The models have been constructed using state-of-the-practice techniques. Model calibration for flow is excellent and adequate for solute transport. I see no major faults with the presented model work...". See Appendix B, Figures 6-13 to 6-16 for modeled plume outlines for the present (2003) and future (2013).

[2] "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

__No__ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): The Interim Corrective Measures operating in the North Dock and South Terminal Shoreline Areas show the control of groundwater migration into the Turning Basin and Western portion of Coon Island Loop has been established. See The Semi-annual Sitewide Groundwater Monitoring Reports for systems effectiveness evaluations. Internal waters are all monitored under the LPDES permit and are not surface water bodies that need to be evaluated for this determination.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):_____

_____

[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):_____

_____

[4] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

   Yes If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

   _____ If no - enter "NO" status code in #8.

   _____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

Monitoring of the Sitewide Upper and Lower Aquitard Containment System is performed on a semi-annual basis. Monitoring of the Chicot Containment system is performed on a semi-annual basis. Monitoring of the WTU Surge Pond is performed on a semi-annual basis. The Chicot model for fate and transport is planned to be run annually and reported in the Chicot Containment System Report. Specific monitor well locations are provided in their respective reports (see Appendix, Figures). Ongoing evaluations of the monitoring systems provide conclusions on the effectiveness of the monitoring system and recommendations for adding new wells or removing ineffective wells from the systems.

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

_YE_ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the PPG Industries Inc., facility, EPA ID # **LAD008086506**, located at 1300 PPG Drive, Lake Charles, LA. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

____ IN - More information is needed to make a determination.

Completed by (signature) _____ Date 6/25/04
(print) William H. Schramm
(title) Geologist III

Supervisor (signature) _____ Date 7/7/04
(print) LEWIS DONLON
(title) GEOLOGIST SUPERVISOR
(EPA Region or State) R6

Locations where References may be found:

Louisiana Department of Environmental Quality Records File Room
PPG Industries, 1300 PPG Drive, Lake Charles, LA
McNeese University Library, Lake Charles, LA
Bibliography in Appendix C lists all pertinent documents

Contact telephone and e-mail numbers

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(phone #) 225-219-3403
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Attachments Available
Upon Request