



January 29, 2016

Robin Gifford  
Enforcement and Inspection Branch  
Hazardous Waste Division, ADEQ  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

**RE: WHIRLPOOL FORT SMITH – 2015 ANNUAL REPORT**

Dear Ms. Gifford:

Whirlpool Corporation is pleased to submit this 2015 Annual Report to the Arkansas Department of Environmental Quality (ADEQ), as required by the Remedial Action Decision Document (RADD) dated December 27, 2013 and the revised RADD dated November 15, 2015 (RADDs). The Annual Report summarizes the coordinated efforts between our organizations in 2015 in addressing trichloroethylene (TCE) in the groundwater under and adjacent to the former Whirlpool manufacturing facility in Fort Smith.

This Annual Report is being submitted in conjunction with the 2015 Two Year Technical Review Report, which provides a far more detailed and extensive review of progress made both on- and off-site, as well as a thorough description of the scientific data collected, validated and summarized throughout 2014 and 2015, all which have been documented and presented to ADEQ, the City of Fort Smith and area residents in quarterly progress reports made available on [www.whirlpoolfortsmith.com](http://www.whirlpoolfortsmith.com).

In summary, Whirlpool and their environmental consultant, Ramboll Environ, conducted further remediation efforts during 2015, in accordance with the RADDs and with continued oversight by ADEQ. Whirlpool followed a science-driven, Adaptive Remedy Approach – which involved the constant gathering, analyzing and validating of data to confirm and update the understanding of the groundwater and soil contamination on and near the former Whirlpool facility – to complete a number of required and supplemental remediation activities both on- and off-site.

Whirlpool's investigation, monitoring and remedial actions in 2015 consisted of:

- ISCO injections in the supplemental neck area and Areas 2 and 3 to maintain and enhance further separation of the north and south plumes;
- An ISCR pilot test near the northeast portion of the north plume;
- Settlements with local property owners within the originally proposed well drilling ban area related to the north groundwater plume to obtain deed restrictions precluding the use of groundwater in the future; and
- Further investigation and monitoring of soil, soil vapor and groundwater conditions both on- and off-site including investigation southwest of the former manufacturing building.

As described in more detail in the 2015 Two Year Technical Review Report, the remediation efforts have resulted in reductions of TCE concentrations of 83% in certain targeted areas and 53% in the source area, and have created and increased the separation of the north and south plume. Importantly, there were no findings that changed the conclusion that there remains **no health risk** to Fort Smith residents from exposure to TCE in the groundwater beneath or near the Whirlpool property.



Whirlpool was also able to reach agreements with 100% of residents in the well drilling ban area during 2015. As a result of these agreements, the environmental class action lawsuit and most individual lawsuits against Whirlpool were dismissed. Efforts to further redevelop the site and generate economic activity in the area also continued over the past year, and further redevelopment options are in progress that are expected to benefit the entire Fort Smith community. These plans will be discussed more fully with state and local officials in early 2016.

Finally, Whirlpool continued to make progress reports at City Directors' meetings during 2015 and maintained a regularly updated website - [www.whirlpoolfortsmith.com](http://www.whirlpoolfortsmith.com) - to provide the Fort Smith community, elected officials and members of the press with the latest information and extensive background materials, including all reports and data submitted to ADEQ related to this project.

The progress achieved in all of these areas is described in more detail in the 2015 Two Year Technical Review Report. We are looking forward to advancing to the next phase of our efforts on behalf of the residents, economy and environment in Fort Smith, and will continue to work directly with ADEQ using the latest scientific data to appropriately manage this site.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Noel". The signature is written in a cursive style with a large initial "J" and "N".

Jeff Noel  
Vice President, Whirlpool Corporation