



October 3, 2014

Mr. Mostafa Mehran  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

**Re: Response to ADEQ Correspondence Dated September 22, 2014  
Boys and Girls Club Initial Report of Findings  
Whirlpool Corporation  
Fort Smith, Arkansas  
EPA No. ARD042755389  
AFIN No. 66-00048  
CAO LIS 13-202**

Dear Mr. Mehran:

ENVIRON International Corporation (ENVIRON), on behalf of Whirlpool Corporation, is submitting this response to your September 22, 2014, letter providing comments on the *Boys and Girls Club Initial Report of Findings (Initial Report)* dated August 28, 2014. Arkansas Department of Environmental Quality (ADEQ) comments are provided in the text below and the respective response follows.

In summary, Whirlpool and ENVIRON are fully committed to ensuring that nature and extent of any groundwater contamination near the northeast corner of the Whirlpool property is appropriately delineated. For this reason, as indicated in our *Initial Report*, we will be completing a *Final Northeast Corner Investigation Report (Final Report)* following the installation of additional permanent monitoring wells in this area and the collection and analysis of groundwater samples from those wells. We look forward to working with ADEQ and the relevant property owners to determine appropriate next steps based on the data and information in the *Final Report*.

**ADEQ Comment:**

**Results, Phase II:**

*For clarity, it should be noted in the text of the report that the groundwater sample from DP-40 located between Boys and Girls Club parking lot and Boys and Girls Club Lane (approximately 250 feet north of DP-45) shows Trichloroethene (TCE) concentration of 3.2J µg/L. This concentration is below the Remedial Action Level (RAL) of 5.0 µg/L for the groundwater, but it is above the detection limit. The detection of TCE in DP-40 within the property boundary of Boys and Girls Club is in addition to the TCE found in the groundwater sample taken from DP-45 (6.8 µg/L). This could be an indication of plume expansion. Please revise the report to include this information:*

**ENVIRON Response:**

All data collected during the investigation of the northeast corner of the Whirlpool property, Boys and Girls Club property and the City of Fort Smith properties between June and

August 2014 has been presented in the *Boys and Girls Club Initial Report of Findings* dated August 28, 2014. The estimated 3.2 J µg/L TCE concentration at DP-45 is below the laboratory's reporting limits for TCE (i.e. the quality assurance for the data is limited at TCE concentrations below the laboratory's reporting limits).

We are installing permanent groundwater monitoring wells during the week of October 6, 2014 to complete the investigation at the northeast corner of the Whirlpool property (wells proposed in the *Boys and Girls Club Initial Report of Findings*). The data from groundwater monitoring wells will be used to confirm the boundaries of groundwater impact in the vicinity of the Boys and Girls Club property.

A Final Northeast Corner Investigation Report is referenced in the subject *Boys and Girls Club Initial Report of Findings* which will be prepared after the permanent wells are installed and sampled. Discussion of plume expansion is premature until after the investigation at the northeast corner is complete and groundwater monitoring has commenced. In addition, issuing a revised initial report of findings is not necessary due to the pending Final Northeast Corner Investigation Report (to be issued to ADEQ by November 21, 2014).

#### **ADEQ Comment:**

##### **Figure 2:**

*Given the apparent shape of the plume, ADEQ requires an additional monitoring well in the northwest corner of City of Fort Smith property (three properties). The well should be installed at the corner of Ingersoll Avenue and Boys and Girls Club Lane (latitude: 35.324306, longitude: -94.413596) immediately west of DP-50. In addition, since groundwater from DP-45 exhibited a TCE concentration of 6.8 µg/L, exceeding the RAL, Whirlpool should install a monitoring well at the DP-46 location in order to delineate the extent of TCE contamination in the groundwater. In summary, ADEQ is requiring two (2) additional wells be installed as shown in the attached*

#### **ENVIRON Response:**

The original proposed groundwater monitoring wells are being installed during the week of October 6, 2014. Whirlpool has a written access agreement to install the four monitoring wells proposed in the subject initial report of findings. After installation of these wells and evaluation of data, we will further assess the extent of the groundwater plume, groundwater flow direction and gradient, and subsurface hydrogeologic conditions. This assessment will be presented in the pending Final Northeast Corner Investigation Report. We will review and confer with ADEQ whether additional groundwater monitoring wells are necessary and the appropriate locations for these wells to monitor groundwater conditions at the northeast corner.

We have not been provided access to install permanent monitoring wells on the City of Fort Smith properties that have been obtained for the pending Jenny Lind Road construction project (i.e. location of DP-46). We can re-assess installation of monitoring wells in the City of Fort Smith right-of-way along the pending expansion of Jenny Lind Road after the road construction project is complete.

**ADEQ Comment:**

**RADD:**

*Additionally, it should be noted ADEQ is in the process of re-opening the Remedial Action Decision Document (RADD) and including the new information regarding the Northeast Corner in the RADD.*

**ENVIRON Response:**

We understand ADEQ wishes to include new information and data collected from Whirlpool's voluntary investigation at the northeast corner of the Whirlpool property into the RADD and that our respective legal counsels are in discussions with respect to the mechanisms to include it. The Final Northeast Corner Investigation Report submission to ADEQ is targeted for November 21, 2014.

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If you have any questions or comments please contact me at your earliest convenience.

Sincerely,

**ENVIRON International Corporation**



Michael F. Ellis, PE  
Principal