

Area 1 Supplemental Work Plan Fact Sheet

Supplement to the February 2014 Final Remedy Work Plan by ENVIRON on behalf of Whirlpool Corporation

On September 8, 2014, ENVIRON, on behalf of Whirlpool, submitted a proposed supplement to the Final Remedy Work Plan with additional remedial actions to address TCE contamination in Area 1, located near the northwest corner of the Whirlpool property in Fort Smith.

Overview

- As outlined by Whirlpool representatives at the July 8, 2014 City Directors meeting, Whirlpool is proposing to conduct supplemental remediation activities in Area 1 following the identification of concentrations of TCE in the soils in a linear drainage feature in this area.
- The supplemental work is being proposed under the Adaptive Remedy Approach being employed for the remediation of the site. Under this approach, new monitoring data is constantly gathered and incorporated into the site understanding to facilitate implementation of the most effective remedial actions to address current on-site and off-site conditions.
- The proposed actions enhance the scope of the remedy in Area 1 based upon the latest data collected since the RADD was finalized and includes an interim corrective action measure to supplement the ongoing remediation activities, including the two injection events completed earlier in 2014.

Proposed Supplemental Area 1 Remediation Activities – Interim Corrective Action Measure

- Removal of approximately 300 cubic yards of TCE impacted soil in the linear drainage feature using large diameter borings. This impacted soil will be properly characterized and permitted for disposal off site. Soil removal provides certainty regarding the effective removal of TCE impact in soil in Area 1 and the linear drainage feature.
- Placement of crushed limestone backfill in the large diameter borings to increase the naturally low pH of groundwater in Area 1 and the linear drainage feature to enhance natural attenuation of TCE in groundwater and provide a platform for potential future activities.
- Performance of a third injection event in Area 1 and the linear drainage feature via permanent and temporary injection points to remediate TCE impacts characterized in saturated soil and groundwater in the vicinity.
- Consistent with the adaptive remedy approach, the effectiveness of this enhanced remedy in Area 1 will continue to be assessed, and supplemental remedial action will be performed if the data suggests further efforts are necessary to reduce TCE concentrations.

Next Steps

- After ADEQ reviews and approves the Area 1 Supplemental Work Plan, the proposed remediation activities will begin.
- Following ADEQ approval, receipt of all necessary permits and mobilization of contractors, the proposed work will be implemented over a period of approximately 8 to 11 weeks.