



ADMINISTRATIVE CENTER ■ BENTON HARBOR, MICHIGAN 49022

JEFFREY NOEL

CORPORATE VICE PRESIDENT
COMMUNICATIONS AND PUBLIC AFFAIRS

February 18, 2014

Tammie Hynum
Chief, Hazardous Waste Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: Accelerated Work Plan Implementation Schedule
WHIRLPOOL CORPORATION, FT SMITH, ARKANSAS
CAO LIS 13-202
EPA ID NO. ARD042755389
AFIN 66-00048

Dear Ms. Hynum,

Thank you for you and your agency's ongoing leadership on the remediation of the groundwater under and near the Whirlpool property in Fort Smith. Consistent with Mr. Mostafa Mehran's letter of February 3, 2014, we have begun the first steps in the science-based remediation process mandated under the Final RADD. As we stated in our correspondence accompanying our January 24, 2014 Revised Final Remedy Work Plan submission, and consistent with proven, successful ISCO coupled with natural attenuation requires a step-by-step approach where each step is carefully executed to help assure greater success at the next level of activity.

In our January submission, we also emphasized our commitment to expeditious implementation of the remediation steps wherever possible. We appreciate your request to accelerate the start of the chem-ox injection phase of the remediation process. Consistent with the input and guidance from you and your staff over the past few weeks, we will submit an updated Revised Final Remedy Work Plan that achieves this objective through a "dual-path" adaptive approach to implementation of the Work Plan process. We will commence installation of chem-ox injection systems on or before February 25, 2014, while we continue to use data from the extensive field work to validate and fine-tune remediation steps for the subsequent phases of treatment.

The adaptive approach will allow us to accelerate the on-site injection chem-ox treatments, and provide further assurance to the community that the remediation process is underway and the TCE is being aggressively attacked, without deviating from the proven step-by-step process required for successful use of ISCO as evident by numerous sites that have successfully implemented ISCO coupled with natural attenuation. The updated plan will also support our ability to demonstrate progress toward the remediation goals within 24 months of the approval of the Final RADD.

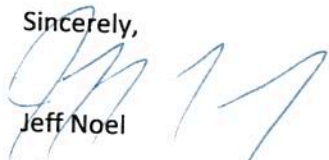
The updated Revised Final Remedy Work Plan, which will contain the details of this approach and timeline for activities, will be submitted to ADEQ no later than February 25, 2014. Below is a high-level summary of the anticipated upcoming activities during the next four months:

- February 2014
 - Week of February 17: Installation of soil-vapor monitoring wells.
 - Week of February 24: Installation of Phase I ISCO chem-ox injection systems, submission of 2nd Revised Work Plan to ADEQ.
- March 2014
 - Week of March 3: Begin 1st quarter groundwater monitoring sample collection, conduct Phase I ISCO dye and tracer testing.
 - Week of March 10: Begin Phase I ISCO chem-ox injections.
- April 2014
 - Weekly monitoring of Phase I ISCO injections results.
 - Development of Phase II ISCO adaptive remedy based on Phase I results and ongoing groundwater monitoring.
- May 2014
 - Conduct Phase II ISCO preparations and injections.
 - 2nd Quarter groundwater monitoring
- June 2014
 - Weekly monitoring of Phase II ISCO injection results.
 - Development of Phase III ISCO adaptive remedy based on Phase II results and ongoing groundwater monitoring.

We will work closely with ADEQ to keep you informed on potential adjustments to the timing of these steps due to potential events out of Whirlpool's control, such as adverse weather and the completion of property access agreements. We also appreciate the commitment by ADEQ to give your full attention to any issues associated with obtaining permits. This will help ensure that the remediation process continues to progress and that we are able to meet the accelerated timeline in the updated Work Plan for the initial chem-ox injections at the source of the contamination and the subsequent off-site injections.

Whirlpool remains committed to staying in Fort Smith and working closely with ADEQ, area residents, and the City of Fort Smith until this project is successfully completed. We will continue to keep the community informed by making this updated Work Plan and additional background information, including all site testing data and reports submitted to ADEQ, publicly available on www.whirlpoolfortsmith.com.

Sincerely,



Jeff Noel

VP, Whirlpool Corporation