

January 8, 2018

Mr. Josh Hesselbein  
 Enforcement and Inspection Branch  
 Hazardous Waste Division, ADEQ  
 5301 Northshore Drive  
 North Little Rock, Arkansas 72118-5317

**RE: WHIRLPOOL TRANSMITTAL OF THE 2017 ANNUAL REPORT**

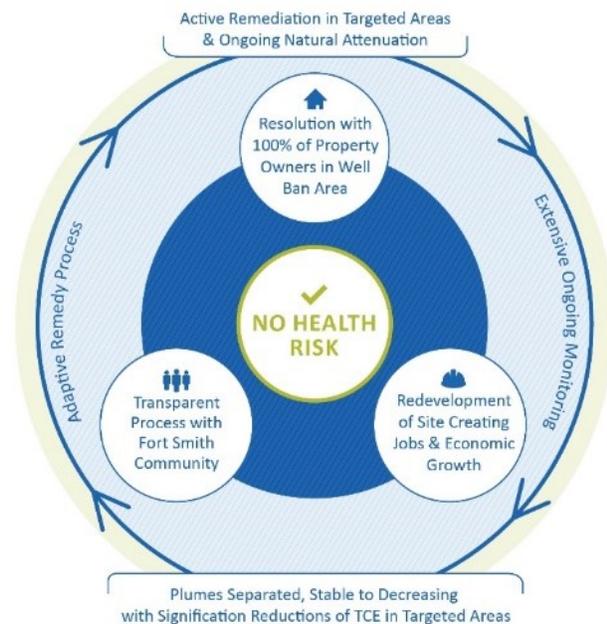
Dear Mr. Hesselbein:

Whirlpool Corporation is pleased to submit the 2017 Annual Report to the Arkansas Department of Environmental Quality (ADEQ), in accordance with both the Revised Groundwater Monitoring Plan (RGWMP) approved by ADEQ in September 2016 and the Remedial Action Decision Document (RADD) issued by the Arkansas Department of Environmental Quality (ADEQ) on December 27, 2013 and revised in November 2015 (Revised RADD). The 2017 Annual Report, as required, summarizes the coordinated efforts between our organizations in addressing trichloroethylene (TCE) in the groundwater under and adjacent to the former Whirlpool manufacturing facility in Fort Smith. The report provides an overview of progress made both on- and off-site, as well as a thorough description of the scientific data collected, validated and summarized throughout 2017. This report will be made available on [www.whirlpoolfortsmith.com](http://www.whirlpoolfortsmith.com), to facilitate ready access by the City of Fort Smith and area residents, as they may wish.

As a threshold matter, Whirlpool believes it is important to report that once again nothing in the latest findings or those over the last four years has 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.

In summary, Whirlpool’s extensive work in Fort Smith over the past four years (2014 through 2017) has resulted in meaningful, measured progress on a number of fronts, including:

1. The completion of required and supplemental active remediation activities following a science-driven, Adaptive Remedy process that resulted in significant reductions of TCE concentrations in the source area and enhanced the separation of the north and south plumes.
2. Continuing comprehensive monitoring and controls implemented to: ensure there remains no health risk to area residents; track the progress of remediation efforts; document the continuing effectiveness of natural attenuation processes remediating groundwater impacts at the site; and, identify the needs and appropriateness of additional investigations or measures, based on the latest scientific data;
3. Completion of resolution agreements with all residents whose properties are located within the area of the designated well drilling ban;
4. Repurposing the property to create economic growth and benefit the entire Fort Smith community; and
5. Ensuring that City officials and area residents have timely access to the most current information and are fully informed of notable developments through our website and presentations to City Directors.



As discussed in last year’s annual report, these accomplishments provide the foundation for Whirlpool’s current phase of work, focused on the re-use and redevelopment of the site, which will continue to be undertaken in close coordination with ADEQ. Whirlpool made significant progress in the redevelopment of the property in 2017. As noted previously, the warehouse was sold to Spartan Logistics in September 2014 and Spartan is already employing area residents on site. Further, the former manufacturing building was sold to Phoenix Investors in February 2017 and building modifications continue to facilitate repurposing the building for future use. Monitoring activities in 2018 will include re-assessing indoor air and sub-slab vapor within the former Whirlpool building after building modification activities are complete and designated uses are established.

**I. Summary of Investigation, Remediation and Monitoring Activities Completed in 2017**

Site investigation, remedial efforts, and monitoring to date have included not only the actions described in the RADDs but also voluntary remedial measures to enhance and expand reductions in TCE concentrations in soil and groundwater at on-site and off-site locations.

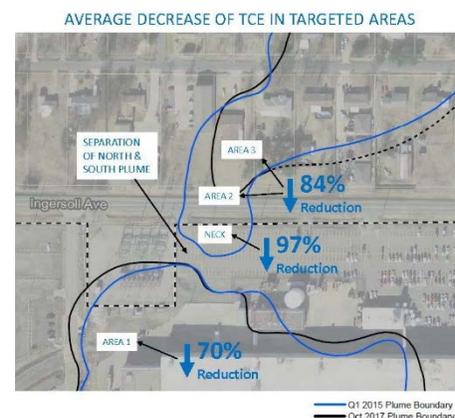
The monitoring efforts completed in 2017 included the collection of groundwater samples for the continuing evaluation of the in-situ chemical oxidation (ISCO) and in-situ chemical reduction (ISCR) efforts performed at on-site and off-site locations to reduce TCE concentrations, as well as monitoring in accordance with the RGWMP. Consistent with Whirlpool’s commitments as set forth in the approved RGWMP, an Action Plan was provided in Appendix F of the 2016 Annual Report to address TCE concentrations measured at plume boundary wells MW-189 and MW-194, which had marginally exceeded the remedial action levels. The proposed investigation was completed in April 2017, and the subsequent 2017 Revised Action Plan included supplemental investigation activities at plume boundary locations. This supplemental investigation was completed in October 2017 and the results are presented in the Action Plan provided as Appendix F of this 2017 Annual Report. The current Action Plan proposes, based on the additional/latest data, targeted, supplemental investigation activities as well as supplemental remediation activities to address and mitigate the potential for plume expansion beyond the property boundary.

**II. Impact of Remediation Activities**

Remediation efforts that took place in the first two year period (2014 and 2015) and the continued remediation and MNA efforts throughout 2017 have resulted in reductions of TCE concentrations in the source area, created and increased the separation of the north and south plume, and limited further plume migration at the north plume boundary.

Overall, TCE concentrations in the source area have been reduced by:

- Approximately 97% within the neck area
- Approximately 84% within Areas 2 and 3;
- Approximately 70% in monitoring wells within the linear drainage feature in the source area in Area 1.



Groundwater monitoring results for the south and north plume consistently show stable to decreasing trends in TCE concentrations, demonstrating natural attenuation processes are effectively remediating groundwater impacts at the site. Continued groundwater monitoring has confirmed TCE concentrations are generally stable to decreasing for 71% and 84% of monitoring wells in the south and north plumes, respectively.

**III. Community Engagement and Resolution with Residents**

Throughout the past four years, Whirlpool has worked diligently to keep its commitment to treat residents fairly and to ensure that City officials and Fort Smith residents were timely informed of important developments.

In 2015, Whirlpool reached agreements with 100% of residents in the well drilling ban area. As a result of these agreements, the environmental class action lawsuit and individual lawsuits against Whirlpool were dismissed. These settlement agreements include: deed restrictions precluding the use of groundwater; a financial settlement; and access agreements to facilitate future investigation or monitoring, if required.



Whirlpool has provided progress reports at City Directors' meetings, and continues to regularly update the 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.

**IV. Conclusion**

The progress made by Whirlpool during the mutually agreed, initial two-year remediation process in 2014 and 2015 and the subsequent , approved program through 2017 has resulted in the completion of a series of remediation activities that have shown real progress in the cleanup of the site. At the same time, Whirlpool has worked to rebuild trust with area leaders and residents, closely monitored the Site to verify the continuing absence of any health risks, and fulfilled commitments to repurpose the property for the benefit of the entire community.

Whirlpool will continue to monitor conditions at the Site to ensure no health risks, 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 stylized and written in a cursive-like font.

Jeff Noel, Vice President, Whirlpool Corporation