

September 3, 2014

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

**Re: Response to July 31, 2014, ADEQ Correspondence  
First Quarter 2014 Progress Report  
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 two general comments in your July 31, 2014, comment letter on ENVIRON's response dated July 15, 2014, regarding the First Quarter 2014 Progress Report.

Arkansas Department of Environmental Quality's (ADEQ's) first comment indicated that the J-flagged data should be used in the statistical analysis of the trend of trichloroethene (TCE) concentrations in MW-61; and, TCE concentrations in MW-61 have shown a continuous increase in concentration since March 2011. The statistical analysis of the trend of TCE concentrations ENVIRON performed for the data collected in March 2014 and earlier did in fact utilize included the actual J-flagged data values. We only used half the detection limit when the sample collected for the values reported by the laboratory as was found to have a non-detect value (as described in our July 15, 2014 correspondence). We only used half the detection limit for the values reported by the laboratory as non-detect (as described in our July 15, 2014 correspondence).

We agree that TCE concentrations increased marginally during the last three monitoring events in the data set ranging from October 2013 [2.4 J micrograms per liter ( $\mu\text{g/L}$ )] to March 2014 (4.7 J  $\mu\text{g/L}$ ), but we would highlight that the October 2011 TCE results at MW-61 were non-detect. We continue to closely monitor MW-61 and we have reported in the Second Quarter 2014 Groundwater Monitoring Report dated August 15, 2014, that the TCE concentration in MW-61 was 6.6  $\mu\text{g/L}$ .

ADEQ's second comment regarded that the 5  $\mu\text{g/L}$  contour line is not positioned close enough to MW-61 on the TCE iso-concentration map. The iso-concentration contours are illustrative depictions used to provide guidance in visualizing the occurrence and concentration of constituents in groundwater between and beyond data points but do not imply certainty where data are extrapolated. The depiction of the 5  $\mu\text{g/L}$  contour in the 2014 First Quarter Groundwater Monitoring Report is based upon the laboratory results for the full set of boundary monitoring wells in addition to the results from MW-61 and the analysis performed for selecting

the location of the contour line included computer modeling and interpretation of the entire data set. We conclude the 5 µg/l contour line is reasonably positioned while considering the 4.7 J µg/L TCE concentration reported for MW-61 (i.e. J-flagged data represents estimated concentrations).

The Second Quarter 2014 TCE iso-concentration map in the Second Quarter 2014 Groundwater Monitoring Report depicts the 5 µg/L contour line extending beyond MW-61 since the TCE concentration was reported at 6.6 µg/L.

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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