



December 30, 2014

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

**Re: Response to ADEQ Correspondence Dated November 26, 2014
Offsite Shallow Groundwater Investigation Work Plan – October 2014
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 Arkansas Department of Environmental Quality (ADEQ) comments dated November 26, 2014, providing comments on the Offsite Shallow Groundwater Investigation Work Plan – October 2014 (received on December 4, 2014). ADEQ comments are reiterated below followed by ENVIRON's response to each comment.

ADEQ Comment #1: 2.3 Site Hydrogeology, Second Paragraph, First Sentence

This sentence states that “The potential for shallow permeable zones is a result of the soil vapor monitoring efforts completed to date as required by the RADD”. Soil vapor monitoring did not create the shallow permeable zones. Possibly the intent of the sentence is “The identification of the existence of shallow potentially permeable water bearing zones is a result of the soil vapor monitoring efforts completed to date as required by the RADD.” Please clarify.

ENVIRON Response: The sentence had a typographical error and should read “The potential for shallow permeable zones was identified as a result of the completion of the soil vapor monitoring efforts to date as required by the RADD.”

ADEQ Comment #2: 2.3 Site Hydrogeology, Third Paragraph, First Sentence

Please replace “Date” with dates of completion.

ENVIRON Response: The sentence will be revised to state “Two additional soil vapor monitoring points (VP-3 and VP-4) were attempted north of Ingersoll Avenue (February 2014).”

AEQ Comment #3: Section 3.1, Onsite Trench Excavation, Last Paragraph

Spoils removed from the excavation must be placed in a roll-off container, labeled and characterized. Based on the characterization of the waste, the excavated soil must be sent to the appropriate disposal facility. Please correct.

ENVIRON Response: A test trench was proposed to observe subsurface soil at the location of former soil vapor monitoring point SV-2. The current soil vapor monitoring plan includes performance of an initial boring to characterize the subsurface soil in this vicinity. Therefore, the trench is not necessary and will be removed from the offsite shallow groundwater investigation.

ADEQ Comment #4: Installation of Shallow Monitoring Wells, First Paragraph, Third Bullet

ENVIRON's Soil Vapor Monitoring and Property Access Update Letter, dated April 28, 2014 to ADEQ stated: "After multiple conversations and meetings with the City of Fort Smith's Director of Engineering and Director of Utilities, ENVIRON determined that installation of a soil vapor monitoring point near MW-46R in the Jacobs Avenue right-of-way was not feasible due to significant underground utilities in the right-of-way on both sides of the street, including a 16-inch water distribution main running east-west in the south right-of-way and a sewer line, natural gas main and overhead electrical in the north right-of-way along Jacobs Avenue. The clustering of the buried and overhead utilities, coupled with the right-of-way physical limitations due to stormwater drainage swales and narrow pavement width along the entire length of Jacobs Avenue, resulted in the need to identify other suitable locations for long term soil vapor monitoring."

Whirlpool is now proposing to install a shallow monitoring well near MW-46R. Please explain why it is possible to install a groundwater monitoring well in this location where the possibility of installing a soil vapor monitoring well was not feasible.

ENVIRON Response: The subject shallow groundwater well was initially proposed near MW-46R in the street. The historically proposed soil vapor point along Jacobs Avenue was specifically targeted for installation within the right-of-way along the edge of the street. The soil vapor monitoring points could not be installed due to underground utilities. Additional wells have been proposed to monitor groundwater in association with the soil vapor effort at other locations; therefore, a shallow groundwater monitoring well in the right-of-way near MW-46R is not necessary.

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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