



November 14, 2014

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

**Re: Response to ADEQ Correspondence Dated October 13, 2014
Addendum to the Soil Vapor Monitoring Plan
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) October 13, 2014, correspondence providing comments on the *Addendum to the Soil Vapor Monitoring Plan* (comment letter received on October 16, 2014).

ADEQ Comment:

Section 1, Background, Last Paragraph

Please identify on Figure 1 which location is VP-5 and which location is VP-6.

ENVIRON Response:

The general locations for the formerly planned soil vapor monitoring points VP-5 and VP-6 have been added to Figure 1 (attached).

ADEQ Comment:

Section 2.1, Addendum to Final Remedy Work Plan, First Paragraph

This section presents possible locations for the new soil vapor monitoring points as shown in Figure 3. ADEQ cannot determine if the new points will be located on the periphery of the groundwater plume or if some points will be located in the area of highest groundwater contamination. Please overlay the most recent plume figure onto Figure 3 to show the location of the plume under the private properties. In addition, the number of additional monitoring points is not shown. Please provide the number and proposed locations of the additional soil vapor monitoring points. If a soil vapor monitoring point cannot be installed at a particular location due to the presence of water, ADEQ requests that Whirlpool install a shallow groundwater monitoring well at that location.

ENVIRON Response:

A revised Figure 3 is attached with the 2014 Third Quarter groundwater plume added to the figure.

Two sampling locations are proposed to be selected from any of the green shaded properties. We cannot identify specific properties for sampling until we are granted access by the individual property owners.

The inventory of soil vapor sampling points will consist of the following (see Figure 3):

- Whirlpool property: In the vicinity of VP-2 (re-installation of permanent soil vapor sampling points);
- Whirlpool Jacobs Avenue property: In the vicinity of VP-1 (re-installation of permanent soil vapor sampling points);
- Scroggins property: Green shaded property north of Jacobs Avenue; and
- Two to-be-determined properties preferably within the green shaded areas based upon access provided by the property owners.

If shallow groundwater is present at a proposed soil vapor monitoring location, a shallow monitoring well will be installed, as requested. These shallow monitoring wells, if shallow groundwater is present, will be installed in accordance with the *Offsite Shallow Groundwater Investigation Work Plan* submitted to ADEQ on October 30, 2014.

Data from the shallow monitoring well will be used to assess vapor intrusion in lieu of soil vapor data.

ADEQ Comment:

Section 2.1, Addendum to Final Remedy Work Plan, Footnote 7

Please provide information regarding the location of aforementioned properties on Figure 3.

ENVIRON Response:

Information regarding the various property owner names and addresses is provided below. The properties north of Jacobs Avenue from east to west consist of (see Figure 3):

- Morgan Property (1801 Jacobs Avenue);
- Winters Property (1705 Jacobs Avenue);
- Smith Property (1701 Jacobs Avenue);
- King Property (1605 Jacobs Avenue);
- Nichols Property (1601 Jacobs Avenue);
- Plunkett Property (1505 Jacobs Avenue); and
- Whirlpool Property (1501 Jacobs Avenue - not shaded but the location of VP-1).

The properties south of Jacobs from east to west consist of:

- Keith Property (1804 Jacobs Avenue);
- Flowers Property (1700 Jacobs Avenue);
- Watts Property (1604 Jacobs Avenue);
- Reith Properties LLC Property (1600 A&B Jacobs Avenue);
- Fowler Property (1504 Jacobs Avenue); and
- Wilkinson Property (1500 Jacobs Avenue).

The property south of Brazil is the Taylor Property (1714/1716 Brazil Avenue).

ADEQ Comment:

Section 2.1, Addendum to Final Remedy Work Plan, Next to Last Paragraph

ADEQ is of the opinion that the monitoring points VP-1 and VP-2 should be replaced permanently. Please confirm that all of the proposed soil vapor monitoring points will be permanent. The proposed monitoring points will aid the facility to meet the requirement of the Final Remedy Work Plan and allow Whirlpool Corporation to submit Soil Gas Monitoring Report on Quarterly basis (Quarterly Performance Monitoring).

ENVIRON Response:

Soil vapor monitoring points will be permanent as requested.

ADEQ Comment:

Section 2.2, Additional Work, First Paragraph

Please confirm that subslab soil vapor monitoring or crawl space air sampling will be performed at all locations requested by property owners.

ENVIRON Response:

Whirlpool Corporation has committed to ADEQ to conduct soil vapor monitoring on five properties over or near the plume in order to provide additional assurance that no exposure pathway exists. We have been working for several months to reach an agreement with property owners to complete this testing. As of this date, we have three properties available for testing (two Whirlpool properties and Scroggins property referenced above). We need an agreement with two more property owners to comply with the Work Plan. After consulting with the class counsel, we sent letters directly to three of the property owners referenced above whose properties are appropriate to conduct the soil vapor testing in order to meet the requirements of the Work Plan.

As described in Section 2 of the *Addendum to the Soil Vapor Monitoring Plan*, once granted access by the private property owners to conduct the soil vapor monitoring, Whirlpool will perform testing and any necessary follow up activities. If the property owner requests it, Whirlpool Corporation will also provide (at no charge to the property owner) sub slab soil vapor or crawlspace air monitoring (depending on type of dwelling on the property). If the property owner requests any additional testing beyond the soil vapor monitoring, it will be conducted approximately two weeks after the soil vapor monitoring tests results are available. All testing will be conducted in accordance with US Environmental Protection Agency guidelines.

Speculating on whether other property owners who are not over the groundwater plume may wish to have soil vapor, sub slab, or crawl space monitoring is premature at this time.

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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

LIST OF ATTACHMENTS

- Figure 1: Proposed Additional Soil Gas Locations from Final Remedy Work Plan
Figure 3: Updated Proposed Soil Gas Monitoring Locations

FIGURES



**PROPOSED ADDITIONAL
SOIL GAS LOCATIONS
FROM FINAL REMEDY WORK PLAN**

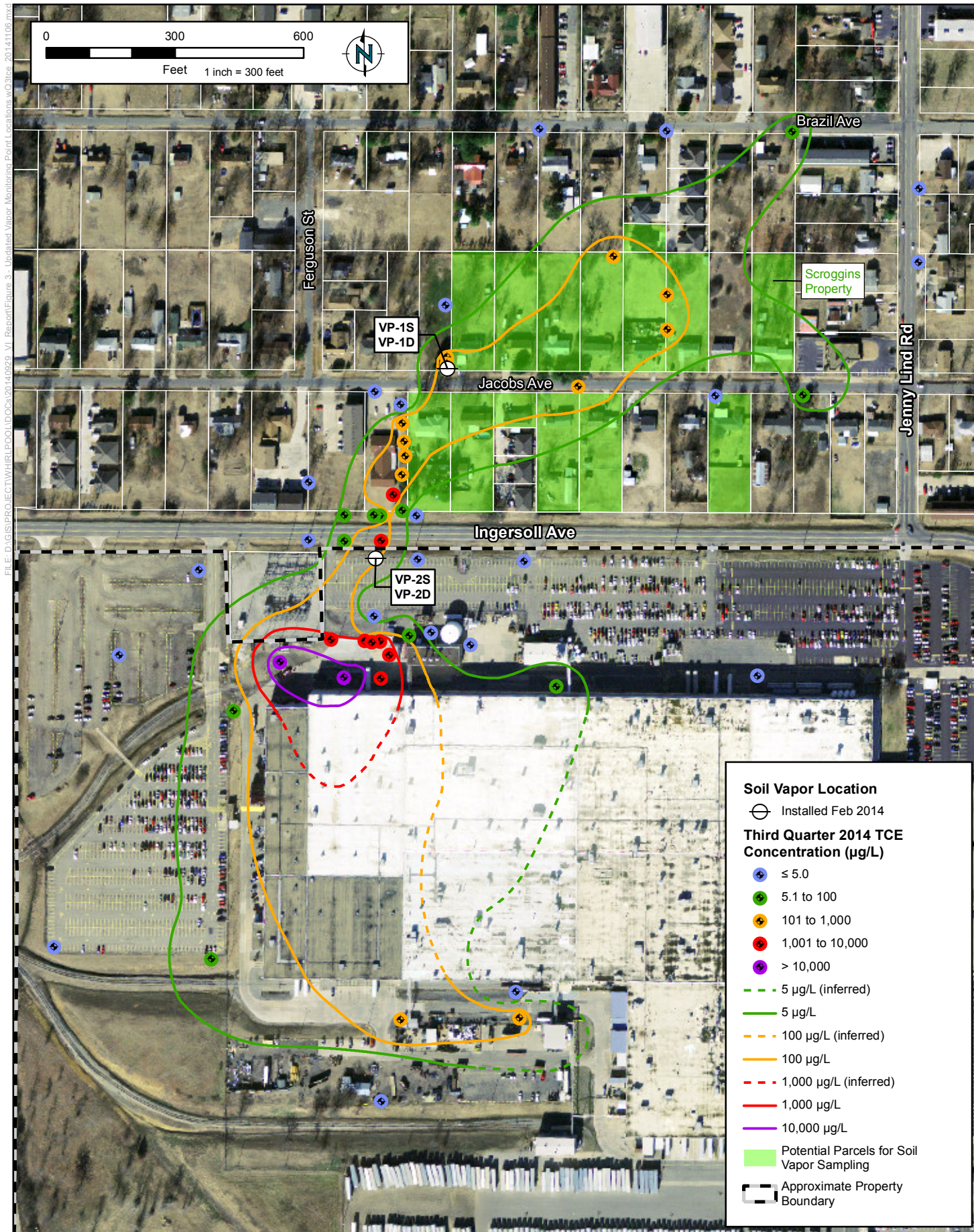
Whirlpool Facility - Fort Smith, Arkansas

**Figure
1**

DRAFTED BY: KTS

DATE: 11/11/2014

PROJECT: 2131344B



UPDATED PROPOSED SOIL VAPOR MONITORING LOCATIONS

Figure
3

DRAFTED BY: KTS

DATE: 11/07/2014

Whirlpool Facility - Fort Smith, Arkansas

PROJECT: 3433253A