



ARKANSAS
Department of Environmental Quality

CERTIFIED MAIL 91 7199 9991 7030 4901 7885

August 1, 2013

Whirlpool Corporation
Attn: Mr. Robert Karwowski
Director, Environmental, Health & Safety
2000 North M-63
Benton Harbor, MI 49022

**RE: Whirlpool Corporation, Forth Smith, Arkansas
2012/2013 Groundwater Monitoring Report – June 2013
EPA No. ARD042755389 AFIN No. 66-00048**

Dear Mr. Karwowski:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has completed the review of the 2012/2013 Annual Groundwater Monitoring Report dated June 24, 2013. The deficiencies noted in the report are listed below:

Section 2.1, Sampling Methods, 2nd Paragraph:

Water Quality data, especially Dissolved Oxygen (DO), pH, and Oxidation Reduction Potential (ORP), is important in the evaluation of natural attenuation and should be included in the tabulated historical results. This also applies to the information provided in Section 2.2, Fall 2012 Event, 2nd Paragraph. Please include data pertaining to DO, pH, ORP, turbidity, specific conductance, and temperature in tabulated format in upcoming reports.

Section 2.3, Spring 2013 Event, 4th Paragraph, 1st Sentence, First Word:

This sentence contains a typographical error. IT-72 should read as IW-72. Please correct.

Section 3.2, On-Site Data, 4th Paragraph:

The southern boundary wells of the on-site plume (ITMW-05, ITMW-09, and ITMW-10) located some distance from the property boundary, exhibit increasing TCE concentrations which is an indication of the continued expansion of the southern plume. In the upcoming reports, please include discussion pertaining to the monitoring wells in the southern segment of the plume.

Table 1, Water Level Elevations:

Water level elevations are not provided for IW and MW monitoring wells with numbers greater than 39. Please include the data for the remaining wells in Table 1.

Figure 5, Source Area Trends:

The plot for MW-25 does not match the historical record. On 11/4/2010, the TCE concentration in monitoring well MW-25 was reported as 270,000 ug/l. This data is not included in Figure 5.

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Whirlpool Corporation

Also, the information for the data taken on 9/10/2002 showing the concentration of 157,000 ug/l for TCE is not included. Additionally, six zero values were included in the graph. These zero values are not found in the previous reports. Please make the necessary revisions.

Please respond to the deficiencies outlined in this letter within ten (10) days from the receipt of this letter. If you have any questions concerning this correspondence, please contact me at (501) 682-0837 or e-mail me at mehran@adeq.state.ar.us.

Sincerely,

Arnette Cusher, P.E.

for

Mostafa Mehran
Engineer II
Technical Branch

cc: Tamara R. House-Knight, Ph. D., Environ

ADEQ

ARKANSAS
Department of Environmental Quality

HAZARDOUS WASTE DIVISION ROUTING SLIP

22 AC
07/15/2013

Subject: Whirlpool Corporation

From: Mostafa Mehran MM

<u>Route in turn to:</u>	<u>Action Needed</u>	<u>Initials</u>	<u>Date</u>
D. Ritchie	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JDR</u>	<u>07/22/2013</u>
D. Gillespie	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>DF</u>	<u>7/24/13</u>
J. Rigg	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JWR</u>	<u>7/23/13</u>
A. Cusher	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>AC</u>	<u>7/24/13</u>
T. Almand	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JA</u>	<u>7-24-13</u>
J. Rich	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JR</u>	<u>8-1-31</u> <i>comments 7-30 OK</i>
T. Hynum	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JTH</u>	<u>8/1/13</u> <i>comments 8/1/13 OK</i>

**Note: Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.*

DISPOSITION:

Return to Mostafa Mehran

COMMENTS: [Insert a brief description of the contents being routed]

The letter pertains to the following:

Whirlpool GWMR – June 24, 2013 – 2012/2013 Monitoring Report