

ADEQ

ARKANSAS
Department of Environmental Quality

CERTIFIED MAIL 91 7199 9991 7030 4901 6284

February 27, 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
Final Remedy Work Plan – January 16, 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 Final Remedy Work Plan (Final Remedy WP) dated January 16, 2013. However, this Final Remedy WP has been submitted prior to approval of the Revised Risk Management Plan (RRMP) dated November 30, 2012. Additionally, the Final Remedy WP does not provide an acceptable remedy for concentrations of trichloroethylene (TCE) in the off-site monitoring wells. Whirlpool Corporation is required to further evaluate the options mentioned in the January 22, 2013 letter and those in the RRMP. As noted in the January 22, 2013 letter from ADEQ, Whirlpool must seriously evaluate an active remedy; not a passive remedy inclusive solely of an off-site institutional control. Since the issues concerning the RRMP have not been addressed, the Final Remedy WP is not approved at this time.

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,


Mostafa Mehran
Engineer II
Technical Branch

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

ADEQ

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Department of Environmental Quality

HAZARDOUS WASTE DIVISION ROUTING SLIP

02/06/2013

Subject: Whirlpool Corporation

From: Mostafa Mehran **MM**

<u>Route in turn to:</u>	<u>Action Needed</u>	<u>Initials</u>	<u>Date</u>
J. Rigg	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JWR</u>	<u>2/13/13</u>
M. Lawler	<input type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>ML</u>	<u>2/13/13</u>
A. Cushner	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>AC</u>	<u>2/13/13</u>
R. Healey	<input checked="" type="checkbox"/> Concurrence <input type="checkbox"/> Review	<u>RGH</u>	<u>2/13/13</u>
T. Almand	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>TA</u>	<u>2-19-13</u>
J. Rich	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<u>JR</u>	<u>2-19-13</u>
T. Hynum	<input checked="" type="checkbox"/> Concurrence <input type="checkbox"/> Review	<u>JH</u>	<u>2/26/13</u> <i>Comments 2/20/13</i> <i>Comments 2/22/13</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:

Final Remedy Work Plan – January 16, 2013