



Monday, February 23, 2015

Ray Gosack  
City Administrator, City of Fort Smith, Arkansas  
623 Garrison Ave  
3rd Floor, Room 315  
Fort Smith, AR 72901

*Via Electronic Mail*

**RE: WHIRLPOOL COMMENTS ON THE REVISED RADD**

Dear Mr. Gosack,

Whirlpool Corporation submitted comments last Friday, February 20, 2015 on the draft Revised Remedial Action Decision Document (RADD) for the former Whirlpool facility in Fort Smith issued by the Arkansas Department of Environmental Quality (ADEQ) on December 21, 2014. A copy of our submission to ADEQ is attached to this letter and available on WhirlpoolFortSmith.com.

In summary, data collected to date show that the extensive remedial actions taken in 2014 have achieved significant and encouraging results, and that there remains no health risk to area residents. Indeed, the required and voluntary remedial work has resulted in 1) decreasing or stabilized concentrations of TCE in groundwater, 2) separation of the on-site area of contamination the plume beneath the neighborhood to the north of the Whirlpool property, and 3) over 50% reductions in TCE concentrations in the three targeted injection areas. In light of this progress under the current 2013 RADD, we believe that the path to achieving our shared goals should be informed by the data and conclusions collected in 2015, and that pushing forward with a Revised RADD would be premature at this time.

If ADEQ decides to move forward with a Revised RADD, our submission outlines in detail a number of comments and suggestions to help ensure that any future actions are based in sound-science and constitute appropriate, effective steps toward achieving the desired remediation goals. Most importantly, we believe that there are possible soil removal and targeted ISCO treatment options that should be carefully evaluated and considered in place of the additional remedial activities proposed in the draft revised RADD, which would be neither the most appropriate nor most effective alternatives. We also suggest a number of more technical modifications to the proposed Revised RADD in order to incorporate prior successes and improve our ability to reach the desired remedial outcomes.

Whirlpool Corporation remains committed to working closely with ADEQ and the City and residents of Fort Smith to address the current on- and offsite conditions, while protecting human health and the environment, and allowing for the redevelopment of the property.

Please feel free to contact me if you have any questions about the details of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Noel".

Jeff Noel, VP, Whirlpool Corporation