

August 9, 2013

Via E-Mail and FedEx

Mr. Mostafa Mehran
Arkansas Department of Environmental Quality
Hazardous Waste Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

**Re: Whirlpool Corporation, Fort Smith, Arkansas
Response to ADEQ Annual Groundwater Monitoring Report Review Letter Dated
August 1, 2013**

EPA No. ARD042755389

AFIN No. 66-00048

Dear Mr. Mehran:

On behalf of Whirlpool Corporation, ENVIRON International Corporation (ENVIRON) has prepared this written response to your letter dated August 1, 2013. ADEQ's comments or questions are noted in italics. ENVIRON's response follows for each bulleted item.

- *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.

ENVIRON Response – ENVIRON agrees that this is important information and thus have been collecting and evaluating this data for understanding the monitored natural attenuation process at the site. These parameters will be included in tabular form in future 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.

ENVIRON Response – The correction will be made in future reports.

- *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.

ENVIRON Response – We appreciate ADEQ’s observation of the slight changes in concentrations of TCE within the plume, however these fluctuations in the existing southern wells presented in the Monitoring Report do not suggest that there is an expansion of the plume to the south. Although TCE concentrations fluctuate within the plume, the groundwater data for monitoring wells ITMW-05, ITMW-09, and ITMW-10 presented in the 2012-2013 Monitoring Report were generally consistent with data collected in this area during the prior sampling events from 2008 to 2011.

Importantly, the southernmost well ITMW-06 has been consistently non-detect since the year 2000, and continued to be non-detect during the fall 2012 and spring 2013 monitoring events. Also, in the monitoring well to the east, ITMW-04, TCE concentrations have been either non-detect or detected below the MCL since 2003 with intermittent TCE concentrations detected above the MCL. These wells assist in bounding the general extent of the plume and show that the plume as previously delineated has not expanded.

Furthermore, in June 2013 additional monitoring wells were installed further to the south of the ITMW-05, ITMW-09, and ITMW-10 area along the Whirlpool property boundary (Figure 1). TCE and other chlorinated solvents were not detected in any sample collected at these new wells. Tables 1 and 2 present the groundwater and soil results from the sampling completed in June. This data presents an additional line of evidence that TCE impacted groundwater is contained within the Whirlpool property.

Collectively, these data reaffirm that the defined southern plume is not expanding and continues to be confined to the Whirlpool property.

- *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.

ENVIRON Response – Comment noted. Available water level information for each monitoring well is provided in Table 3 and will be included in future annual reports.

- *Figure 5, Source Area Trends*

a) 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 µg/l. This data is not included in Figure 5. Also, the information for the data taken on 9/10/2002 showing the concentration of 157,000 µg/l for TCE is not included.

b) Additionally, six zero values were included in the graph. These zero values are not found in the previous reports. Please make the necessary revisions.

Mr. Mostafa Mehran
Response to ADEQ August 1, 2013
Annual Groundwater Monitoring Report Review Letter

ENVIRON Response –

a) Analytical data from the entire site database was used to compile the referenced graphs. The values referenced as incorrect were checked against the project database and were found to be correct as illustrated in the 2012-2013 Annual Groundwater Monitoring Report.

b) Although Figure 5 appears to present zero values for six data points, these values are not zero. Due to the scale of the y-axis depicting historical TCE concentrations above 90,000 µg/l, the six TCE detections of 103, 136, 100, 140, 270, and 120 µg/l appear as zero on the graph. To review the exact data for all points on Figure 5 (ITMW-17, ITMW-19, and MW-25), please see Table 4 of this response.

We welcome the opportunity to discuss this letter and associated concerns with you at your earliest convenience.

Sincerely,



Tamara R. House-Knight, Ph D
Manager/Toxicologist

cc: Ray Gosack – City of Ft Smith
Robert Karwowski – Whirlpool Corporation

Figure

FILE: D:\GIS\PROJECT\WHIRL POOL\DC-Cu-2013\0807 - NO Detects in Groundwater - 2005 to 2013.mxd



Tables

Response to ADEQ August 1, 2013
Annual Groundwater Monitoring Report Review Letter

Table 1 Summary of Analytical Results (Groundwater) Whirlpool-Ft. Smith Additional Sampling				
Analyte	TMW-01-062613	TMW-02-062613	TMW-04-062613	TMW-05-062613
Month/Day/Year of Sampling Event	06/26/2013	06/26/2013	06/26/2013	06/26/2013
Acetone	2.3 U	2.3 U	2.3 U	2.3 U
Benzene	0.56 U	0.56 U	0.56 U	0.56 U
Chlorobromomethane	0.81 U	0.81 U	0.81 U	0.81 U
Bromoform	0.77 U	0.77 U	0.77 U	0.77 U
Bromomethane	2.2 U	2.2 U	2.2 U	2.2 U
2-Butanone (MEK)	1.6 U	1.6 U	1.6 U	1.6 U
Carbon disulfide	1.7 U	1.7 U	1.7 U	1.7 U
Carbon tetrachloride	0.92 U	0.92 U	0.92 U	0.92 U
Dibromochloromethane	0.92 U	0.92 U	0.92 U	0.92 U
Chlorobenzene	0.82 U	0.82 U	0.82 U	0.82 U
Chloroethane	1.7 U	1.7 U	1.7 U	1.7 U
Chloroform	0.82 U	0.82 U	0.82 U	0.82 U
Chloromethane	0.85 U	0.85 U	0.85 U	0.85 U
1,1-Dichloroethane	0.50 U	0.50 U	0.50 U	0.50 U
1,2-Dichloroethane	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	0.76 U	0.76 U	0.76 U	0.76 U
cis-1,2-Dichloroethene	0.56 U	0.56 U	0.56 U	0.56 U
trans-1,2-Dichloroethene	0.88 U	0.88 U	0.88 U	0.88 U
1,2-Dichloropropane	1.4 U	1.4 U	1.4 U	1.4 U
cis-1,3-Dichloropropene	0.97 U	0.97 U	0.97 U	0.97 U
trans-1,3-Dichloropropene	0.59 U	0.59 U	0.59 U	0.59 U
Ethylbenzene	1.3 U	1.3 U	1.3 U	1.3 U
2-Hexanone	1.4 U	1.4 U	1.4 U	1.4 U
Methylene Chloride	1.4 U	1.4 U	1.4 U	1.4 U
4-Methyl-2-pentanone (MIBK)	1.1 U	1.1 U	1.1 U	1.1 U
Styrene	0.56 U	0.56 U	0.56 U	0.56 U
1,1,2,2-Tetrachloroethane	0.80 U	0.80 U	0.80 U	0.80 U
Tetrachloroethene	1.2 U	1.2 U	1.2 U	1.2 U
Toluene	0.55 U	0.55 U	0.55 U	0.55 U
1,1,1-Trichloroethane	0.98 U	0.98 U	0.98 U	0.98 U
1,1,2-Trichloroethane	0.53 U	0.53 U	0.53 U	0.53 U
Trichloroethene	1.6 U	1.6 U	1.6 U	1.6 U
Vinyl acetate	0.60 U	0.60 U	0.60 U	0.60 U
Vinyl chloride	0.11 U	0.11 U	0.11 U	0.11 U
o-Xylene	0.93 U	0.93 U	0.93 U	0.93 U
m-Xylene & p-Xylene	1.3 U	1.3 U	1.3 U	1.3 U
Xylenes, Total	2.0 U	2.0 U	2.0 U	2.0 U
Bromodichloromethane	0.76 U	0.76 U	0.76 U	0.76 U
1,2-Dichloroethene, Total	0.84 U	0.84 U	0.84 U	0.84 U

Notes:

Sample Method: SW-846 8260B (ug/l)

U – Indicates the compound or analyte was analyzed for but not detected at or above the Practical Quantitation Limit (PQL) preceding the U indicator.

J – Laboratory estimated result < Practical Quantitation Limit (PQL) and ≥ Method Detection Limit (MDL).

Response to ADEQ August 1, 2013
Annual Groundwater Monitoring Report Review Letter

Table 2
Summary of Analytical Results (Soil)
Whirlpool-Ft. Smith Additional Sampling

Analyte	TMW-01-062513-15	TMW-01-062513-23	TMW-01-062513-7.5	TMW-02-062513-10	TMW-02-062513-15	TMW-03-062513-13	TMW-03-062513-5.5	TMW-04-062513-04	TMW-04-062513-10	TMW-05-062513-09	TMW-05-062513-17
Month/Day/Year of Sampling Event	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013	06/25/2013
1,1,1-Trichloroethane	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U	0.74 U
1,1,2,2-Tetrachloroethane	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U
1,1,2-Trichloroethane	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U	0.73 U
1,1-Dichloroethane	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U	0.87 U
1,1-Dichloroethene	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U	1.2 U
1,2-Dichloroethane	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U
1,2-Dichloropropane	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U
2-Butanone (MEK)	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U
2-Hexanone	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
4-Methyl-2-pentanone (MIBK)	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U
Acetone	21	1.7 U	24	1.7 U	1.7 U	1.7 U	28	1.7 U	1.7 U	1.7 U	1.7 UJ
Benzene	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U	0.63 U
Bromodichloromethane	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U	0.66 U
Bromoform	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U
Bromomethane	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U
Carbon disulfide	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U	0.55 U
Carbon tetrachloride	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U
Chlorobenzene	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U	0.96 U
Chlorobromomethane	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U	1.8 U
Chloroethane	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U
Chloroform	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
Chloromethane	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U
cis-1,2-Dichloroethene	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U	0.83 U
cis-1,3-Dichloropropene	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U	0.54 U
Dibromochloromethane	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U	0.94 U
Ethylbenzene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methylene Chloride	3.7	2.7	2.9	2.2 U	4.0	3.4	4.4	2.2 U	2.2 U	2.2 U	2.2 U
m-Xylene & p-Xylene	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U	1.5 U
o-Xylene	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U
Styrene	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U
Tetrachloroethene	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U	0.71 U
Toluene	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U
trans-1,2-Dichloroethene	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U
trans-1,3-Dichloropropene	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U
Trichloroethene	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U	1.4 U
Vinyl acetate	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U	0.93 U
Vinyl chloride	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U	0.90 U
1,2-Dichloroethene, Total	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U	1.9 U
Xylenes, Total	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U

Notes:

Sample Method: SW-846 8260B (ug/kg)

U – Indicates the compound or analyte was analyzed for but not detected at or above the Practical Quantitation Limit (PQL) preceding the U indicator.

J – Laboratory estimated result < Practical Quantitation Limit (PQL) and ≥ Method Detection Limit (MDL).

UJ – Estimated non-detect due to laboratory quality control failure.

Response to ADEQ August 1, 2013 Annual Groundwater Monitoring Report Review Letter

Table 3
Water Level Elevations
Whirlpool-Ft. Smith

Location	Top of Casing	X	Y	2/22/1999	10/28/1999	12/10/1999	3/27/2000	9/18/2000	3/26/2001	9/10/2001	2/18/2002	6/23/2003	10/1/2006	4/1/2007	9/1/2007	4/1/2008	12/1/2008	4/1/2009	10/1/2009	4/1/2010	10/1/2010	3/1/2011	10/1/2011	4/1/2012	10/1/2012	4/22/2013			
ITMW-1	476.93	3,584,597	368,913	464.07	469.03	464.39	463.79	464.70	462.84	464.32	462.78	474.60	464.36	461.98	462.97	462.29	463.88	462.75	463.90	462.73	464.22	463.49	NM	462.24	462.88	462.28	462.88	461.15	
ITMW-2	477.79	3,584,402	369,021	464.76	465.21	464.57	464.41	464.91	463.86	464.55	463.55	475.10	461.57	NM	NM	463.06	464.40	463.68	464.55	463.72	465.06	464.31	NM	463.06	463.19	463.43	465.70	465.12	
ITMW-3	478.79	3,584,519	369,075	464.40	465.19	464.47	464.08	464.83	463.40	464.50	463.18	472.80	464.46	462.16	463.15	462.72	464.20	463.32	464.18	463.29	464.63	463.91	NM	462.63	463.04	462.92	463.09	465.77	
ITMW-4	477.9	3,584,464	368,208	464.28	465.25	464.53	463.82	464.58	462.89	465.20	462.90	477.60	464.28	462.15	462.89	462.15	463.58	462.58	463.88	462.69	464.14	463.53	NM	462.24	462.77	462.22	462.62	460.70	
ITMW-5	473.55	3,584,196	368,205	464.09	465.05	464.33	463.68	464.38	462.86	463.98	462.77	476.60	464.05	461.98	462.67	462.08	463.41	462.48	463.64	462.56	463.98	463.32	NM	462.09	462.53	462.03	462.43	454.77	
ITMW-6	476.25	3,584,136	367,970	463.99	464.79	464.18	463.54	464.14	462.67	463.74	462.69	481.10	463.76	461.85	462.39	461.09	463.25	462.41	463.45	462.47	463.80	463.19	NM	461.94	462.24	461.86	462.18	454.06	
ITMW-7	477.87	3,583,760	368,323	464.08	464.21	463.83	463.83	463.85	463.52	463.52	463.43	479.70	463.65	462.12	462.57	462.61	463.65	463.28	463.56	463.31	464.25	463.55	NM	462.84	462.24	462.90	462.49	458.12	
ITMW-9	476.52	3,584,469	368,146	464.16	465.16	464.44	463.73	464.47	462.80	464.09	462.81	479.50	464.17	462.04	462.77	462.00	463.46	462.51	463.74	462.60	464.03	463.43	NM	462.13	462.63	462.09	462.52	455.60	
ITMW-10	477.58	3,584,192	368,157	464.06	465.01	464.33	463.64	464.46	462.80	464.02	462.55	478.60	464.02	461.97	462.62	461.94	463.38	462.59	463.66	462.56	463.98	463.34	NM	462.07	462.49	462.02	462.46	457.64	
ITMW-11	474.07	3,584,192	369,040	464.98	465.15	465.10	464.60	464.85	464.19	464.66	463.82	474.00	464.70	462.65	463.45	463.50	464.71	464.37	464.85	464.29	465.47	464.75	NM	463.44	463.40	463.95	465.82	462.15	
ITMW-12	478.19	3,584,212	369,007	464.91	465.19	464.60	464.59	464.85	464.16	464.62	463.91	474.40	464.49	462.41	463.24	462.25	464.53	464.12	464.65	464.03	465.18	464.48	NM	462.20	463.18	463.65	463.22	464.18	
ITMW-13	478.93	3,584,260	369,052	464.97	465.19	464.60	464.58	464.92	464.15	464.60	463.80	475.40	464.49	462.43	463.24	463.27	464.54	464.12	464.65	464.02	465.25	464.54	NM	463.20	463.20	463.70	463.69	463.76	
ITMW-14	483.04	3,584,312	369,056	464.92	465.19	464.67	464.54	464.93	464.08	464.60	463.71	475.70	464.49	462.40	463.23	463.21	464.51	463.96	464.69	463.94	465.18	464.55	NM	463.13	463.14	463.62	461.72	468.28	
ITMW-15	474.5	3,584,157	369,043	465.02	465.15	464.58	464.63	464.88	464.21	464.58	463.84	474.80	464.67	462.61	463.42	463.50	464.59	464.39	464.64	464.28	465.48	464.78	NM	463.34	463.34	463.97	465.41	462.93	
ITMW-16	481.9	3,584,181	369,100	465.22	465.34	464.77	464.68	464.09	464.43	464.77	464.09	476.50	464.61	462.53	462.38	463.50	464.73	464.38	464.83	464.27	NM	464.77	NM	463.40	463.34	463.90	463.38	466.05	
ITMW-17	480.84	3,584,078	369,051	465.36	465.12	464.54	464.63	464.92	463.24	464.58	463.99	476.10	464.46	462.40	463.22	463.30	464.56	464.19	464.70	464.12	465.28	464.61	NM	463.25	463.15	463.77	463.19	465.71	
ITMW-18	474.07	3,584,189	368,955	464.91	465.16	464.55	464.55	464.89	464.13	464.56	463.78	473.90	464.45	462.44	463.20	463.30	464.50	464.10	464.63	463.99	465.19	464.42	NM	463.18	463.13	463.67	463.35	463.02	
ITMW-19	476.67	3,584,104	368,961	464.97	465.15	464.52	464.61	464.95	464.74	464.85	463.78	474.30	464.46	462.40	463.46	463.29	464.62	464.16	464.66	464.07	465.25	464.57	NM	463.24	463.17	463.74	463.25	463.17	
ITMW-20	477.3	3,583,583	369,042	465.32	464.93	464.55	464.82	464.73	464.75	464.42	464.54	475.70	464.52	462.07	463.55	465.86	464.77	464.64	464.76	464.54	465.44	464.79	NM	463.72	463.30	464.34	463.51	462.92	
ITMW-21	474.5	3,583,842	368,898	465.31	464.93	464.59	464.90	464.68	464.83	464.62	464.26	474.40	464.47	462.73	463.35	463.66	464.68	464.44	464.62	464.38	465.32	464.65	NM	463.58	463.40	464.14	463.27	461.27	
IW-72	471.65	3,584,269	369,590	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.37	465.30	464.65	464.48	NM	463.17	463.46	463.06	462.11
IW-73	471.48	3,584,274	369,503	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.47	465.85	464.85	464.66	NM	463.30	463.98	463.38	462.88
IW-74	472.06	3,584,271	369,545	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.41	465.37	464.72	464.58	NM	463.25	463.89	463.87	462.76
IW-75	472.17	3,584,285	369,605	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NM	NM	NM	NM	NM	NM	NM	463.65	462.83
IW-76	472.26	3,584,264	369,426	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.32	465.40	464.63	464.51	NM	463.18	463.77	463.26	462.86
IW-77	473.01	3,584,241	369,380	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.38	465.47	464.81	464.69	NM	463.42	464.00	463.48	462.91
IW-78	473.49	3,584,197	369,338	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.37	465.47	464.78	464.67	NM	463.36	463.58	463.44	463.27
IW-79	473.84	3,584,231	369,336	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.47	465.48	464.82	464.69	NM	463.38	464.01	463.45	463.41
IW-80	473.3	3,584,261	369,343	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	464.36	465.35	464.63	464.56	NM	463.25	463.88	463.24	462.38
MW-22	473.93	3,585,066	368,913	464.29	465.64	464.91	464.23	465.20	463.22	464.82	463.11	473.90	464.99	462.57	463.69	462.69	464.45	463.51	464.24	463.29	464.66	463.96	NM	462.73	463.45	462.77	463.62	461.55	
MW-23	475.9	3,584,105	369,238	464.85	465.27	464.70	464.65	464.04	464.41	464.70	464.07	475.80	464.60	462.52	463.35	463.55	464.37	464.42	464.88	464.32	474.19	464.83	NM	463.42	463.37	464.01	463.42	462.98	
MW-24	476.39	3,584,089	369,134	465.14	465.27	464.69	464.82	464.04	464.38	464.69	464.08	476.60	464.44	463.54	463.37	463.56	464.77	464.43	464.89	464.31	NM	464.80	NM	463.48	463.37	463.98	463.44	462.97	
MW-25	476.89	3,583,957	369,006	465.21	465.28	464.77	464.86	465.09	464.48	464.73	464.15	474.70	464.68	462.67	463.47	463.55	464.72	464.42	464.87	464.36	465.49	464.83	NM	463.50	463.38	464.01	463.49	463.12	
MW-26	478.05	3,583,779	369,230	465.69	465.32	464.89	465.10	465.09	464.98	464.78	465.72	476.10	464.85	463.05	463.85	464.06	465.15	464.89	465.11	464.74	465.75	465.08	NM	463.93	463.66	464.56	463.88	463.63	
MW-27	475.42	3,584,290	369,226	NM	NM	464.70	464.61	465.02	464.38	464.71	463.99	475.70	464.60	462.51	463.38	463.53	464.75	464.44	464.89	464.31	NM	464.79	NM	463.44	463.34	463.98	463.42	463.00	
MW-28	470.49	3,584,537	369,209	NM	NM	464.39	464.41	464.91	464.24	464.83	463.73	470.60	464.68	462.45	463.41	463.40	464.71	464.21	464.76	464.13	NM	464.68	NM	463.23	463.38	463.79	463.38	462.69	
MW-29	474.91	3,583,394	368,371	NM	NM	464.07	464.59	463.92	464.44	463.59	464.29	475.10	463.94	462.78	462.96	463.56	464.27	462.29	463.97	464.30	464.97	464.17	NM	463.28	462.64	463.91	462.87	463.44	
MW-30	478.99	3,583,792	368,432	NM	NM	464.22	464.35	464.24	464.04	463.92	463.69	479.20	464.12	462.49	463.08	463.27	464.21	463.91	464.10	463.76	464.76	464.08	NM	463.02	462.72	463.55	462.52	462.61	
MW-31	476.03	3,584,038	369,286	NM	NM	NM	NM	NM	464.78	465.35	464.01	476.10	464.53	462.45	463.41	463.46	464.71	464.36	464.28	464.25	NM	463.78	NM	463.45	463.29	NM	463.02	462.80	
MW-32	475.68	3,584,122	369,279	NM	NM	NM	NM	NM	464.32	464.71	464.06	475.70	464.57	462.50	463.34	463.47													

Table 4 TCE Groundwater Concentrations for Monitoring Wells ITMW 17, ITMW-19, and MW-25 Whirlpool-Ft. Smith			
Date Sample Collected	ITMW-17	ITMW-19	MW-25
2/1/1991	21000	9900	--
4/15/1991	21000	--	--
4/24/1991	21000	--	--
11/1/1993	18000	27000	--
12/1/1996	9300	25000	--
2/1/1999	11000	33000	29000
12/1/1999	--	--	94500
3/1/2000	6780	33100	35900
9/19/2000	5500	35700	--
9/21/2000	--	--	59000
1/5/2001	8310	34000	--
3/28/2001	6700	38000	34000
9/13/2001	6300	19000	60000
9/9/2002	--	--	56000
9/11/2002	6500	27000	--
2/26/2003	4380	16200	45900
7/17/2003	--	--	62200
9/24/2003	--	27300	103
9/25/2003	6090	--	--
4/13/2004	--	19400	--
4/14/2004	5050	--	25600
9/21/2004	5760	20000	85200
4/7/2005	5750	18300	21100
9/28/2005	--	--	136
9/29/2005	5460	25700	--
3/15/2006	15900	21300	36300
10/12/2006	19000	16000	65000
4/18/2007	13000	20000	19000
9/21/2007	11000	19000	55000
4/29/2008	6200	17000	25000
12/10/2008	5600	11000	100
4/27/2009	5200	13000	39000
10/27/2009	--	--	140
5/11/2010	--	--	81000
5/12/2010	4500	--	--
5/13/2010	--	19000	--
11/4/2010	5400	19000	270
3/22/2011	5300	16000	57000
10/26/2011	4500	17000	120
4/17/2012	--	--	18000
4/19/2012	4700	18000	--
10/19/2012	3500	15000	56000
4/25/2013	5600	13000	9500

Note:

Concentrations presented in µg/l

-- Indicates the well was not sampled