ASHLAND

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December 5, 2007

U.S. Environmental Protection Agency
901 North 5th Street ARTD/RCAP
Kansas City, Kansas 66101-2907
Attn: Mr. Harry Gabbert

RCAP RECEIVED
DEC 06 2007

Subject: Quarterly Groundwater Sampling
Ashland Inc.
5420 Speaker Road
Kansas City, KS 66106
RCRA Permit # KSD057889313

Dear Mr. Gabbert:

As proposed in the request for a Class III Permit Modification request dated November 21, 2006, Ashland has now completed eight calendar quarters of groundwater sampling at the Ashland facility located at 5420 Speaker Road, Kansas City, Kansas. This quarterly sampling was not requested by the United States Environmental Protection Agency (EPA) or required by the permit, but was undertaken voluntarily by Ashland in addition to the Annual Groundwater sampling which is required by the Corrective Measures Implementation (CMI) Plan dated February 2001 and approved in a letter from the EPA dated March 1, 2004.

Groundwater samples were collected from three selected monitor wells (MW-2A, MW-6, and MW-9A) on November 7, 2007. These three wells historically had the highest concentrations and most recently had concentrations above the Maximum Contaminant Levels (MCL). The samples were analyzed by Test America in Savannah, Georgia, for volatile organic compounds (VOCs) via EPA SW-846 Method 8260B. The laboratory results of the November 2007 sampling event are attached. In addition, Tables 5, 6 and 7 summarizing groundwater data from the annual groundwater monitoring reports are attached, showing historical sample results for MW-2A, MW-6, and MW-9A as shown on Figure 1. These tables have been updated to include the results of the current sampling event. MCLs for the compounds detected are also shown on the table. The laboratory data sheets for the previous sampling events were presented in the appropriate annual groundwater monitoring report.

Once again, the groundwater analytical data shows no VOC constituent concentrations that exceed the MCLs in any of the sampled monitor wells. This is the eighth consecutive quarterly sampling event to demonstrate these results. Accordingly, Ashland will now discontinue the additional voluntary quarterly sampling events.

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The next annual sampling event as required by the CMI plan is scheduled for April 2008. However, Ashland's urges EPA to quickly act on our Class III Permit modification request submitted November 21, 2006 as soon as possible and grant the "Corrective Action Complete" determination, such that expense of unnecessary further groundwater monitoring can be avoided.

Pending EPA approval of the permit modification, the next steps will be:

- Prepare notifications to implement the public notice and a 60-day public comment period in accordance with 40 CFR 270.42(c)(2).
- Plug and abandon all monitor wells, air sparge wells and AS/SVE wells in accordance with Kansas regulations K.A.R. 28-30-2 through K.A.R. 28-30-4, K.A.R. 28-30-7, and the Class V Air Sparging Permit request approved by Kansas Department of Health and Environment dated June 28, 2004.
- Decontaminate, decommission, dismantle and remove the above ground treatment system and piping.
- Application to KDHE to terminate the underground injection permit for sparge air.

If you have any questions, please call me at (614) 790-1586.

Sincerely,

Susie Drye for

Michael Dever, PG
Remediation Project Manager

Attachments

cc: Mostafa Kamal, Kansas Department of Health and Environment
Kristina Woods, Ashland
James T. Price
Kristan Sansone, URS Atlanta
Richard Johannes, URS Overland Park

FIGURE

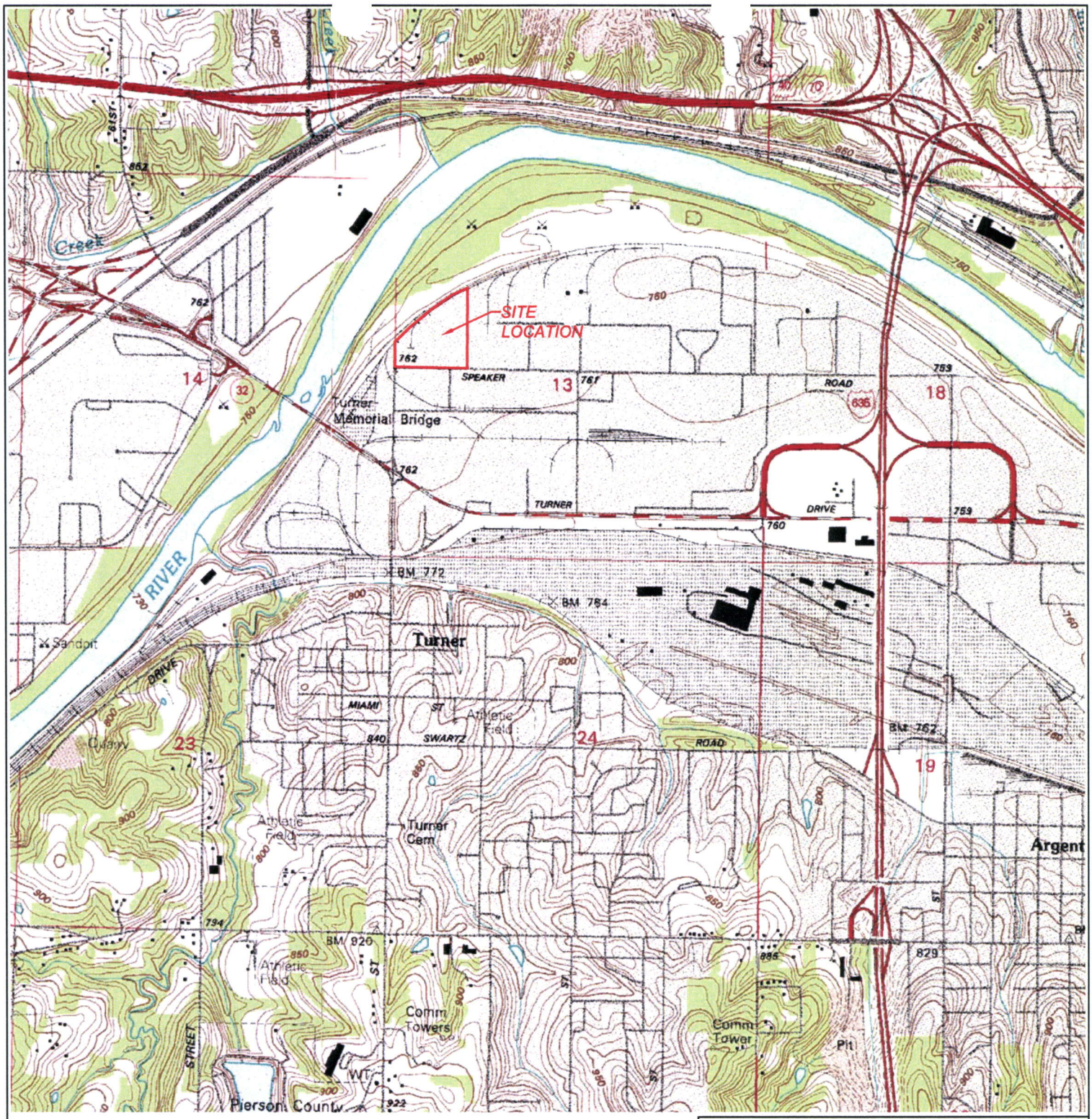

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FIGURE 1
SITE LOCATION MAP

ASHLAND KANSAS CITY DSO
KANSAS CITY, KANSAS

DRAWN BY: MDO	DATE DRAWN: 11/02/2007
REVIEWED BY: KS	DATE REVIEWED:
SCALE: 1" = 200'	PLOT DATE:
PROJECT NO.: 37680077	
REVISED BY:	REV. DATE:
REVISED BY:	REV. DATE:

TABLES

TABLE 5
HISTORICAL GROUNDWATER TRENDS
MW-2A
ASHLAND KANSAS CITY DSO

Volatile Organic Compounds		MCL	6/21/1999	1/24/2000	4/10/2000	10/24/2000	5/9/2002	6/12/2003	8/17/2004	5/4/2005	1/23/2006	4/19/2006	8/4/2006	11/21/2006	1/9/2007	4/3/2007	8/28/2007	11/7/2007
Benzene	ug/l	5	ND (25)	**27**	ND (250)	NS	ND (250)	ND (50)	ND (1)	ND (1)	1.0	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)
Ethylbenzene	ug/l	700	310	**12000**	**6800**	NS	**26,000**	**3800**	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	43	10
Toluene	ug/l	1000	ND (25)	**1300**	600	NS	**26,000**	ND (50)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)
Xylenes	ug/l	10,000	1200	**40000**	**21000**	NS	**73,000**	**12000**	7	ND (2)	32	ND (2)	ND (2)	38	ND(2)	ND(2)	12	17
cis-1,2-Dichloroethene	ug/l	70	ND (25)	55	ND (250)	NS	ND (250)	ND (50)	ND (1)	ND (1)	1.5	1.5	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)
Vinyl Chloride	ug/l	2	ND (50)	ND (50)	ND (500)	NS	ND (250)	NA	ND (1)	ND (1)	1.6	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)
Acetone	ug/l	-	ND (100)	110000	15000	NS	20,000	ND (1200)	ND (25)	ND (25)	NA	ND (25)	ND (25)	ND (25)	ND (25)	ND (25)	ND (25)	ND (25)
Chlorobenzene	ug/l	100	ND (25)	25	ND (250)	NS	ND (250)	ND (50)	ND (1)	ND (1)	1.9	ND (1)	ND (1)	1.9	1.4	ND (1)	ND (25)	ND (1)
Methyl ethyl ketone (MEK)	ug/l	-	ND (100)	2200	ND (1200)	NS	ND (2,500)	ND (500)	ND (10)	ND (10)	NA	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (1)	ND (10)
1,2-dichloroethane	ug/l	-	NA	NA	NA	NS	NA	NA	ND (1)	ND (1)	3.8	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)
4-Methyl-2-pentanone (MIBK)	ug/l	-	ND (100)	2600	ND (1200)	NS	ND (2,500)	ND (500)	ND (10)	ND (10)	NA	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)

Notes: Table includes only constituents historically detected in groundwater.
Analytical detections that exceed the MCL are marked in bold.
ND - Non Detect
NA - Not Analyzed or Not Available
NS - Not Sampled
(1) - Reporting limit of 1 µg/L

TABLE 6
HISTORICAL GROUNDWATER TRENDS
MW-6
ASHLAND KANSAS CITY DSO

Volatile Organic Compounds		MCL	3/10/1999	1/18/2000	4/12/2000	10/24/2000	5/9/2002	6/12/2003	8/20/2004	5/5/2005	1/23/2006	4/21/2006	8/4/2006	11/21/2006	1/9/2007	4/3/2007	8/28/2007	11/7/2007
Benzene	ug/l	5	ND (1000)	ND (1200)	NA	NS	NA	NA	ND (20)	3.3	ND(5)	ND(5)	ND(5)	1.6	ND(1)	ND(1)	ND (5)	ND (2)
Ethylbenzene	ug/l	700	**1300**	**1600**	**1500**	NS	**810**	160	65	70	100	59	66	61	17	73	90	32
Toluene	ug/l	1000	**33000**	**48000**	**35000**	NS	**3100**	790	63	15	ND(5)	ND(5)	ND(5)	ND(1)	8.9	47	12	4
Xylenes	ug/l	10,000	**17000**	**21000**	**19000**	NS	8800	6200	1400	540	970	690	560	99	80	1100	1300	530
Trichloroethene	ug/l	5	NA	NA	NA	NS	NA	NA	ND (20)	ND (1)	ND(5)	ND(1)	ND(5)	ND(1)	2.7	ND(1)	ND (5)	ND (2)
cis-1,2-Dichloroethene	ug/l	70	ND(1000)	ND(1200)	ND(500)	NS	ND(50)	ND(20)	**120**	7	ND(5)	7	ND(5)	ND(1)	ND(1)	ND(1)	13	8.9
1,2-Dichloroethene (total)	ug/l	-	NA	NA	NA	NS	NA	NA	140	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vinyl chloride	ug/l	2	ND(2000)	ND(2500)	ND(1000)	NS	ND(50)	ND(20)	**47**	1.2	ND(5)	1.2	ND(5)	ND(1)	ND(1)	ND(1)	ND (5)	ND (2)
Acetone	ug/l	-	ND (100)	ND (100)	ND (5000)	NS	ND (25)	ND (25)	ND (25)	ND (25)	NA	260	ND (130)	ND(25)	ND(25)	ND(25)	ND (130)	ND (50)
Chlorobenzene	ug/l	100	ND (25)	ND (250)	ND (500)	NS	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	6.3	ND(5)	ND(1)	ND(1)	ND(1)	NS	ND (2)
Chloroethane	ug/l	-	ND (2000)	ND (2500)	ND(1000)	NS	NA	NA	ND (20)	15	ND(5)	15	ND(5)	ND(1)	1.1	ND(1)	ND (5)	ND (1)
Dibromomethane	ug/l	-	NA	NA	NA	NS	NA	NA	NA	NA	NA	2.1	NA	NA	NA	NA	NA	NA
Methyl ethyl ketone (MEK)	ug/l	-	NA	ND (6200)	ND (25000)	NS	NA	NA	ND (200)	ND (50)	NA	ND (10)	ND (50)	ND (10)	ND (10)	21	ND (50)	ND (20)
1,1-Dichloroethane	ug/l	-	ND(1000)	ND(1200)	ND(500)	NS	92	ND(20)	82	2.6	ND(5)	2.6	ND (5)	ND(1)	ND(1)	1.2	21	21
1,2-Dichlorobenzene	ug/l	600	NA	NA	NA	NS	ND(200)	NA	66	ND(1)	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	ug/l	75	NA	NA	NA	NS	ND(200)	NA	**220**	1	ND(5)	1.0	NA	NA	NA	NA	NA	NA

Notes: Table includes only constituents historically detected in groundwater.
Analytical detections that exceed the MCL are marked in bold.
ND - Non Detect
NA - Not Analyzed or Not Available
NS - Not Sampled
(1) - Reporting limit of 1 µg/L

TABLE 7
HISTORICAL GROUNDWATER TRENDS
MW-9A
ASHLAND KANSAS CITY DSO

Volatile Organic Compounds		MCL	3/9/1999	1/18/2000	1/21/2000	4/12/2000	10/24/2000	5/1/2002	6/12/2003	8/19/2004	5/5/2005	1/24/2006	4/18/2006	8/4/2006	11/21/2006	1/9/2007	4/3/2007	8/28/2007	11/7/2007
Benzene	ug/l	5	ND(1200)	ND(620)	ND(1000)	ND(500)	**110**	ND(50)	ND(1)	1.2	ND(1)	3.1	NS (dry)	ND(1)	NS (dry)	NS (dry)	ND (1)	1.4	ND (1)
Ethylbenzene	ug/l	700	**1600**	**1600**	**1600**	**860**	**2200**	420	ND(1)	ND(1)	ND(1)	120	NS (dry)	ND(1)	NS (dry)	NS (dry)	8.9	2.2	2.8
Toluene	ug/l	1000	**33000**	**20000**	**22000**	**12000**	**43000**	**5600**	22	ND(1)	ND(1)	1.4	NS (dry)	ND(1)	NS (dry)	NS (dry)	18	1.2	ND (1)
Xylenes	ug/l	10,000	**12000**	**12000**	**12000**	6700	**15000**	3800	320	ND(2)	ND(2)	930	NS (dry)	ND(2)	NS (dry)	NS (dry)	100	26	31
Trichloroethene	ug/l	5	ND(1200)	ND(620)	ND(1000)	Na	ND(50)	ND(200)	1.2	ND(1)	ND(1)	ND (5)	NS (dry)	ND (1)	NS (dry)	NS (dry)	ND (1)	ND (1)	ND (1)
cis-1,2-Dichloroethene	ug/l	70	ND(1200)	ND(620)	ND(1000)	ND(500)	**500**	ND(50)	ND(1)	ND(1)	19	1.5	NS (dry)	ND(1)	NS (dry)	NS (dry)	ND (1)	21	8.1
Vinyl chloride	ug/l	2	ND (2500)	ND(1200)	ND(2000)	ND(1000)	ND(1)	ND(1)	ND(1)	ND(1)	**6.2**	ND(1)	NS (dry)	ND (1)	NS (dry)	NS (dry)	ND (1)	ND (1)	ND (1)
Acetone	ug/l	-	ND(12000)	ND(6200)	ND(10000)	ND(5000)	ND(500)	ND(1200)	120	ND(25)	ND(25)	NA	NS (dry)	ND(1)	NS (dry)	NS (dry)	ND (25)	ND (25)	ND (25)
Chloroethane	ug/l	-	ND(2500)	ND(1200)	ND(2000)	ND(1000)	ND(100)	ND(50)	17	10	7	36	NS (dry)	ND(1)	NS (dry)	NS (dry)	ND (1)	ND (1)	ND (1)
Methyl ethyl ketone (MEK)	ug/l	-	ND(6200)	ND(3100)	ND(5000)	ND(2500)	ND(250)	ND(500)	320	ND(10)	ND(10)	NA	NS (dry)	ND(1)	NS (dry)	NS (dry)	11	ND(10)	ND (10)
Styrene	ug/l	100	ND(1200)	NA	NA	NA	ND(50)	ND(200)	3.9	ND(1)	ND(1)	ND(1)	NS (dry)	ND (1)	NS (dry)	NS (dry)	ND (1)	ND (1)	ND (1)
Vinyl acetate	ug/l	-	ND(2500)	1200	ND(2000)	NA	NA	NA	NA	NA	NA	NA	NS (dry)	NA	NS (dry)	NS (dry)	NA	NA	NA
1,1,1-Trichloroethane	ug/l	200	ND(1200)	ND(620)	ND(1000)	ND(500)	ND(50)	ND(50)	ND(1)	1.4	ND(1)	ND(1)	NS (dry)	ND (1)	NS (dry)	NS (dry)	ND (1)	ND (1)	ND (1)
1,1-Dichloroethane	ug/l	-	ND(1200)	ND(620)	ND(1000)	ND(500)	630	57	ND(1)	8.4	12	ND(1)	NS (dry)	ND(1)	NS (dry)	NS (dry)	ND (1)	20	19

Notes: Table includes only constituents historically detected in groundwater.
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