

September 28, 2016

Mary Siedlecki
North Carolina Department of Environment and Natural Resources
Division of Waste Management
1646 Mail Service Center
Raleigh, North Carolina 27699-1646



Re: Notification of Name Change
Ashland LLC
Administrative Order in Lieu of Post-Closure Permit
Ashland Raleigh Facility
1415 South Bloodworth Street
Raleigh, North Carolina
Docket Number 2011-008
EPA ID Number NCD 088 560 032
Via Fed-Ex

Dear Ms. Siedlecki,

In September 2015, Ashland Inc. (“Ashland”) announced a plan to separate into two independent, publicly traded companies – one focused on specialty chemicals and the other focused on high-performance lubricants (<http://investor.ashland.com/releases.cfm>). The new Ashland will be a global leader in providing specialty chemical solutions to customers in a wide range of consumer and industrial markets. Valvoline will focus on building the world's leading engine and automotive maintenance business by providing hands-on expertise to customers in each of its primary markets. Our goal is to make the transition successful and seamless.

As part of this separation, Ashland underwent changes to the legal structure. This letter serves as notification to the North Carolina Department of Environment and Natural Resources (“NCDENR”) of changes in the legal structure of Ashland, whereby Ashland Inc. was converted into an LLC. Please note there were no changes to Ashland’s operations, address or tax identification number.

Ashland currently operates under the Resource Conservation & Recovery Act Administrative Order in Lieu of Post-Closure Permit (“Order”) for the Ashland Raleigh Facility in Raleigh, North Carolina. Ashland requests the NCDENR change the legal name to Ashland LLC on said Order.

The Ashland separation and restructuring has no effect on the ownership of the company, or its assets and liabilities in any way that would influence the remediation efforts currently underway at the Ashland Raleigh Facility. In addition, it does not change our commitment to fulfill our environmental obligations at the site.

If you have any questions or concerns, please do not hesitate to contact me at (614) 790-1713 or trichardson@ashland.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trey Richardson', written in a cursive style.

Trey Richardson
Remediation Project Manager
Ashland LLC

cc: Kristina Woods, Senior Environmental Counsel, Environmental Litigation for Ashland LLC