



Hercules LLC
A wholly owned subsidiary of Ashland LLC
Ashland LLC
500 Hercules Road
Wilmington, DE 19808-1599
Writer's Direct Dial: (302) 995-3456
Writer's Email: tdhassett@ashland.com

October 11, 2016

Jason Metzger
Georgia Department of Natural Resources
Environmental Protection Division
Response and Remediation Program
2 Martin Luther King, Jr. Dr., SE, Suite 1054
Atlanta, Georgia 30334

Re: Notification of Name Change
Hercules LLC, a wholly owned subsidiary of Ashland LLC
Voluntary Remediation Program
Hercules Incorporated, Savannah Plant
3000 Louisville Road
Savannah, Georgia
Georgia Hazardous Sites Inventory Number 10696
VRP Number 1332420701
Via Fed-Ex

Dear Mr. Metzger,

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.

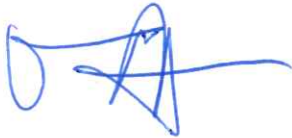
As part of this separation, Ashland and some of its wholly owned subsidiaries, including Hercules Incorporated ("Hercules"), underwent changes to the legal structure. This letter serves as notification to the Georgia Environmental Protection Division ("GA EPD") of changes in the legal structure of Hercules, whereby Hercules Inc. was converted into an LLC. Please note there have been no changes to Hercules' operations, address or tax identification number.

Hercules currently operates under the April 9, 2012 Voluntary Investigation and Remediation Plan ("VIRP")/Voluntary Remediation Program ("VRP") Application Number 1332420701 for the Hercules Incorporated, Savannah Plant (Georgia Hazardous Sites Inventory Number 10696) in Savannah, Georgia approved by the GA EPD on March 15, 2013. Hercules requests the GA EPD change the legal name to Hercules LLC on said VRP. All information regarding the name change is provided in the attached revised VIRP Application Form and Checklist (first page only).

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 Hercules Incorporated, Savannah Plant. 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 (302) 995-3456 or tdhassett@ashland.com.

Sincerely,




Timothy Hassett
Remediation Project Manager
Ashland LLC

Ecopy

cc: Kristina Woods, Senior Environmental Counsel, Environmental Litigation for Ashland LLC
Carolyn Daniels, GAEPD
David Wilderman, ARCADIS
Johnnie Quiller, Solenis

Attachments: VIRP Application Form and Checklist (first page only)

Voluntary Investigation and Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION			
COMPANY NAME	Hercules LLC		
CONTACT PERSON/TITLE	Timothy Hassett, Remediation Project Manager		
ADDRESS	500 Hercules Road, Wilmington, DE 19808-1599		
PHONE	(302) 995-3456	FAX	(302) 995-3485
		E-MAIL	tdhassett@ashland.com
GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP			
NAME	David M. Wilderman, PG	GA PE/PG NUMBER	Georgia Registration No. 978
COMPANY	ARCADIS U.S., Inc.		
ADDRESS	1000 Cobb Place Blvd., Bidj 500-A, Kennesaw, GA 30144		
PHONE	(404) 952-1635	FAX	(770) 428-4004
		E-MAIL	David.wilderman@arcadis-us.com
APPLICANT'S CERTIFICATION			
<p>In order to be considered a qualifying property for the VRP:</p> <p>(1) The property must have a release of regulated substances into the environment; (2) The property shall not be: (A) Listed on the federal National Priorities List pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601. (B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or (C) A facility required to have a permit under Code Section 12-8-66. (3) Qualifying the property under this part would not violate the terms and conditions under which the division operates and administers remedial programs by delegation or similar authorization from the United States Environmental Protection Agency. (4) Any lien filed under subsection (e) of Code Section 12-8-96 or subsection (b) of Code Section 12-13-12 against the property shall be satisfied or settled and released by the director pursuant to Code Section 12-8-94 or Code Section 12-13-6.</p> <p>In order to be considered a participant under the VRP: (1) The participant must be the property owner of the voluntary remediation property or have express permission to enter another's property to perform corrective action. (2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.</p> <p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> <p>I also certify that this property is eligible for the Voluntary Remediation Program (VRP) as defined in Code Section 12-8-105 and I am eligible as a participant as defined in Code Section 12-8-106.</p>			
APPLICANT'S SIGNATURE			
APPLICANT'S NAME/TITLE (PRINT)	Timothy Hassett, Remediation Project Manager		DATE
			10/11/10