



June 9, 2026

Mr. Trey Richardson  
Ashland Inc.  
1979 Atlas Street  
Columbus, Ohio 43228

**Re: Ashland Chemical Co  
Assessment  
Correspondence  
RCRA C - Hazardous Waste  
Hamilton County  
OHD000816728**

**Subject: Contingent Approval: Passive Soil Gas Survey Abbreviated Work Scope**

Dear Mr. Richardson:

On May 18, 2026, the Ohio Environmental Protection Agency (Ohio EPA) Division of Environmental Response and Revitalization received the Passive Soil Gas Survey Abbreviated Work Scope<sup>1</sup> submitted by EHS Support for the Ashland Losantiville site located at 1953 Losantiville Avenue, Cincinnati, Ohio. Ohio EPA is providing the following comments to assist in the completion of an approvable document and to expedite the proposed work.

Ohio EPA contingently approves Ashland to conduct passive soil gas sampling while concurrently requesting access to the residences to conduct active sampling to evaluate the potential vapor intrusion pathway and to implement follow-up active sampling to verify the range of passive sampling results. The general use of passive soil gas sampling is of a qualitative nature. Therefore, to quantify potential risks from a vapor intrusion pathway, Ohio EPA relies on active sampling protocols for soil gas and indoor air paired with sub-slab vapor sampling. Passive soil gas sampling results cannot alone identify that the vapor intrusion pathway is incomplete.

Proceed with the work scope and install the passive soil gas sampling probes at the locations indicated in the document. The decision tree and contingent approval requirements outlined above should be followed for the next steps.

### **COMMENTS**

**Comment 1:** The “Objective” section of the Work Scope states that samples would be analyzed for site-related volatile organic compounds (VOCs), but there is no list included in the work scope.

<sup>1</sup> <https://edocpub.epa.ohio.gov/publicportal/ViewDocument.aspx?docid=4124450>

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**Action item:** Provide a list of proposed VOCs for Method TO-17 analysis based on detections in soil and groundwater at the Ashland Losantiville site, including daughter products, or analyze the full list of VOCs for Method TO-17.

**Comment 2.** In Appendix A of the Work Scope, the BEACON section titled “Report” states, “The report will contain a narrative with the QA/QC program and findings, laboratory data (in nanograms and [micrograms per cubic meter]  $\mu\text{g}/\text{m}^3$ , if requested).”

The standard units for measuring vapor results against the U.S. EPA Vapor Intrusion Screening Levels are  $\mu\text{g}/\text{m}^3$ ; therefore, these units must appear in the report.

**Action item:** Request the lab to report the Method TO-17 results in  $\mu\text{g}/\text{m}^3$  during both project set-up and on the laboratory chain of custody.

There is no need to revise the work scope at this time. We look forward to meeting with you and discussing these comments during our call on June 16, 2026.

If you have any questions or would like to meet to discuss the comments before June 16, 2026, please contact me at 937.285.6035 or [Randy.Kirkland@epa.ohio.gov](mailto:Randy.Kirkland@epa.ohio.gov).

Sincerely,



Randy Kirkland SWDO

Manager

Division of Environmental Response and Revitalization

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