



FACT SHEET

Public Comment Period for
Proposed RCRA/HSWA Permit Renewal
Former Ashland Inc. Facility
455 Industrial Drive, Jackson, MS 39209
EPA ID # MSD 000 829 150

EPA REGION 4, Atlanta, GA

I. INTRODUCTION

Pursuant to the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984, the U.S. Environmental Protection Agency (EPA) is proposing to renew a hazardous waste cleanup (i.e. corrective action) permit for the former Ashland Inc. facility located at 455 Industrial Drive in Jackson, Mississippi (the Facility).

In Mississippi, implementation of the environmental permitting regulations under RCRA is shared between the Mississippi Department of Environmental Quality (MDEQ) and the EPA. The State of Mississippi has been authorized by the EPA to issue permits for the operation, closure, and post-closure care of Hazardous Waste Management Units (HWMUs), while the EPA retains authority to issue permits under HSWA requiring corrective action for releases of hazardous waste or hazardous constituents from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). SWMUs are any units which have been used for the treatment, storage, or disposal of solid waste at any time, irrespective of whether the unit is or was intended for the management of solid waste. AOCs are areas having a probable release to the environment of a hazardous waste or hazardous constituent which is not associated with a SWMU and is determined to pose a current or potential threat to human health or the environment.

II. PUBLIC COMMENT PERIOD AND REQUESTS FOR HEARING

The EPA encourages the public to review and comment on the draft HSWA renewal permit (Draft Permit) during a 45-day public comment period. The 45-day comment period begins on **August 20, 2026** and ends at midnight on **October 3, 2026**. Written comments on the Draft Permit should be submitted to Danesha Byron, U.S. Environmental Protection Agency, Region 4, 61 Forsyth Street, SW, Atlanta, GA 30303, or via email at byron.danesha@epa.gov. Comments must be submitted before the end of the public comment period. In addition to submitting public comments, the public may also request a formal public hearing on the Draft Permit. Such a request must be made during the 45-day public comment period, must be in writing to the EPA contact listed above, and must state the nature of the issues to be raised at the hearing. If a public hearing is held, the time and place of the hearing will be published at least 30 days prior to the hearing.

The Draft Permit, this Fact Sheet, and an index of the Administrative Record are available upon request at the physical locations listed in Table 1 below. Instructions for obtaining other supporting documents in the Administrative Record are available online as indicated in Table 1.

Table 1. Locations for Administrative Record		
Local	EPA	Online
Margaret Walker Alexander Library 2525 Robinson Street, Jackson, MS 39209 Hours: Mon. – Thurs. 10:00 a.m. – 7:00 p.m. Central Time Sat. – Fri. 9:00 a.m. – 5:00 p.m. Central Time Sunday - Closed Contact: (601) 354-8911	U.S. EPA, Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303 Hours: Mon. – Fri. 9:00 a.m. - 5:00 p.m. Eastern Time Contact: Danesha Byron Byron.danesha@epa.gov (404) 562 – 8365	https://semspub.epa.gov/src/collection/04/AR67861
	STATE Mississippi Department of Environmental Quality 515 East Amite Street Jackson, MS 39202 Hours: Mon. – Fri. 8:00 a.m. - 5:00 p.m. Central Time Contact: (601) 961-5758	

III. FINAL DECISION

The EPA will not finalize any decision concerning the Draft Permit until after review of and response to all comments received during the public comment period, and after the public hearing is held (if requested). After the EPA's consideration of any public comments that are received, the comments will be summarized, and responses will be provided in a Response to Comments (RTC) document. The RTC document will be drafted after the conclusion of the public comment period and will be incorporated into the Administrative Record. Issuance of the final HSWA renewal permit for the Facility will be in accordance with 40 C.F.R. § 124.15. All persons submitting comments will be notified of the EPA's final decision.

IV. FACILITY BACKGROUND

Ashland Inc. (Ashland) operated a bulk chemical product storage and distribution center at the Facility from 1968 to 2009. The original site occupies an approximately 6.28-acre tract of land within the Hawkins Field Industrial District of northwest Jackson, Mississippi, that is zoned for industrial/commercial use. During World War II, the Hawkins Field was a military airport. Unusually thick, concrete pads constructed by the military remain on the property. Major site features included an office building, product storage warehouse, aboveground storage tank farms, and a covered truck loading/unloading area. Unlined stormwater swales are located adjacent to the north,

east, and south sides of the original site. The property is bordered by industrial and commercial facilities to the north, Industrial Drive to the east, by the Gulf, Mobile and Ohio Railroad right-of-way to the west, and by commercial warehouse buildings to the south. Residential communities are located to the west and southwest at distances of 750 feet or more, and to the south at a distance of approximately 30 feet.

Since 2014, the original 6.28-acre portion of the Facility has been owned and used by Jaxon Energy LLC (Jaxon) to manufacture renewable diesel fuel. According to Jaxon, its operations at the Facility do not involve the generation, treatment, storage, or disposal of hazardous waste. Ashland no longer conducts any ongoing manufacturing operations at the Facility but has primary responsibility for conducting the corrective action under HSWA. In addition, while Ashland no longer directly owns any portion of the Facility, its wholly-owned subsidiary, called Blazer Properties LLC, has purchased the western 6-acre portion of the Facility (the Blazer Property) from the prior owner, Trustmark National Bank. The groundwater in an approximately two-acre portion of the Blazer Property has been impacted by contamination that migrated from the original Ashland site. As a result, the Facility includes the Blazer Property and now totals approximately 12.28 acres in size. Figure 1 in this Fact Sheet depicts the current Facility property boundaries and parcel ownership.

V. SUMMARY OF DRAFT PERMIT

The EPA is proposing to issue the Draft Permit to Ashland as an operator of the corrective action at the Facility, and to Jaxon and Blazer Properties LLC as Facility owners. All three companies are collectively referred to in the Draft Permit as “the Permittee.” The Draft Permit is designed to renew and update the existing HSWA permit for the Facility that was issued August 4, 2014, and administratively continued pursuant to 40 C.F.R. § 270.51 (the 2014 Permit). The Draft Permit contains the following components:

- **Cover Page**
The Cover Page cites authority for issuance of the Draft Permit and explains the term of the permit, which is 10 years.
- **PART I. Standard Permit Conditions**
Part I of the Draft Permit sets forth standard conditions applicable to all hazardous waste management facilities (e.g., duty to comply, duty to allow access, etc.). Each condition specifies the exact authority to require the Permittee’s compliance with the condition. Unless otherwise specified, all citations refer to the regulations as codified in Title 40 of the Code of Federal Regulations (40 C.F.R.). MDEQ’s authorized hazardous waste program is codified at 11 Miss. Admin. Code Pt. 3, Ch. 1.
- **PART II. Corrective Action**
Part II of the Draft Permit sets forth the specific corrective action requirements to address releases of hazardous waste or hazardous constituents from SWMUs and AOCs that have been identified at the Facility. In general, HSWA permits can require any of the following corrective action activities for any SWMUs or AOCs:
 - **A SWMU Assessment Report** to report and/or investigate a newly identified SWMU.
 - **Confirmatory Sampling** to determine if a release of hazardous waste or hazardous constituents to the environment from any SWMU or at any AOC has occurred.
 - **RCRA Facility Investigation** to determine the scope and extent of any such release.

- **Interim Measures** to minimize or prevent further contamination or exposure while long-term remedies are evaluated.
- **Corrective Measures Study** to identify and evaluate potential remedial alternatives for the releases that have been identified at the Facility.
- A **Remedy** consisting of the particular corrective measures selected by the EPA to achieve long-term protection of human health and the environment.

Ultimately, two basic conclusions are possible for any SWMU/AOC:

- 1) A remedy (cleanup) is needed to protect human health and/or the environment; or
- 2) No further action is currently required to protect human health and/or the environment.

The initial HSWA permit for the Facility, issued in 2001 (2001 Permit), identified twelve SWMUs and five AOCs at the Facility based on the information contained in the *RCRA Facility Assessment (RFA) Report*, dated September 22, 1998. Several phases of RCRA Facility Investigation (RFI) were conducted at the Facility in the 2000s to characterize the nature and extent of contamination. The contaminants of concern were found to include tetrachloroethylene (PCE); trichloroethylene (TCE); cis-1,2-dichloroethylene (DCE); trans-1,2-DCE; 1,1-DCE; 1,1-DCA; 1,1,2-trichloroethane (TCA); vinyl chloride (VC); chloroethane; chlorobenzene; chloroform; chloromethane; benzene, toluene, ethylbenzene, and xylenes (BTEX); naphthalene; and 1,4-dioxane in soil and groundwater.

In 2009, Ashland ceased all chemical product storage and distribution operations at the Facility and cleaned and removed all process and storage areas. In the 2014 Permit, the EPA determined that 11 of the 12 SWMUs and two of the five AOCs at the Facility required No Further Action (NFA) based on information obtained from the RFA, a Confirmatory Sampling (CS) Program Report dated January 15, 2002, and the RFI Phase I through V Reports prepared between 2003 and 2006. One remaining SWMU (SWMU 4A) and three AOCs (AOCs A, C, and E) required a Remedy under the 2014 Permit. Table 2 of this Fact Sheet summarizes the status of all SWMUs and AOCs at the Facility, and Figure 2 depicts their general locations.

Ashland evaluated potential remedies for contaminated media on a site-wide basis in a Revised Final Corrective Measures Study Report dated August 12, 2011 (2011 Revised CMS Report). In the 2014 Permit, based on information presented in the 2011 Revised CMS Report, the EPA selected the following site-wide corrective measures as the Remedy to address releases from SWMU 4A and AOCs A, C, and E: (1) Monitored Natural Attenuation (MNA) of contaminants in groundwater, (2) a Site Management Plan (SMP) to ensure a safe framework for any future subsurface activities, (3) an Environmental Covenant to (a) compel the continuation of commercial/industrial land use only, (b) prevent the use of groundwater as well as installation of groundwater wells (except monitoring wells as part of the Corrective Measures), and (c) require continued operations and maintenance of the vapor intrusion mitigation system at the Facility's existing building pursuant to a plan approved by the EPA; (d) require the implementation of the SMP should subsurface disturbance activities ever occur; and (4) Facility inspection and maintenance activities, including annual inspection of the property fence, gate, signs, concrete surface barrier and asphalt paving, gravel, and landscaped grasses.

In March 2018, Ashland installed and began operation of a sub-slab depressurization system (a Vapor Intrusion Mitigation System (VIMS)) within the former warehouse building of the Facility. The VIMS was installed as an Interim Measure under the 2014 Permit in response to sub-slab vapor sampling results that exceeded the EPA's calculated commercial Vapor Intrusion Screening Levels, as documented in a Former Warehouse Sub-Slab Assessment and Communication Test Summary Report dated January 26, 2018. The Permittee operates the VIMS pursuant to an

Operation, Maintenance and Monitoring Plan dated March 20, 2020, which has been approved by the EPA.

On February 13, 2024, the EPA issued a RCRA Inspection Report for the Facility that documents a one-time spill of diesel fuel in 2020 from Jaxon's operations at the Facility. Jaxon reported that the 2020 diesel spill was remediated, and steps were taken to prevent further releases. The EPA has no evidence of a Release requiring Corrective Action from the SWMUs/AOCs determined to be NFA under the 2014 HSWA Permit.

In the Draft Permit, the EPA proposes to require a joint or concurrent RCRA Facility Investigation and Corrective Measures Study (RFI/CMS) for the SWMU and AOCs that required a Remedy under the 2014 Permit (SWMU 4A and AOCs A, C, and E) as well as for the Blazer Property. The purpose of the joint RFI/CMS is to evaluate additional remedial options for sitewide groundwater at the Facility, propose data collection as necessary to inform such evaluation, and determine whether a Remedy modification for sitewide groundwater is appropriate. The EPA is proposing to require a joint or concurrent RFI/CMS because of the Agency's concerns, based on available groundwater monitoring data, about the sufficiency of MNA in meeting the Target Cleanup Standards under the 2014 Permit. The Draft Permit includes minimum requirements for the RFI/CMS, including a requirement for the EPA to review and approve the Permittee's proposal for the RFI/CMS and final RFI/CMS report. The EPA will decide whether to modify the Remedy for the Facility based on its review of the final RFI/CMS report. If modifications to the Remedy are found to be appropriate, the EPA will propose such modifications in another proposed renewal or modification of the Facility's HSWA permit and allow for public review of, and comment on, the proposed Remedy modification at that time.

Until such time as the EPA modifies the Remedy in a subsequent HSWA permit modification or renewal, the Draft Permit would continue to require the site-wide corrective actions selected as the Remedy in the 2014 Permit (described above) to address the following SWMUs/AOCs:

- SWMU 4A and AOCs A, C, and E, collectively referred to as Groundwater and Soil Management Area 1 (GWSMA 1) in the Draft Permit; and
- The Blazer Property, also referred to as GWSMA 2 in the Draft Permit.

Because Ashland's subsidiary now owns the Blazer Property, and in light of the vapor intrusion concerns documented in the Former Warehouse Sub-Slab Assessment and Communication Test Summary Report dated January 26, 2018, the EPA proposes to tailor the requirement for an Environmental Covenant in the Draft Permit to (A) include the Blazer Property as well as the original portion of the Facility property; (B) require continued operation and maintenance of the vapor intrusion mitigation system at the Facility's existing structure; and (C) expressly prohibit the construction of habitable buildings on the Facility property, as well as any subsurface disturbance activities, without the EPA's prior consent. The Draft Permit also requires that the joint RFI/CMS must (1) incorporate the continuation of the Environmental Covenant; (2) incorporate the continued operation of the VIMS installed in 2018 as an Interim Measure on the Facility's existing building; and (3) include updates or enhancements to the Facility's SMP to address measures needed for the VIMS and any other vapor intrusion considerations.

Financial assurance for the cost of corrective action is already in place under the 2014 Permit. As the EPA is continuing the Remedy under the 2014 Permit pending the results of a joint RFI/CMS, the Draft Permit does not require any additional financial assurance or any update to the cost estimate for corrective action (beyond annual updates for inflation). If the EPA modifies the Remedy in a future HSWA permit modification or renewal, the EPA would undertake another review of the corrective action cost estimate and financial assurance at that time.

Figure 1. Facility Location. General Facility property boundary shown by purple dashed-lines marked and labeled “Approximate Subject Property Boundary.”

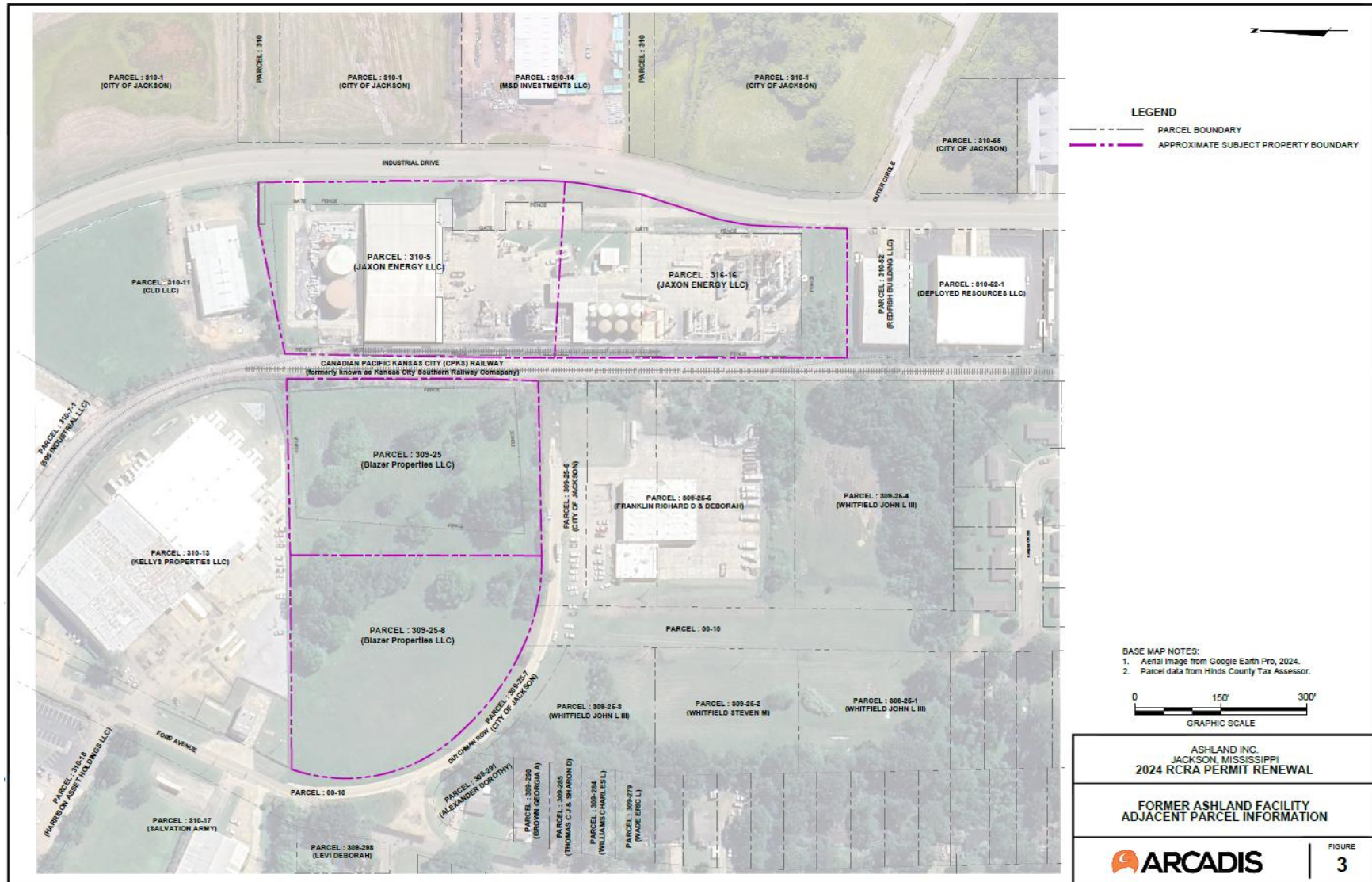


Figure 2. General Location of SWMUs, AOCs, and Monitoring Wells, From the HWSA Permit Application, Oct. 30, 2024.

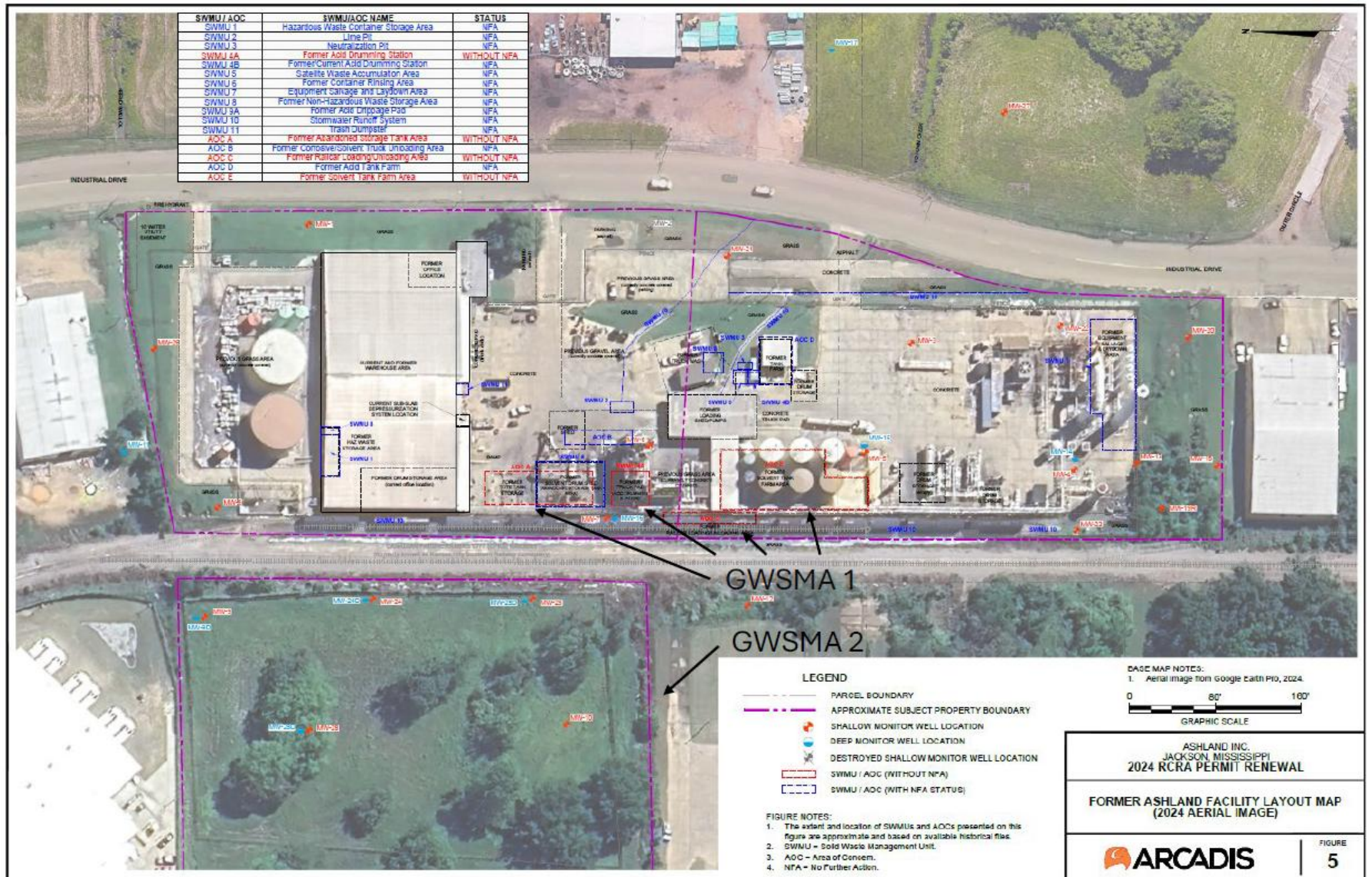


Table 2. Facility SWMUs and AOCs

<u>SWMU/AOC No.</u>	<u>Name</u>	<u>Status</u>
SWMU 1	Hazardous Waste Container Storage Area and Non-Hazardous Waste Container Storage Area	NFA
SWMU 2	Lime Pit	NFA
SWMU 3	Neutralization Pit	NFA
SWMU 4A	Former Acid Drumming Station	Remedy required
SWMU 4B	Acid Drumming Station (Current Acid Drumming Station)	NFA
SWMU 5	Satellite Waste Accumulation Area	NFA
SWMU 6	Former Container Rinsing Area	NFA
SWMU 7	Equipment Salvage and Laydown Area	NFA
SWMU 8	Former Non-Hazardous Waste Storage Area	NFA
SWMU 9A	Former Acid Drillage Pad	NFA
SWMU 10	Stormwater Runoff System	NFA
SWMU 11	Trash Dumpster	NFA
AOC A	Abandoned Storage Tank Area	Remedy required
AOC B1	Former Truck Loading/Unloading Area	NFA
AOC B2	Corrosive Truck Unloading Pad	NFA
AOC B3	Solvent Truck Loading/Unloading Area	NFA
AOC C	Railcar Loading/Unloading Area	Remedy required
AOC D	Acid Tank Farm	NFA
AOC E	Solvent Tank Farm Area	Remedy required