



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

April 30, 2025

Kathryn Navarro, Registered Agent
Simpson Tacoma Kraft Company, LLC
1301 5th Ave, Suite 2700
Seattle, WA 98101

Re: Final Determination of Liability for Release of Hazardous Substances at the following Contaminated Site:

- **Site Name:** WestRock Tacoma
- **Site Address:** 801 Portland Ave Tacoma, WA 98421
- **Cleanup Site ID:** 16842
- **Facility/Site ID:** 39

Dear Kathryn Navarro:

On February 5, 2025, the Department of Ecology (Ecology) sent you written notice of our preliminary determination that Simpson Tacoma Kraft Company, LLC is a potentially liable person (PLP) for a release of hazardous substances at the WestRock Tacoma facility (Site). On March 5, 2025, Ecology received your response to Ecology's preliminary determination.

Based on available information, Ecology finds that credible evidence exists that Simpson Tacoma Kraft Company, LLC is liable for a release of hazardous substances at the Site. On the basis of this finding, Ecology has determined that the Simpson Tacoma Kraft Company, LLC is a PLP with regard to the Site.

Ecology previously issued a preliminary determination that Simpson Investment Company is a PLP for the Site on October 10, 2023. Ecology issued a final determination of liability for the Simpson Investment Company on December 12, 2023. You later provided additional information to Ecology, indicating that the Simpson Tacoma Kraft Company, LLC was the owner and operator of the Site, not the Simpson Investment Company. Based on this information, Ecology withdraws its previous determination that the Simpson Investment Company is a PLP for the Site. This determination does not preclude Ecology from later establishing that Simpson Investment Company is a PLP. This determination is subject to change should Ecology receive additional information.

Kathryn Navarro

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The purpose of the Model Toxics Control Act (MTCA) is to identify, investigate, and cleanup facilities where hazardous substances have been released. Liability for environmental contamination under MTCA is strict, joint and several (RCW 70A.305.040(2)). Ecology ensures that contaminated sites are investigated and cleaned up to the standards set forth in the MTCA statute and regulations. Ecology has determined that it is in the public interest for remedial actions to take place at this Site. Ecology will contact you regarding the actions necessary for the Simpson Tacoma Kraft Company, LLC to bring about the prompt and thorough cleanup of hazardous substances at this Site. Failure to cooperate with Ecology or comply with MTCA in this matter will result in Ecology employing enforcement tools as it deems necessary and appropriate. This includes, but is not limited to, the issuance of an administrative order. Failure to comply with such an order may result in a fine of up to \$25,000 per day and liability for up to three times the costs incurred by the state (RCW 70A.305.050(1)).

Your rights and responsibilities as a PLP are outlined in Chapter 70A.305 RCW, and Chapters 173-340 and 173-204 WAC. Ecology's cleanup project manager for the Site, Emily Toffol, will contact you with information about how Ecology intends to proceed with the cleanup.

If you have any questions regarding this notice, please contact Emily Toffol at 360-790-8363 or emily.toffol@ecy.wa.gov.

Sincerely,



James DeMay
Industrial Section Manager
Solid Waste Management Program

By certified mail: 9489 0090 0027 6381 5459 21

cc: Katie Page, Perkins-Coie
Derek Threet, Office of the Attorney General
Facility Files, Cleanup