

Ecody



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

February 19, 2026

Detrex Corporation
c/o Katie Rhoades, EHS Specialist
1000 Belt Line Street
Cleveland, OH 44109

Clark Hill PLC
Attn. Christopher Clare
1001 Pennsylvania Ave. NW
Suite 1300 South
Washington, DC 20004

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

Site name: Alexander Avenue Petroleum Tank Facilities
Property address: 709 and 721 Alexander Avenue, Tacoma, WA 98421
Facility/Site ID: 1377
Cleanup Site ID: 743

Dear Katie Rhoades and Christopher Clare:

On January 15, 2026, the Department of Ecology (Ecology) sent you written notice of our preliminary determination that the Detrex Corporation is a potentially liable person (PLP) for a release of hazardous substances at the Alexander Avenue Petroleum Tank Facilities facility (Site). On January 26, 2026, Ecology received your written comments.

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

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 Detrex Company 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, Sam Meng, will contact you with information about how Ecology intends to proceed with the cleanup.

If you have any questions regarding this notice, please contact Sam Meng at (360) 999-9587 or sam.meng@ecy.wa.gov. Thank you for your cooperation.

Sincerely,



Marian Abbett, PE
Section Manager
Toxics Cleanup Program
Southwest Region Office

By certified mail: 9489 0090 0027 6340 1912 20, 9489 0090 0027 6340 1913 50

cc: John Level, Office of the Attorney General, john.level@atg.wa.gov
Sam Meng, PE, Ecology, sam.meng@ecy.wa.gov
Ecology Site File