

June 5, 2026

Jen Duggan, Executive Director  
Environmental Integrity Project (EIP)  
1000 Vermont Avenue NW, Suite 1100  
Washington, DC 20005  
environmentalintegrity.org

**RE: Port Townsend Paper Company — Follow-Up to EIP's May 2025 'A Paper Trail of Pollution' Report — V\_1.26**

Dear Ms. Duggan,

I write with a simple and direct request: we want Port Townsend Paper Company (PTPC) to make safety, health, the environment, transparency, and compliance their number one priority. Not their second priority. Not a consideration balanced against production schedules and profit margins. Number one.

I am writing to you because the Environmental Integrity Project (EIP) has already done more documented research on Port Townsend Paper Company (PTPC) than any other organization outside of the regulatory agencies themselves. Your May 2025 report 'A Paper Trail of Pollution' — which included a physical visit to the PTPC mill, one of only three mills visited nationally — named PTPC specifically and documented:

- Clean Air Act (CAA): High Priority Violation (HPV) for 12 of the last 12 quarters; five enforcement actions and 23 violation notices over five years; only \$63,750 in Clean Air Act (CAA) penalties
- Clean Water Act (CWA): six enforcement actions for water pollution violations; only \$44,000 in fines

These figures from your report are now part of our community's public record. I cite them in every letter I send to regulatory agencies and elected officials. Your researchers physically walked the property and documented what the rest of the country wasn't looking at.

Port Townsend Paper Company (PTPC) operates a kraft pulp and paper mill on 450 acres bordering Port Townsend Bay. The mill's public compliance record includes:

- Clean Air Act (CAA): High Priority Violation (HPV) — the most serious noncompliance classification — every quarter for three consecutive years. Twelve of twelve quarters.
- Clean Water Act (CWA): Multiple documented spills into Port Townsend Bay, including approximately 114,000 gallons of untreated wastewater near Glen Cove in April 2025. Fine: \$20,000 — less than 9 cents per gallon.
- Hazardous Waste (RCRA): June 2025 inspection found 9 violations including emergency preparedness failures.

- National Pollutant Discharge Elimination System (NPDES): permit expired October 2018, renewed May 2025 after 6+ years on administrative extension — during which the mill continued discharging 12 million gallons of effluent into Port Townsend Bay daily.
- Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend Health Consultation: hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide measured near the mill above EPA chronic health reference concentrations.

Since your report was published, the May 26, 2026 Nippon Dynawave disaster in Longview — eleven workers killed when a white liquor tank imploded — has dramatically changed the context. Port Townsend Paper Company (PTPC) operates the identical kraft process. The sizes, ages, and inspection histories of PTPC's white liquor storage tanks are not publicly disclosed. White liquor is exempt from the EPA Risk Management Program (RMP).

### **What I Am Asking:**

- Consider updating or expanding the 'Paper Trail of Pollution' report to include white liquor storage safety as a new category of analysis, given the Longview disaster and the absence of any public disclosure requirement for white liquor tanks at US kraft mills
- Share any additional research your team has compiled on PTPC since the May 2025 report
- Consider formally writing to the Washington State Department of Ecology and EPA Region 10 requesting immediate independent inspection of PTPC's white liquor storage infrastructure
- Connect our community effort with any other communities or researchers working on similar kraft mill accountability issues

I have compiled extensive documentation on PTPC's compliance record, the ATSDR 2024 findings, the fire history, the shift and fatigue patterns, and the regulatory gaps. I would welcome the opportunity to share this research and coordinate with your team.

Respectfully,

**David Ginsberg**

[address redacted]

Port Townsend WA 98368

[phone redacted]

davidbginsberg@gmail.com