

June 5, 2026

Nina Bell, Executive Director
Northwest Environmental Advocates (NWEA)
P.O. Box 12187
Portland, OR 97212
nwea.org

RE: Port Townsend Paper Company — Kraft Mill Accountability and White Liquor Safety — V_1.26

Dear Ms. Bell,

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 Northwest Environmental Advocates (NWEA) because your organization stopped a dioxin-emitting pulp mill on the Columbia River in 1990 and has spent decades using litigation, negotiation, and advocacy to enforce environmental laws in the Pacific Northwest. Port Townsend Paper Company (PTPC) is precisely the kind of facility your organization was built to address.

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 the May 26, 2026 Nippon Dynawave disaster in Longview — eleven workers killed when a white liquor tank imploded in the deadliest industrial accident in modern Washington State history — the stakes have sharpened. PTPC operates the identical kraft process. White liquor is exempt

from the EPA Risk Management Program (RMP) — there is no required public safety plan, no mandated worst-case release scenario, and no required disclosure of tank sizes or inspection history. Northwest Environmental Advocates (NWEA) has the legal expertise and the track record to challenge that exemption and to push for meaningful accountability.

What I Am Asking:

- Assess whether PTPC's National Pollutant Discharge Elimination System (NPDES) permit and its conditions are legally adequate given the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 findings that toxic sulfur compounds near the mill exceed EPA chronic health reference concentrations
- Assess whether the white liquor Risk Management Program (RMP) exemption is legally challengeable and whether Northwest Environmental Advocates (NWEA) would consider engaging on that issue at the federal level
- Consider formally requesting that the Washington State Department of Ecology conduct an emergency inspection of PTPC's white liquor storage infrastructure
- Review PTPC's Whole Effluent Toxicity (WET) testing history and advise whether current permit requirements are adequate to detect biological harm from the mill's daily discharge

I have compiled extensive documentation on PTPC's compliance record and regulatory gaps and would welcome the opportunity to share it with your team.

Respectfully,

David Ginsberg

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