

June 5, 2026

Executive Director
Puget Soundkeeper Alliance
130 Nickerson Street, Suite 107
Seattle, WA 98109
puget-sound.org

RE: Port Townsend Bay Industrial Discharge — Port Townsend Paper Company — V_1.26

Dear Executive Director,

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 the Puget Soundkeeper Alliance because Port Townsend Bay drains directly into Admiralty Inlet and ultimately into Puget Sound — the body of water your organization was created to protect. Port Townsend Paper Company (PTPC) discharges 12 million gallons of treated effluent into that bay every single day, making it the largest industrial discharger in Jefferson County.

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.

In April 2025, approximately 114,000 gallons of untreated industrial wastewater spilled directly into Port Townsend Bay near Glen Cove — a known recreational shellfish harvesting area. Port Townsend Paper Company (PTPC) declined to answer any questions about what was in the

discharge, whether it was toxic to marine life, or whether shellfish from the area were safe to eat. No independent shellfish tissue testing has been conducted near the PTPC outfall. The Agency for Toxic Substances and Disease Registry (ATSDR) confirmed in 2024 that toxic sulfur compounds near the mill exceed EPA chronic health reference concentrations.

The Toxics Release Inventory (TRI) shows PTPC releases annually: 193,797 pounds of methanol, 53,240 pounds of manganese compounds, 30,023 pounds of hydrogen sulfide (H₂S), 4,209 pounds of lead compounds, and 19,980 pounds of nitrates — all discharged into a bay that connects directly to Puget Sound.

What I Am Asking:

- Formally assess whether Port Townsend Bay near the PTPC discharge outfall warrants a Puget Soundkeeper water quality investigation, given the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 findings and the April 2025 untreated wastewater spill
- Request that the Washington Department of Fish and Wildlife (WDFW) and Washington State Department of Ecology conduct independent shellfish tissue testing near the PTPC outfall
- Formally comment on PTPC's renewed National Pollutant Discharge Elimination System (NPDES) permit, which expires May 2030, requesting mandatory quarterly Whole Effluent Toxicity (WET) testing and real-time outfall monitoring
- Consider whether the PTPC discharge warrants formal Puget Soundkeeper watchdog engagement

Port Townsend Bay is part of the Salish Sea. What enters it enters Puget Sound. I would welcome your assessment and your engagement.

Respectfully,

David Ginsberg

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