

June 5, 2026

Executive Director
Washington Environmental Council (WEC)
1402 Third Ave, Suite 1400
Seattle, WA 98101
wecprotects.org

RE: Port Townsend Paper Company — Request for WEC Engagement on Kraft Mill Accountability — 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 Washington Environmental Council (WEC) because the legislative and regulatory gaps exposed by Port Townsend Paper Company (PTPC)'s compliance record — and by the May 26, 2026 Nippon Dynawave disaster in Longview — are precisely the kind of systemic issues Washington Environmental Council (WEC) exists to address at the state level.

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.

The Longview disaster killed eleven workers when a white liquor tank imploded. Port Townsend Paper Company (PTPC) operates the identical process. White liquor is exempt from the EPA Risk Management Program (RMP). Washington State has no requirement for independent

inspection or public disclosure of white liquor tank sizes, ages, or inspection histories at kraft mills. Washington State Department of Ecology's fine levels for water quality violations have not been raised since the late 1980s — meaning a 114,000-gallon untreated wastewater spill into Port Townsend Bay in 2025 cost Port Townsend Paper Company (PTPC) less than 9 cents per gallon.

Legislative Actions Washington Environmental Council (WEC) Could Champion:

- A Washington State Kraft Mill White Liquor Safety Act requiring mandatory independent inspection of white liquor storage tanks, public disclosure of tank sizes and inspection histories, and development of public emergency response plans for white liquor releases
- Modernization of Washington State Department of Ecology fine levels for water quality violations — fines not raised since the late 1980s provide no meaningful deterrence for industrial facilities
- A mandatory fence-line air monitoring requirement for industrial facilities where Agency for Toxic Substances and Disease Registry (ATSDR) has confirmed emissions above chronic health reference concentrations, with real-time public data
- A Worker Safety Report Fast-Track Act requiring that any worker report of structural integrity concerns at hazardous chemical storage equipment trigger a mandatory state inspection within 30 days

I have compiled extensive research documentation and would welcome the opportunity to brief Washington Environmental Council (WEC) staff or present to your board. The July 2026 Local Emergency Planning Committee (LEPC) meeting in Jefferson County — which will address the Longview disaster — is open to the public and may be a useful starting point.

Respectfully,

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