

June 5, 2026

Casey Sixkiller, Director
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RECEIVED

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**DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR**

RE: Urgent Request for Ecology Action on Port Townsend Paper Company — V_1.13

Dear Director Sixkiller,

I write to you as a Port Townsend resident with urgent concern about Port Townsend Paper Company in the wake of the Longview disaster. Your background as US Environmental Protection Agency (EPA) Region 10 Regional Administrator means you know this facility's compliance record and you know the stakes. PTPC is now the only active kraft mill in Washington State. Its compliance record, the regulatory gaps exposed by Longview, and the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 health findings make immediate action essential.

On May 26, 2026, eleven workers died at the Nippon Dynawave kraft paper mill in Longview, Washington, when a 900,000-gallon white liquor tank imploded — the deadliest industrial accident in modern Washington State history. OPB interviewed seven chemical safety experts who confirmed the implosion mechanism involved a blockage that prevented air backfilling the tank as liquid was pumped out, creating catastrophic negative pressure. Workers had reported a structural warning to the Division of Occupational Safety and Health two months before the disaster. No action was taken.

PTPC operates the identical kraft pulping process — the same white liquor chemistry, sodium hydroxide and sodium sulfide — on 450 acres bordering Port Townsend Bay, five miles from residential neighborhoods. PTPC's daily output of 950–1,000 tons per day exceeds Nippon Dynawave's. The size, age, and inspection history of PTPC's white liquor tanks are not publicly disclosed. White liquor is exempt from the US Environmental Protection Agency (EPA) Risk Management Program — there is no required public safety plan, no mandated tank disclosure, and no worst-case release scenario on file anywhere.

PTPC's documented compliance record warrants urgent attention following Longview:

- Clean Air Act: High Priority Violation for all 12 of the last 12 consecutive quarters. Only \$99,750 in total penalties across all statutes in five years.
- Clean Water Act: documented spills into Port Townsend Bay including: 800 gallons of untreated process wastewater (November 2021–March 2022, fine \$27,000); 114,000 gallons of untreated wastewater near Glen Cove (April 2025, fine \$20,000 — less than 9

cents per gallon); and 1,000 gallons of condensed water (January 2025) — plus two additional Ecology penalties issued in 2023 for 2022 water quality violations; two new formal enforcement orders issued April and May 2026.

- Hazardous Waste (Resource Conservation and Recovery Act (RCRA)): June 2025 inspection found 9 violations including emergency preparedness and prevention procedure failures — the exact category that failed at Nippon Dynawave.
- National Pollutant Discharge Elimination System (NPDES) discharge permit: Expired October 2018 — The National Pollutant Discharge Elimination System (NPDES) water discharge permit expired in October 2018 and remained on administrative extension for over six years. A new permit was finally issued in May 2025 and expires in May 2030. The 6+ year gap without a valid permit is documented in EPA Enforcement and Compliance History Online (ECHO) records. into Port Townsend Bay.
- Agency for Toxic Substances and Disease Registry (ATSDR) 2024: Federal scientists confirmed hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide measured near PTPC above US Environmental Protection Agency (EPA) chronic health reference concentrations.

On June 1, 2026, Port Townsend Paper Company issued a public statement indicating it has met with industry experts, verified that tank vents are open and overflow lines are not submerged, and is scheduling non-destructive testing of tanks in 2026. These are welcome initial steps. They are not, however, a substitute for the independent inspection with publicly disclosed results that this community is requesting. The key questions remain unanswered: the sizes, ages, and inspection histories of PTPC's white liquor tanks are still not public information.

Requests to the Department of Ecology:

- Conduct an immediate, comprehensive inspection of PTPC's white liquor storage infrastructure — including tank age, design specifications, condition, secondary containment capacity, and last inspection dates — and make findings publicly available.
- Invoke Washington's Chemical Accident Prevention Program (CAPP) authority under RCW 90.48 to require PTPC to file a public accident prevention plan for white liquor storage, filling the gap left by the federal Risk Management Program (RMP) exemption.
- Finalize and strengthen PTPC's National Pollutant Discharge Elimination System (NPDES) permit renewal — expired since October 2018, now in its 8th year of administrative extension. The renewed permit must include mandatory Whole Effluent Toxicity (WET) testing, comprehensive Gas Chromatography-Mass Spectrometry (GC-MS) and Inductively Coupled Plasma-Mass Spectrometry (ICP-MS) chemical analysis panels, continuous real-time outfall monitoring with public data feeds, and sediment and bioaccumulation surveys of Port Townsend Bay.
- Issue a formal response to the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend findings and initiate enforcement action under existing Clean Air Act (CAA) authority to address the 12/12-quarter continuous violation record.
- Require a public corrective action plan and timeline for the 9 Resource Conservation and Recovery Act (RCRA) violations found in June 2025 — particularly the emergency preparedness and prevention procedure failures.

- Make all PTPC Discharge Monitoring Reports, inspection records, and enforcement actions publicly available in accessible format.

Director Sixkiller, you have called yourself 'all about practical solutions.' The practical solution is clear: inspect the tanks, strengthen the permit, invoke Chemical Accident Prevention Program (CAPP), and make the data public. The Longview disaster has given Ecology both the justification and the public mandate to act. I welcome the opportunity to share my full research documentation.

Respectfully,

A handwritten signature in black ink, appearing to read 'David Ginsberg', with a stylized, sweeping flourish at the end.

David Ginsberg

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