

June 5, 2026

Andrew Bursky, Tim Fazio, Sam Astor, Jacob Hudson, Michael Sher
 Managing Partners, Atlas Holdings LLC
 One Landmark Square, Suite 1900
 Stamford, CT 06901
atlasholdingsllc.com/contact

RE: Port Townsend Paper Company — A Community Member's Request for Partnership on Safety, Health, Environment, Transparency, and Compliance

Dear Mr. Bursky, Mr. Fazio, Mr. Astor, Mr. Hudson, and Mr. Sher,

My name is David Ginsberg. I am a retired resident of Port Townsend, Washington — not an attorney, not an industry expert. Just a neighbor of the Port Townsend Paper Company mill, and someone who has spent the past several weeks doing research because I believe our community deserves to understand the facility operating five miles from our homes.

I am writing to you directly because I believe you may not be fully aware of how Port Townsend Paper Company is perceived in this community, and because I genuinely believe the concerns I am raising are ones that Atlas Holdings — given your stated commitments — would want to know about and address.

I want to share one personal detail that I think is relevant. I have lived in Port Townsend for ten years. For most of those years, when I noticed the distinctive odor drifting from the direction of the mill, I assumed it was simply the smell of pulp — an industrial fact of life in a mill town, unpleasant but essentially harmless. The kind of thing you get used to. I never gave it much thought. That changed when I began researching what that smell actually is. In 2024, federal scientists from the Agency for Toxic Substances and Disease Registry (ATSDR) conducted a health study specific to Port Townsend and found that the compounds producing that odor — hydrogen sulfide, methyl mercaptan, and related sulfur compounds — were measured near the mill above US Environmental Protection Agency (EPA) chronic health reference concentrations. The smell I had dismissed as a minor inconvenience for a decade is, according to federal science, a documented public health concern. I suspect many of my neighbors made the same assumption I did. I think you should know that.

I want to be clear about my intention: I am not writing to threaten or to litigate. I am writing because I would like to work with you, not against you. I believe there is a real opportunity here for Atlas Holdings and Port Townsend Paper Company to become a model of what responsible industrial citizenship looks like — and I would welcome the chance to help make that happen.

What Prompted This Letter

On May 26, 2026, eleven workers died at the Nippon Dynawave kraft paper mill in Longview, Washington — the deadliest industrial accident in modern Washington State history — when a white liquor storage tank imploded. Governor Ferguson called it 'the deadliest industrial tragedy in modern Washington State history.'

Port Townsend Paper Company operates the identical process — the same white liquor chemistry, the same kraft pulping system — on 450 acres bordering Port Townsend Bay. After Longview, I began researching Port Townsend Paper Company (PTPC)'s compliance record. What I found in publicly available databases was troubling enough that I felt I had an obligation to share it — first with our community, and now with you.

I want to share what I found not to embarrass Atlas Holdings, but because I believe you are in the best position to change it.

What Your Own Website Says — and What the Record Shows

Your safety page states: 'All Atlas operating companies must pursue and achieve world-class safety performance and are held accountable for reaching that goal. We believe all workplace accidents are preventable. We believe a healthy and safe work environment is a fundamental right of all employees.'

I believe those words. They are exactly the right standard. And I am writing because the public record at Port Townsend Paper Company does not yet reflect them.

According to US Environmental Protection Agency (EPA)'s publicly available EPA Enforcement and Compliance History Online (ECHO) database (Facility Registry ID: 110000490326), since Atlas acquired PTPC in October 2022:

- Port Townsend Paper Company has been in Clean Air Act High Priority Violation — the most serious noncompliance category the US Environmental Protection Agency (EPA) tracks — every single quarter for the past three years. Twelve consecutive quarters.
- The mill has received two new formal enforcement orders from the Washington State Department of Ecology in April and May 2026.
- A June 2025 hazardous waste inspection found nine violations, including failures in emergency preparedness and prevention procedures — the exact category that failed at Nippon Dynawave before the May 26 disaster.
- In April 2025, 114,630 gallons of untreated industrial wastewater spilled directly into Port Townsend Bay. When asked by the local newspaper whether the discharge was toxic to marine life and whether it was safe to eat shellfish from the nearby crabbing area, PTPC declined to answer any questions.
- The federal Agency for Toxic Substances and Disease Registry (ATSDR) conducted a health study specific to Port Townsend in 2024 and found that sulfur compounds near the mill exceed US Environmental Protection Agency (EPA) chronic health reference concentrations — meaning long-term exposure poses a documented health risk to our community.

I am not an expert in any of this. I am a retired contractor who learned to use US Environmental Protection Agency (EPA)'s public databases and read government documents. Everything I have described is publicly available. If I found it, others will too.

What Our Community Is Asking For

I have been organizing a community petition and writing to elected officials and regulatory agencies. But before I finalize those efforts, I wanted to write to you directly — because if Atlas Holdings is willing to address these concerns proactively, that changes everything. A company that acts before it is compelled to is a very different story than one that waits for regulators to force the issue.

Our community's request is simple: we want Port Townsend Paper Company 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.

Specifically, we are asking for four things:

1. Safety

Independent inspection of PTPC's white liquor storage tanks, with full public disclosure of tank sizes, ages, inspection dates, and any deficiencies found. A seismic vulnerability assessment of all chemical storage infrastructure — we live on the Cascadia Subduction Zone. And a specific emergency response plan for a white liquor release near Port Townsend Bay, developed in coordination with East Jefferson Fire Rescue and Jefferson County Emergency Management.

2. Health

Independent quarterly biological testing of Port Townsend Bay discharge — exposing live aquatic organisms directly to the mill's discharge water to measure real biological harm. Fence-line air monitoring with real-time public data so residents know what they are breathing. Annual occupational health screenings for workers in high-exposure areas, with aggregate results made public.

3. Environment

Independent soil contamination testing across the mill's 450-acre property, including groundwater monitoring wells around the perimeter. A comprehensive bay ecosystem assessment — sediment sampling, shellfish tissue testing, and eelgrass surveys. And a commitment to address the nine hazardous waste violations found in June 2025.

4. Transparency and Compliance

When something goes wrong — as it did in April 2025 — tell the community what happened, what was in the discharge, whether it was harmful, and what is being done about it. Answer the questions the local newspaper asked and received no response to. Engage with the Community Relations contact on the PTPC website as if it means something.

On compliance: twelve consecutive quarters of Clean Air Act High Priority Violations is not a minor paperwork issue. It is a pattern that regulators, journalists, and community members are now examining very carefully in the aftermath of Longview. A genuine commitment to achieving compliance — with a public timeline and regular updates — would transform the community's relationship with the mill overnight.

4. Fire History and Worker Fatigue

Three fires occurred at Port Townsend Paper Company in less than 12 months. A 200-yard wood chip conveyor belt spanning six stories was fully engulfed in January 2022 — East Jefferson Fire Rescue found a compromised sprinkler system with a part missing and noted 'there's room for improvement.' The cause was never determined; damage exceeded \$500,000. A second fire followed in March 2022. A third fire in December 2022 involved a confined space so hazardous firefighters could not enter; a firefighter was hospitalized for exhaustion. Three fires in under 12 months. Compromised sprinklers. Causes undetermined.

Your own job postings confirm that production workers work 12-hour rotating shifts with overtime that former employees describe as mandatory and routine. Public reviews from former workers state: 'Safety came second to getting equipment back up and running.' 'Millwrights are doing jobs that used to take 6 people minimum with 3. Hours are long — scheduled downs are always 16-hour days, twice the work and half the people.' The National Institute for Occupational Safety and Health (NIOSH) has documented that 12-hour rotating shifts — particularly night shifts — significantly increase accident risk. Adding mandatory overtime extends workers to 14, 16, or more hours operating around white liquor, recovery boilers, confined spaces, and elevated conveyor systems. The Nippon Dynawave disaster occurred at a shift change. Fatigue and shift timing are part of the federal Chemical Safety Board (US Chemical Safety Board (CSB)) investigation.

The full compliance record for Atlas Holdings portfolio companies is publicly available at the Good Jobs First Violation Tracker: violationtracker.goodjobsfirst.org/parent/atlas-holdings

An Invitation

I recognize that I am a private citizen with no standing to demand anything. I have no legal authority over Port Townsend Paper Company. I am not a regulator, a lawyer, or a politician.

What I am is a neighbor who has done his homework and who genuinely believes that Atlas Holdings has the values, the resources, and the leadership to make Port Townsend Paper Company something this community is proud of rather than afraid of.

I would welcome a conversation — a phone call, a video meeting, or a visit to Port Townsend. I would be glad to share the full research I have compiled. And I would be genuinely delighted to write a very different kind of letter to our community — one that says Atlas Holdings heard us and is acting.

Thank you for taking the time to read this. I look forward to hearing from you.

Sincerely,

David Ginsberg

[REDACTED]

Port Townsend WA 98368

[REDACTED]

davidbginsberg@gmail.com