

June 5, 2026

Jefferson County Marine Resources Committee
c/o Jefferson County Board of Commissioners
1820 Jefferson Street
Port Townsend WA 98368
360-385-9100

RE: Port Townsend Paper Company — Bay Water Quality and Marine Resources — V_1.17

Dear Marine Resources Committee Chair and Members,

I write with a simple and direct request: we want Port Townsend Paper Company to make safety, health, and the environment their number one priority. Not their second priority. Not a consideration balanced against production schedules and profit margins. Number one.

I am a Port Townsend resident writing to the Jefferson County Marine Resources Committee because your committee's mandate — protecting and restoring the marine resources of Jefferson County waters — is directly and continuously affected by Port Townsend Paper Company's daily discharge into Port Townsend Bay.

PTPC operates a kraft pulp and paper mill on 450 acres bordering Port Townsend Bay, five miles from Port Townsend's residential neighborhoods. The mill produces 950–1,000 tons per day using the kraft process — the same white liquor chemistry (sodium hydroxide and sodium sulfide) that killed 11 workers in Longview, Washington on May 26, 2026, when a white liquor tank imploded at the Nippon Dynawave mill in the deadliest industrial accident in modern Washington State history.

PTPC's documented compliance record is public in US Environmental Protection Agency (EPA)'s EPA Enforcement and Compliance History Online (ECHO) database (FRS ID: 110000490326):

- Clean Air Act: High Priority Violation every single quarter for the past three 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
- Hazardous Waste: June 2025 inspection found 9 violations including emergency preparedness failures
- 12 million gallons of effluent (liquid waste or wastewater discharged into the environment) discharged into Port Townsend Bay every day
- The size, age, and inspection history of PTPC's white liquor storage tanks are not publicly disclosed — white liquor is exempt from US Environmental Protection Agency (EPA)'s Risk Management Program

In 2024, the federal Agency for Toxic Substances and Disease Registry (ATSDR) confirmed hydrogen sulfide and other sulfur compounds near PTPC exceed US Environmental Protection Agency (EPA) chronic health reference concentrations. The Pacific Northwest sits on the Cascadia Subduction Zone, capable of producing a magnitude 9.0 earthquake. A major seismic event could rupture PTPC's white liquor tanks, overwhelm secondary containment, and send caustic chemicals directly into Port Townsend Bay.

Port Townsend Bay is your jurisdiction. Port Townsend Paper Company is its largest industrial discharger. No independent shellfish tissue testing has been conducted near the PTPC outfall. No independent benthic assessment has evaluated the bay floor near the discharge point. No bioaccumulation study has measured how PTPC's chemical releases move up the food chain from sediment to the shellfish and fish that Jefferson County residents harvest and eat.

What I Am Requesting:

- Formally request that the Washington Department of Fish and Wildlife (WDFW) and Washington Department of Ecology conduct independent shellfish tissue testing, sediment sampling, and biological assessment of Port Townsend Bay near the PTPC discharge outfall
- Issue a formal committee recommendation that PTPC implement mandatory quarterly Whole Effluent Toxicity (WET) testing — exposing live aquatic organisms directly to PTPC's discharge water to measure actual biological harm — with results made publicly available
- Formally request that the Jefferson County Board of Commissioners activate the Local Emergency Planning Committee (LEPC) and include bay contamination response planning in the first emergency planning session
- Include the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend findings — which confirmed toxic sulfur compounds above US Environmental Protection Agency (EPA) chronic health reference concentrations near PTPC — in the Marine Resources Committee's annual report to the Board of Commissioners

Your committee has a unique and credible voice on the health of Jefferson County's marine resources. We are asking you to use it on behalf of Port Townsend Bay.

Respectfully,

David Ginsberg

[address redacted]

Port Townsend WA 98368

[phone redacted]

davidbginsberg@gmail.com