

June 5, 2026

Jefferson County Public Health
Health Officer / Environmental Health Director
615 Sheridan Street
Port Townsend WA 98368
360-385-9400 | co.jefferson.wa.us/290/Public-Health

RE: Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend Findings — Request for County Public Health Response — V_1.17

Dear Health Officer,

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 writing to Jefferson County Public Health about a documented public health concern that requires a formal county response. In 2024, the federal Agency for Toxic Substances and Disease Registry (ATSDR) conducted a health consultation specific to Port Townsend and found that hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide — Total Reduced Sulfur (TRS) compounds associated with Port Townsend Paper Company's kraft pulping operations — were measured near PTPC above US Environmental Protection Agency (EPA) chronic health reference concentrations.

This is a federal finding about our specific community's air quality. It directly contradicts the Washington State Department of Health's general guidance (DOH 334-553) which tells residents paper mill odors are 'rarely at levels that harm health.' Jefferson County Public Health has both the authority and the responsibility to respond to this contradiction.

PTPC operates a kraft pulp and paper mill on 450 acres bordering Port Townsend Bay, five miles from residential neighborhoods in Jefferson County. The mill produces 950–1,000 tons per day using the kraft process — the same chemistry 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 a matter of public record 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 — 12 consecutive quarters
- 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 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
- National Pollutant Discharge Elimination System (NPDES): permit expired October 2018; renewed May 2025 after 6+ years on administrative extension
- Total penalties all statutes five years: less than \$100,000
- Daily discharge of effluent (liquid waste or wastewater discharged into the environment): 12 million gallons into Port Townsend Bay — the largest discharger in Jefferson County

In 2024, the federal Agency for Toxic Substances and Disease Registry (ATSDR) specifically studied Port Townsend and found hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide measured near PTPC above US Environmental Protection Agency (EPA) chronic health reference concentrations. The Washington State Department of Health guidance still tells residents these odors are 'rarely at levels that harm health.' The federal science says otherwise — for our specific community.

What I Am Requesting from Jefferson County Public Health:

- Issue a formal public health advisory for Jefferson County residents acknowledging the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend findings and providing accurate guidance about the health risks of long-term exposure to Total Reduced Sulfur (TRS) compounds at the levels documented near PTPC
- Formally request that the Washington State Department of Health revise DOH 334-553 to accurately reflect the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend-specific findings
- Assess whether populations most vulnerable to hydrogen sulfide and Total Reduced Sulfur (TRS) compound exposure — residents with cardiovascular or respiratory conditions, older adults (42.6% of Jefferson County residents are over 65), and children — are receiving adequate and accurate health guidance
- Formally participate as a required member of the Jefferson County Local Emergency Planning Committee (LEPC) once it is activated, contributing a public health perspective to emergency response planning for PTPC
- Request that PTPC provide Jefferson County Public Health with its worker hydrogen sulfide exposure monitoring data for the past five years, and assess whether worker and community exposure levels warrant an occupational health investigation

Nearly 2,000 odor complaints were filed by Port Townsend residents between 2016 and 2021. These residents were not imagining their symptoms. Federal scientists have now confirmed what they were experiencing. Jefferson County Public Health should tell them so.

Respectfully,

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