

June 5, 2026

Director

National Institute for Occupational Safety and Health (NIOSH)

Centers for Disease Control and Prevention

1600 Clifton Road NE

Atlanta, GA 30329

800-232-4636 | cdc.gov/niosh

**RE: Request for National Institute for Occupational Safety and Health (NIOSH)
Investigation — Occupational Health at Port Townsend Paper Company — V_1.17**

Dear Director,

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, Washington resident writing to the National Institute for Occupational Safety and Health (NIOSH) to request an occupational health investigation into PTPC — the only remaining active kraft mill in Washington State following the May 26, 2026 Longview disaster and the PCA Wallula shutdown.

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.

The 300 workers inside Port Townsend Paper Company are exposed daily to hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and other Total Reduced Sulfur (TRS) compounds at concentrations the federal Agency for Toxic Substances and Disease Registry (ATSDR) confirmed in 2024 exceed US Environmental Protection Agency (EPA) chronic health reference concentrations in the surrounding community — outside the fence. Inside the fence, where workers spend 8–12 hour shifts, concentrations are higher. Hydrogen sulfide desensitizes the nose at harmful levels — workers cannot smell danger they cannot see.

PTPC releases 30,023 pounds of hydrogen sulfide, 193,797 pounds of methanol, 53,240 pounds of manganese compounds, and 4,209 pounds of lead compounds annually per US Environmental Protection Agency (EPA) Toxics Release Inventory (TRI) data. Manganese causes manganism — a progressive neurological disorder similar to Parkinson's disease — at sustained occupational exposure levels. Lead accumulates in the body and causes neurological damage. Hydrogen sulfide causes acute and chronic pulmonary and neurological effects. None of PTPC's worker exposure monitoring data is publicly disclosed.

PTPC also has a documented fire history directly relevant to a National Institute for Occupational Safety and Health (NIOSH) Health Hazard Evaluation (HHE). Three fires occurred at the facility in under 12 months in 2022: a six-story wood chip conveyor belt fully engulfed with a compromised sprinkler system (cause undetermined, \$500,000 damage); a second fire two months later (cause undetermined); and a third in a confined space vault so hazardous firefighters could not safely enter (a firefighter was hospitalized for exhaustion). PTPC's own job postings confirm 12-hour rotating shifts with mandatory overtime. Former employees publicly describe: 'Safety came second to getting equipment back up and running.' National Institute for Occupational Safety and Health (NIOSH) research confirms 12-hour rotating shifts significantly increase accident risk — adding mandatory overtime to 14-16+ hours in confined spaces with caustic chemicals creates compounded fatigue risk. This work environment pattern warrants National Institute for Occupational Safety and Health (NIOSH) investigation independent of the Longview disaster context.

What I Am Requesting from National Institute for Occupational Safety and Health (NIOSH):

- Conduct a Health Hazard Evaluation (HHE) of Port Townsend Paper Company, assessing worker exposure to hydrogen sulfide, Total Reduced Sulfur (TRS) compounds, manganese, lead, methanol, and other chemicals documented in PTPC's US Environmental Protection Agency (EPA) Toxics Release Inventory filings

- Query the National Institute for Occupational Safety and Health (NIOSH) WONDER occupational mortality database for Jefferson County workers in the pulp and paper industry (NAICS 322110) for respiratory disease, neurological conditions, cardiovascular disease, and cancer — and make findings publicly available
- In the context of the Longview disaster, assess whether kraft mill workers nationally — and at PTPC specifically — are receiving adequate protection from white liquor exposure and hydrogen sulfide monitoring under current Occupational Safety and Health Administration (OSHA) standards
- Recommend whether current Occupational Safety and Health Administration (OSHA) permissible exposure limits for hydrogen sulfide (20 ppm) are adequate for workers in enclosed spaces near kraft pulp digesters and recovery boilers, or whether the ACGIH's recommended 1 ppm threshold should become the regulatory standard

The workers of Port Townsend Paper Company go to work every day in conditions that federal science has confirmed expose the surrounding community to toxic levels of sulfur compounds. The workers inside the fence deserve the same scientific scrutiny and the same protection.

Respectfully,

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