

June 5, 2026

President, Port Townsend Marine Trades Association (PTMTA)
385 Benedict Street
Port Townsend WA 98368
360-351-0106 | ptmta.org

RE: Port Townsend Paper Company — Bay Health and Marine Trades Economic Risk — V_1.17

Dear President,

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 Port Townsend Marine Trades Association (PTMTA) because the livelihoods of every marine trades business in this community depend on a healthy Port Townsend Bay — and that bay receives 12 million gallons of industrial effluent (liquid waste or wastewater discharged into the environment) from Port Townsend Paper Company every single day.

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.

A catastrophic white liquor release into Port Townsend Bay would close the Boat Haven boatyard, shut down both marinas, contaminate the waters where your members haul, repair, and launch vessels, and potentially destroy the marine trades economy of Port Townsend for years. In the context of the Longview disaster — where a white liquor tank imploded and killed 11 workers one week ago — that risk is not hypothetical. It is documented chemistry operating five miles from your members' businesses.

What I Am Asking PTMTA to Consider:

- Formally write to Port Townsend Paper Company requesting independent white liquor tank inspection with public results, mandatory Whole Effluent Toxicity (WET) testing of bay discharge, and a publicly available emergency response plan for a white liquor release near Port Townsend Bay
- Pass a resolution of the Port Townsend Marine Trades Association formally expressing the association's expectation that PTPC make safety, health, and the environment its number one priority
- Join the Port of Port Townsend and the Northwest Maritime Center in calling for independent water quality testing of Port Townsend Bay near the PTPC discharge outfall
- Support the activation of the Jefferson County Local Emergency Planning Committee (LEPC) and participation in emergency response planning for a white liquor bay release scenario

Your members are on that bay every day. They deserve to know what is in it.

Respectfully,

David Ginsberg

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