

June 5, 2026

Commanding Officer
US Coast Guard Sector Puget Sound
1519 Alaskan Way South
Seattle, WA 98134
206-217-6200 | VHF Channel 16

RE: Port Townsend Paper Company White Liquor Storage — Admiralty Inlet Navigable Water Risk — V_1.17

Dear Commanding 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 a Port Townsend, Washington resident writing to US Coast Guard Sector Puget Sound about a potential navigable water safety concern directly within your jurisdiction. PTPC operates a kraft paper mill on 450 acres bordering Port Townsend Bay, storing white liquor — a highly caustic mixture of sodium hydroxide and sodium sulfide — in tanks of undisclosed size, age, and inspection status.

Port Townsend Bay discharges directly into Admiralty Inlet, a major navigable waterway under Coast Guard jurisdiction. Naval Magazine Indian Island sits directly across Admiralty Inlet from PTPC. On May 26, 2026, eleven workers died at the Nippon Dynawave kraft paper mill in Longview, Washington when a white liquor tank imploded. PTPC operates the identical process. A catastrophic white liquor release into Port Townsend Bay would contaminate Admiralty Inlet and potentially affect all vessel traffic transiting the area.

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 Asking Coast Guard Sector Puget Sound to Consider:

- Assess whether a major white liquor release from PTPC into Port Townsend Bay constitutes a hazardous materials scenario requiring pre-positioned Coast Guard response capability, and whether current response plans adequately address caustic chemical contamination of Admiralty Inlet
- Verify that PTPC’s facility emergency response plan addresses a catastrophic white liquor release into Port Townsend Bay, and that Coast Guard Sector Puget Sound is formally included in that plan as a response coordinator
- Formally request that the Jefferson County Local Emergency Planning Committee (LEPC) — which has been Jefferson County Emergency Management Director Willie Bence has confirmed that the Local Emergency Planning Committee (LEPC) meets quarterly, is open to the public, and that Port Townsend Paper Company (PTPC) is an active participant. A Local Emergency Planning Committee (LEPC) meeting is scheduled for July 2026, at which the Longview disaster is expected to be addressed. Under the Emergency Planning and Community Right-to-Know Act (EPCRA), PTPC reports its chemical inventories annually to local fire departments, the Local Emergency Planning Committee (LEPC), and the Washington State Department of Ecology. under the Emergency Planning and Community Right-to-Know Act (EPCRA) — be convened and that a white liquor bay release scenario be specifically addressed in the emergency response plan
- Consider whether the National Response Center (NRC) records for PTPC reflect the full history of spills and discharges into Port Townsend Bay, and whether a formal Coast Guard inspection of PTPC’s waterfront chemical storage is warranted under your navigable waters authority

Port Townsend Bay and Admiralty Inlet are navigable waters of the United States. The Coast Guard's jurisdiction over hazardous materials risks in those waters is clear. We are asking you to exercise that jurisdiction proactively — before a disaster requires a response.

Respectfully,

David Ginsberg

[address redacted]

Port Townsend WA 98368

[phone redacted]

davidbginsberg@gmail.com