

June 5, 2026

Kelly Susewind, Director
Washington Department of Fish and Wildlife (WDFW)
1111 Washington Street SE
Olympia, WA 98501
Kelly.Susewind@dfw.wa.gov | director@dfw.wa.gov | 360-902-2200

RE: Port Townsend Bay — PTPC Discharge, Shellfish Safety, and Treaty Resources — V_1.17

Dear Director Susewind,

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 you as a Port Townsend resident about the Washington Department of Fish and Wildlife's (Washington Department of Fish and Wildlife (WDFW)) direct stake in the operations of PTPC and the health of Port Townsend Bay. The bay supports commercial and recreational fishing, treaty-protected shellfish harvesting by the Jamestown S'Klallam and Port Gamble S'Klallam Tribes, and a marine ecosystem that has received 12 million gallons of industrial effluent (liquid waste or wastewater discharged into the environment) every day for more than 100 years.

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.

In April 2025, PTPC discharged 114,630 gallons of untreated industrial wastewater directly into Port Townsend Bay near Glen Cove — a known Dungeness crab harvesting area. When asked whether it was safe to eat shellfish from Glen Cove, PTPC declined to answer. No independent shellfish tissue testing has been conducted near the PTPC discharge outfall. Glen Cove residents and recreational harvesters have received no guidance.

What I Am Requesting from Washington Department of Fish and Wildlife (WDFW):

- Conduct an independent assessment of fish and shellfish health in Port Townsend Bay, with particular focus on areas near and downstream of PTPC’s discharge outfall, and make findings publicly available in plain language
- Conduct shellfish tissue testing — mussels, oysters, clams, and crabs — from waters near the PTPC discharge point, testing for industrial contaminants including heavy metals, dioxins, furans, per- and polyfluoroalkyl substances (PFAS) compounds, and the specific chemicals documented in PTPC’s US Environmental Protection Agency (EPA) Toxics Release Inventory filings. Publish results in plain language.
- Review and update shellfish harvest advisories for Port Townsend Bay near the PTPC outfall based on current independent testing — not self-reported PTPC data
- Formally assess whether PTPC’s daily discharge of 12 million gallons of treated effluent is affecting salmon habitat, eelgrass beds, and other marine species under Washington Department of Fish and Wildlife (WDFW)’s jurisdiction in Port Townsend Bay
- Formally participate as a reviewing agency in PTPC’s National Pollutant Discharge Elimination System (NPDES) permit renewal process, ensuring that the conditions of that permit adequately protect the fish and wildlife resources Washington Department of Fish and Wildlife (WDFW) is charged with managing and protecting
- In the event of any future spill from PTPC into Port Townsend Bay, conduct an immediate independent wildlife impact assessment and publish findings within 30 days

Washington Department of Fish and Wildlife (WDFW) has a direct mandate to protect the marine resources of Port Townsend Bay. The fish and shellfish in that bay are eaten by Jefferson County residents, harvested by tribal members exercising treaty rights, and marketed commercially. They deserve independent testing that does not rely on the discharging facility's self-reported data.

Respectfully,

David Ginsberg

[address redacted]

Port Townsend WA 98368

[phone redacted]

davidbginsberg@gmail.com