

June 5, 2026

Steve Owens, Chairperson
US Chemical Safety Board (CSB)
1750 Pennsylvania Ave NW, Suite 910
Washington, DC 20006
info@csb.gov | 202-261-7600

RE: Request to Include Port Townsend Paper Company in Scope of Longview Investigation — V_1.17

Dear Chairman Owens,

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 about PTPC — the only remaining active kraft mill in Washington State — in the context of your investigation into the May 26, 2026 Nippon Dynawave disaster in Longview. I commend the Chemical Safety Board (US Chemical Safety Board (CSB)) for immediately deploying investigators and I write to formally request that PTPC be included in the investigation's scope.

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.

Specific Requests to the Chemical Safety Board (US Chemical Safety Board (CSB)):

- Formally expand the scope of the Longview investigation to include a safety assessment of all remaining active kraft mills in Washington State, beginning with Port Townsend Paper Company — and issue interim safety recommendations applicable to those facilities before the final Longview report is published
- Issue an interim recommendation requiring independent public inspection of white liquor storage tanks at all US kraft mills, using the same criteria investigators are applying at Nippon Dynawave: tank construction, corrosion, venting, and maintenance records
- Issue an interim recommendation that US Environmental Protection Agency (EPA) initiate a rulemaking review to add white liquor (sodium hydroxide and sodium sulfide at kraft mill concentrations) to the Risk Management Program list of extremely hazardous substances requiring public safety plans
- Issue an interim recommendation requiring that any worker report of structural integrity concerns about hazardous chemical storage equipment trigger a mandatory inspection within 30 days — addressing the exact gap that allowed the Longview sinkhole report to go unanswered

The Chemical Safety Board (US Chemical Safety Board (CSB)) is the only federal agency whose sole mission is preventing industrial chemical disasters. Port Townsend has an opportunity to benefit from the Longview investigation before a disaster forces the question. I urge you to make that possible.

Respectfully,

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