

June 5, 2026

Emma Pokon, Regional Administrator
US Environmental Protection Agency, Region 10
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The Good Jobs First Violation Tracker documents \$108,020,712 in penalties across 143 violation records for companies currently owned by Atlas Holdings, including 102 workplace safety or health violation records. Full record: violationtracker.goodjobsfirst.org/parent/atlas-holdings

RE: Request for US Environmental Protection Agency (EPA) Region 10 Action on Port Townsend Paper Company Following the Longview Disaster — V_1.13

Dear Administrator Pokon,

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 Port Townsend Paper Company — a facility under US Environmental Protection Agency (EPA) Region 10's direct regulatory oversight. Following the May 26 Longview disaster, PTPC is now the only active kraft mill in Washington State. Its compliance record — documented in your own EPA Enforcement and Compliance History Online (ECHO) database — and the regulatory gaps exposed by Longview make immediate action urgent.

On May 26, 2026, eleven workers died at the Nippon Dynawave kraft paper mill in Longview, Washington, when a 900,000-gallon white liquor tank imploded — the deadliest industrial accident in modern Washington State history. OPB interviewed seven chemical safety experts who confirmed the implosion mechanism involved a blockage that prevented air backfilling the tank as liquid was pumped out, creating catastrophic negative pressure. Workers had reported a structural warning to the Division of Occupational Safety and Health two months before the disaster. No action was taken.

PTPC operates the identical kraft pulping process — the same white liquor chemistry, sodium hydroxide and sodium sulfide — on 450 acres bordering Port Townsend Bay, five miles from residential neighborhoods. PTPC's daily output of 950–1,000 tons per day exceeds Nippon Dynawave's. The size, age, and inspection history of PTPC's white liquor tanks are not publicly disclosed. White liquor is exempt from the US Environmental Protection Agency (EPA) Risk Management Program — there is no required public safety plan, no mandated tank disclosure, and no worst-case release scenario on file anywhere.

PTPC's documented compliance record warrants urgent attention following Longview:

- Clean Air Act: High Priority Violation for all 12 of the last 12 consecutive quarters. Only \$99,750 in total penalties across all statutes in five 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; two new formal enforcement orders issued 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 — the exact category that failed at Nippon Dynawave.
- National Pollutant Discharge Elimination System (NPDES) discharge permit: Expired October 2018 — The National Pollutant Discharge Elimination System (NPDES) water discharge permit expired in October 2018 and remained on administrative extension for over six years. A new permit was finally issued in May 2025 and expires in May 2030. The 6+ year gap without a valid permit is documented in EPA Enforcement and Compliance History Online (ECHO) records. into Port Townsend Bay.
- Agency for Toxic Substances and Disease Registry (ATSDR) 2024: Federal scientists confirmed hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide measured near PTPC above US Environmental Protection Agency (EPA) chronic health reference concentrations.

On June 1, 2026, Port Townsend Paper Company issued a public statement indicating it has met with industry experts, verified that tank vents are open and overflow lines are not submerged, and is scheduling non-destructive testing of tanks in 2026. These are welcome initial steps. They are not, however, a substitute for the independent inspection with publicly disclosed results that this community is requesting. The key questions remain unanswered: the sizes, ages, and inspection histories of PTPC's white liquor tanks are still not public information.

Requests to US Environmental Protection Agency (EPA) Region 10:

- Conduct a coordinated multi-statute inspection of PTPC — Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act (RCRA) — using findings from the US Chemical Safety Board (CSB) Longview investigation as a reference framework, and make results publicly available.
- Require PTPC to complete and publicly file its National Pollutant Discharge Elimination System (NPDES) permit renewal — now The National Pollutant Discharge Elimination System (NPDES) water discharge permit expired in October 2018 and remained on administrative extension for over six years. A new permit was finally issued in May 2025 and expires in May 2030. The 6+ year gap without a valid permit is documented in EPA Enforcement and Compliance History Online (ECHO) records.. The renewal must include: mandatory quarterly Whole Effluent Toxicity (WET) testing; comprehensive Gas

Chromatography-Mass Spectrometry (GC-MS) and Inductively Coupled Plasma-Mass Spectrometry (ICP-MS) chemical analysis; and real-time continuous outfall monitoring with public data feeds.

- Issue an emergency enforcement action under Clean Air Act authority to address PTPC's 12-consecutive-quarter High Priority Violation record — the maximum noncompliance period tracked by EPA Enforcement and Compliance History Online (ECHO).
- Apply US Environmental Protection Agency (EPA)'s existing Chemical Accident Prevention authorities to require PTPC to disclose white liquor tank sizes, ages, and inspection records — and advocate for adding white liquor to the US Environmental Protection Agency (EPA) Risk Management Program's list of extremely hazardous substances requiring public safety plans.
- Require PTPC to address all 9 Resource Conservation and Recovery Act (RCRA) emergency preparedness violations identified in the June 2025 inspection — with a public corrective action plan and verified compliance timeline.
- Formally request the US Chemical Safety Board expand its Longview investigation scope to include all remaining Washington kraft mills, including PTPC.

Port Townsend Bay is a marine bay adjacent to 33,944 residents and is home to treaty-protected tribal fishing rights. It has received PTPC's industrial discharge for more than 100 years. Federal Agency for Toxic Substances and Disease Registry (ATSDR) scientists have confirmed toxic Total Reduced Sulfur (TRS) compounds above health reference levels near the facility. The community is entitled to the full protection of federal environmental law — rigorously enforced. I welcome the opportunity to brief your staff.

Respectfully,

David Ginsberg

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