

June 5, 2026

The Honorable Bob Ferguson
Governor, State of Washington
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

RE: Urgent Request for State Action on Port Townsend Paper Company Following the Longview Disaster — V_1.13

Dear Governor Ferguson,

You called the Longview disaster 'the deadliest industrial tragedy in modern Washington State history.' I am writing from Port Townsend to ask that the same urgency that brought you to Longview be directed at the kraft paper mill operating five miles from my community — Port Townsend Paper Company — before we face our own tragedy.

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 the Governor's Office:

- Direct the Washington Department of Ecology to conduct an immediate, comprehensive inspection of PTPC's white liquor storage infrastructure and make findings publicly available.
- Direct the Department of Labor and Industries to conduct an emergency Washington Industrial Safety and Health Act (WISHA) inspection of PTPC's white liquor handling systems, worker hydrogen sulfide exposure monitoring, and confined space procedures — and publish all Washington Industrial Safety and Health Act (WISHA) inspection records for PTPC.
- Direct Ecology to invoke its Chemical Accident Prevention Program (CAPP) authority under RCW 90.48 to require PTPC to file a public accident prevention plan for white liquor storage — filling the gap left by the federal Risk Management Program (RMP) exemption.
- Direct the Washington Department of Health to issue updated community health guidance for Port Townsend that accurately reflects the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 finding — contradicting DOH's July 2024 guidance that paper mill odors are 'rarely at levels that harm health.'
- Support emergency legislation: a Kraft Mill White Liquor Tank Safety Act; a Fence-Line Air Monitoring Act (California model); and a Worker Safety Report Fast-Track Act ensuring worker structural warnings trigger mandatory inspection within 30 days.

PTPC is owned by Atlas Holdings LLC of Greenwich, Connecticut. Their own website states that all portfolio companies 'must pursue and achieve world-class safety performance and are held accountable.' PTPC's record since the October 2022 acquisition tells a different story. The community around Port Townsend Bay needs your accountability to be real.

I have compiled comprehensive research documentation and welcome the opportunity to brief your staff.

Respectfully,

David Ginsberg

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