

June 5, 2026

Nick Brown, Attorney General
Washington State Office of the Attorney General
1125 Washington Street SE
Olympia, WA 98504
press@atg.wa.gov | 360-753-2727

RE: Port Townsend Paper Company — Request for Attorney General Review of Compliance Record and Regulatory Gap — V_1.17

Dear Attorney General Brown,

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 resident writing to request that the Washington State Office of the Attorney General review the compliance record of PTPC and the regulatory gaps exposed by the May 26, 2026 Longview disaster — the deadliest industrial accident in modern Washington State history.

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.

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

What I Am Requesting from the Attorney General:

- Review PTPC's documented compliance record under Washington's environmental laws — Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act (RCRA) — and assess whether the pattern of violations, inadequate penalties, and regulatory gaps constitutes grounds for Attorney General action under Washington's consumer protection or environmental enforcement authorities
- Review whether PTPC's refusal to answer basic public health questions after the April 2025 untreated wastewater spill into Port Townsend Bay — including whether the discharge was toxic to marine life and whether shellfish from Glen Cove were safe to eat — constitutes a violation of Washington's public disclosure obligations or creates liability under consumer protection law
- Assess the legal implications of the federal Agency for Toxic Substances and Disease Registry (ATSDR) 2024 finding that toxic sulfur compounds near PTPC exceed US Environmental Protection Agency (EPA) chronic health reference concentrations, in the context of Washington's Model Toxics Control Act (Washington Model Toxics Control Act (MTCA)) and existing environmental enforcement authorities
- Investigate whether PTPC's white liquor storage infrastructure — whose size, age, and inspection history are not publicly disclosed — should be subject to mandatory public disclosure under Washington law, particularly in the aftermath of the Longview disaster
- Formally refer PTPC's compliance record to the Washington State Department of Ecology and Department of Labor & Industries for priority enforcement review

Attorney General Brown, you have described your role as 'the people's advocate.' The people of Port Townsend and Jefferson County are asking for your office's attention on a facility that has accumulated 12 consecutive quarters of Clean Air Act violations, contaminated Port Townsend Bay on multiple occasions, and refused to answer basic public health questions. We welcome the opportunity to brief your environmental enforcement staff.

Respectfully,

David Ginsberg

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