

June 5, 2026

Joel Sacks, Director
Washington State Department of Labor and Industries
7273 Linderson Way SW
Tumwater, WA 98501

**RE: Emergency Washington Industrial Safety and Health Act (WISHA) Inspection Request
— Port Townsend Paper Company — V_1.13**

Dear Director Sacks,

I am writing as a Port Townsend resident to request an emergency proactive Washington Industrial Safety and Health Act (WISHA) inspection of Port Townsend Paper Company — now the only active kraft mill in Washington State — following the Longview disaster, and to request public disclosure of PTPC's complete Washington Industrial Safety and Health Act (WISHA) inspection history.

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.

The Longview disaster revealed a catastrophic failure of Washington's worker safety inspection system: workers notified Washington Division of Occupational Safety and Health (DOSH) of a structural problem two months before the implosion. Nothing was done. Eleven people died. I am asking L&I to ensure this failure is not repeated at PTPC.

Specific Requests to Department of Labor and Industries:

- Conduct an emergency proactive Washington Industrial Safety and Health Act (WISHA) inspection of PTPC's white liquor handling systems, storage tanks, confined space

programs near digesters and recovery boilers, worker hydrogen sulfide exposure monitoring programs, and emergency response procedures.

- Require PTPC to demonstrate compliance with Occupational Safety and Health Administration (OSHA) Process Safety Management standards — including current Process Hazard Analysis documentation, mechanical integrity testing records for white liquor storage tanks, and written emergency response procedures.
- Investigate PTPC's worker hydrogen sulfide (H₂S) and Total Reduced Sulfur (TRS) exposure monitoring program: are workers near digesters and recovery boilers being monitored at required frequency? What do results show relative to Occupational Safety and Health Administration (OSHA)'s 20 ppm PEL and ACGIH's recommended 1 ppm limit?
- Make all Washington Industrial Safety and Health Act (WISHA) inspection reports, citations, penalties, and injury/illness records for Port Townsend Paper Corporation publicly available without requiring a formal public records request.
- Review response protocols when workers report structural integrity concerns about hazardous chemical storage equipment — and implement a mandatory 30-day inspection trigger. The Longview sinkhole lesson must become a regulatory change.

The 300 workers inside Port Townsend Paper Company are exposed daily to the same chemical processes that killed 11 of their counterparts in Longview. They deserve the full protection of Washington's worker safety laws — rigorously enforced. I urge you to treat this with the urgency it warrants.

Respectfully,

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