

Community Safety Questions and Answers

Complete Q&A Following the Longview Mill Disaster of May 26, 2026

Citizens for Safe Water and Air - Port Townsend

PORT TOWNSEND, WA

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This document answers frequently asked questions about the May 26, 2026 white liquor tank implosion at the Nippon Dynawave Packaging mill in Longview, Washington, and what it means for Port Townsend Paper Company (PTPC), a kraft pulp and paper mill on Port Townsend Bay. All factual claims are sourced from official government records, court documents, and published news reporting.

1. The Longview Disaster: What Happened and Why It Matters Here

Q: What happened at the Longview Nippon Dynawave mill?

On May 26, 2026, at approximately 7:15 AM, a 900,000-gallon tank of white liquor imploded at the Nippon Dynawave Packaging mill in Longview, Washington. All eleven workers have been confirmed dead, the deadliest industrial accident in modern Washington State history. Governor Ferguson called it 'the deadliest industrial tragedy in modern Washington State history.' Approximately 600,000 gallons of white liquor rushed through work areas, including employee break rooms. 2,226 dead fish were recovered from drainage ditches near the facility by June 1, 2026, according to the Washington State Department of Ecology.

Q: What caused it, according to chemical safety experts?

Seven chemical safety experts interviewed by Oregon Public Broadcasting (OPB) on May 30, 2026 converged on a leading theory. Expert Stan Kmiotek, with a 40-year career, said tank implosions are far rarer than explosions and that he could 'count on one hand' the number he had seen; implosions happen without warning. The leading expert theory is that a blockage prevented air from backfilling the tank as white liquor was pumped out, creating catastrophic negative pressure. Half a dozen colleagues reached the same conclusion.

Oregon Public Broadcasting (OPB), citing its expert sources, reported that 'the implosion happened during a shift change that brought more workers on site and around a break room located next to the massive tank.' United States Chemical Safety and Hazard Investigation Board (CSB) Chairperson Steve Owens said, 'The United States Chemical Safety and Hazard Investigation Board (CSB) is opening an investigation to determine how it happened and what can be done to prevent something like this from happening again.'

Prior incidents and accountability

- March 2026: Workers reported a sinkhole to the Washington Division of Occupational Safety and Health (DOSH), regarding a separate tank, not the one that imploded. No action was taken on either complaint. This was two months before the disaster.
- August 2025: A two-alarm fire destroyed a warehouse on Nippon property, months before the implosion.
- Washington State Department of Labor and Industries (L and I) had two open inspections at Nippon Dynawave at the time of the disaster.
- Brian Wood, Nippon Dynawave's lead spokesperson, is simultaneously an elected city councilor in nearby Kelso.
- Josh Estes of the Association of Western Pulp and Paper Workers (AWPPW) union said, 'We are going to fight to get those answers.'
- At least one victim family has retained an attorney. Litigation is expected.
- During cleanup, residents reported hydrogen sulfide (H₂S) sulfur odor from diluted white liquor drainage flushing, confirming that even diluted white liquor releases the same Total Reduced Sulfur (TRS) compounds PTPC emits daily.
- Nippon Dynawave is a United States subsidiary of Nippon Paper (Japan), which acquired the Longview site from Weyerhaeuser in 2016 for \$285 million.

Q: What is white liquor and why is it so dangerous?

White liquor is a caustic solution of sodium hydroxide (NaOH) and sodium sulfide (Na₂S) used in kraft pulping to dissolve lignin from wood chips. Contact causes immediate second and third-degree chemical burns. Its vapors are toxic to eyes, lungs, and throat. At the Longview site it was so caustic it damaged firefighter protective gear. White liquor is not covered by the Risk Management Program (RMP), meaning there are no required public safety plans, no mandated tank size disclosures, and no worst-case release scenario planning for any kraft mill in America.

Q: Is this the same chemical used at PTPC?

Yes, identical process, identical chemical. PTPC is a kraft mill. It uses white liquor in the same way as Nippon Dynawave. The mill sits on 450 acres bordering Port Townsend Bay. PTPC's daily production output of 950 to 1,000 tons per day actually exceeds Nippon Dynawave's approximately 770 tons, suggesting comparable or greater volumes of white liquor in storage. We do not know how large PTPC's white liquor tanks are, when they were last inspected, or what the emergency response plan is for a release near Port Townsend Bay.

On June 1, 2026, PTPC issued a public statement that the company had verified tank vents are open and overflow lines are not submerged, and is scheduling non-destructive testing for 2026. Three admissions stand out. First, 'We are unaware of the root cause of the tank failure or the technical details of the Nippon Dynawave facility.' Second, 'Since the incident in Longview, we have been conducting extra safety inspections,' which confirms pre-Longview practices were insufficient. Third, the company said it is 'working on scheduling further non-destructive testing,' meaning additional testing had not yet been scheduled as of the press release date. Self-conducted verification is not a substitute for

independent inspection with publicly disclosed results.

2. The Smell: Toxic Chemicals, Not Rotten Pulp

Q: Is the stink rotten paper pulp or toxic chemicals?

Toxic chemicals, not rotten pulp. The rotten egg and cabbage smells residents report are hydrogen sulfide (H₂S), methyl mercaptan, dimethyl sulfide, and dimethyl disulfide, Total reduced sulfur (TRS) compounds produced directly by the kraft pulping process. These are the same chemical family as white liquor itself, just escaping through stacks at low concentration. A 2024 Agency for Toxic Substances and Disease Registry (ATSDR) federal investigation found hydrogen sulfide (H₂S), methyl mercaptan, dimethyl sulfide, and dimethyl disulfide were measured near PTPC above United States Environmental Protection Agency (EPA) chronic health reference concentrations during mill operations.

Established health effects include eye irritation, respiratory inflammation, fatigue, nausea, headache, and dizziness. Populations most at risk include people with heart or lung disease, older adults, and children. Nearly 2,000 odor complaints were filed between 2016 and 2021 alone. These were not people being overly sensitive; they were people being repeatedly exposed to toxic compounds at harmful concentrations, confirmed by federal scientists. Critically, the Agency for Toxic Substances and Disease Registry (ATSDR) study detected fourteen distinct sulfur compounds near the mill (ATSDR Health Consultation 334-170, June 2024). The Washington State Department of Ecology currently regulates only four of them, leaving ten compounds with no enforceable regulatory limit at PTPC.

Q: What does the WA Department of Health say, and does it match the federal findings?

The Washington State Department of Health (DOH), in a July 2024 document (DOH 334-553), concluded odors are 'Rarely Harmful,' stating that 'most environmental odors, such as those caused by a paper mill, are RARELY AT LEVELS THAT CAN HARM YOUR HEALTH.' This frames odors as a quality-of-life inconvenience, not a health hazard. The federal Agency for Toxic Substances and Disease Registry (ATSDR), in its 2024 Port Townsend-specific finding, concluded the opposite: hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide were all measured near PTPC above United States Environmental Protection Agency (EPA) chronic health reference concentrations. Same year, same community, opposite conclusions.

There are three possible explanations for the discrepancy, all newsworthy; see the Community Health Report for a full discussion.

3. PTPC's Full Environmental and Safety Compliance Record

Q: What is the safety and environmental record of PTPC?

Clean Air Act: High Priority Violation, Every Quarter

- High Priority Violation for 11 of the last 12 quarters, one of the longest noncompliance periods tracked.
- Violations include hazardous air pollutants, particulate matter, nitrogen oxides, visible emissions, carbon monoxide, and asbestos (April 2024).

- 23 informal enforcement actions over 5 years; 4 formal enforcement actions; only \$63,750 in total CAA penalties.
- Most recent: a warning letter in February 2026 and a notice of violation in March 2026.

Clean Water Act: Chronic Spills into Port Townsend Bay

- 13 or more documented industrial spills into Port Townsend Bay since 2013, all confirmed in United States Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO).
- CWA violations in every quarter for 3 years running; two new formal administrative orders issued in April and May 2026.
- November 2021 through March 2022: approximately 800 gallons of untreated wastewater plus 14 permit exceedances, fine of \$27,000.
- July 6, 2022: recovery furnace hazardous air pollutant exceedance, fine of \$56,250.
- January 2025: approximately 1,000 gallons of condensed water spilled. April 2025: approximately 114,000 gallons of untreated wastewater spilled near Glen Cove, with a \$20,000 fine covering both 2025 incidents combined (roughly \$10,000 per incident, approximately 8.8 cents per gallon for the 114,000-gallon discharge).

Hazardous Waste (RCRA): Emergency Preparedness Failures

- June 2025 inspection: 9 violations including failures in preparedness, prevention, and emergency procedures under Resource Conservation and Recovery Act (RCRA) subpart 262.M, the exact category relevant to white liquor tank failure.
- A written informal enforcement notice was issued in October 2025.

Total penalties across all statutes over 5 years exceed \$103,250: \$63,750 under the Clean Air Act, at least \$47,000 confirmed under the Clean Water Act, and \$0 under Resource Conservation and Recovery Act (RCRA). For a facility with \$319 million in annual expenditures, over \$103,250 in confirmed penalties over five years, approximately \$20,000 or more per year, is not deterrence; it is a cost of doing business. The Environmental Integrity Project's 2025 national study specifically named PTPC as an example of the enforcement gap between violations and consequences.

Separately, the American Geophysical Union's TEX has an active Port Townsend project pairing the community with pro-bono atmospheric scientists to design a community sulfur monitoring network and develop a regulatory proposal for the Washington State Department of Ecology, providing independent scientific support for this advocacy (thrivingearthexchange.org/project/port-townsend-wa/). The Good Jobs First Violation Tracker documents \$108,020,712 in penalties across 143 violation records for companies currently owned by Atlas Holdings.

Q: What toxic chemicals does PTPC release annually?

Per PTPC's own United States Environmental Protection Agency (EPA) TRI filings for the 2024 reporting year (covering 2023 calendar year activity), the mill released 377,546 pounds of toxic chemicals in total. The individual chemicals, their 2024-reported pounds, and their primary health effects are as

follows.

- Methanol: 193,797 pounds. Toxic by inhalation; causes central nervous system and optic nerve damage.
- Ammonia: 58,802 pounds. Respiratory irritant; toxic at concentration.
- Manganese compounds: 53,240 pounds. Neurological damage with long-term exposure.
- Hydrogen sulfide (H₂S): 30,023 pounds. The same Total reduced sulfur (TRS) compound present in white liquor chemistry.
- Zinc compounds: 20,517 pounds. Aquatic toxicity and bioaccumulation in fish.
- Nitrate compounds: 19,980 pounds. Water quality impairment and aquatic ecosystem harm.
- Acetaldehyde: 17,523 pounds. Classified as probably causing cancer in humans.
- Formaldehyde: 8,677 pounds. Known to cause cancer in humans, the same classification given to tobacco smoke and asbestos.
- Phenol: 5,205 pounds. Skin, eye, and respiratory irritant.
- Lead compounds: 4,209 pounds. Neurotoxin with no safe level of exposure, according to the United States Environmental Protection Agency (EPA).

4. Wastewater Discharge, Testing, and Port Townsend Bay

Q: What does it mean that the mill sends treated wastewater directly into Port Townsend Bay?

PTPC operates a large industrial wastewater treatment plant that treats process water and discharges it directly into Port Townsend Bay, continuously, for more than 100 years. Between April 2018 and March 2023, PTPC discharged an average of 9.6 million gallons of treated wastewater per day; the highest recorded single day reached 14.4 million gallons. The discharge pipe extends 1,200 feet offshore and releases through 29 separate openings at a depth of 45 feet.

PTPC's National Pollutant Discharge Elimination System (NPDES) permit, the legal document governing what the mill can discharge into the bay, expired in October 2018 and remained on administrative extension for over six years. The Washington State Department of Ecology attributed the delay to 'largely competing priorities and staff turnover.' A new permit was issued in May 2025. It includes new limits for three carcinogens previously unregulated here despite 100-plus years of discharge: benzo(a)anthracene and chlordane, classified as probably causing cancer in humans, and pentachlorophenol, known to cause cancer in humans, the same classification given to tobacco smoke and asbestos, and also a banned pesticide.

The mill was also authorized to discharge 7 percent more effluent under the new permit. No enforceable final limits on these three carcinogens take effect until 2029. Background concentrations are assumed to be zero for 27 pollutants because no prior measurements exist. A Per- and polyfluoroalkyl substances (PFAS) study is now required but has not yet been conducted.

Q: What is Whole Effluent Toxicity testing, and why hasn't it been required?

Whole Effluent Toxicity (WET) testing exposes live aquatic organisms directly to discharge water and measures biological harm, regardless of which specific compound causes it. It catches what compound-by-compound testing misses entirely. Test organisms include fathead minnows, Daphnia water fleas, and mysid shrimp. Cost runs \$12,000 to \$24,000 per year on a quarterly basis, trivial for a facility with \$319 million in annual expenditures. Port Townsend Bay has received 100-plus years of industrial discharge without a single independent biological harm assessment.

Order-of-magnitude comprehensive testing cost estimates, which require confirmation from certified labs, break down across four tiers.

- Tier 1, comprehensive gas chromatography-mass spectrometry (GC-MS) plus inductively coupled plasma mass spectrometry (ICP-MS) metals testing, quarterly: approximately \$8,000 to \$16,000 per year.
- Tier 2, real-time continuous outfall monitoring: \$15,000 to \$40,000 in capital cost plus \$3,000 to \$8,000 per year.
- Tier 3, WET testing, quarterly, independent labs: approximately \$12,000 to \$24,000 per year.
- Tier 4, a one-time baseline bay bioaccumulation survey: approximately \$50,000 to \$150,000.
- Total ongoing annual cost across these tiers: approximately \$23,000 to \$48,000 per year, less than 0.02 percent of PTPC's \$319 million in annual expenditures. By comparison, the New-Indy South Carolina settlement, which comprehensive testing could help avoid, totaled \$103,000,000. For quotes, contact Pace Analytical, Eurofins, or Great Lakes Environmental Center.

5. White Liquor Tank Sizes: Longview vs. Port Townsend**Q: How do the white liquor tank sizes in Longview and Port Townsend compare?**

In Longview, at Nippon Dynawave, the confirmed failed tank capacity was 900,000 gallons. Contents at the time of implosion were approximately 60 percent full, or roughly 600,000 gallons, and approximately 600,000 gallons were released. 2,226 dead fish were recovered from surrounding drainage ditches by June 1, 2026.

In Port Townsend, PTPC's white liquor tank sizes, ages, inspection dates, and secondary containment capacity are not in any public database. White liquor is exempt from the United States Environmental Protection Agency (EPA)'s Risk Management Program (RMP), so there is no required public safety plan on file. PTPC's daily production of 950 to 1,000 tons exceeds Nippon Dynawave's approximately 770 tons, suggesting comparable or greater white liquor storage volumes, but no public document confirms the actual tank sizes. To obtain this information, file a public records request with the Washington State Department of Ecology, or request Tier II hazardous chemical inventory reports from the Jefferson County Local Emergency Planning Committee (LEPC).

6. Worker Safety: Shift Hours, OSHA, and L and I**Q: How many hours do employees work per shift at PTPC?**

Confirmed from PTPC's own job postings on Indeed, Glassdoor, and ZipRecruiter, the schedule is a 4-day rotation on an 8-day tour: 2 day shifts from 5:00 AM to 5:00 PM and 2 night shifts from 5:00 PM to 5:00 AM, followed by 4 days off. Shift changes occur at exactly 5:00 AM and 5:00 PM, twice every day the mill operates. Mandatory overtime is common; employee reviews describe 50 to 60-plus hours per week as normal. Scheduled shutdowns mean 'always 16-hour days' per employee reviews. Reviews also describe understaffing, stating 'Millwrights are doing jobs that used to take 6 people minimum with 3.'

Q: Are there any OSHA complaints against PTPC?

Federal OSHA does not apply in Washington State. Washington is a federally-approved 'state plan state.' Worker safety is governed by Washington Industrial Safety and Health Act (WISHA), administered by the Washington State Department of Labor and Industries (L and I), not federal OSHA. Searching OSHA.gov will not return PTPC's worker safety record. The full Washington Industrial Safety and Health Act (WISHA) inspection and citation history for PTPC is held by L and I and has not been publicly obtained.

Three National Labor Relations Board (NLRB) unfair labor practice cases have been filed: 19-CA-341576, 19-CA-285952, and 19-CB-297178, the latter involving the Steelworkers Union. A public records request can be sent to publicrecords@lni.wa.gov requesting all Washington Industrial Safety and Health Act (WISHA) inspection reports, citations, penalties, and injury or illness records for PTPC, 2015 to present. This is a public record and a matter of urgent community interest.

7. Lawsuits: PTPC, National Precedents, and Class Actions

Q: Are there any lawsuits against PTPC specifically?

PTPC has been the subject of several legal actions across multiple statutes and forums, summarized here by case, action type, year, and outcome.

- Sierra Club v. Port Townsend Paper Corp.: a federal Clean Water Act citizen suit over National Pollutant Discharge Elimination System (NPDES) violations, historic. The court found sufficient evidence to proceed, and the same violations continue today.
- United States Environmental Protection Agency (EPA) Docket Region 10, Case 10-2019-0042: a Clean Water Act enforcement action, 2019. Closed, penalty paid.
- Department of Justice (DOJ) and United States Environmental Protection Agency (EPA) Clean Air Act settlement, over a digester out of compliance since 2001, 2019. Resulted in a \$342,000 penalty settlement.
- National Labor Relations Board (NLRB) Case 19-CA-341576, PTPC LLC: an unfair labor practice case, recent. Active or recently resolved.
- National Labor Relations Board (NLRB) Case 19-CB-297178, Steelworkers Union vs. PTPC: an unfair labor practice case, recent. Active or recently resolved.
- Asbestos and personal injury case over worker exposure to asbestos-containing dryer felts, 2005 (historic). Resulted in a \$242,000 King County jury verdict.

Q: What are the national kraft mill legal precedents?

A kraft containerboard mill in Catawba, South Carolina, operated by New-Indy, released the identical Total reduced sulfur (TRS) chemicals as PTPC: hydrogen sulfide (H₂S), methyl mercaptan, dimethyl sulfide, and dimethyl disulfide, drawing more than 30,000 complaints to state regulators. The United States Environmental Protection Agency (EPA) issued an emergency order in May 2021 under Clean Air Act Section 303, followed by a consent decree in December 2021 and a \$1.1 million civil penalty. A \$103 million total settlement was approved by a federal court in June 2024, including \$18 million paid directly to approximately 6,000 households, or about \$3,000 per household, and \$85 million for remediation, including steam stripper installation, lagoon covers, and environmental repair.

Port Townsend's position is materially stronger than New-Indy's was: approximately 2,000 documented complaints, federal Agency for Toxic Substances and Disease Registry (ATSDR) confirmation of toxic levels, 100-plus years of bay discharge, and a mill still actively operating, meaning both injunction and damages remain available as remedies.

Separately, a Maine kraft mill class action, Demmons v. ND Paper, was filed in October 2022 in United States District Court for the District of Maine. Plaintiffs are approximately 5,900 households within 2.5 miles, alleging nuisance, trespass, and negligence over chronic Total reduced sulfur (TRS) rotten-egg emissions identical to PTPC's. On September 12, 2023, the court denied the motion to dismiss on the nuisance and negligence claims, finding them legally viable and allowing the case to proceed to discovery. Port Townsend's position is stronger here too: approximately 2,000 documented complaints versus 70 in Maine, federal Agency for Toxic Substances and Disease Registry (ATSDR) confirmation, and a mill still actively operating.

8. Who Owns PTPC: Atlas Holdings**Q: Who owns PTPC?**

- Current owner: Atlas Holdings LLC, a private equity firm based in Greenwich, Connecticut.
- Founders: Andrew Bursky and Tim Fazio, who founded Atlas Holdings in 2002.
- Acquisition: October 2022, via purchase of Crown Paper Group; terms not disclosed (Peninsula Daily News, October 14, 2022).
- Atlas portfolio: more than \$16 billion in capital (Atlas Holdings press release, May 5, 2025); as of March 2026, Blackstone and Blue Owl made a strategic minority investment.
- Public disclosure: none. Atlas Holdings is a private company with no SEC filings and no public shareholders.
- PTPC investment claimed: PTPC's chief executive states 'over \$80 million invested since acquisition.'
- Incoming Crown chairman statement (2022): Randy Nebel said, 'We will be a superb employer, a trusted steward of our communities and a valued partner.' (Peninsula Daily News, October 14, 2022)

- Atlas paper portfolio: Finch Paper, Iconex, Marcal, Millar Western Forest Products, and Twin Rivers Paper, all cited by Atlas at the time of acquisition (Peninsula Daily News, October 14, 2022).
- Good Jobs First Violation Tracker: \$108,020,712 in penalties across 143 violation records for Atlas Holdings portfolio companies.

Acquisition commitments vs. reality

At the time of the acquisition, incoming Crown Paper Group chairman Randy Nebel stated, 'Our goal is simple; we will be a superb employer, a trusted steward of our communities and a valued partner for our customers and suppliers.' Atlas co-founder Tim Fazio said, 'Paper, packaging and allied industries remain an important and growing sector for Atlas. We are thrilled to welcome the Crown team and excited to get to work in building an even stronger company.' Port Townsend City Manager John Mauro said at the time of acquisition, 'The city perspective is the water supply, which was built into our water contract that was approved last year.'

In the three-plus years since, PTPC has continued 11 of 12 quarters in Clean Air Act High Priority Violation, has been subject to two new formal enforcement orders in April and May 2026, had 9 Resource Conservation and Recovery Act (RCRA) emergency preparedness failures in June 2025, and had a 114,000 gallon spill in April 2025 (source: peninsuladailynews.com/2022/10/14/port-townsend-paper-mill-parent-firm-purchased/).

Atlas Holdings' own website stated, in April 2023 (atlasholdingsllc.com/our-approach/safety/), 'Our view on safety is clear; all Atlas operating companies must pursue and achieve WORLD-CLASS SAFETY PERFORMANCE and are HELD ACCOUNTABLE for reaching that goal. We believe all workplace accidents are preventable.' The documented record since Atlas acquired PTPC in October 2022 stands in contradiction to that statement.

- 11 of 12 quarters in Clean Air Act High Priority Violation, continuous and unresolved.
- June 2025: 9 Resource Conservation and Recovery Act (RCRA) violations including emergency preparedness failures.
- April and May 2026: 2 new formal Clean Water Act enforcement orders, within the same month.
- Employee reviews describe mandatory 50 to 60-plus hour weeks, deferred maintenance, and aging equipment.
- Agency for Toxic Substances and Disease Registry (ATSDR)'s 2024 finding: toxic compounds above health reference levels near the facility.

The question for county and city commissioners is who at Atlas Holdings is specifically 'held accountable' for this record, and what that accountability has looked like in practice.

9. PTPC's Claims, Toxic Exposure, and Hidden Data

Q: What does PTPC say about itself, and does it match the record?

PTPC describes itself as 'a responsible neighbor and preserving the environment.' On April 23, 2025, PTPC announced 156 consecutive days without a recordable injury, the highest in 25 years. This press

release was issued approximately one month before the April 2025 discharge of 114,000 gallons of untreated wastewater into Port Townsend Bay, PTPC's largest documented spill. A recordable injury is a cut, a fall, a burn, an acute traumatic event; it says nothing about chronic toxic exposure.

The same company calling itself a 'responsible neighbor' has 13-plus documented industrial spills into Port Townsend Bay since 2013, 11 of 12 quarters in Clean Air Act High Priority Violation, and federal scientists confirming toxic compounds above health reference levels near the facility.

Q: What data should be released, and what might PTPC be hiding?

Documents that exist at PTPC but are not public, and why they matter, include the following.

- American Petroleum Institute (API) 653 white liquor tank inspection records: age, corrosion, and last test dates, the most critical missing safety data post-Longview.
- Process Hazard Analysis, required under Process Safety Management (PSM) rules, which describes every way the process could fail. Never disclosed publicly.
- Worker hydrogen sulfide (H₂S) and Total reduced sulfur (TRS) exposure monitoring data. OSHA regulation 29 CFR 1910.1020 requires these records, and workers can request their own. Are workers above OSHA limits near digesters?
- 10 years of National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Reports, which would show trends in toxic compounds entering the bay.
- The Resource Conservation and Recovery Act (RCRA) corrective action plan for the June 2025 emergency preparedness failures.
- Secondary containment calculations: if a tank fails, how much liquid can be contained, and where does the rest go? Port Townsend Bay is downhill.
- Atlas Holdings' internal safety audit since the October 2022 acquisition.

10. Laws and Regulations: What Exists and What's Needed

Q: What tools are available now, without new legislation?

- The Jefferson County Local Emergency Planning Committee (LEPC), required by the Emergency Planning and Community Right-to-Know Act (EPCRA), has authority now to visit PTPC, request chemical inventories, review emergency plans, and make information public.
- EPCRA Tier II reports: PTPC must file annual chemical inventory reports with the Local Emergency Planning Committee (LEPC) and the Washington State Department of Ecology, public records that can be requested today.
- Washington Industrial Safety and Health Act (WISHA), administered by the Washington State Department of Labor and Industries (L and I), is stricter than federal OSHA and can conduct proactive inspections without a complaint. An emergency Washington Industrial Safety and Health Act (WISHA) inspection of PTPC's white liquor systems is fully justified post-Longview.

- The Washington Chemical Accident Prevention Program (CAPP), under Revised Code of Washington (RCW) 90.48, has broader state authority than the federal Risk Management Program (RMP) for catastrophic release risk, and can be invoked for white liquor storage now.
- National Pollutant Discharge Elimination System (NPDES) permit renewal: the Washington State Department of Ecology can add WET testing, continuous monitoring, and disclosure requirements. This is the strongest near-term state lever.
- City Council: no new law is needed to pass a formal resolution requesting PTPC safety transparency and refer the matter to the Washington State Department of Ecology, L and I, and the United States Environmental Protection Agency (EPA).

Contra Costa County, California: the industrial safety ordinance gold standard

Contra Costa County's Industrial Safety Ordinance has been called 'the strongest local ordinance in the nation,' enacted after the Chevron Richmond fire. It was expanded in September 2024 to cover tanks of 50,000 gallons or more. It requires independent safety audits with public results, regular county inspections, fines for deficiencies, and root cause analysis after any major incident. Jefferson County can enact this now. The Longview disaster is Port Townsend's Chevron Richmond moment.

New Washington State laws urgently needed

- A WA Kraft Mill White Liquor Tank Safety Act, requiring independent American Petroleum Institute (API) 653 tank inspections with results filed publicly with the Washington State Department of Ecology.
- A WA Fence-Line Air Monitoring Act, providing real-time public air data on the California model. PTPC qualifies immediately under the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 finding. The American Geophysical Union's TEX has an active Port Townsend project, published January 2026 and in progress, designing a community sulfur monitoring network with pro-bono atmospheric scientists Haroula Baliaka (Caltech) and Dr. Edmund Seto (University of Washington Director, Center for Environmental Health Equity). Source: thrivingearthexchange.org/project/port-townsend-wa/
- A WA Chemical Accident Prevention Expansion, adding white liquor to CAPP regardless of the federal Risk Management Program (RMP) exemption.
- A WA Worker Safety Report Fast-Track Act, under which worker reports of structural integrity concerns would trigger a mandatory 30-day inspection. This reflects the Longview sinkhole lesson: workers warned the state two months before the disaster, no action was taken, and 11 people died.

11. What Should PTPC Do Now?

Immediate: this week

- Inspect all white liquor storage tanks for structural integrity, corrosion, and pressure anomalies; do not wait for a regulatory directive.
- Review last inspection dates for all chemical storage vessels and address any open L and I items immediately.

- Brief workers, especially those near digesters and chemical recovery areas, on evacuation routes and emergency procedures for a major white liquor release scenario.

Short term: next 30 days

- Engage an independent process safety engineer to audit white liquor tank design, containment berms, and pressure relief systems.
- Review secondary containment capacity: PTPC borders Port Townsend Bay, and a spill into the bay would be catastrophic for the marine environment and the community's fishing and tourism economy.
- Coordinate with Jefferson County Emergency Management on updated emergency response protocols specific to a white liquor release scenario.

Community-facing: proactive disclosure

- Issue a voluntary public statement confirming inspections are underway and committing to full transparency of results.
- Disclose white liquor tank sizes, ages, and last inspection dates to the public and to Jefferson County Emergency Management.
- Monitor the United States Chemical Safety and Hazard Investigation Board (CSB) Longview investigation closely and proactively implement findings rather than waiting for regulatory mandates.

12. Water: The Community's Strongest Lever

Q: How much water does PTPC use compared to the community?

PTPC does not use bay water. The mill draws freshwater from the Big and Little Quilcene Rivers via the Olympic Gravity Water System (OGWS), a nearly 30-mile gravity pipeline built in 1927 to 1928. Port Townsend Bay is the discharge destination for treated wastewater, not the water source for operations.

The City of Port Townsend uses approximately 1 million gallons per day. PTPC uses 10 to 13 million gallons per day, approximately 12 to 13 times more than all Port Townsend residents combined, and approximately 3 to 5 times more than the entire county combined. Jefferson PUD's largest well, Sparling, produces 500,000 gallons per day; PTPC alone uses 20 to 26 times this amount.

- Agreement signed / expires: December 30, 2021 / 2041.
- Rate for both parties: \$1.20 per thousand gallons of raw water, the same rate for both parties despite the massive usage imbalance between them.
- Residents pay: \$4.76 per thousand gallons of treated water, nearly four times the mill's rate.
- Mill annual payment: approximately \$4.6 million in 2024, rising to approximately \$4.9 million by 2031.
- City annual payment: approximately \$432,000 in 2024, rising to approximately \$460,000 by 2031.
- Pipeline replacement cost: \$161 million, estimated over 40 years.

- Hard cap: 14 million gallons per day maximum.
- Drought provision: the city can require the mill to temporarily shut down, a new provision added in 2021.
- Rate renegotiation: due by the end of 2026, an opportunity to formally request safety commitments.

The 2026 rate review: an opportunity to attach safety conditions

The rate model updates every 5 years, and the next update is due by the end of 2026. The City of Port Townsend owns the water rights; PTPC has no independent right to the water. This is the most powerful near-term opportunity to attach conditions to water access, including mandatory independent white liquor tank inspections, public disclosure of all wastewater test results quarterly, WET testing as a contractual water agreement requirement, an independent environmental audit every 3 years, and a specific emergency response protocol for a white liquor release near the bay.

13. Alternative Pulping Methods: Are There Safer Options?

Q: What methods do not use white liquor, and are they safer?

- Kraft pulping, PTPC's current method: uses white liquor (sodium hydroxide (NaOH) and sodium sulfide (Na₂S)); produces Total reduced sulfur (TRS) odor, as demonstrated at Longview; carries a demonstrated explosion and implosion risk; produces the strongest pulp and remains PTPC's current process.
- Mechanical pulping: uses no chemicals; produces no sulfur odor; presents no hazardous storage risk; not viable for PTPC, since the resulting fiber is too weak for containerboard.
- Sulfite (acid) pulping: does not use white liquor, relying on sulfurous acid instead; produces some sulfur dioxide emissions; presents lower risk because the process is acidic rather than caustic; not viable for PTPC, produces weaker fiber, and is a declining process industry-wide.
- Recycled Old Corrugated Cardboard (OCC) fiber: uses no chemicals; produces no odor; presents no hazardous storage risk; partially viable, and PTPC already blends this fiber into its process today.
- Organosolv pulping: does not use white liquor, relying on organic solvent compounds instead; produces no sulfur odor; presents minimal explosion risk; not yet viable at commercial scale, and remains at pilot scale only.

Kraft dominates because it produces the strongest pulp from the widest range of wood species, essential for containerboard. PTPC already blends recycled OCC fiber with virgin kraft; increasing the OCC ratio reduces white liquor volumes and proportionally reduces catastrophic release risk without changing the product line. Organosolv, a benign kraft alternative, produces no sulfur compounds and no large caustic tanks, but remains at pilot scale only.

14. The National Picture: Kraft Mills and Systemic Failure

Q: What is the national overview of kraft paper plants in the United States?

- United States paper mill businesses: 165 as of 2025, a declining figure (source: IBISWorld).

- United States paper industry annual revenue: approximately \$80 billion (source: First Research).
- United States states with kraft or pulp mills: 22 or more states (source: United States Environmental Protection Agency (EPA) mill directory).
- Kraft share of United States chemical pulping: approximately 70 to 75 percent by volume (industry estimate).
- Estimated kraft revenue: approximately \$60 to \$70 billion annually, calculated from American Forest and Paper Association data.

The Environmental Integrity Project's May 2025 study of 185 large United States paper mills called out PTPC by name: Clean Air Act violation in 11 of 12 quarters, 5 enforcement actions, and \$44,000 in total water fines. The study also found the oldest boiler of all 185 mills was installed in 1928 at Nippon Dynawave in Longview, the same plant that killed 11 workers, published 8 months before the disaster.

Q: What has happened at other kraft mills?

- New-Indy, Catawba, South Carolina: more than 50,000 odor complaints; United States Environmental Protection Agency (EPA) action for 'imminent and substantial endangerment' under Clean Air Act Section 303; \$103 million settlement in June 2024, including \$18 million paid directly to approximately 6,000 households.
- International Paper, Bogalusa, Louisiana: a June 2015 black liquor evaporator rupture; a \$1.25 million settlement in 2022; a \$500,000 Total reduced sulfur (TRS) consent settlement in February 2025; a new class action filed in September 2025.
- Domtar, Kingsport, Tennessee: a federal class action filed in March 2026, currently active, covering more than 10,000 affected households, over hydrogen sulfide (H₂S) from a 23-acre wastewater lagoon. Domtar's defense is that 'compliance with regulations bars liability'; if this defense fails, PTPC faces identical exposure under the Agency for Toxic Substances and Disease Registry (ATSDR) 2024 Port Townsend finding.

The community pattern matches Port Townsend exactly: odors dismissed as nuisance, thousands of complaints, years of inaction, federal scientists confirming toxic levels, enforcement actions, inadequate penalties, and litigation. Port Townsend is not ahead of this curve; it is somewhere in the middle. The question for Port Townsend is whether accountability comes before or after a disaster.

15. City and County Perspectives: Taxes, Water, and Economic Dependency

Q: How do the City of Port Townsend and Jefferson County each view this issue?

City of Port Townsend

- Owns the water rights to the Quilcene watershed; PTPC has no independent right to the water.
- The 2021 agreement marked the first time in 65 years the mill pays per gallon, now \$1.20 per thousand gallons.

- Both parties pay the same rate despite a 12-to-1 usage ratio; residents pay \$4.76 per thousand gallons for treated water.
- August 2025: the city issued a mandatory conservation notice during a pipeline leak, while the mill kept running.
- The city can require a mill shutdown during droughts, a new 2021 provision establishing conditional access.
- The 2026 rate review is due: an opportunity to formally request voluntary safety commitments from PTPC.

Jefferson County

- PTPC provides 40 percent of all manufacturing jobs in Jefferson County.
- The mill has 300-plus direct employees; average salary is \$92,600 versus a county median income of \$64,800.
- PTPC self-reports nearly \$4 million in annual local and state taxes.
- PTPC reports \$319 million in direct expenditures in 2024.
- This economic dependency creates structural pressure to accommodate rather than challenge the mill, a regulatory capture risk.

Both bodies must internalize a critical distinction: demanding a white liquor tank inspection is not threatening the mill's existence. It is protecting the 300 workers inside it, the community around it, and the bay beneath it. The Longview workers did not die because someone demanded a safety inspection; they died because no one did. The economic argument for the mill's importance is exactly why its safety must be verified. A Longview-scale disaster at PTPC would end 300 jobs, devastate the bay economy, and destroy the community relationship with the mill permanently.

Q: Does the City of Port Townsend receive property tax from PTPC?

The mill is not in the City of Port Townsend, so the city gets zero property tax. PTPC sits on unincorporated Jefferson County land, outside city limits. The City of Port Townsend receives zero property tax from the mill. All property tax flows to Jefferson County, the state, school districts, and special districts. The city's entire financial relationship with the mill is through the water agreement, not through any direct tax revenue. For the exact breakdown of PTPC's taxes by recipient, contact the Jefferson County Assessor at 360-385-9105 or search trueweb.jeffcowa.us.

Mission

We want PTPC 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.

Sources and Citations

All factual claims in this document are drawn from the following sources, verified during research for this document.

1. United States Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO): Live PTPC Facility Report, Facility Registry Service identifier 110000490326.
echo.epa.gov/detailed-facility-report?fid=110000490326
2. Washington State Department of Ecology: PTPC Facility Page.
ecology.wa.gov/regulations-permits/permits-certifications/industrial-facilities-permits/port-townsend-paper
3. Washington State Department of Ecology: September 2025 Penalty (\$20,000).
ecology.wa.gov/about-us/who-we-are/news/2025/sept-18-port-townsend-paper-penalty
4. Washington State Department of Ecology: December 2022 Penalty (\$56,250).
ecology.wa.gov/about-us/who-we-are/news/2022/dec-14-port-townsend-paper-penalty
5. Agency for Toxic Substances and Disease Registry (ATSDR) Health Consultation: PTPC.
atsdr.cdc.gov/sites/port_townsend/index.html
6. PTPC Company FAQ. ptpc.com/education/
7. Water Supply Agreement, December 30, 2021. cityofpt.us/sites/default/files/fileattachments/public_works/page/6251/water_supply_agreement_123021_final_executed_exhibits_usw_active01_505396662_1.pdf
8. New-Indy \$103 Million Settlement. newindyclassaction.com
9. New-Indy United States Environmental Protection Agency (EPA) Consent Decree and \$1.1 Million Penalty. epa.gov/newsreleases/epa-proposes-settlement-agreement-new-indy-address-emissions-hydrogen-sulfide-catawba
10. Environmental Integrity Project (EIP), 2025 United States Paper Mill Study. environmentalintegrity.org/news/pollution-from-the-u-s-paper-industry-is-vastly-under-reported-new-study-reveals/
11. Atlas Holdings: Crown Paper Group Acquisition announcement.
atlasholdingsllc.com/news/atlas-holdings-acquires-crown-paper-group/
12. Peninsula Daily News: Mill Acquisition Reported Locally, October 14, 2022.
peninsuladailynews.com/2022/10/14/port-townsend-paper-mill-parent-firm-purchased/
13. Good Jobs First Violation Tracker: Atlas Holdings. violationtracker.goodjobsfirst.org/parent/atlas-holdings
14. National Labor Relations Board (NLRB) Cases: nrlb.gov/case/19-CA-341576, nrlb.gov/case/19-CA-285952, and nrlb.gov/case/19-CB-297178.
15. Port Townsend Leader: Mill Cites \$319 Million Economic Impact.
ptleader.com/articles/archives/mill-cites-319m-economic-impact/
16. Peninsula Daily News: \$342,000 United States Environmental Protection Agency (EPA) Clean Air Act settlement (2019).
peninsuladailynews.com/news/port-townsend-paper-corporation-settles-with-epa-for-violation-of-clean-air-act/
17. Maine federal court order: Demmons v. ND Paper, September 12, 2023.
govinfo.gov/content/pkg/USCOURTS-med-1_22-cv-00305/pdf/USCOURTS-med-1_22-cv-00305-0.pdf