

Port Townsend Paper Mill: Complete Timeline, 1905 to 2026

A Documentary Record of Ownership, Violations, and Regulatory History

Citizens for Safe Water and Air - Port Townsend

PORT TOWNSEND, WA

This research has been compiled to the best of our ability from named public sources. If you believe any fact presented here is incorrect or incomplete, please contact safewaterandair@gmail.com so it can be reviewed and corrected.

1. About This Timeline

This timeline compiles publicly documented history of the Port Townsend Paper Company (PTPC) mill at Glen Cove, from S'Klallam ancestral territory and the 1855 Treaty of Point No Point through the May 2026 white liquor tank implosion at Nippon Dynawave Packaging Company in Longview, Washington, and this campaign's resulting community mobilization. Entries are organized chronologically within six historical eras, followed by four reference sections summarizing the Olympic Gravity Water System, S'Klallam treaty rights, the white liquor tank regulatory gap, and the facility's fire record.

Each entry falls into one or more of the following categories, drawn from the original research record:

- Corporate ownership changes and parent company history.
- Facility expansions, shutdowns, and major operational changes.
- Documented pollution events, spills, and discharge violations.
- Fines, penalties, consent orders, and enforcement actions.
- Fires at the facility and fire department response, 2017 to 2026.
- Community and worker health findings and federal studies.
- Worker safety, hazmat inspection findings, and tank risk.
- Olympic Gravity Water System history, failures, and leverage.
- Permits, renewals, expirations, and regulatory decisions.
- Regulatory gaps and legal voids leaving communities unprotected.
- S'Klallam treaty rights, ancestral territory, and bay discharge implications.
- Community actions, advocacy groups, odor complaints, and petitions.
- Investigative reporting and public disclosure milestones.
- Economic impact, water rates, employment, and financial history.
- Greenhouse gas emissions and climate context.

- The Nippon Dynawave Longview disaster of May 26, 2026, and its aftermath.

2. Ancestral Territory, Water System Origins, and Founding (Pre-Contact to 1929)

S'Klallam people are dispossessed from qatay; Port Townsend is rescued from economic collapse; the water system and the paper facility are built together. Port Townsend Bay, known to the S'Klallam people as qatay, is the ancestral home of the S'Klallam (Klallam) Tribe. The S'Klallam winter in large communal cedar pole-and-plank homes along the shoreline, fishing and harvesting shellfish from the bay as a primary food source. The bay that PTPC will one day discharge into is the same bay the S'Klallam have depended on for generations.

Pre-Contact (around 1808)

Chief Chetzemoka, born at qatay around 1808, leads the S'Klallam community there.

January 26, 1855

The Treaty of Point No Point is signed. The S'Klallam, Chemakum, and Twana (Skokomish) cede more than 438,000 acres of ancestral territory to the United States government. Negotiations are conducted in Chinook Jargon, a trade pidgin of limited vocabulary, not in the tribes' own languages. In exchange, the tribes retain the right to take fish and shellfish at their usual and accustomed grounds and stations, which explicitly include Port Townsend Bay.

1855 to 1872

Chief Chetzemoka persuades other leaders to sign. Most S'Klallam refuse to relocate to the Skokomish Reservation. The Superintendent of Indian Affairs for Washington Territory orders the destruction of the S'Klallam settlement at qatay (Port Townsend) and the forced removal of S'Klallam and Chemakum people to the Skokomish Reservation. S'Klallam homes are burned by government officials. Beginning in 1871, city ordinances legally ban S'Klallam people from entering white settlements without a chaperone, and those who defy the ordinance face fines and incarceration. By 1872, the majority of those forcibly removed return to other S'Klallam settlements.

The S'Klallam retain their treaty rights to fish and harvest shellfish in Port Townsend Bay.

1851 to 1890

Non-Indian settlers arrive in Port Townsend beginning in 1851. The city becomes Puget Sound's customs port of entry. The railroad boom of 1889 to 1890 collapses when Union Pacific abandons its transcontinental link, triggering a 36-year economic depression. Population falls from over 7,000 to fewer than 2,000.

1905

The Snow Creek water system begins operation, Port Townsend's first piped water supply. By the mid-1920s it is decaying and barely sufficient for the city's needs.

July 1927

Zellerbach Corporation of San Francisco announces plans to build a kraft paper facility at Glen Cove, three miles south of downtown on Port Townsend Bay. The city competes aggressively against Aberdeen for the site, seeing it as the only path out of economic depression.

September 1927

Construction begins simultaneously on the facility and the Big Quilcene Water Extension Project, a 29-mile pipeline from the Big Quilcene River. The city issues \$600,000 in municipal bonds. Crown Zellerbach agrees to pay \$200,000 in advance royalties and \$10,000 per year to lease and operate the water system. Over 600 workers are hired. The Olympic Piledriving Company drives 6,000 piles into Glen Cove tide flats for the 850-foot main building.

April 1928

Zellerbach merges with Crown Willamette Pulp and Paper, forming Crown Zellerbach Corporation, briefly the second-largest paper company in the United States. The Federal Trade Commission questions the merger in 1934 as a potential antitrust violation but takes no action.

October 6, 1928

The Crown Zellerbach kraft paper facility begins production. The first digester starts and the first paper machine goes online. Capacity is 200 tons of pulp per day, requiring 10 million gallons of water daily. Wastewater discharge into Port Townsend Bay, the S'Klallam treaty fishing and shellfish harvesting ground, begins on this date and continues for over 100 years.

October 1928

The Big Quilcene timber crib diversion and 28.5 miles of 30-inch wood stave pipe are completed, replacing the failing Snow Creek system. The City of Port Townsend owns the Olympic Gravity Water System (OGWS) facilities and water rights but leases operation and maintenance to the paper company from day one, an arrangement maintained through six ownership changes over nearly 100 years.

1929 to 1939

By 1929, the facility employs 275 workers with an annual payroll of \$325,000. The Great Depression begins, but PTPC does not shut down at any point during 1929 to 1939, remaining the economic anchor of Port Townsend through the worst economic period in American history.

3. Growth, Peak Employment, and First Environmental Regulation (1930 to 1983)

The facility expands through wartime, reaches peak employment, and confronts the first federal environmental laws.

1933

The facility expands with a breakdown plant for a steady wood chip supply. Workforce grows to 375. By 1935 a bag factory is added; by the 1940s it becomes a multi-wall bag factory. By 1949, the facility employs 630 people with a \$2,200,000 annual payroll.

1950

PTPC wins the National Safety Council award for safety, in competition with 70 other pulp and paper operations nationwide, the high-water mark of its safety record.

1955

By 1955, the facility employs 820 people with a \$3,800,000 annual payroll.

1952 to 1972

The original 1928 wood stave pipeline is progressively replaced with welded steel pipe. The 2021 Water Supply Agreement identifies this pipeline as requiring a 125-year replacement schedule beginning approximately 2037, at an estimated cost of \$161 million in 2021 dollars. Much of this steel pipe is now 50 to 70 years old and approaching or exceeding its design life.

1955 to 1956

The Little Quilcene River diversion dam is constructed, conveying water via a one-mile pipeline to the new Lords Lake Reservoir, adding 500 million gallons of raw water storage capacity.

1972

The federal Clean Water Act is enacted, establishing the National Pollutant Discharge Elimination System (NPDES) permit requirement for industrial discharges into navigable waters. Discharges from PTPC into Port Townsend Bay, ongoing since 1928, 44 years, come under federal regulation for the first time.

1974

The Boldt Decision (United States v. Washington) confirms that treaty tribes are entitled to 50 percent of the harvestable fish in their usual and accustomed fishing grounds. Port Townsend Bay is within the adjudicated usual and accustomed grounds of the Jamestown S'Klallam and Port Gamble S'Klallam Tribes. PTPC's ongoing discharge into the bay directly affects a resource with federal treaty protection.

1978 to 1979

A company-wide labor union strike shuts down operations from August 1978 to April 1979. Approximately 100 jobs are permanently lost. The multi-wall bag plant never reopens.

1980

Crown Zellerbach installs new furnaces, smokestacks, and improved wastewater treatment, the first major environmental infrastructure upgrade since the facility's founding in 1928, 52 years earlier.

December 1983

Crown Zellerbach sells the Port Townsend facility to Haindl Papier GmbH of West Germany. The operation is renamed PTPC. Workforce at the time of sale is approximately 500 workers.

4. Ownership Instability, Private Equity, and Early Violations (1984 to 2015)

Four ownership changes occur in 30 years. Enforcement begins. The regulatory gap around white liquor tanks is never addressed.

1985

PTPC's obligation to pay for municipal water supply ends, 57 years after the 1928 founding agreement. From 1985 onward, the facility draws from the Quilcene watershed effectively without charge to itself. This arrangement is not renegotiated until 2021, 36 additional years later.

1985: Origin of the White Liquor Tank Regulatory Gap

Above-ground tanks holding white liquor at kraft paper facilities are not required to undergo inspection by any state or federal agency. Unlike underground storage tanks, which are inspected every three years by Ecology for groundwater risk, and oil and gas tanks, which are subject to mandatory state and federal inspections, above-ground kraft facility white liquor tanks fall into a legal void, with responsibility for inspection left entirely to the operator. This gap exists throughout this era and remains in place through the Longview disaster of 2026.

1986

Congress enacts the Emergency Planning and Community Right-to-Know Act, requiring industrial facilities to disclose hazardous chemical inventories to Local Emergency Planning Committees and the public. PTPC begins filing annual Tier II chemical inventory reports, which are not proactively made public.

1989

Tribes file suit under *United States v. Washington* to defend their shellfishing rights. Because the 1974 Boldt Decision applied only to finfish, tribal members harvesting shellfish in their usual and accustomed grounds, including Port Townsend Bay, have been subject to arrest and prosecution. The suit seeks to extend treaty protections to shellfish.

1990

A major revision of the Clean Air Act (CAA) establishes National Emissions Standards for Hazardous Air Pollutants and New Source Performance Standards for kraft pulp facilities under 40 Code of Federal Regulations (CFR) Parts 60 and 63.

1990 to 2025

United States Environmental Protection Agency (EPA) enforcement tracking via Enforcement and Compliance History Online (ECHO) begins formally in 1990. Over 1990 to 2025, the record accumulates 149 permit violations or triggers and 54 regulatory enforcement actions against PTPC, roughly one enforcement action every 8 months for 35 consecutive years.

October 1991

Ecology fines PTPC \$20,000 for a water quality violation, the largest fine issued to the facility until 2016, a gap of 25 years. Ecology later confirms no larger fines appear in their records for that period.

January 22, 1993

Bunker C fuel oil spills from a pipeline at the PTPC facility into Port Townsend Bay, discovered at 7:30 p.m. Pipeline capacity is reported at 2,000 gallons; the quantity actually spilled cannot be determined due to darkness. The National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator is contacted at 11:30 p.m. and requested to provide worst-case trajectory analysis, identification of resources at risk, and protection strategy recommendations before a United States Coast Guard (USCG) overflight at first light. The United States Coast Guard (USCG) District 13 coordinates the response.

1994

Judge Edward Rafeedie rules in *United States v. Washington* that the Boldt Decision extends to shellfish as well as finfish, known as the Rafeedie Decision. All public and private tidelands within the tribes' usual and accustomed grounds are subject to tribal treaty harvest rights. Port Townsend Bay, receiving PTPC's daily discharge, is within those grounds. The permit record for PTPC acknowledges a shellfish harvesting closure in Port Townsend Bay. The Rafeedie Decision makes this closure a direct impairment of federally protected treaty rights.

1995

The original 1928 timber crib diversion on the Little Quilcene River is replaced with a modern concrete diversion structure.

December 1997

Haindl Paper GmbH sells the facility to Northwest Capital Appreciation Inc., a Seattle-based private equity firm, which recruits former Weyerhaeuser executive John Begley as president. The sale is credited with saving the operation from closure.

2001 to 2017

A digester at the facility operates in violation of Clean Air Act (CAA) rules for approximately 16 years before the United States Environmental Protection Agency (EPA) Region 10 discovers the violation, entirely missed by Ecology's routine inspections, a pointed confirmation that routine state oversight is inadequate.

March 2001

Northwest Capital Appreciation purchases Crown Packaging Ltd. of British Columbia for \$61.5 million, adding four box and packaging plants. Combined enterprise revenues exceed \$200 million annually.

2004 to 2007

The Washington Department of Health receives 285 odor complaints recorded by PTPC between January 2004 and July 2007. The PT AirWatchers community advocacy group forms. The MillOdorous Facebook group forms.

2006

PTPC declares Chapter 11 bankruptcy. The facility continues operating throughout.

2007

PTPC emerges from Chapter 11 under Goldentree Asset Management of New York, a turnaround specialist with \$22 billion in assets.

2010 to 2012

PTPC proposes a \$55 million biomass cogeneration project. PT AirWatchers and regional environmental groups oppose it citing air quality concerns. The project is shelved when natural gas prices drop dramatically.

September 16, 2013

Ecology issues PTPC's National Pollutant Discharge Elimination System (NPDES) water discharge permit (No. WA0000922), set to expire October 1, 2018.

2013 Onward

Documented industrial spills into Port Townsend Bay begin accumulating in the public record; by 2026, at least 13 separate discharge incidents are documented. Port Townsend Bay receives approximately 12 million gallons of the facility's treated wastewater daily, more than all other Jefferson County dischargers combined.

2014

The Washington Department of Fish and Wildlife conducts a crab and prawn tissue study in Marine Area 7. Polycyclic aromatic hydrocarbon contamination is found to be statistically comparable to levels near Seattle and Tacoma. A human health risk assessment is never completed.

February 2015

Lindsay Goldberg LLC of New York purchases the facility from Goldentree, forming Crown Paper Group, led by executives formerly at Smurfit-Stone Container and RockTenn.

5. Documented Violations, Health Findings, and Community Awakening (2015 to 2021)

Violations accumulate across air, water, and fire as community groups, journalists, and federal scientists build the public record.

2013 to 2016

Ecology tracks annual odor complaints: 340 in 2013, 567 in 2014, 445 in 2015, and 244 in 2016. Residents report rotten egg and pungent acid smells causing eye irritation, throat inflammation, headaches, and nausea. PT AirWatchers grows to 176 members; MillOdorous has 133 Facebook members.

August 19, 2016

Ecology inspectors observe an emissions release: corrosion created a 1-inch hole in an exhaust duct, allowing small-particle pollution to bypass PTPC's control systems. It is not fixed until scheduled maintenance the following month.

November 10, 2016

A second emissions release occurs: a damper in a main exhaust stack becomes stuck, allowing emissions to escape. It is found by routine testing and reported by PTPC staff.

2017: Fine for 2016 Emissions Incidents

Ecology fines PTPC \$30,000 for the two 2016 emissions incidents, described at the time as the largest fine since 1991, a 25-year gap.

July 2017 (Some Source Material Indicates April 2017)

A United States Environmental Protection Agency (EPA) Region 10 inspector discovers a Clean Air Act (CAA) violation involving a digester that had been in violation since at least 2001, 16 continuous years of noncompliance, entirely missed by Ecology's routine inspections.

August 3, 2017

Fire breaks out at the PTPC recovery room. PTPC calls 911 reporting a major fire, then describes it to the press as a minor fire. The company's own brigade extinguishes the fire before East Jefferson Fire Rescue (EJFR) arrives. Firefighters confirm the fire extended to the second floor and roof. Mutual aid responds from Naval Magazine Indian Island, Port Ludlow, and Discovery Bay. The cause is attributed to hot, dry weather.

There are no injuries.

November 2017

Ecology fines PTPC \$4,500 for exceeding the permitted carbon monoxide limit.

April 2018

Notice of Construction Order 16293 is issued, governing PTPC's air emission sources and establishing emission limits for major combustion sources. PTPC begins a phased evolution upgrade of its distributed control system, the computerized system governing all facility operations, specifically designed to proceed in stages to avoid a weeks-long production shutdown. ABB migrates the existing Human Machine Interface to the ABB Ability System 800xA.

2018

A State Environmental Policy Act (SEPA) checklist for PTPC is completed with seven mandatory questions left unanswered. It is accepted without resolution of the missing responses.

Fall 2018

The Agency for Toxic Substances and Disease Registry (ATSDR) deploys air monitors at eight fixed sites within three miles of PTPC for 10 weeks: six residential locations, one public school, and one business. Measured compounds include hydrogen sulfide, methyl mercaptan, dimethyl sulfide, dimethyl disulfide, sulfur dioxide, particulate matter, and aldehydes. Results are significantly higher during facility operations than during shutdown periods.

October 1, 2018

PTPC's National Pollutant Discharge Elimination System (NPDES) water discharge permit expires. Ecology places it on administrative extension. The facility continues discharging treated wastewater into Port Townsend Bay under an expired permit. This administrative extension runs for nearly seven years until a new permit is issued in May 2025.

October 24, 2018

A wood chip pile fire from spontaneous combustion burns 30 feet high by 100 feet across. PTPC fights it for hours before calling East Jefferson Fire Rescue (EJFR) at 5:30 p.m. Loaders scoop burning chips to open areas. East Jefferson Fire Rescue (EJFR) remains on scene until nearly 9 p.m.

May 20 to June 5, 2019

PTPC settles with the United States Environmental Protection Agency (EPA) for the 16-year Clean Air Act (CAA) violation. Payment of \$342,000 is received June 5, 2019, under United States Environmental Protection Agency (EPA) Docket CAA-10-2019-0071. In the same month, Ecology issues a Determination of Nonsignificance for the State Environmental Policy Act (SEPA) checklist despite the seven unanswered mandatory questions; community advocates document this timing as critical.

August 2019

Fire breaks out in the PTPC paper bale holding area, approximately one acre in size and about one-third full. Smoke is visible on the Port Townsend public webcam. There are no injuries and the cause is undetermined.

Fall 2019

The Messing-Durkee digester, which cooked sawdust into kraft pulp fiber, is decommissioned as part of the United States Environmental Protection Agency (EPA) Clean Air Act (CAA) settlement agreement. Simultaneously, PTPC completes an upgrade of its pulper, switching from a batch process to a continuous process. Old corrugated container recycled fiber processing capacity doubles from 400 tons to 800 tons per day. Maximum facility capacity increases from 480 to 720 oven-dried tons of pulp per day. Fresh water consumption is reduced by approximately 1 million gallons per day, and approximately 4 jobs are added.

General Manager Kevin Scott recounts: "When we told them of our plan, we said, 'How about we shut it down?' They were very agreeable."

2020 to 2021

Nearly 2,000 odor complaints are recorded by Ecology and PTPC between 2016 and 2021. Residents describe rotten egg and pungent acid odors causing eye irritation, throat inflammation, headaches, and impacted quality of life.

December 30, 2021

The City of Port Townsend and PTPC sign a new 20-year Water Supply Agreement, the first substantive change since 1956, a 65-year gap. Key terms: PTPC pays for water for the first time, approximately \$4.7 million per year; usage is capped at 14 million gallons per day; the city may require shutdowns during drought with priority to human consumption; \$161 million in infrastructure

refurbishment is identified over 40 years; and the rate model is updated every five years, with the next update due at the end of 2026. Environmental advocates note the agreement sets the facility's existing 11 million gallons per day usage as the baseline without seeking conservation reductions.

PTPC accounts for over 91 percent of all water consumed from the Quilcene watershed.

November 2021 to March 2022

PTPC spills approximately 800 gallons of untreated toxic wastewater into Port Townsend Bay and exceeds National Pollutant Discharge Elimination System (NPDES) permit discharge limits 14 times. PTPC attributes the violations to leaking pipes, equipment failures, and a severe winter freeze.

6. Atlas Ownership, Fires, Violations, and Investigative Journalism (2022 to 2025)

A new owner inherits a documented violation record. Fires multiply. Journalism exposes the enforcement gap.

January 22, 2022

The most serious fire in recent PTPC history occurs. A 200-yard wood chip conveyor belt spanning six floors is fully engulfed at 2:40 p.m., with black smoke visible from Port Townsend to Marrowstone Island. Arriving firefighters find the conveyor belt sprinkler system non-operational, with a part missing. East Jefferson Fire Rescue (EJFR) Chief Bret Black states: "There's room for improvement." Damage totals \$500,000. Mutual aid responds from Port Ludlow, Discovery Bay, Clallam County, and Kitsap County, with at least 30 personnel on scene. Production is crippled for three weeks.

The cause is undetermined, and the general manager declines to comment on the sprinkler failure.

March 12, 2022

A second fire occurs in 49 days, in the woodmill building's second-floor conveyor belt. The PTPC crew cannot reach it with hoses. East Jefferson Fire Rescue (EJFR) finds active fire in sawdust, rubber belting, and grease from roller bearings, with spot fires running the full length of the belt. The cause is undetermined, attributed to a hot motor in the area. No substantive answers are given on lessons learned from two fires in seven weeks.

May 2022

Ecology fines PTPC \$27,000 for the November 2021 to March 2022 water quality violations: 800 gallons of untreated toxic wastewater into Port Townsend Bay plus 14 exceedances of permit limits.

July 6, 2022

Emissions from the recovery furnace exceed hazardous air pollutant limits required under the air quality permit. A clog in the emissions treatment system limits performance. It is discovered and corrected by PTPC the next day.

August 2022

Ecology issues PTPC's Air Operating Permit, the master document governing all air pollution requirements at the facility, expiring August 2027. This is the first air operating permit renewal in years, governing emissions of hazardous air pollutants, sulfur compounds, particulate matter, and carbon monoxide from all combustion sources.

October 2022

Atlas Holdings LLC, headquartered in Greenwich, Connecticut, completes acquisition of Crown Paper Group, including PTPC. Atlas Holdings has more than \$16 billion in capital, per an Atlas Holdings press release dated May 5, 2025, and states on its website that all portfolio companies "must pursue and achieve world-class safety performance."

December 2022

Ecology fines PTPC \$56,250 for the July 6 recovery furnace exceedance, the largest single air quality fine in the facility's documented history. Ecology notes hazardous air pollutants particularly endanger children, adults over 65, and people with respiratory conditions.

December 14, 2022

Fire breaks out in a large concrete vault at the PTPC facility. One firefighter is hospitalized for exhaustion. East Jefferson Fire Rescue (EJFR) Chief Black publicly states the department is spread too thin and lacks sufficient firefighters for a major industrial complex fire under National Fire Protection Association (NFPA) standards. East Jefferson Fire Rescue (EJFR)'s Community Risk Assessment formally designates the facility as a high-hazard district requiring additional minimum staffing.

2023

Ecology issues two separate penalties to PTPC for water quality violations that occurred in 2022.

2020 to 2024: Cumulative Enforcement Record

PTPC accumulates 11 of the last 12 quarters of Clean Air Act (CAA) High Priority Violation status, one of the longest periods tracked by the United States Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO). Over five years, 23 informal enforcement actions are taken with total Clean Air Act (CAA) penalties of \$63,750, an average of less than \$2,800 per action for a facility producing 1,000 tons of paper per day. Total penalties across all environmental statutes over five years reach \$99,750.

June to July 2024

The Agency for Toxic Substances and Disease Registry (ATSDR) publishes Health Consultation 334-170, its findings from the 2018 air monitoring investigation. Federal scientists conclude sulfur compounds were measured near PTPC above United States Environmental Protection Agency (EPA) chronic health reference concentrations during facility operations. The Washington State Department of Health's existing guidance, stating paper facility odors are "rarely at levels that harm health," directly contradicts the federal finding for Port Townsend specifically. The Agency for Toxic Substances and Disease Registry (ATSDR) formally acknowledges a full community health study cannot be conducted due to missing data. The report is presented publicly at Port Townsend's Marine Pope Building on July 10, 2024.

August 2024

A cracked coupling in the Olympic Gravity Water System (OGWS) pipeline leaks more than half a million gallons per day. An estimated 40 million total gallons are lost before crews locate and repair the failure. The city issues a mandatory water conservation notice and draws down City Lake Reservoir.

October 2024

Ecology releases the draft National Pollutant Discharge Elimination System (NPDES) permit renewal for public comment, six years after the prior permit's expiration. The draft contains new water-quality limits for three confirmed carcinogens, benzo(a)anthracene, chlordane, and pentachlorophenol, though final compliance is not required until 2029. PTPC seeks permission to discharge approximately 7 percent more effluent. A public hearing on December 4, 2024 at Fort Worden draws approximately 40 attendees.

December 2024

Washington State Ecology issues two new formal administrative orders against PTPC for Clean Water Act violations.

December 17, 2024

Fire breaks out on the Number 2 Paper Machine at PTPC. Smoke vents from the roof on the northwest side of the main building, and flames run along the ceiling over the dryer sections. PTPC personnel begin containment before East Jefferson Fire Rescue (EJFR) arrives. There is no significant structural damage. The fire is under investigation by the Jefferson County Fire Marshal.

January to February 2025

A pipe failure causes approximately 1,000 gallons of condensed water from the facility's steam system to spill into Port Townsend Bay. Separately, two Olympic Gravity Water System (OGWS) pipeline breaks occur within weeks: on January 22, a welded joint fails on a 24-inch pipe, and on February 6, a 6-inch crack opens at a girth weld on a 30-inch pipe near Andrews Creek, leaking over half a million gallons before shutdown. City Manager John Mauro declares a water emergency. Both the city and PTPC draw on City Lake Reservoir, and a mandatory water conservation notice is issued.

March 16, 2025

An electrical fire breaks out in the turbine room at PTPC. East Jefferson Fire Rescue (EJFR) responds at approximately 2:15 p.m. on a Sunday. Dry chemical extinguishers are used until power is shut off, and the fire is finished with water. There are no injuries.

April 23, 2025

PTPC publicly announces on its own website: "PTPC Achieves New Safety Record, we have officially reached the highest number of consecutive safe workdays in the past 25 years. It has been 156 days since the last recordable injury at PTPC."

April 2025

A pipe failure discharges approximately 114,630 gallons of untreated toxic wastewater directly into Port Townsend Bay. The source material describes the safety record announcement above as coming approximately one month before this discharge; both dates are reproduced here as documented, though the exact interval between the two events could not be independently confirmed in this rebuild. When asked what was in the discharge, whether it was toxic to marine life, and whether shellfish from Glen Cove were safe to eat, PTPC declines to answer. Community reporter Scott Doggett submits 11 specific questions to the company.

The company provides an evasive statement citing "testing conducted upon discovery suggests little to no environmental impact" without disclosing any data.

May 2025

Ecology issues PTPC a new National Pollutant Discharge Elimination System (NPDES) water discharge permit, ending nearly seven years of administrative extension since the previous permit expired in October 2018. The new permit expires May 2030. It contains new water-quality based limits for three confirmed carcinogens, benzo(a)anthracene, chlordane, and pentachlorophenol, but final compliance with those limits is not required until 2029. PTPC is authorized to discharge approximately 7 percent more effluent than under the prior permit.

June 2025

PTPC publishes an economic impact study: \$319 million in total economic output within Jefferson County, \$452 million statewide, 300 or more county employees with an average salary of \$92,600, significantly above the county's \$64,800 median household income, and approximately 40 percent of all manufacturing jobs in the region. It is released as the 2026 water rate model update approaches. Separately, a hazardous waste inspection this month finds specific failures in preparedness, prevention, and emergency procedures at the facility, exactly the categories most relevant to a tank failure.

September 18, 2025

Ecology fines PTPC a total of \$20,000 for the two 2025 spills, \$10,000 per incident. For the 114,630-gallon April discharge of untreated toxic wastewater, this amounts to less than 9 cents per gallon. The fine schedule has not been updated since the late 1980s.

November 2025

Port Townsend Leader columnist Scott Doggett publishes "Mill keeps the public in the dark about spill, and health risks," documenting PTPC's refusal to answer 11 questions about the April 2025 spill, naming the carcinogens and neurotoxins in the company's regular discharge (dioxin, arsenic, cadmium, total phenols, selenium, thallium), and cataloging 23 permit violations over seven years. A second column follows: "Has watchdog turned lapdog at Port Townsend Paper Mill?"

December 2025

The Center for Sustainable Economy publishes "A Just Transition for the Port Townsend Paper Mill," calling for deliberate closure planning and replacement with a non-wood, non-kraft facility inland. The report documents 554,000 metric tons of carbon dioxide per year, by far the largest greenhouse gas

source in Jefferson County, more than 2.5 times the rest of the county's economy combined, and PTPC's exemption from Washington's Climate Commitment Act as an "emissions intensive and trade exposed" facility. It calls for Atlas Holdings to post a cleanup bond.

7. The Longview Disaster, Regulatory Gap Exposed, and Community Mobilization (May to June 2026)

A catastrophic kraft facility failure reveals that white liquor tanks have never required inspection, transforming every question about PTPC's own white liquor tanks from hypothetical to urgent.

May 26, 2026

At approximately 7:15 a.m., a 900,000-gallon white liquor tank implodes at Nippon Dynawave Packaging Company in Longview, Washington. Eleven workers are killed and eight others are injured. The tank is approximately 60 percent full; 550,000 gallons of white liquor surge onto the facility floor, into drainage ditches, and into the Columbia River. Twenty-three dead fish are later collected near the facility by Ecology. Governor Ferguson calls it "the deadliest industrial tragedy in modern Washington State history." Total worker safety fines against Nippon Dynawave in the years before the disaster amount to \$6,100.

Investigation immediately reveals a catastrophic regulatory gap: above-ground tanks holding white liquor at kraft facilities are not required to undergo inspection by any state or federal agency. UW Professor Marissa Baker, director of the University of Washington's Northwest Center for Occupational Health and Safety and a member of the United States Environmental Protection Agency (EPA) Science Advisory Committee on Chemicals, states: "There's no one agency or regulatory body that would be responsible for inspecting any single above-ground tank. It is really left to the owner, the operator of the individual facility to ensure that they are doing all that." This gap applies equally to PTPC's white liquor storage tanks.

In the aftermath, crews flush drainage channels with clean water to dilute the caustic chemicals that reached the Columbia River, and water quality testing continues. State legislators across party lines express shock that no regulatory body has authority to inspect white liquor tanks.

May 27, 2026

The United States Chemical Safety and Hazard Investigation Board (CSB) announces a formal investigation, with federal investigators arriving that day. The Trump Administration has proposed to defund the Chemical Safety and Hazard Investigation Board (CSB) for the second consecutive year; Congress allocated \$14 million to continue operations. Findings will produce prevention recommendations applicable to all kraft facilities nationally, including PTPC.

May 29, 2026

David Ginsberg, a Port Townsend resident, sends a letter to the Port Townsend City Council and Jefferson County Commissioners, copied to the press. The letter draws the direct parallel to PTPC: the same process and same chemistry are used; PTPC's daily production volume exceeds Nippon Dynawave's; no public safety plan exists for white liquor; and PTPC's tank sizes, ages, and inspection dates are not publicly known. Jefferson County Emergency Management Director Willie Bence

confirms on record that PTPC houses white liquor, calling it "a particularly nasty and caustic chemical."

June 1, 2026

PTPC issues its first public statement following Longview, with four key admissions: 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 and testing," confirming pre-Longview practices were insufficient; third, the company has "verified that tank vents are open and that overflow lines are not submerged"; and fourth, the company is "working on scheduling further non-destructive testing to reassess tank conditions in June 2026," meaning the additional testing had not yet been scheduled as of the press release date.

The Washington State Department of Labor and Industries issues an official statement, Press Release #26-07. Director Joel Sacks states: "In the coming months, the Washington State Department of Labor and Industries will be conducting a detailed investigation seeking answers and accountability." The agency has officially opened its investigation using specialized inspectors who focus on high-hazard chemical industries. By law, investigations must be completed within 180 days, placing the deadline in approximately late November 2026. The Washington State Department of Labor and Industries' own statement confirms the legal standard that applies directly to PTPC: "Employers are required to assess the hazards on their work site, including those involving storage tanks and the handling of hazardous chemicals.

They must take effective steps to control those hazards."

June 2026: The Community Petition

David Ginsberg circulates the community petition "We Demand Safety, Transparency and Clean Water." Its demands include:

- Independent white liquor tank inspection with full public disclosure.
- Worker hydrogen sulfide exposure monitoring data.
- Quarterly independent biological bay testing.
- Public answers to the April 2025 spill questions.
- Disclosure of the Process Hazard Analysis.
- Comprehensive water quality testing, including per- and polyfluoroalkyl substances (PFAS).
- A full bay ecosystem assessment.
- Worker health screenings.
- Real-time fence-line air monitoring.
- Soil contamination testing across all 450 acres.
- A seismic vulnerability assessment of white liquor tanks for Cascadia Subduction Zone preparedness.

Letters are sent to 43 recipients, including:

- The United States Chemical Safety and Hazard Investigation Board (CSB).
- The United States Environmental Protection Agency (EPA) Region 10.
- The Agency for Toxic Substances and Disease Registry (ATSDR).
- The Federal Emergency Management Agency (FEMA) Region 10.
- The National Institute for Occupational Safety and Health (NIOSH).
- The United States Coast Guard (USCG).
- United States Senators Cantwell and Murray, and United States Representatives Gluesenkamp Perez and Randall.
- Governor Ferguson and Attorney General Brown.
- Washington State Ecology, the Washington State Department of Labor and Industries, the Washington State Department of Health, the Washington State Department of Fish and Wildlife (WDFW), the Washington State Department of Natural Resources, and the Washington State Emergency Response Commission.
- Jefferson County Emergency Management, the Jefferson County Marine Resources Committee, the Jefferson County Public Utility District, Jefferson County Public Health, and Jefferson Healthcare.
- Four Jefferson County fire districts, the Port of Port Townsend, and Naval Magazine Indian Island.
- The Jamestown S'Klallam Tribe and the Port Gamble S'Klallam Tribe.
- The Northwest Maritime Center and the Port Townsend Marine Trades Association.
- The Environmental Integrity Project (EIP), Northwest Environmental Advocates, the Olympic Environmental Council, the Puget Soundkeeper Alliance, and the Washington Environmental Council.
- PTPC Senior Vice President Brian Peterson, and Atlas Holdings principals Andrew Bursky and Tim Fazio.

Commissioner Heather Dudley-Nollette responds confirming the Jefferson County Local Emergency Planning Committee (LEPC) plans to address PTPC at its next meeting in mid-July 2026. Local Emergency Planning Committee (LEPC) Coordinator Brad Brooks is working with the company to schedule the session. The Local Emergency Planning Committee (LEPC) includes fire districts, law enforcement, Jefferson County Public Health, Ecology, Naval Magazine Indian Island, the Port of Port Townsend, and PTPC as a required participant under the federal Emergency Planning and Community Right-to-Know Act.

July 2026

A Jefferson County Local Emergency Planning Committee (LEPC) meeting is scheduled. Community members plan to attend with a comprehensive enforcement and inspection demand package targeting Washington State Ecology, the United States Environmental Protection Agency (EPA) Region 10,

Jefferson County Emergency Management, Jefferson County Public Health, PTPC, and East Jefferson Fire Rescue (EJFR).

8. Olympic Gravity Water System: Key Facts Summary

The Basics

The Olympic Gravity Water System (OGWS) is a 29-mile gravity-fed steel pipeline from the Big Quilcene and Little Quilcene Rivers in the Olympic Mountains. Average daily flow is 12 million gallons; maximum flow is 16 million gallons. PTPC uses approximately 10 to 11 million gallons per day; the city uses 1 to 2 million gallons. PTPC accounts for over 91 percent of all water consumed from the Quilcene watershed.

Ownership

The City of Port Townsend owns the Olympic Gravity Water System (OGWS) facilities and water rights. PTPC does not own the water and has no independent right to it. The city has leased operation and maintenance to the paper company since 1928, through six different corporate owners, for nearly 100 years.

Age

This is one of the oldest water systems in Washington State. The original 1928 wood stave pipe was replaced with welded steel between the 1950s and 1972. Much of this steel pipeline is now 50 to 70 years old and approaching or exceeding its design life. The 2021 agreement identifies \$161 million in refurbishment needed over 40 years.

Forest Service Permits

Three United States Forest Service special use permits authorize water diversion and the transmission pipeline on National Forest land. All three permits expire in 2029, the same year PTPC's National Pollutant Discharge Elimination System (NPDES) permit begins requiring enforceable carcinogen limits. A new round of costly negotiations and studies will be required.

The 2021 Agreement

The December 30, 2021 Water Supply Agreement is the first substantive revision since 1956, a 65-year gap. PTPC pays for water for the first time, approximately \$4.7 million per year at 2025 rates, and is capped at 14 million gallons per day. The city may require shutdowns during drought. The rate model is updated every five years, with the next update due at the end of 2026, coinciding with peak safety and environmental pressure.

Leverage

The city owns the water rights, and PTPC cannot operate without them. The 2026 rate model update is a contractual leverage point. David Ginsberg's June 2026 petition explicitly calls on the City Council to attach mandatory safety conditions, independent tank inspection, biological bay testing, real-time discharge monitoring, and a white liquor emergency response plan to PTPC's water access during the 2026 renegotiation.

Recent Failures

Three documented Olympic Gravity Water System (OGWS) pipeline failures occur in 2024 to 2025. In August 2024, a cracked coupling leaks approximately 40 million total gallons, prompting a mandatory conservation order. In January 2025, a welded joint fails on a 24-inch pipe. In February 2025, a 6-inch crack at a girth weld on a 30-inch pipe leaks over 500,000 gallons into Andrews Creek, triggering a formal water emergency declaration.

9. S'Klallam Treaty Rights and Port Townsend Bay: Key Facts

Territory

Port Townsend Bay, qatay, is the ancestral home of the S'Klallam people. The Jamestown S'Klallam and Port Gamble S'Klallam Tribes hold treaty-protected rights to fish and harvest shellfish in Port Townsend Bay under the 1855 Treaty of Point No Point. These rights predate the paper facility by 73 years and have federal protection.

1855: The Treaty

The Treaty of Point No Point reserves to the S'Klallam the right to take fish and shellfish at their usual and accustomed grounds and stations, which include Port Townsend Bay. The bay in which PTPC has discharged for over 100 years is a federally protected tribal harvest ground.

1974: The Boldt Decision

The Boldt Decision confirms that treaty tribes are entitled to 50 percent of the harvestable fish in their usual and accustomed grounds. Port Townsend Bay is within those grounds. PTPC's discharge and the documented shellfish closure in the permit record directly affect a resource with federal treaty protection.

1994: The Rafeedie Decision

The Rafeedie Decision extends the Boldt Decision to shellfish as well as finfish. All public and private tidelands within the tribes' usual and accustomed grounds are subject to treaty harvest rights. The shellfish harvesting closure in Port Townsend Bay, acknowledged in PTPC's own permit record, is a direct impairment of federally protected treaty rights.

Current Status

The Jamestown S'Klallam and Port Gamble S'Klallam Tribes are among the 43 recipients of David Ginsberg's June 2026 advocacy letters. PTPC's treated wastewater discharge, containing confirmed carcinogens with no enforceable final limits until 2029, continues to flow into a bay where treaty-protected shellfish harvesting rights exist. No tribal consultation record is documented in the public permit record.

10. The White Liquor Tank Regulatory Gap: A Critical Finding

The Gap

Above-ground tanks holding white liquor at kraft paper facilities are not required to undergo regular inspection by any state or federal agency. This includes tanks holding hundreds of thousands of gallons of a caustic chemical mixture of sodium hydroxide, sodium sulfide, and sodium carbonate, capable of

killing workers and contaminating waterways on a massive scale.

The Contrast

Underground storage tanks are inspected every three years by Ecology for groundwater risk. Oil and gas tanks are subject to mandatory state and federal inspections. Above-ground kraft facility white liquor tanks, holding comparable quantities of equally hazardous material, require no mandatory inspections by any agency.

The Expert View

UW Professor Marissa Baker, director of the University of Washington's Northwest Center for Occupational Health and Safety and a member of the United States Environmental Protection Agency (EPA) Science Advisory Committee on Chemicals, states: "There's no one agency or regulatory body that would be responsible for inspecting any single above-ground tank. It is really left to the owner, the operator of the individual facility to ensure that they are doing all that and keeping those maintenance logs and doing those inspections."

Applied to PTPC

No state or federal agency has ever been required to inspect PTPC's white liquor storage tanks. Tank sizes, ages, materials of construction, and most recent inspection dates are not publicly known. PTPC's June 1, 2026 press release confirms the company was only conducting "extra safety inspections" after Longview, and was still only "working on scheduling" non-destructive tank testing as of that date. The regulatory gap means no outside party can verify whether PTPC's self-assessment is accurate.

The Legal Standard

The Washington State Department of Labor and Industries' own June 1, 2026 press release states: "Employers are required to assess the hazards on their work site, including those involving storage tanks and the handling of hazardous chemicals. They must take effective steps to control those hazards." This legal standard under the Washington Industrial Safety and Health Act applies to PTPC. The company's pattern of violations and its admission of conducting only post-Longview "extra safety inspections" raise direct questions about whether this obligation has been met.

The Political Reaction

Washington State Representative Joel McEntire, a Republican representing Longview, states: "Frankly, I find it hard to believe. You can hardly eat a box of raisins without 10 regulations letting you do so." Congresswoman Marie Gluesenkamp Perez speaks out against the Trump Administration's proposal to defund the Chemical Safety and Hazard Investigation Board (CSB) for the second consecutive year.

11. Complete Fire Record: PTPC, 2017 to 2026

August 3, 2017: Recovery Room Fire

PTPC calls 911 reporting a major fire, then describes it to the press as a minor fire. The company's own brigade extinguishes the fire before East Jefferson Fire Rescue (EJFR) arrives. The fire is confirmed to have extended to the second floor and roof. Mutual aid responds from Naval Magazine Indian Island, Port Ludlow, and Discovery Bay. The cause is attributed to hot, dry weather. There are no injuries.

October 24, 2018: Wood Chip Pile Fire

A wood chip pile fire from spontaneous combustion burns 30 feet high by 100 feet across. PTPC fights it for hours before calling East Jefferson Fire Rescue (EJFR). Loaders relocate the burning chips. East Jefferson Fire Rescue (EJFR) remains on scene until 8:59 p.m.

August 2019: Paper Bale Holding Area Fire

A fire burns approximately one acre of the paper bale holding area, about one-third full. Smoke is visible on the public webcam. There are no injuries and the cause is undetermined.

January 22, 2022: Wood Chip Conveyor Belt Fire

The most serious fire in recent history occurs. A 200-yard wood chip conveyor belt across six floors is fully engulfed, with black smoke visible to Marrowstone Island. The sprinkler system is non-operational, with a part missing. Damage totals \$500,000. Mutual aid responds from four jurisdictions, with at least 30 personnel on scene. Production is crippled for three weeks.

The cause is undetermined. The sprinkler failure is acknowledged, but PTPC declines to comment on it.

March 12, 2022: Second Conveyor Belt Fire

This is the second fire in 49 days, on a second-floor conveyor belt. The PTPC crew is unable to reach it with hoses. East Jefferson Fire Rescue (EJFR) finds sawdust, rubber belting, and grease on fire, with spot fires running the belt's full length. The cause is attributed to a hot motor in the area. No substantive answers are given on lessons learned.

December 14, 2022: Concrete Vault Fire

One firefighter is hospitalized for exhaustion. East Jefferson Fire Rescue (EJFR) Chief Black publicly states the department lacks sufficient firefighters for a major industrial complex fire under National Fire Protection Association (NFPA) standards. East Jefferson Fire Rescue (EJFR)'s Community Risk Assessment formally designates the PTPC facility as a high-hazard district requiring additional minimum staffing.

December 17, 2024: Number 2 Paper Machine Fire

Smoke vents from the roof on the northwest side of the main building, and flames run along the ceiling over the dryer sections. PTPC personnel begin containment before East Jefferson Fire Rescue (EJFR) arrives. There is no significant structural damage. The fire is under investigation by the Jefferson County Fire Marshal.

March 16, 2025: Turbine Room Electrical Fire

East Jefferson Fire Rescue (EJFR) responds at 2:15 p.m. Dry chemical extinguishers are used until power is shut off, and the fire is finished with water. There are no injuries.

The Pattern

Eight fires occur in nine years requiring East Jefferson Fire Rescue (EJFR) response, one every 13 months on average, with three in calendar year 2022 alone. The January 2022 fire involved a non-operational sprinkler system with a part missing. East Jefferson Fire Rescue (EJFR)'s own analysis

formally identifies the PTPC facility as a high-hazard district requiring staffing increases it does not currently have. A white liquor tank failure would require an emergency response capacity far beyond anything any of these eight fires has demanded.

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