

Regulatory Enforcement Record

Environmental, Safety, and Fire Violations, 1991 to 2026

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. Facility Profile: Compliance Summary

This facility profile draws on two primary regulatory databases: the Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO) system, which provides 5-year and 3-year compliance summaries, and the Washington State Department of Ecology's Permit and Reporting Information System (PARIS), which provides all-time counts for the facility's wastewater discharge permit. As of July 2, 2026, Ecology's Permit and Reporting Information System (PARIS) database recorded 164 violations, 80 inspections, and 62 enforcement actions for Port Townsend Paper Company (PTPC)'s wastewater permit.

2. Labor and Industries Inspection Record

The Washington State Department of Labor and Industries' Division of Occupational Safety and Health (DOSH) shows 4 inspections on record for PTPC, 3 of which resulted in cited violations. In total, these inspections produced 5 citations, comprising 1 repeat violation and 4 serious violations, with total penalties of \$29,400.

3. Environmental Enforcement Actions, Chronological

The following chronological record compiles environmental and workplace safety enforcement actions against PTPC drawn from Washington State Department of Ecology, Environmental Protection Agency (EPA), and Washington State Department of Labor and Industries records, together with contemporaneous odor complaint and incident documentation.

1991 to 1998

- October 1991: The Washington State Department of Ecology issued PTPC a \$20,000 fine for a water quality violation, the largest fine issued to the facility until 2016, a gap of 25 years. Source: Port Townsend Leader, April 2017, citing Ecology records.
- January 22, 1993: Bunker C fuel oil spilled from a pipeline at PTPC into Port Townsend Bay. The spill was discovered at 7:30 p.m.; pipeline capacity was 2,000 gallons, but the actual quantity spilled could not be determined due to darkness. The National Oceanic and Atmospheric Administration (NOAA) Scientific Support Coordinator was contacted at 11:30 p.m. for worst-case trajectory analysis, and the U.S. Coast Guard (USCG) District 13 coordinated the response. No penalty amount is confirmed in available public records.

- 1997: The Environmental Protection Agency (EPA) Environmental Appeals Board docketed two cases against the facility, Prevention of Significant Deterioration (PSD) 97-13 and Prevention of Significant Deterioration (PSD) 97-14, filed September 22, 1997 under the Clean Air Act's Prevention of Significant Deterioration program. These were permit disputes, not financial penalties, and both appeals were dismissed January 12, 1998.

2016 to 2020

- August 19, 2016: A 1-inch hole caused by corrosion in a recovery furnace duct allowed fine particle pollution and other emissions to escape, amounting to less than 1 percent of total emissions. The hole was not repaired until a scheduled maintenance shutdown in September 2016. The violation was resolved by a \$30,000 air penalty in April 2017, combined with the November 2016 stuck damper incident below.
- November 10, 2016: A damper in one of the plant's main exhaust stacks became stuck, allowing emissions to escape. This violation was resolved together with the August 2016 incident by the same \$30,000 air penalty in April 2017.
- April 20, 2017: The Washington State Department of Ecology issued a combined \$30,000 air fine, \$20,000 for the August 2016 incident and \$10,000 for the November 2016 incident, described at the time as the largest fine since 1991, a 25-year gap. Status: resolved.
- July 6 to 7, 2017: An Environmental Protection Agency (EPA) Region 10 inspection discovered a Clean Air Act violation: a digester was not routing all of its emissions to a control device, a violation ongoing since 2001, 16 continuous years of noncompliance. PTPC was notified in April 2018, and the matter was resolved by a \$342,000 Environmental Protection Agency (EPA) consent agreement in May 2019.
- November 2017: Carbon monoxide emissions exceeded the permitted level on three days, violating the 30-day rolling average limit. The violation was resolved by a \$4,500 citation in February 2018.
- February 1, 2018: The Washington State Department of Ecology issued a \$4,500 air citation and fine; the fine was confirmed paid. Status: resolved.
- August 8, 2019: The Washington State Emergency Operations Center's hazardous materials incident log recorded a black liquor spill at PTPC at 4:39 a.m. The log entry does not specify a spill volume, and this campaign has not previously reported this incident. Newly discovered in the August 2026 Ecology records production.
- December 4, 2019: A second black liquor spill at PTPC was reported to the Washington State Emergency Operations Center at 6:34 p.m., logged as approximately 500 gallons, with a note flagging possible soil contamination. The report was filed by Kayla Anderson. Newly discovered in the August 2026 Ecology records production.
- May 20, 2019: PTPC and the Environmental Protection Agency (EPA) finalized a \$342,000 air consent agreement settling the digester violation dating to 2001. Payment was received June 5, 2019, and the digester was subsequently decommissioned. Status: resolved.
- July 23, 2020: Ecology's internal Release 304 spill and release log records a process water spill into Port Townsend Bay via a screen break, logged at approximately 145 pounds. This campaign has not

yet re-verified this figure against a higher-resolution copy of the source record (see Section 12) and had not previously reported this incident.

2021 to 2022

- July 12, 2021: A \$7,500 air fine was issued under Enforcement and Compliance History Online (ECHO) Case WA000A200198789, Notice of Penalty (NOP) 20170, under the Clean Air Act program; violation categories were not specified in the Enforcement and Compliance History Online (ECHO) record. Status: resolved August 9, 2021.
- July 14, 2021: A National Response Center incident report (#1310683), filed by Chris Corden, documented approximately 100 gallons of primary clarifier effluent released due to a faulty pump O-ring. Ecology's internal Release 304 spill log separately logs an incident on the same date at approximately 50 to 100 gallons, corroborating the National Response Center report. Newly discovered in the August 2026 Ecology records production.
- January 2, 2022: The Washington State Emergency Operations Center's hazardous materials incident log recorded two separate incidents at PTPC on the same day: a treated wastewater discharge permit pH excursion lasting more than 10 hours, beginning at 11:09 a.m., and a separate effluent release of approximately 750 to 1,000 gallons reported at 12:28 p.m. Whether either or both relate to the self-reported November 2021 through March 2022 wastewater violations described below has not been confirmed. Newly discovered in the August 2026 Ecology records production.
- January 29, 2022: A process sewer leak at PTPC was reported to the Washington State Emergency Operations Center at 10:12 a.m. Newly discovered in the August 2026 Ecology records production.
- November 15, 2021: A Washington State Department of Labor and Industries referral inspection (1563964.015) at this union facility resulted in three citations. Citation 01001, a REPEAT violation of Washington Administrative Code (WAC) 296-24-975(2)(B)(IV) covering energy control and lockout-tagout, penalty \$12,000. Citation 02001, a SERIOUS violation of Washington Administrative Code (WAC) 296-24-975(2)(B)(III)(A) covering process hazard, mechanical integrity, and employee exposure, with 2 workers exposed, penalty \$5,400, corrected during the inspection. Citation 02002, a SERIOUS violation of Washington Administrative Code (WAC) 296-24-980(1)(A)(I) covering a mechanical and process safety provision, penalty \$5,400, also corrected during the inspection. Total penalties: \$22,800. The case closed March 29, 2022.
- November 2021 through March 2022: Approximately 800 gallons of untreated process wastewater spilled into Port Townsend Bay, and treated wastewater discharge permit limits were exceeded 14 times. PTPC attributed these self-reported violations to leaking pipes, equipment failures, and freezing weather. Resolved by a \$27,000 penalty in May 2022.
- May 17, 2022: The Washington State Department of Ecology issued a \$27,000 wastewater fine, Enforcement and Compliance History Online (ECHO) Case WA-789995, Notice of Penalty (NOP) Docket 23183, covering both the untreated wastewater spill and the treated wastewater discharge exceedances above. Status: resolved June 14, 2022.
- May 18, 2022: Ecology conducted a compliance inspection with sampling, Inspection INS-WA-001, under Permit WA0000922 Version 4.

- July 6, 2022: A stack test performed by contractor Montrose measured recovery furnace particulate matter at 0.051 grains per dry standard cubic foot at 8 percent oxygen, against an applicable federal limit of 0.044 grains per dry standard cubic foot at 8 percent oxygen under 40 Code of Federal Regulations (CFR) 63.862(a)(1)(i)(A), a 15.9 percent exceedance. One of three test runs was abnormally high, but excluding that run still exceeded the limit. The cause was a plugged inlet perforated plate in Precipitator Cell No. 1, with Precipitator Cell No. 2, Field A offline since March 26, 2022. The stack test report was submitted to Ecology August 11, 2022; a re-test on August 25, 2022 measured 0.035 grains per dry standard cubic foot, demonstrating compliance, with the re-test report submitted October 14, 2022. Resolved by a \$56,250 penalty in December 2022.
- September 30, 2022: The Washington State Department of Ecology issued Notice of Violation Docket 21402 for the July 6, 2022 recovery furnace exceedance, later escalated to Notice of Penalty Docket 21441.
- October 10, 2022: Compliance Order 21387, Enforcement and Compliance History Online (ECHO) Case WA000A200216985, was issued under the Clean Air Act program with a \$0 penalty. Status: final order issued.
- November 7, 2022: A Washington State Department of Labor and Industries complaint inspection (1633133.015, Complaint #1965246) at this non-union facility resulted in Citation 01001, a SERIOUS violation of Washington Administrative Code (WAC) 296-800-28030(4) covering the accident and injury prevention program requirement, penalty \$2,200, with abatement due March 15, 2023. The case closed March 22, 2023. Total penalties: \$2,200.
- December 12, 2022: The Washington State Department of Ecology issued a \$56,250 air fine, Notice of Penalty (NOP) Docket 21441, Enforcement and Compliance History Online (ECHO) Case WA000A200219685, issued by James DeMay, Industrial Section Manager, to Bert Brown, Interim Mill Manager, under the Clean Air Act, Air Operating Permit 0000922, Washington Administrative Code (WAC) 173-400, and Revised Code of Washington (RCW) 70A.15.3160, for the federal standard violation at 40 Code of Federal Regulations (CFR) 63.862(a)(1)(i)(A), 0.044 grains per dry standard cubic foot at 8 percent oxygen. Status: resolved January 19, 2023.

2023

- Early January 2023: A leak in the wastewater line from No. 9 pump station to the main pump station discharged 7,500 to 10,000 gallons of untreated process wastewater to Port Townsend Bay. A written report was submitted January 5, 2023 and revised January 11, 2023. Resolved by a \$6,000 penalty in May 2023.
- January 17, 2023: A \$3,000 wastewater fine, Enforcement and Compliance History Online (ECHO) Case WA-791364, was issued under the Clean Water Act industrial stormwater program for 2022 water quality violations. Status: resolved February 17, 2023.
- May 1, 2023: The Washington State Department of Ecology issued a \$6,000 wastewater fine, Notice of Penalty (NOP) Docket 21561, Enforcement and Compliance History Online (ECHO) Case WA-791807, to Bert Brown, Interim Mill Manager, under Revised Code of Washington (RCW) 90.48.144, covering the early January 2023 untreated wastewater spill from the No. 9 pump station. Status: resolved May 26, 2023.

- May 10, 2023: Ecology conducted a compliance inspection with sampling, Inspection INS-WA-002, under Permit WA0000922 Version 4.
- September 18, 2023: Ecology conducted a compliance inspection without sampling, Inspection INS-WA-003, under Permit WA0000922 Version 4.
- September 18, 2023: Compliance Order 22129, Enforcement and Compliance History Online (ECHO) Case WA000A200232315, was issued under the Clean Air Act, Maximum Achievable Control Technology standards, and Title V permit program, for the February 2023 recovery furnace particulate matter exceedance. Eleven of the last twelve quarters of Clean Air Act High Priority Violation status trace to this single compliance order, confirmed by James DeMay on June 23, 2026. PTPC filed a notice of appeal with the Pollution Control Hearings Board on October 20, 2023; the appeal settled March 24, 2025 with a \$0 penalty recorded in the Enforcement and Compliance History Online (ECHO) record. The amended order's terms remain unknown pending public records request P030509-063026, expected July 29, 2026. PTPC is currently in compliance with the limit while working through the amended order's requirements. Status: NOT CLOSED as of July 2026.

2024

- April 18, 2024: A Washington State Department of Labor and Industries safety inspection (1722486.015) resulted in Citation 01001, a SERIOUS violation of Washington Administrative Code (WAC) 296-24-73505(1) covering paper machine equipment guarding, with 4 workers exposed, penalty \$4,400. PTPC contested the citation May 9, 2024; the Final Order of August 19, 2024 confirmed the penalty at the full \$4,400 through a State Settlement. Abatement was completed June 10, 2024, and the case closed August 19, 2024. Total penalties: \$4,400.
- June 12, 2024: Ecology conducted a compliance inspection without sampling, Inspection INS-WA-004, under Permit WA0000922 Version 4.
- August 19, 2024: Total Suspended Solids (TSS) at Outfall 001 measured 18,999 pounds per day against a daily maximum limit of 16,212 pounds per day, an exceedance of 2,787 pounds per day, or 17.2 percent above the limit. The cause was an external utility power outage at 8:24 p.m. on August 17, 2024, which increased solids loading to the Aeration Stabilization Basin, with a synergistic effect from three additional aerators started per Ecology's prior recommendation. The exceedance was discovered August 20, 2024 at 10:22 a.m. through daily laboratory analysis and logged as Environmental Report Tracking System (ERTS) #733193; Ecology was notified August 21, 2024. PTPC's response letter, dated February 20, 2025, was signed by Micheal R. Clea, MBA, MESH, Environmental Manager. Compliance was re-established with no further exceedances after a phased aerator start-up plan beginning September 10, 2024. Ecology's contact for this matter was Emily Toffol, Solid Waste Management Program, Industrial Section.

2025

- January 4, 2025 (Event A, Notice of Penalty (NOP) 23694): A leak in a 6-inch condensed steam line under the PTPC dock, northeast of the main pump station, was discovered at approximately 02:10 hours and stopped by approximately 03:00 hours, discharging approximately 1,000 gallons to Port Townsend Bay. The line was repaired with epoxy and pipe wrap at 04:00 hours, with a planned 20.9-foot pipe replacement. The violation was of National Pollutant Discharge Elimination System

(NPDES) Permit WA0000922's requirement that discharge occur through a permitted outfall. Resolved by a \$20,000 penalty, combined with the April 28, 2025 spill below, in September 2025. Ecology's internal Release 304 spill log separately records this same date as an untreated process water release via a sewer line break, corroborating the account above.

- January 21, 2025: Notice of Violation Docket 23432 for the August 19, 2024 Total Suspended Solids (TSS) exceedance, 18,999 pounds per day against a 16,212 pounds per day limit, was received by PTPC. The company responded February 20, 2025, noting compliance had been re-established as of September 10, 2024.
- March 20, 2025: A Washington State Department of Labor and Industries union referral inspection (1812975.015, Referral #2275824) resulted in no violations cited. The case closed May 7, 2025, the same day as the close conference. Total penalties: \$0.
- April 28, 2025 (Event B, Notice of Penalty (NOP) 23694): A leak in the process wastewater line under the dock, between the No. 9 and main pump stations, was discovered at approximately 10:30 hours, with flow stopped by 14:00 hours. The leak discharged approximately 114,630 gallons of untreated process wastewater to Port Townsend Bay, the largest confirmed single untreated wastewater discharge in the public record. The line was repaired with a rubber-lined clamp encapsulated in quick-set and grout concrete, with pipe replacement or lining planned for the November 2025 annual maintenance shutdown. PTPC declined to answer 11 questions from reporter Scott Doggett about discharge contents and shellfish safety. Resolved by a \$20,000 penalty, combined with the January 4, 2025 spill above, in September 2025.
- September 17, 2025: The Washington State Department of Ecology issued a \$20,000 fine for untreated wastewater, Notice of Penalty (NOP) Docket 23694, to Bert Brown, Mill Manager, under Revised Code of Washington (RCW) 90.48.144, covering both the January and April 2025 spills at \$10,000 per incident; for the 114,630-gallon April 28 discharge, this amounts to less than 9 cents per gallon. Copies were sent to Micheal Clea, Heather Holme, and Liane Monroe at PTPC, and to Mady Lyon and Brittny Goodsell at Ecology. Status: resolved.
- October 27, 2025: Ecology conducted a compliance inspection without sampling, Inspection INS-WA-005, under Permit WA0000922 Version 5; the inspection report was filed February 23, 2026 as 2026-02-23-PTPC-WQInspectionReport-2025.pdf.
- November 3, 2025: Partially treated wastewater was discharged to soil, not to the bay and not through a permitted outfall, logged as Environmental Report Tracking System (ERTS) #742655. PTPC reported the spill by phone to Ecology, with an Environmental Report Tracking System (ERTS) report filed within 24 hours. A Warning Letter was issued February 24, 2026 (2026-02-24-PTPC-WarningLetter-UnauthorizedDischarge.pdf); Ecology determined no further enforcement action was warranted after review.
- November 17, 2025: Ecology sent an informal action email regarding the permit. Status: complete.
- November 21, 2025: Nine hazardous waste violations under the Resource Conservation and Recovery Act (RCRA) were resolved through a compliance certificate based on PTPC's self-certification. Ecology stated it will continue routine inspections, per James DeMay on June 23, 2026. Whether an independent inspection followed remains unknown, a question raised in a letter

from David Ginsberg to DeMay on June 29, 2026, which was awaiting reply as of this writing.

- November 2025: Air and wastewater permit violations dating to this period were confirmed still open as of June 10, 2026, and are being addressed with enforcement actions.

2026

- February 24, 2026: Ecology issued a Warning Letter for unauthorized discharge (2026-02-24-PTPC-WarningLetter-UnauthorizedDischarge.pdf), relating to the November 3, 2025 industrial spill, Environmental Report Tracking System (ERTS) #742655; disposition was that no further action was required after review.
- April 7 and April 10, 2026: Two black liquor spill events occurred on the facility floor. Black liquor is the spent cooking liquor from the pulping process. PTPC asserts these spills caused the treated wastewater effluent limit exceedances documented in Notice of Violation Docket 24681 below, and also failed to follow required Spill Prevention, Control, and Countermeasure Plan procedures following these events.
- April 17, 2026: An Administrative Order, Enforcement and Compliance History Online (ECHO) Case WA-794611, was issued under the Clean Water Act industrial stormwater program, addressing ongoing Total Suspended Solids (TSS) and Biochemical Oxygen Demand (BOD) exceedances and whole effluent toxicity failures, and requiring a compliance schedule and a Per- and polyfluoroalkyl substances (PFAS) sampling plan. Related documents submitted by PTPC include a Per- and polyfluoroalkyl substances (PFAS) Sampling and Analysis Plan (February 27, 2026), an Initial Action Level Sampling Plan (February 10, 2026), a 2025 Cooling Water Intake Structure (CWIS) Annual Certification Statement, a Compliance Schedule (June 1, 2026), a Stormwater Pollution Prevention Plan (June 1, 2026), Q2 Whole Effluent Toxicity (WET) Testing (June 12, 2026), a corrective action report (June 12, 2026), and a stormwater monitoring report (June 22, 2026). Status: active, ongoing compliance schedule.
- April 20 to 21, 2026: A self-reported Total Suspended Solids (TSS) and Biochemical Oxygen Demand (BOD) permit violation was submitted by PTPC on April 22, 2026 as a 5-day violation report, '2026 04 20- TSS and Biochemical oxygen demand (BOD) 5-day Report.pdf.' Ecology's interim determination on April 21, 2026 was that no enforcement action was necessary at that time; this relates to the April 17, 2026 Administrative Order and the underlying April 2026 exceedances.
- May 4, 2026: An Administrative Order Amendment, Enforcement and Compliance History Online (ECHO) Case WA-794583, was issued under the Clean Water Act industrial stormwater program, with a \$0 penalty. Status: NOT CLOSED.
- May 18, 2026: A Notice of Violation for wastewater was confirmed in Ecology's Permit and Reporting Information System (PARIS) Facility Summary, though the subject matter is not specified in that summary capture. This was the second Notice of Violation issued in 2026, coming 17 days before Notice of Violation Docket 24681 below; the specific document is not yet in hand. Status: OPEN.
- May 19, 2026: Ecology conducted a compliance inspection without sampling, Inspection INS-WA-006, the most recent inspection on record, under Permit WA0000922 Version 5. Status: complete.

June 4, 2026: Notice of Violation Docket 24681 (Wastewater, Open)

Notice of Violation Docket 24681 was issued by James DeMay, Industrial Section Manager, to Bert Brown, Mill Manager, under the Clean Water Act and National Pollutant Discharge Elimination System (NPDES) Permit WA0000922 Special Permit Condition S1.A, citing authority under Revised Code of Washington (RCW) 90.48.120(1). The notice documents six treated wastewater effluent limit exceedances during April 2026:

- April 8: 5-day Biochemical Oxygen Demand (BOD5) measured 12,566 pounds per day against a limit of 9,477 pounds per day.
- April 9: Biochemical Oxygen Demand (BOD5) measured 12,830 pounds per day against a limit of 9,477 pounds per day.
- April 9: Total Suspended Solids (TSS) measured 17,874 pounds per day against a limit of 16,518 pounds per day.
- April 10: Total Suspended Solids (TSS) measured 21,258 pounds per day against a limit of 16,518 pounds per day.
- April 12: Total Suspended Solids (TSS) measured 21,854 pounds per day against a limit of 16,518 pounds per day.
- April 14: Total Suspended Solids (TSS) measured 18,732 pounds per day against a limit of 16,518 pounds per day.

The notice cites an additional violation for failure to follow the Spill Prevention, Control, and Countermeasure Plan, Special Permit Condition S10, following the black liquor spill events of April 7 and April 10, 2026. PTPC is required to file a full compliance report within 30 days. Status: OPEN.

4. Complete Fire Record, PTPC, 2017 to 2026

PTPC has required East Jefferson Fire Rescue response for eight fires in nine years, an average of one every 13 months, including three fires in calendar year 2022 alone.

- August 3, 2017, Recovery room fire: PTPC called 911 reporting a 'major fire' but described it to the press as a 'minor fire.' The fire was confirmed to have extended to the second floor and roof. Mutual aid came from Naval Magazine Indian Island, Port Ludlow, and Discovery Bay. The cause was attributed to 'hot, dry weather.' No injuries were reported.
- October 24, 2018, Wood chip pile fire, spontaneous combustion: A wood chip pile 30 feet high by 100 feet across caught fire. PTPC fought the fire for hours before calling East Jefferson Fire Rescue. Loaders relocated burning chips. East Jefferson Fire Rescue remained on scene until 8:59 p.m.
- August 2019, Paper bale holding area fire: The fire covered approximately one acre, about one-third full, and smoke was visible on Port Townsend's public webcam. No injuries were reported and the cause was undetermined.

- January 22, 2022, Conveyor belt fire, the most serious in recent history: A 200-yard wood chip conveyor belt spanning six floors was fully engulfed, with black smoke visible from Port Townsend to Marrowstone Island. The sprinkler system was non-operational because a part was missing; Chief Bret Black said, 'There's room for improvement.' Damage totaled \$500,000. Mutual aid came from four jurisdictions with at least 30 personnel, and production was crippled for three weeks. PTPC declined to comment on the sprinkler failure, and the cause was undetermined.
- March 12, 2022, second fire in 49 days, second-floor conveyor belt: A PTPC crew could not reach the fire with hoses. East Jefferson Fire Rescue found active fire in sawdust, rubber belting, and grease, with spot fires running the full length of the belt. The cause was described as a 'hot motor in the area.' No substantive answers were given about lessons learned from two fires in seven weeks.
- December 14, 2022, Concrete vault fire: One firefighter was hospitalized for exhaustion. Chief Bret Black publicly stated the department lacks sufficient firefighters for a major industrial complex fire under National Fire Protection Association standards. East Jefferson Fire Rescue's Community Risk Assessment formally designated PTPC as a high-hazard district requiring additional minimum staffing.
- December 17, 2024, Number 2 Paper Machine fire: Smoke vented from the roof, with flames running along the ceiling over the dryer sections. PTPC personnel began containment before East Jefferson Fire Rescue arrived. The fire is under investigation by the Jefferson County Fire Marshal.
- March 16, 2025, Turbine room electrical fire: East Jefferson Fire Rescue responded at approximately 2:15 p.m. Dry chemical extinguishers were used until power was shut off. No injuries were reported.

5. Statutory Penalty Cap

The maximum daily fine the Washington State Department of Ecology can impose on PTPC has not risen since 1987, 38 years without adjustment, even as inflation has tripled.

6. Clean Air Act Monitoring Gap

As of this record, 4,902 days, approximately 13.4 years, have passed since the last formal Clean Air Act evaluation of PTPC, with the last evaluation occurring around 2012 to 2013. The July 2022 recovery furnace exceedance was detected only through PTPC's own periodic stack testing, not a regulatory inspection. Zero formal Resource Conservation and Recovery Act (RCRA) hazardous waste inspections have been conducted at this facility despite violation quarters appearing in the Enforcement and Compliance History Online (ECHO) record.

7. Regulatory Gap: Tank Inspection Authority

University of Washington associate professor of occupational health Marissa Baker stated in June 2026: 'The federal or state agencies would not have kind of purview on inspecting, maintaining the tank. Is it structurally sound? Is it being cleaned as it should? That's going to really fall on the employer. Department of Labor and Industries would not be inspecting a tank like that in a routine inspection.'

8. Aquatic Health Finding

A 2014 Washington Department of Fish and Wildlife crab and prawn tissue study in Marine Area 7 found polycyclic aromatic hydrocarbon contamination statistically comparable to levels found near Seattle and Tacoma. A human health risk assessment based on this finding was never completed.

9. Q2 2026 Whole Effluent Toxicity Testing, Pass

PTPC passed its second-quarter 2026 acute Whole Effluent Toxicity (WET) tests, using water flea and fathead minnow species, conducted by Spheros Environmental. This testing was ordered by the Washington State Department of Ecology outside the facility's normal permit timeline. No statistically significant difference was detected between the laboratory control and the acute critical effluent concentration of 2.2 percent effluent for either test species. Samples were collected May 6, 7, 13, and 20, 2026, and results were submitted to Ecology on June 12, 2026.

10. Complete Penalty Summary

The total confirmed penalty amount across all programs is \$545,650, comprised of a prior confirmed total of \$516,250 in environmental penalties plus \$29,400 in Washington State Department of Labor and Industries penalties. The Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO) 5-year total is \$105,750, covering Environmental Protection Agency (EPA)-tracked programs only; Washington State Department of Labor and Industries (L&I) and Washington Industrial Safety and Health Act (WISHA) penalties and pre-2021 penalties are tracked separately. The 1993 Bunker C spill penalty amount is unknown, and pre-1994 enforcement history is not recoverable from the sources reviewed for this record. Entries marked TBD do not yet have confirmed penalty amounts.

11. Permit Status

Treated Wastewater Discharge Permit (NPDES Permit WA0000922)

Version 5 of the permit, the active version, was issued May 19, 2025, effective June 1, 2025, and expires May 31, 2030. The previous permit, Version 4, expired October 1, 2018, after an administrative extension issued April 6, 2018; PTPC operated under that administrative extension for nearly seven years.

Version 5 adds new requirements: Per- and polyfluoroalkyl substances (PFAS) monitoring, aerator reinstallation, cooling water intake structure certification, whole effluent toxicity limits, and stormwater pollution prevention plan updates. The permit's receiving water is Port Townsend Bay, Glen Cove area, at Outfalls 001 and 005. There are no enforceable final limits on benzo(a)anthracene, a probable carcinogen, chlordane, a probable carcinogen, or pentachlorophenol, a confirmed human carcinogen, in treated wastewater discharge until 2029 at the earliest. PTPC is authorized to discharge approximately 7 percent more effluent than under the prior permit.

Air Operating Permit 0000922

This permit was issued in August 2022 and expires in August 2027. The recovery furnace federal standard is 0.044 grains per dry standard cubic foot at 8 percent oxygen under 40 Code of Federal Regulations (CFR) Part 63.862(a)(1)(i)(A). The Air Operating Permit also contains a separate,

permit-level condition of 0.08 grains per dry standard cubic foot.

12. Record Limitations and Pending Public Records Requests

- Ecology's Permit and Reporting Information System (PARIS) all-time counts, 164 violations, 80 inspections, and 62 enforcement actions, cover permit WA0000922 Versions 1 through 5 from 1990 to present. The bulk of pre-2021 individual entries are in Ecology's internal records system and not indexed online; full detail requires the Permit and Reporting Information System (PARIS) database export, the subject of public records request P030509-063026.
- Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO) enforcement data covers approximately the last five years for most programs. Pre-2021 penalties are captured in this record only where press releases, court records, or campaign-compiled documents independently documented them.
- Washington State Department of Labor and Industries inspection records, 35 general inspections confirmed, are pending under Requests 165966 and 166020, estimated for release September 11, 2026. The four inspections documented here come from Occupational Safety and Health Administration (OSHA) Integrated Management Information System (IMIS) records; additional inspections may exist in Washington State Department of Labor and Industries records not indexed in the Occupational Safety and Health Administration (OSHA) Integrated Management Information System (IMIS).
- Resource Conservation and Recovery Act (RCRA) hazardous waste: zero formal inspections are on record despite violation quarters appearing in the Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO) record. Facility-level Resource Conservation and Recovery Act (RCRA) compliance detail requires the RCRAInfo portal or a bulk CE_REPORTING.zip download under Handler ID WAD009248056.
- Clean Air Act: 4,902 days have passed since the last formal evaluation. Two Clean Air Act formal actions beyond Notice of Penalty Docket 21441 and Notice of Violation Docket 21402 appear in the Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO) count of 4 formal actions but are not yet individually documented in this record.
- The May 18, 2026 Notice of Violation has unknown subject matter; the specific document is not yet in hand.
- The 1993 Bunker C fuel oil spill penalty amount is unknown from publicly available sources.
- Pre-1991 enforcement history is not recoverable from any source reviewed to date.
- An August 2026 Washington Public Records Act production (request P030817-072026, closed by Ecology August 13, 2026) surfaced Ecology's internal "Release 304" spill and release log for this facility, spanning 2010 to 2025, and a set of Washington State Emergency Operations Center hazardous materials incident log entries, newly incorporated above where confirmed. Additional entries in the Release 304 log, including from 2010 and 2013, list specific volumes this campaign has not yet re-verified against a higher-resolution copy of the source record and are not yet reproduced here with specific figures.

Sources and Citations

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

1. Environmental Protection Agency (EPA) Enforcement and Compliance History Online (ECHO):
<https://echo.epa.gov>
2. Washington State Department of Ecology Permit and Reporting Information System (PARIS):
<https://paris.ecology.wa.gov>
3. PollutionScan (Enforcement and Compliance History Online (ECHO) mirror):
<https://www.pollutionscan.com/washington/jefferson/port-townsend-paper-mill>
4. Comprehensive Violation and Enforcement Citation Report, all four databases, July 2, 2026 (in campaign archive).
5. Notice of Penalty (NOP) Docket 21441 (Air, \$56,250):
<https://apps.ecology.wa.gov/publications/documents/ecypub/ptpc-notice-of-penalty-docket-21441.pdf>
6. Notice of Penalty (NOP) Docket 21561 (Water, \$6,000):
<https://apps.ecology.wa.gov/publications/documents/ecypub/ptpc-wq-notice-of-penalty-docket-21561.pdf>
7. Notice of Penalty (NOP) Docket 23694 (Water, \$20,000):
<https://apps.ecology.wa.gov/publications/documents/ecypub/ptpc-wq-notice-of-penalty-docket-23694.pdf>
8. Notice of Violation Docket 24681 (June 4, 2026): in campaign archive as 2026-06-04-PTPC-NOV24681.pdf
9. Occupational Safety and Health Administration (OSHA) Integrated Management Information System (IMIS) inspections 1563964.015, 1633133.015, 1722486.015, 1812975.015:
<https://www.osha.gov/pls/imis/establishment.html>
10. RCRAInfo (Handler WAD009248056): <https://rcrainfo.epa.gov>
11. Washington State Department of Ecology press releases: April 20, 2017; May 17, 2022; December 14, 2022; September 18, 2025.
12. Peninsula Daily News: June 9, 2019 (Environmental Protection Agency (EPA) settlement); February 7, 2022 and March 21, 2022 (fires); December 14, 2022 (fire).
13. Port Townsend Leader: April 2017; November 2018; March 2022; November 19, 2025; November 26, 2025; December 2024; June 2026. The November 2018 citation could not be re-located at a specific Port Townsend Leader URL during this research pass and is retained here pending verification.
14. KIRO 7: August 2019 (fire; no specific working article URL could be re-located during this research pass, retained pending verification); March 2025 (fire).
15. Agency for Toxic Substances and Disease Registry (ATSDR) Health Consultation 334-170, June 24, 2024:
<https://www.atsdr.cdc.gov/HAC/pha/PortTownsendPaperCorp/Port-Townsend-HC-508.pdf>
16. National Oceanic and Atmospheric Administration (NOAA) Incident News #6923; U.S. Coast Guard (USCG) District 13 records (1993 Bunker C spill).
17. Environmental Integrity Project (EIP): "A Paper Trail of Pollution," May 29, 2025, pages 7, 29, 35 to 36:
https://environmentalintegrity.org/wp-content/uploads/2025/08/EIP_Report_PaperTrailofPollution_5.29.25.pdf
18. Mady Lyon, Washington State Department of Ecology, email to David Ginsberg, June 10, 2026.
19. James DeMay, Washington State Department of Ecology, email to David Ginsberg, June 23, 2026.
20. Melanie Johnson, Washington State Department of Labor and Industries, letters June 24 and July 1, 2026.

21. Spheros Environmental, Whole Effluent Toxicity Testing Q2 2026, Report ID PG2398.01, June 2026.
22. Washington Department of Fish and Wildlife (WDFW), 2014 crab and prawn tissue study, Marine Area 7: <https://wdfw.wa.gov/publications/01608>
23. Environmental Protection Agency (EPA) Environmental Appeals Board Docket, Prevention of Significant Deterioration (PSD) 97-13 and Prevention of Significant Deterioration (PSD) 97-14.
24. Environmental Protection Agency (EPA) Docket CAA-10-2019-0071 (2019 consent agreement).
25. KUOW radio, reporter John Ryan, June 2026 (Marissa Baker quote): <https://www.kuow.org/stories/washington-paper-mills-mum-about-chemical-safety-after-longview-disaster>
26. V_1.9 PTPC Complete Timeline (David Ginsberg, June 2026).
27. Washington State Emergency Operations Center hazardous materials incident log entries naming Port Townsend Paper Company directly, 2019 to 2022, obtained by David Ginsberg via Washington Public Records Act request P030817-072026 to the Washington State Department of Ecology.
28. National Response Center Incident Report #1310683, July 14, 2021, reported by Chris Corden, obtained in the same August 2026 records production.
29. Washington State Department of Ecology: internal Tier2 Submit database "Release 304" spill and release log for Port Townsend Paper Company, Community Right-to-Know ID# WAD009270919, 2010 to 2025, obtained in the same records production.
30. Elizabeth Rios, Washington State Department of Ecology, email to David Ginsberg, August 13, 2026, confirming closure of public records request P030817-072026 as Ecology's final response.