



Port Townsend Paper Corporation  
100 Mill Road, Port Townsend, WA 98368  
www.PTPC.com

February 20, 2025

Emily Toffol  
Solid Waste Management Program, Industrial Section  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

**Subject: NOV 23432 August 19, 2024, NPDES Permit 0000922 TSS Exceedance**

Dear Ms. Toffol,

This correspondence is in response to Notice of Violation (NOV) Docket # 23432, received from Department of Ecology (Ecology) in a letter dated January 21, 2025. NOV 23432 detailed a total suspended solids (TSS) permit exceedance at Port Townsend Paper (PTPC Outfall 001 composite sample) for the operational day of August 19, 2024. Port Townsend Paper (PTPC) became aware that an upset incident caused an exceedance on August 20, 2024, at 10:22 AM when daily laboratory analysis was completed and reported. The concentration was 18,999 lb/day of TSS, which exceeds PTPC's daily limit of 16,212 lb./day under NPDES Permit 0000922. PTPC Environmental staff left a voicemail for you on August 21, 2024. Ecology's Southwest Regional Office was also contacted at 11:20 a.m. on August 21, 2024. The incident was assigned ERTS #733193. The increase in suspended solids was found to be associated with the startup of three (3) additional aerators in the aeration stabilization basin (ASB) and an upset incident in the form of a power outage .

Following the receipt of Ecology's July 29, 2024, wastewater inspection report for the inspection conducted on June 12, 2024, the PTPC Maintenance Department repaired and restarted three (3) aerators in the aeration stabilization basin. The increased aeration was in response to Ecology's recommendation to re-evaluate the number of aerators necessary to increase aeration and achieve a dissolved oxygen greater than 1 part per million (ppm) at the ASB outfall in accordance with PTPC's Treatment System Operating Plan (TSOP).

With the additional aerators in operation, TSS increased as anticipated. TSS remained below the daily limit until the operational day of August 19, 2024. An upset condition was caused by an external power outage that caused a mill wide power outage on August 17, 2024, at 8:24 p.m. The outage was caused by factors affecting the utility and resulted in lost power to the entire PTPC facility. PTPC did not have warning or control over the outage. This upset condition caused increased solids loading to the ASB, which resulted in an unexpected synergistic effect with the increased solids being released by the additional operating aerators.

Mill personnel quickly implemented several corrective actions to reduce suspended solids. Two (2) aerators were taken offline immediately as a corrective measure when TSS readings began to increase. Water conservation measures were undertaken to reduce flow and increase settling time. Following the exceedance, a third aerator was then taken offline to reduce the resuspension of previously settled solids. In addition, extra sampling was conducted to monitor TSS loading throughout each shift. These actions prevented any further exceedances.



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On September 10, 2024, PTPC began implementing a phased aerator start-up plan. Newly operational aerators were run for approximately 12 hours a day and their operation was rotated. This allowed for increased aeration without further TSS exceedances. PTPC continues to run as many aerators as are operable dependent on aeration stabilization basin suspended solids. No exceedances have occurred since the change.

PTPC's historical daily TSS tracking shows that this exceedance was not a reflection of our daily operational levels but was the result of an unpredictable upset condition and other supporting synergistic factors, including the operation of additional aerators per Ecology's recommendation. Additionally, PTPC continues to carefully monitor conditions at the ASB and evaluate new technologies to increase aeration. Dissolved oxygen has improved, with an average of 3.1 ppm year to date in 2025.

If you have any questions, please contact me at (360)379-2059 or [Micheal.Clea@ptpc.com](mailto:Micheal.Clea@ptpc.com).

Sincerely,

*Micheal R. Clea*

Micheal Clea MBA, MESH  
Environmental Manager  
Port Townsend Paper Corporation