

Chemical Inventory

Complete Tier Two Emergency and Hazardous Chemical Inventory, Reporting Year 2025

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. Overview and Purpose

This document is the complete chemical inventory Port Townsend Paper Company (PTPC) reported to the Washington State Department of Ecology for Reporting Year 2025 under the Emergency Planning and Community Right-to-Know Act (EPCRA), Section 312, commonly called Tier Two reporting. Facilities storing hazardous chemicals above certain threshold quantities must disclose what they store, how much, and where, so that firefighters, emergency planners, and the surrounding community know what is on site before an incident happens, not only after. This filing lists 33 reportable chemicals.

This inventory was obtained by David Ginsberg through a Washington Public Records Act request to the Washington State Department of Ecology, request number P030817-072026, closed by Ecology on August 13, 2026 as its final response on the request [1][2]. The underlying filing was certified by Bert Brown and received by the Washington State Emergency Response Commission (SERC) on February 26, 2026 [1].

One finding from the filing's own cover page is worth stating plainly: PTPC checked "No" to both threshold questions asked on the form itself, whether it is subject to Emergency Planning under Emergency Planning and Community Right-to-Know Act (EPCRA) Section 302 (40 Code of Federal Regulations (CFR) Part 355), and whether it is subject to Chemical Accident Prevention under Clean Air Act Section 112(r) (40 Code of Federal Regulations (CFR) Part 68, the federal Risk Management Program) [1][3]. Those are separate, higher-threshold federal programs from Tier Two reporting itself, triggered only by specific extremely hazardous substances at specific quantities.

PTPC's own self-assessment is that it does not meet either threshold, despite the scale of chemical storage documented in this filing, including a single trade-secret chemical stored at nearly 4.9 million pounds. This campaign has not independently verified that self-assessment against the specific substance and quantity thresholds those two programs use.

Notably absent from this filing, as from every prior year's Tier Two filing reviewed by this campaign: white liquor and black liquor, the two chemical mixtures central to the kraft pulping process at the center of most of this campaign's tank safety research, are never listed as named chemicals here. Only their individual components are, principally sodium hydroxide and sodium hydrosulfide solution, both listed below. Tier Two reporting therefore cannot supply a single tank-specific white liquor or black liquor volume; the individual chemical entries below are the closest publicly available substitute.

2. Facility Identification and Emergency Contacts

Facility Name	Port Townsend Paper Corp (doing business as PTPC)
Address	100 Mill Road, Port Townsend, WA 98368, Jefferson County
Community Right-to-Know ID#	WAD009270919
Parent Company	Crown Paper Group, 100 Mill Road, Port Townsend, WA 98368
Maximum Occupants	300 (manned)
North American Industry Classification System (NAICS) Code	322120
Tier Two Contact	Heather Holme, Environmental Engineer, heather.holme@ptpc.com, (360) 379-2083
Emergency Contact	Shannon Daugherty, Safety Manager, (360) 379-2141, 24-hour: (559) 333-1103
Secondary Emergency Contact	Pulp Mill Foreman, (360) 379-2196, 24-hour: (360) 390-5618
Facility Emergency Coordinator	Grant Boursaw, Pulp Superintendent, (360) 379-2071, 24-hour: (360) 301-2755
Certifying Official	Bert Brown, owner/operator's authorized representative

Table 2. Facility identification and contacts as filed for Reporting Year 2025 [1].

3. How to Read This Inventory

Each entry below reports two figures: the maximum amount of that chemical present on site at any one time during 2025, and the average amount present across the year, both in pounds. Hazard categories are the physical and health hazard checkboxes PTPC itself checked on the filing, using the federal Globally Harmonized System (GHS) hazard classification categories; this document reports exactly what PTPC checked, not an independent hazard assessment.

Four of the 33 chemicals, Infinity Ps4470, Hercobond Plus 555, Glyoxal 40 Percent, and Ultra-Phase 40T, are claimed by PTPC as trade secrets, marked with an asterisk throughout this document. Under Emergency Planning and Community Right-to-Know Act (EPCRA), a trade secret claim can withhold a chemical's specific identity from public disclosure, but it cannot withhold quantities, hazard categories, or storage locations, all of which are reported below exactly as filed. A data quality note on the trade secret entries specifically: as filed, Hercobond Plus 555 and Glyoxal 40 Percent both list an identical Chemical Abstracts Service (CAS)# (107-22-2), and Ultra-Phase 40T lists the same Chemical Abstracts Service (CAS)# as Aluminum Sulfate (10043-01-3).

This inconsistency exists in PTPC's own filing; it is reproduced here exactly as filed rather than corrected or omitted, since this campaign cannot determine from the filing alone whether it reflects a generic surrogate Chemical Abstracts Service (CAS)# used specifically because the chemical is trade secret, a data entry error, or something else.

Six chemicals were on site for fewer than the full 365 days of 2025, per the filing's own "number of days on site" field: Infinity Ps4470 (31 days), Glyoxal 40 Percent (92 days), Nalkleen (244 days), Nalcoat 2610 (306 days), Spent Sodium Hydroxide Solution (274 days), and Hercobond Plus 555 (151 days). This suggests these six chemicals were newly introduced, temporarily used, or reformulated partway through the year, consistent with year-over-year Tier Two comparisons this campaign has separately reviewed showing several of these same chemicals as recent additions to PTPC's inventory [4].

4. Plain-Language Glossary: What the Hazard Categories Mean

Table 1 and the chemical-by-chemical list in Section 6 both use the same set of federal Globally Harmonized System (GHS) hazard category labels that PTPC checked on its own Tier Two filing. Those labels are written in regulatory language; the definitions below translate each one used in this filing into plain English, following hazard classification guidance published by the Canadian Centre for Occupational Health and Safety (CCOHS), a government occupational safety agency whose published categories mirror the same Globally Harmonized System (GHS) used in the United States [9].

- Flammable (gases, aerosols, liquids, or solids): catches fire easily, creating a fire or explosion risk.
- Acute toxicity (any route of exposure): can be fatal, toxic, or harmful from a single or brief exposure, whether inhaled, swallowed, or absorbed through skin.
- Skin corrosion or irritation: causes anything from reversible irritation to severe chemical burns on contact with skin.
- Serious eye damage or irritation: causes anything from reversible irritation to permanent eye damage on contact.
- Corrosive to metal: chemically damages or destroys metal it contacts, a hazard for storage tanks, piping, and equipment, not just for people.
- Carcinogenicity: may cause cancer or increase the likelihood of developing cancer.
- Specific target organ toxicity (single or repeated exposure): can damage a specific organ, such as the liver, kidneys, or blood, after one exposure or after repeated exposure over time.
- Aspiration hazard: if swallowed, can enter the lungs instead of the stomach, causing chemical pneumonia, lung injury, or death.
- Germ cell mutagenicity: can cause permanent genetic damage to reproductive cells that can be passed on to future generations.
- Reproduction toxicity: can damage fertility or harm an unborn child.
- Respiratory or skin sensitization: can trigger an allergic reaction, such as asthma-like breathing symptoms or a skin rash, often after repeated exposure.
- Gas under pressure (compressed gas): stored as a compressed or liquefied gas that could explode if the container is heated, or that can cause severe cold burns if a refrigerated gas escapes.

- Simple asphyxiant: a gas that is not itself toxic but can displace breathable oxygen in an enclosed space, causing rapid suffocation.
- Oxidizer (liquid, solid, or gas): does not itself burn but can intensify a fire or cause an explosion by feeding oxygen to whatever is burning nearby.
- Combustible dust: fine particles that, suspended in air, can ignite or explode, similar to the well-known risk of flour dust in an enclosed space.
- Hazard Not Otherwise Classified: a hazard PTPC identified on the filing that does not fit neatly into one of the standard categories above, but that the filer still judged serious enough to disclose.

5. Complete Inventory, Sorted by Maximum Quantity

Chemical	CAS#	Max (lbs)	Avg (lbs)
Petroleum Hydrocarbons	068476-33-5	5,436,198	3,624,132
Hercobond Plus 555	107-22-2 *	4,932,866	352,804
Calcium Oxide	001305-78-8	710,402	290,844
Sodium Hydroxide	001310-73-2	589,616	446,004
Starch (Cationic Amylopectin)	0068936-82-3	303,535	147,064
Soda Ash	000497-19-8	298,606	243,642
Spent Sodium Hydroxide Solution	064742-40-1	294,000	80,000
Propane	000074-98-6	253,536	224,122
Ultra-Phase 40T	10043-01-3 *	227,834	135,733
Sulfuric Acid	007664-93-9	208,532	169,832
Compressed Natural Gas	000074-82-8	129,482	75,531
Sulfur	007704-34-9	116,906	91,367
Asbestos (Friable Only)	001332-21-4	99,999	99,999
Fiberglass	065997-17-3	99,999	99,999
Sodium Hydrosulfide Solution	016721-80-5	86,849	76,423
Oxygen	007782-44-7	85,716	64,287
Glyoxal 40 Percent	000107-22-2 *	78,228	58,671
Turpentine	008006-64-2	62,184	35,508
Aluminum Sulfate	010043-01-3	56,760	27,833
Urea	000057-13-6	51,666	25,802
Hydrogen Peroxide (Concentrations Under 52 Percent)	007722-84-1	49,763	35,731
Ammonium Nitrate Solution	006484-52-2	43,795	24,547
Distillates (Petroleum), Hydrotreated Li	64742-47-8	25,752	14,864
Diesel Fuel No 2	068476-34-6	24,865	18,649

Chemical	CAS#	Max (lbs)	Avg (lbs)
Nalcoat 2610	68002-97-1	24,271	11,368
Phosphoric Acid Solution	007664-38-2	23,664	15,061
Ferric Sulfate	10028-22-5	22,853	8,372
Rosin, Fumarated	68554-16-5	22,781	6,446
Nalkleen	34590-94-8	22,583	12,605
Amorphous Silica	07631-86-9	18,702	2,611
Polyaluminum Chloride	001327-41-9	11,390	6,068
Tetrachloroethylene	000127-18-4	11,030	11,030
Infinity Ps4470	2008-39-1 *	6,728	6,434

Table 1. All 33 reportable chemicals, sorted by maximum quantity on site during Reporting Year 2025, as filed [1]. An asterisk (*) after a CAS# marks a chemical claimed as a trade secret; see Section 3 for what that designation does and does not withhold.

6. Hazard Categories and Storage Locations by Chemical

The following lists every chemical in Table 1 again, in the same descending order, with its full hazard category list and reported on-site storage location or locations, exactly as filed, plus a plain-language note on what each chemical commonly is or is used for. See Section 4 for what each hazard category term means in plain English.

- Petroleum Hydrocarbons, Chemical Abstracts Service (CAS)# 068476-33-5. Max 5,436,198 lbs, average 3,624,132 lbs. Hazard categories: Flammable (gases, aerosols, liquids, or solids), Acute toxicity (any route of exposure), Hazard Not Otherwise Classified. Storage: Fuel oil tank farm; transformer yard; various containers and oil-filled equipment throughout the mill; two package boiler fuel tanks; two used oil tanks inside the oil storage building; stove oil tank near the millwright shop; two baker tanks near the tank farm. What this is: A general term for oil-based fuels, mostly fuel oil the mill burns to power equipment and generate steam. These are flammable and can be toxic if inhaled in concentrated vapor form, similar to home heating oil or the bunker fuel used by ships.
- Hercobond Plus 555 (trade secret chemical), Chemical Abstracts Service (CAS)# 107-22-2. Max 4,932,866 lbs, average 352,804 lbs. On site 151 of 365 days in 2025. Hazard categories: Aspiration hazard. Storage: Outside the roll hole door, for Paper Machine 2 (PM2). What this is: A Solenis brand-name paper strength additive. Solenis's own public product literature describes this line as a dry strength additive used to increase paperboard strength without adding more wood fiber [5]. PTPC's trade secret claim withholds this chemical's exact formulation, not its identity, quantity, or hazard category.
- Calcium Oxide, Chemical Abstracts Service (CAS)# 001305-78-8. Max 710,402 lbs, average 290,844 lbs. Hazard categories: Skin corrosion or irritation, Serious eye damage or irritation, Carcinogenicity, Specific target organ toxicity (single or repeated exposure). Storage: Fresh lime silo at the lime kiln; reburn lime silo at the lime kiln. What this is: Commonly known as quicklime, made in the mill's lime kiln by heating limestone as part of recovering pulping chemicals for reuse. It reacts violently and

generates intense heat when it contacts water, and can cause severe burns to skin, eyes, and the airway.

- Sodium Hydroxide, Chemical Abstracts Service (CAS)# 001310-73-2. Max 589,616 lbs, average 446,004 lbs. Hazard categories: Acute toxicity (any route of exposure), Skin corrosion or irritation, Serious eye damage or irritation, Corrosive to metal. Storage: White liquor, green liquor, and black liquor tanks; south side of the machine shop; Paper Machine 2 (PM2). What this is: Commonly known as lye or caustic soda, the same chemical found in a far more dilute form in some household drain cleaners. It is the central chemical that breaks down wood chips into pulp fiber at PTPC, and is highly corrosive to skin, eyes, and lung tissue.
- Starch (Cationic Amylopectin), Chemical Abstracts Service (CAS)# 0068936-82-3. Max 303,535 lbs, average 147,064 lbs. Hazard categories: Combustible dust. Storage: Paper machines, wet end. What this is: A modified corn starch used across the papermaking industry to help bind paper fibers together and add strength. It is a routine, comparatively low-hazard additive; its only reported hazard here is as a combustible dust, similar to flour dust, if it becomes suspended in the air of an enclosed space.
- Soda Ash, Chemical Abstracts Service (CAS)# 000497-19-8. Max 298,606 lbs, average 243,642 lbs. Hazard categories: Serious eye damage or irritation. Storage: Lime kiln area, green and white liquors; lime kiln area, soda ash tank. What this is: Commonly known as washing soda, the same compound (sodium carbonate) sold for laundry and water softening. At PTPC it is part of the chemical recovery cycle at the lime kiln, and can seriously irritate eyes on contact.
- Spent Sodium Hydroxide Solution, Chemical Abstracts Service (CAS)# 064742-40-1. Max 294,000 lbs, average 80,000 lbs. On site 274 of 365 days in 2025. Hazard categories: Acute toxicity (any route of exposure), Skin corrosion or irritation, Serious eye damage or irritation, Specific target organ toxicity (single or repeated exposure), Aspiration hazard. Storage: Pulp mill, former M&D tank. What this is: The same lye described above under Sodium Hydroxide, after it has already been used once in the pulping process and remains as a leftover process stream rather than fresh caustic soda. It carries the same corrosive hazards to skin, eyes, and the airway.
- Propane, Chemical Abstracts Service (CAS)# 000074-98-6. Max 253,536 lbs, average 224,122 lbs. Hazard categories: Flammable (gases, aerosols, liquids, or solids), Gas under pressure (compressed gas), Simple asphyxiant, Hazard Not Otherwise Classified. Storage: South of the main tank farm; northwest corner of the bag plant; small tanks throughout the mill. What this is: The same fuel gas used in home barbecue tanks, forklifts, and some rural home heating systems. It is highly flammable, and in an enclosed, unventilated space it can build up and displace breathable oxygen.
- Ultra-Phase 40T (trade secret chemical), Chemical Abstracts Service (CAS)# 10043-01-3. Max 227,834 lbs, average 135,733 lbs. Hazard categories: Skin corrosion or irritation, Serious eye damage or irritation. Storage: Outside the roll hole door, Paper Machine 2 (PM2); smaller day tank near PM2. What this is: PTPC's filing withholds this product's specific identity as a trade secret, and this campaign could not locate a public safety data sheet naming its manufacturer or exact composition. Its reported hazards (skin and eye damage) and the fact that its Chemical Abstracts Service (CAS) number matches Aluminum Sulfate's (see Section 3's data quality note) are consistent with an acidic aluminum-salt-based papermaking additive, though this is not confirmed.

- Sulfuric Acid, Chemical Abstracts Service (CAS)# 007664-93-9. Max 208,532 lbs, average 169,832 lbs. Hazard categories: Skin corrosion or irritation, Serious eye damage or irritation, Specific target organ toxicity (single or repeated exposure). Storage: Tank south of the HD storage tank; primary clarifier tank farm; demineralizers, east side of the lime kiln control room; day tank above the C-side low density tank; Thickener Building. What this is: The same acid used in car batteries, in a stronger industrial concentration. It is highly corrosive to skin, eyes, and metal, and PTPC uses it in water treatment and other process steps.
- Compressed Natural Gas, Chemical Abstracts Service (CAS)# 000074-82-8. Max 129,482 lbs, average 75,531 lbs. Hazard categories: Flammable (gases, aerosols, liquids, or solids), Gas under pressure (compressed gas). Storage: Trailers west of the oil pump house. What this is: The same fuel, mostly methane, piped into many homes for stoves, furnaces, and water heaters, stored here in compressed form. It is flammable, and like propane, can displace breathable oxygen in an enclosed space.
- Sulfur, Chemical Abstracts Service (CAS)# 007704-34-9. Max 116,906 lbs, average 91,367 lbs. Hazard categories: Flammable (gases, aerosols, liquids, or solids), Skin corrosion or irritation, Combustible dust. Storage: Fire end of the kiln. What this is: Elemental sulfur, part of the mill's chemical recovery cycle. In dust or powder form it can catch fire, it irritates skin on contact, and burning sulfur releases sulfur dioxide, a toxic, sharp-smelling gas.
- Asbestos (Friable Only), Chemical Abstracts Service (CAS)# 001332-21-4. Max 99,999 lbs, average 99,999 lbs. Hazard categories: Carcinogenicity. Storage: Insulation throughout the mill. What this is: A once-common heat-resistant insulation material. "Friable" means it easily crumbles into microscopic fibers that become airborne and can be inhaled. The International Agency for Research on Cancer (IARC) classifies asbestos as a Group 1 known human carcinogen, and the United States Environmental Protection Agency (EPA) and the Agency for Toxic Substances and Disease Registry (ATSDR) both link inhaled asbestos fibers to mesothelioma and lung cancer [6].
- Fiberglass, Chemical Abstracts Service (CAS)# 065997-17-3. Max 99,999 lbs, average 99,999 lbs. Hazard categories: Skin corrosion or irritation, Specific target organ toxicity (single or repeated exposure). Storage: Stored behind the pulp mill and insulation throughout the mill. What this is: Spun glass fiber insulation, the same general material used in home attic insulation (pink batts). Handling or disturbing it can irritate skin, eyes, and the respiratory tract with tiny glass fibers.
- Sodium Hydrosulfide Solution, Chemical Abstracts Service (CAS)# 016721-80-5. Max 86,849 lbs, average 76,423 lbs. Hazard categories: Acute toxicity (any route of exposure), Skin corrosion or irritation, Serious eye damage or irritation, Corrosive to metal. Storage: Lime kiln area, green and white liquor clarifiers. What this is: One of the two core chemicals, along with sodium hydroxide, that make up the "white liquor" and "green liquor" used in kraft pulping (see Section 1). It is highly corrosive, and if it contacts an acid, it can release hydrogen sulfide, the toxic gas known for its rotten-egg smell.
- Oxygen, Chemical Abstracts Service (CAS)# 007782-44-7. Max 85,716 lbs, average 64,287 lbs. Hazard categories: Oxidizer (liquid, solid, or gas), Gas under pressure (compressed gas). Storage: By the Aerated Stabilization Basin (ASB). What this is: Concentrated industrial oxygen, likely used here to help treat wastewater at the mill's Aerated Stabilization Basin (ASB). Oxygen itself does not

burn, but it dramatically accelerates the burning of anything flammable nearby.

- Glyoxal 40 Percent (trade secret chemical), Chemical Abstracts Service (CAS)# 000107-22-2. Max 78,228 lbs, average 58,671 lbs. On site 92 of 365 days in 2025. Hazard categories: Acute toxicity (any route of exposure), Germ cell mutagenicity. Storage: Outside the roll hole door, for Paper Machine 2 (PM2). What this is: A widely used industrial chemical that works as a cross-linking agent, commonly added to paper and textiles to make them stronger and more water-resistant when wet [7]. It can irritate the body on contact and is classified here as a possible cause of heritable genetic damage (germ cell mutagenicity).
- Turpentine, Chemical Abstracts Service (CAS)# 008006-64-2. Max 62,184 lbs, average 35,508 lbs. Hazard categories: Flammable (gases, aerosols, liquids, or solids), Acute toxicity (any route of exposure), Skin corrosion or irritation, Serious eye damage or irritation, Respiratory or skin sensitization, Aspiration hazard. Storage: Fuel oil tank farm. What this is: A solvent distilled from pine resin, historically familiar as a paint thinner. At a kraft pulp mill it occurs naturally as a byproduct of processing pine and fir wood chips, and its vapors are flammable and irritating.
- Aluminum Sulfate, Chemical Abstracts Service (CAS)# 010043-01-3. Max 56,760 lbs, average 27,833 lbs. Hazard categories: Serious eye damage or irritation, Corrosive to metal. Storage: Dock side of the paper machine building (alum and Fennosize G516); paper machine tote storage and inside the paper machine building through the roll hole by the concrete stairs (shared storage areas also used for Ultraphase 40T). What this is: Commonly known as alum, the same chemical municipal water treatment plants use to help clear cloudiness from drinking water. At PTPC it is used as a papermaking additive; concentrated alum can irritate eyes and corrode metal.
- Urea, Chemical Abstracts Service (CAS)# 000057-13-6. Max 51,666 lbs, average 25,802 lbs. Hazard categories: Serious eye damage or irritation. Storage: Primary clarifier tank farm (UAN); Thickener Building, Nalco 1T60. What this is: The same compound found in agricultural fertilizer and naturally present in mammal urine. It is generally low hazard; its only reported hazard here is eye irritation.
- Hydrogen Peroxide (Concentrations Under 52 Percent), Chemical Abstracts Service (CAS)# 007722-84-1. Max 49,763 lbs, average 35,731 lbs. Hazard categories: Oxidizer (liquid, solid, or gas), Acute toxicity (any route of exposure), Skin corrosion or irritation, Serious eye damage or irritation, Specific target organ toxicity (single or repeated exposure). Storage: South side of the machine shop; caustic baker tank; white liquor, green liquor, and black liquor clarifiers and tanks. What this is: The same chemical family as household hydrogen peroxide disinfectant, but at industrial strength. PTPC uses it as a bleaching and oxidizing agent, and at this concentration it can burn skin and eyes and irritate the airway.
- Ammonium Nitrate Solution, Chemical Abstracts Service (CAS)# 006484-52-2. Max 43,795 lbs, average 24,547 lbs. Hazard categories: Oxidizer (liquid, solid, or gas), Acute toxicity (any route of exposure), Serious eye damage or irritation. Storage: Primary clarifier tank farm (two separate tanks, APP and UAN). What this is: The same compound widely used in agricultural fertilizer. In solid, highly concentrated form it is also a component of some industrial explosives, but PTPC's filing reports it here only as a dissolved solution, classified as an oxidizer and an eye and health irritant, not as an explosive.

- Distillates (Petroleum), Hydrotreated Li, Chemical Abstracts Service (CAS)# 64742-47-8. Max 25,752 lbs, average 14,864 lbs. Hazard categories: Skin corrosion or irritation, Carcinogenicity, Aspiration hazard. Storage: Tote storage near the toolroom; finishing room; tote storage, office side of PM2; roll hole, paper machine basement; waste drum under the kiln; waste drum, OCC basement; ASB dredging area, in totes. What this is: A refined mineral oil product, similar to base oils used in lubricants (the Chemical Abstracts Service (CAS) number filed, 64742-47-8, corresponds to what is commonly labeled hydrotreated light distillates). Some petroleum distillates in this general category are classified as carcinogens, and can cause lung damage if swallowed and drawn into the airway (aspiration hazard).
- Diesel Fuel No 2, Chemical Abstracts Service (CAS)# 068476-34-6. Max 24,865 lbs, average 18,649 lbs. Hazard categories: Flammable (gases, aerosols, liquids, or solids), Skin corrosion or irritation, Carcinogenicity, Specific target organ toxicity (single or repeated exposure), Aspiration hazard. Storage: Diesel fire pump tank at the tank farm; day tank in the pumphouse by the Peco crane; west of the woodmill by the haul-in hopper; split gasoline and diesel fueling tank west of the tank farm. What this is: Ordinary diesel fuel, the same fuel used in trucks, generators, and heavy equipment. It is flammable, and diesel fuel and its combustion byproducts are linked to increased cancer risk with prolonged exposure.
- Nalcoat 2610, Chemical Abstracts Service (CAS)# 68002-97-1. Max 24,271 lbs, average 11,368 lbs. On site 306 of 365 days in 2025. Hazard categories: Aspiration hazard. Storage: Paper Machine 2 (PM2). What this is: This campaign could not locate a public safety data sheet identifying this product's manufacturer or exact composition. Its name and its use at Paper Machine 2 (PM2) suggest a specialty papermaking process chemical, possibly a coating aid, though this is not confirmed; its only reported hazard is aspiration hazard.
- Phosphoric Acid Solution, Chemical Abstracts Service (CAS)# 007664-38-2. Max 23,664 lbs, average 15,061 lbs. Hazard categories: Skin corrosion or irritation. Storage: Primary clarifier tank farm. What this is: The same acid, in a far more dilute form, used as a flavoring in cola soft drinks. At the concentration used industrially here, it is corrosive to skin.
- Ferric Sulfate, Chemical Abstracts Service (CAS)# 10028-22-5. Max 22,853 lbs, average 8,372 lbs. Hazard categories: Acute toxicity (any route of exposure), Skin corrosion or irritation, Serious eye damage or irritation, Corrosive to metal. Storage: Reverse osmosis unit; Thickener Building. What this is: An iron-based chemical widely used by municipal drinking water and wastewater treatment plants to help clump and remove suspended particles from water. It is corrosive to skin, eyes, and metal in concentrated form.
- Rosin, Fumarated, Chemical Abstracts Service (CAS)# 68554-16-5. Max 22,781 lbs, average 6,446 lbs. Hazard categories: Skin corrosion or irritation, Serious eye damage or irritation, Corrosive to metal. Storage: Paper machine dock (Fennosize G17894; changed to EXPN 15008 without change of location on 8/21/23). What this is: A modified form of rosin, the same pine tree resin used on violin bows and by baseball pitchers, chemically treated to work as a papermaking sizing agent that helps paper resist water and ink bleed-through. It is corrosive to skin, eyes, and metal in concentrated form.

- Nalkleen, Chemical Abstracts Service (CAS)# 34590-94-8. Max 22,583 lbs, average 12,605 lbs. On site 244 of 365 days in 2025. Hazard categories: Aspiration hazard. Storage: Paper Machine 2 (PM2). What this is: This campaign could not locate a public safety data sheet identifying this product's manufacturer or exact composition. Its name and its use at Paper Machine 2 (PM2) suggest a specialty cleaning or deposit-control chemical for papermaking equipment, though this is not confirmed; its only reported hazard is aspiration hazard.
- Amorphous Silica, Chemical Abstracts Service (CAS)# 07631-86-9. Max 18,702 lbs, average 2,611 lbs. Hazard categories: Skin corrosion or irritation, Serious eye damage or irritation, Respiratory or skin sensitization. Storage: Drop trailer near the roll hole door; totes inside the paper machine roll hole; mill-wide. What this is: A processed, non-crystalline form of silicon dioxide, the same basic mineral found in sand, used here as a filler or coating aid. Unlike crystalline silica dust, amorphous silica is not classified as a carcinogen, but it can still irritate skin, eyes, and the respiratory tract.
- Polyaluminum Chloride, Chemical Abstracts Service (CAS)# 001327-41-9. Max 11,390 lbs, average 6,068 lbs. Hazard categories: Serious eye damage or irritation, Corrosive to metal. Storage: Paper machines (Fennosize G516). What this is: Another aluminum-based water treatment chemical, similar in role to alum (see Aluminum Sulfate above), commonly used by municipal water treatment plants and in papermaking to help clear water and improve paper formation. It can irritate eyes and corrode metal.
- Tetrachloroethylene, Chemical Abstracts Service (CAS)# 000127-18-4. Max 11,030 lbs, average 11,030 lbs. Hazard categories: Carcinogenicity. Storage: Electrical Room 6, #2 paper machine, elevation 34; Electrical Room 26, west of refiners, elevation 18; Electrical Room 27, north of the cat shop, elevation 18. What this is: Commonly known as "perc," the standard solvent used at most dry cleaners. Here it is reported in electrical rooms, likely as an insulating or cleaning fluid for electrical equipment. The International Agency for Research on Cancer (IARC) classifies it as a Group 2A probable human carcinogen, and the Agency for Toxic Substances and Disease Registry (ATSDR) also documents cancer risk from long-term exposure [8].
- Infinity Ps4470 (trade secret chemical), Chemical Abstracts Service (CAS)# 2008-39-1. Max 6,728 lbs, average 6,434 lbs. On site 31 of 365 days in 2025. Hazard categories: Skin corrosion or irritation, Serious eye damage or irritation, Corrosive to metal, Carcinogenicity, Reproduction toxicity, Specific target organ toxicity (single or repeated exposure). Storage: Pulp mill. What this is: PTPC's filing withholds this product's specific identity as a trade secret, and this campaign could not locate a public safety data sheet naming its manufacturer, composition, or intended use. Its reported hazard profile, corrosive to skin, eyes, and metal, plus carcinogenicity, reproductive toxicity, and organ toxicity, is the broadest of any single chemical in this filing, which makes its undisclosed identity a notable transparency gap given that it is stored directly in the pulp mill.

7. Limitations

- This document reports only what PTPC self-reported on its own Tier Two filing. It is not an independent chemical audit, and this campaign has not independently verified the quantities, hazard classifications, or storage locations against any source other than the filing itself.

- Tier Two reporting thresholds mean chemicals below certain quantities do not have to be reported at all; this list should not be read as a complete accounting of every chemical present on site, only of those that crossed Emergency Planning and Community Right-to-Know Act (EPCRA)'s reporting thresholds for Reporting Year 2025.
- White liquor and black liquor, though central to this campaign's broader tank safety research, are not named anywhere in this filing; see Section 1.
- The four trade secret entries withhold the specific chemical identity behind a product name; the Chemical Abstracts Service (CAS)# irregularities noted in Section 3 could not be resolved from the filing alone.
- The plain-language notes in Section 6 identify well-known chemicals from general public knowledge and, where cited, named public sources. For several proprietary product names (Nalkleen, Nalcoat 2610, Ultra-Phase 40T, and Infinity Ps4470), this campaign could not locate a public safety data sheet confirming the manufacturer or exact composition, and says so plainly rather than guessing at an unconfirmed identity.

Sources and Citations

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

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2. Elizabeth Rios, Washington State Department of Ecology, Hazardous Waste and Toxics Reduction Program, email to David Ginsberg, August 13, 2026, confirming closure of public records request P030817-072026 as Ecology's final response.
3. Emergency Planning and Community Right-to-Know Act (EPCRA), 40 Code of Federal Regulations (CFR) Part 355 (Section 302, emergency planning) and Part 370 (Section 312, Tier Two reporting).
4. Washington State Department of Ecology: Tier2 Submit database records for Port Townsend Paper Company, Community Right-to-Know ID# WAD009270919, reporting years 2023 through 2025, obtained in the same August 2026 records production.
5. Solenis, "Hercobond Plus Dry Strength Additives," public product literature describing the Hercobond Plus product line as a dry strength additive for packaging paperboard, solenis.com, accessed August 2026.
6. Agency for Toxic Substances and Disease Registry (ATSDR), ToxFAQs for Asbestos; United States Environmental Protection Agency (EPA), asbestos hazard information; International Agency for Research on Cancer (IARC) Monographs, asbestos, Group 1 (carcinogenic to humans).
7. General industry and technical literature on glyoxal as a cross-linking and wet-strength agent in paper and textile manufacturing, accessed August 2026.
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9. Canadian Centre for Occupational Health and Safety (CCOHS), "WHMIS: Hazard Classes and Categories," [ccohs.ca](https://www.ccohs.ca), a plain-language guide to the Globally Harmonized System (GHS) hazard classification categories used on PTPC's own Tier Two filing, accessed August 2026.