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Willie Bence

Director, Jefferson County Department of Emergency Management

Jefferson County Department of Emergency Management

107 E. Washington St., Port Townsend, WA 98368

**RE: PTPC White Liquor Release Scenario — Emergency Preparedness Questions
Following the Longview Disaster**

Dear Mr. Bence,

Thank you for your public comments following the May 26, 2026 Nippon Dynawave disaster, in which you confirmed that Port Townsend Paper Company stores white liquor and described it as 'a particularly nasty and caustic chemical.' That candor is exactly what the community needs from its emergency management leadership, and I appreciate it.

I am writing to ask a focused set of questions about Jefferson County's preparedness for a white liquor release scenario at PTPC — not to alarm, but because the Longview disaster has made clear that this is precisely the kind of scenario that emergency management must have planned for in advance. I am aware of the July LEPC meeting and intend to attend. These questions are intended to help that meeting be as productive as possible.

Background: What the Longview Response Required

The Nippon Dynawave implosion on May 26, 2026 required:

- Approximately 40 firefighters and paramedics, including a regional hazmat team
- On-scene chemical decontamination of casualties before hospital transport — standard protocol for caustic chemical exposure
- Formal declaration of a mass casualty scene by the Longview Fire Department (Battalion Chief Mike Gorsuch, AP wire, May 26, 2026)
- Ongoing environmental monitoring of drainage ditches, which produced 2,226 dead fish by June 1, 2026 (Washington Dept. of Ecology)

PTPC's daily production of 950–1,000 tons exceeds Nippon Dynawave's approximately 770 tons. The mill sits on 450 acres directly adjacent to Port Townsend Bay. A release of comparable scale would involve the bay, the Olympic Gravity Water System pipeline corridor, and a small-city emergency response infrastructure. The question is not whether this scenario is possible — it is whether Jefferson County is prepared for it.

Questions for Jefferson County Emergency Management

1

Regional hazmat decontamination capability: Does Jefferson County Emergency Management have a regional hazmat decontamination team pre-positioned and trained for a white liquor release scenario near Port Townsend Bay?

The Longview response required a regional hazmat team with specialized decontamination equipment before casualties could be transported to hospitals. White liquor (sodium hydroxide + sodium sulfide) causes immediate second and third-degree chemical burns and was caustic enough to damage firefighter protective gear at Longview. If a comparable release occurred at PTPC, would East Jefferson Fire Rescue have the decontamination capability required — or does that require mutual aid from Clallam County or beyond? What is the estimated response time for that mutual aid?

2

Current Hazardous Materials Response Plan — PTPC-specific provisions: Does the current Jefferson County Hazardous Materials Response Plan (most recent draft: Rev 5, March 24, 2025) include a specific release scenario for white liquor at PTPC — covering estimated release volumes, bay contamination protocols, evacuation zones, and public notification procedures?

I am aware of the HMRP draft and its general framework. My question is whether white liquor at PTPC has been modeled as a specific scenario within that plan — not just as a generic hazmat category — and whether the plan reflects the proximity of the discharge outfall to Port Townsend Bay.

3

Joint exercises: Has Jefferson County Emergency Management conducted a joint tabletop or field exercise with East Jefferson Fire Rescue, PTPC, and Jefferson County Public Health simulating a major white liquor release at the mill? If not, is one planned in 2026?

The US Chemical Safety Board investigation into the Longview disaster is expected to address preparedness and inter-agency coordination as contributing factors. A pre-disaster exercise at PTPC would be the most direct way to identify gaps before they become casualties.

4

Bay contamination protocol: What is the current emergency protocol for a major industrial chemical release into Port Townsend Bay — including notification to the US Coast Guard, the Washington Department of Fish and Wildlife, the Washington Department of Ecology, and the Jamestown S'Klallam and Port Gamble S'Klallam Tribes, who hold treaty fishing rights in these waters?

5

PTPC RCRA emergency preparedness violations: Are you aware that a June 2025 RCRA inspection of PTPC by the Washington Department of Ecology found 9

violations including failures in emergency preparedness and prevention procedures (category 262.M) — the exact regulatory category relevant to chemical storage tank failure — with an informal enforcement notice issued in October 2025? Has JCDEM been in contact with Ecology or PTPC regarding the corrective action plan for these violations?

6

Water system vulnerability: The PTPC facility lies upstream of the Olympic Gravity Water System pipeline corridor. Does the county emergency plan address contamination of the OGWS water supply in a white liquor release scenario — including protocols for notification to the City of Port Townsend, which owns the water rights, and for alternative water supply?

7

Tribal nation coordination: Have the Jamestown S'Klallam and Port Gamble S'Klallam Tribes been formally consulted as part of LEPC emergency planning for PTPC? Their treaty fishing rights in Port Townsend Bay give them a direct legal and health interest in any release scenario affecting the bay.

A Specific Request

I would like to formally request that Jefferson County Emergency Management confirm — in writing or at the July LEPC meeting — the following:

- Whether a regional hazmat decontamination team is pre-positioned and trained for a white liquor release near Port Townsend Bay
- Whether the current HMRP includes a white liquor release scenario specific to PTPC
- Whether a joint hazmat exercise with PTPC has been conducted or is scheduled for 2026

If any of these are gaps, I believe the post-Longview moment is exactly the right time to close them — and I am committed to supporting that effort as a constructive community partner, not an adversary.

Context

I have spent the past several weeks preparing a community safety research package — including a research paper, Q&A reference, community health report, and formal safety requests to all responsible parties. I am happy to share any of this material. I also note that the American Geophysical Union's Thriving Earth Exchange has an active Port Townsend project (in-progress since January 2026) pairing community leaders with atmospheric scientists from Caltech and the University of Washington to design a community sulfur monitoring network and develop a regulatory proposal for Ecology.

My position is straightforward: PTPC is an important employer and a genuine part of this community. The 300 workers inside that mill deserve the same level of emergency

preparedness that Nippon Dynawave's workers deserved and did not receive. Getting that right is not in conflict with the mill's continued operation — it is a prerequisite for it.

Thank you for your leadership and for your candid public statements following the Longview disaster. I look forward to the July LEPC meeting and to your response.

Respectfully,

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cc: Commissioner Heather Dudley-Nollette, Jefferson County Board of County Commissioners
Bradley Brooks, LEPC Planning Coordinator, Jefferson County Emergency Management