

June 5, 2026

Regional Administrator
FEMA Region 10
130 228th Street SW
Bothell, WA 98021
425-487-4600 | fema.gov/region-10

RE: Port Townsend Paper Company — Industrial Chemical Secondary Hazard in Cascadia Preparedness — V_1.17

Dear Regional Administrator,

I write with a simple and direct request: we want Port Townsend Paper Company to make safety, health, and the environment their number one priority. Not their second priority. Not a consideration balanced against production schedules and profit margins. Number one.

I am a Port Townsend, Washington resident writing to FEMA Region 10 about an industrial chemical secondary hazard that I believe should be specifically incorporated into federal Cascadia Subduction Zone preparedness planning for Jefferson County, Washington.

PTPC operates a kraft pulp and paper mill on 450 acres bordering Port Townsend Bay, five miles from Port Townsend's residential neighborhoods. The mill produces 950–1,000 tons per day using the kraft process — the same white liquor chemistry (sodium hydroxide and sodium sulfide) that killed 11 workers in Longview, Washington on May 26, 2026, when a white liquor tank imploded at the Nippon Dynawave mill in the deadliest industrial accident in modern Washington State history.

PTPC's documented compliance record is public in US Environmental Protection Agency (EPA)'s EPA Enforcement and Compliance History Online (ECHO) database (FRS ID: 110000490326):

- Clean Air Act: High Priority Violation every single quarter for the past three years
- Clean Water Act: documented spills into Port Townsend Bay including: 800 gallons of untreated process wastewater (November 2021–March 2022, fine \$27,000); 114,000 gallons of untreated wastewater near Glen Cove (April 2025, fine \$20,000 — less than 9 cents per gallon); and 1,000 gallons of condensed water (January 2025) — plus two additional Ecology penalties issued in 2023 for 2022 water quality violations
- Hazardous Waste: June 2025 inspection found 9 violations including emergency preparedness failures
- 12 million gallons of effluent (liquid waste or wastewater discharged into the environment) discharged into Port Townsend Bay every day
- The size, age, and inspection history of PTPC's white liquor storage tanks are not publicly disclosed — white liquor is exempt from US Environmental Protection Agency (EPA)'s Risk Management Program

In 2024, the federal Agency for Toxic Substances and Disease Registry (ATSDR) confirmed hydrogen sulfide and other sulfur compounds near PTPC exceed US Environmental Protection Agency (EPA) chronic health reference concentrations. The Pacific Northwest sits on the

Cascadia Subduction Zone, capable of producing a magnitude 9.0 earthquake. A major seismic event could rupture PTPC's white liquor tanks, overwhelm secondary containment, and send caustic chemicals directly into Port Townsend Bay.

Jefferson County's Local Emergency Planning Committee (LEPC) — the federally required body under Emergency Planning and Community Right-to-Know Act (EPCRA) that should hold the emergency response plan for a PTPC white liquor release — is described on the county's own website as 'in its formative stage.' It has been Jefferson County Emergency Management Director Willie Bence has confirmed that the Local Emergency Planning Committee (LEPC) meets quarterly, is open to the public, and that Port Townsend Paper Company (PTPC) is an active participant. A Local Emergency Planning Committee (LEPC) meeting is scheduled for July 2026, at which the Longview disaster is expected to be addressed. Under the Emergency Planning and Community Right-to-Know Act (EPCRA), PTPC reports its chemical inventories annually to local fire departments, the Local Emergency Planning Committee (LEPC), and the Washington State Department of Ecology.. In the event of a Cascadia earthquake that ruptures PTPC's white liquor storage tanks and contaminates Port Townsend Bay, there is no pre-positioned federal or local response plan for this specific secondary hazard.

What I Am Requesting from FEMA Region 10:

- Assess whether FEMA Region 10's Cascadia Subduction Zone preparedness planning specifically addresses industrial chemical secondary hazards in Jefferson County, and whether the absence of a functioning Jefferson County Local Emergency Planning Committee (LEPC) creates a gap in federal response capability
- Formally coordinate with the Washington State Emergency Management Division (EMD) and the Washington State Emergency Response Commission (SERC) to require Jefferson County to activate its Local Emergency Planning Committee (LEPC) as a prerequisite for federal emergency preparedness grant funding
- Include Port Townsend Paper Company's white liquor storage as a named secondary hazard in Jefferson County's Hazard Mitigation Plan, with specific mass decontamination and bay contamination response requirements
- Assess whether FEMA's Hazardous Materials Emergency Preparedness (HMEP) grant program can be directed to Jefferson County specifically to fund Local Emergency Planning Committee (LEPC) activation and white liquor emergency response planning

Federal preparedness resources exist precisely for scenarios like this one — a county with an unactivated Local Emergency Planning Committee (LEPC), a major industrial chemical facility, and a documented Cascadia Subduction Zone earthquake hazard. We are asking FEMA Region 10 to direct those resources to Jefferson County before they are needed in an emergency.

Respectfully,

David Ginsberg

[address redacted]

Port Townsend WA 98368

[phone redacted]

davidbginsberg@gmail.com