

June 5, 2026

Jefferson County Department of Emergency Management
Local Emergency Planning Committee (LEPC) Coordinator / Emergency Management Director
Jefferson County Courthouse
1820 Jefferson Street
Port Townsend WA 98368
360-385-9100

RE: Urgent Request — PTPC Tier II Records, Local Emergency Planning Committee (LEPC) Activation, and White Liquor Emergency Response Planning — V_1.17

Dear Emergency Management Director,

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 writing to you about three urgent matters within your authority as Jefferson County Emergency Management Director and default chair of the Jefferson County Local Emergency Planning Committee (LEPC).

PTPC operates a kraft pulp and paper mill on 450 acres bordering Port Townsend Bay, five miles from residential neighborhoods in Jefferson County. The mill produces 950–1,000 tons per day using the kraft process — the same chemistry 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 a matter of public record 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 — 12 consecutive quarters
- 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; two new formal enforcement orders April and May 2026
- Hazardous Waste (Resource Conservation and Recovery Act (RCRA)): June 2025 inspection found 9 violations including emergency preparedness and prevention procedure failures

- National Pollutant Discharge Elimination System (NPDES): permit expired October 2018; renewed May 2025 after 6+ years on administrative extension
- Total penalties all statutes five years: less than \$100,000
- Daily discharge of effluent (liquid waste or wastewater discharged into the environment): 12 million gallons into Port Townsend Bay — the largest discharger in Jefferson County

In 2024, the federal Agency for Toxic Substances and Disease Registry (ATSDR) specifically studied Port Townsend and found hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide measured near PTPC above US Environmental Protection Agency (EPA) chronic health reference concentrations. The Washington State Department of Health guidance still tells residents these odors are ‘rarely at levels that harm health.’ The federal science says otherwise — for our specific community.

Three Specific Requests:

1. PTPC Tier II Chemical Inventory Records

Port Townsend Paper Company is required under the Emergency Planning and Community Right-to-Know Act (EPCRA) to file annual Tier II chemical inventory reports with your office. These reports disclose all hazardous chemicals stored on site above threshold quantities — including sodium hydroxide and sodium sulfide, the components of white liquor. I formally request that these records be made publicly available, consistent with Emergency Planning and Community Right-to-Know Act (EPCRA)’s 45-day public access requirement. The size and contents of PTPC’s white liquor tanks are not otherwise publicly disclosed.

2. Local Emergency Planning Committee (LEPC) Activation

The Jefferson County Local Emergency Planning Committee (LEPC) 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. — since Emergency Planning and Community Right-to-Know Act (EPCRA) was enacted in 1986. I am formally requesting that you bring this to the Board of Commissioners immediately for Local Emergency Planning Committee (LEPC) member appointment and convening, with PTPC’s white liquor storage as the first agenda item.

3. White Liquor Bay Release Emergency Response Plan

The May 26, 2026 Longview disaster required 40 firefighters, a regional hazmat team, and specialized decontamination capability. A comparable event at PTPC would send white liquor into Port Townsend Bay. I formally request that you assess whether a white liquor bay release

scenario is addressed in Jefferson County's current emergency response plan, and if not, that you initiate development of one immediately.

You are the closest federal-required emergency planning resource to this community and to PTPC. The information in PTPC's Tier II reports is in your possession now. Please make it public.

Respectfully,

David Ginsberg

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