

June 5, 2026

General Manager / Board of Commissioners  
Jefferson County Public Utility District #1  
PO Box 929  
Port Hadlock, WA 98339  
360-385-5800 | jeffpud.org

**RE: Port Townsend Paper Company — Water Supply Contingency and Bay Contamination Risk — V\_1.17**

Dear General Manager and Commissioners,

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 resident writing to Jefferson County Public Utility District (PUD) #1 because the Public Utility District (PUD) has a direct stake in the safety of Port Townsend Paper Company's operations — both as an operator of water supply infrastructure that complements the Olympic Gravity Water System (OGWS) and as a public utility whose service area surrounds Port Townsend Bay.

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.

The Jefferson County Public Utility District operates the Sparling well, providing approximately 500,000 gallons per day to supplement the Olympic Gravity Water System (OGWS) pipeline. PTPC operates and maintains that pipeline — which carries the Public Utility District (PUD)'s water alongside PTPC's own industrial supply. Any disruption to PTPC's operations, or any emergency response requiring PTPC's pipeline staff, could affect the Public Utility District (PUD)'s water supply reliability.

### **What I Am Requesting:**

- Assess whether the Public Utility District (PUD)'s water supply contingency planning adequately addresses a scenario in which PTPC operations are disrupted — whether by a white liquor tank failure, a regulatory shutdown, or a Cascadia Subduction Zone seismic event affecting PTPC's infrastructure
- Formally support the activation of the Jefferson County Local Emergency Planning Committee (LEPC) — currently 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. — and participate in emergency response planning for a white liquor release near Port Townsend Bay
- Assess whether a major contamination of Port Townsend Bay from a PTPC white liquor release could affect any Public Utility District (PUD) water infrastructure, monitoring stations, or intake points in the area

Respectfully,

**David Ginsberg**

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