

June 5, 2026

Washington State Department of Natural Resources (Washington Department of Natural Resources (DNR))

Washington Geological Survey Division

Commissioner of Public Lands

1111 Washington Street SE

Olympia, WA 98504

360-902-1000 | [dnr.wa.gov](http://dnr.wa.gov)

**RE: Seismic Vulnerability of White Liquor Storage at Port Townsend Paper Company — Cascadia Subduction Zone Risk — V\_1.17**

Dear Commissioner and Geological Survey 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 a Port Townsend, Washington resident writing to the Washington State Department of Natural Resources (Washington Department of Natural Resources (DNR)) Geological Survey Division about a specific seismic vulnerability that I believe falls within your agency's expertise and public safety mandate.

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.

Port Townsend Paper Company stores white liquor — a highly caustic mixture of sodium hydroxide and sodium sulfide — in tanks of undisclosed size, age, and seismic design specification on 450 acres bordering Port Townsend Bay. The Cascadia Subduction Zone runs approximately 60–80 miles off the coast of Washington State and is capable of producing a magnitude 9.0 earthquake. Washington Department of Natural Resources (DNR)'s own seismic scenario modeling documents the shaking intensity that Jefferson County would experience in a Cascadia event. A major seismic event could rupture PTPC's white liquor storage tanks, overwhelm secondary containment, and discharge caustic chemicals into Port Townsend Bay and Admiralty Inlet.

### **What I Am Requesting from the Washington Geological Survey:**

- Assess whether Port Townsend Paper Company's white liquor storage tanks and chemical infrastructure have been evaluated for seismic vulnerability under Cascadia Subduction Zone scenarios, and whether PTPC's 450-acre site sits on liquefaction-prone soils that could amplify ground shaking
- Include Port Townsend Bay and PTPC's waterfront industrial site in Washington Department of Natural Resources (DNR)'s publicly available seismic hazard mapping, specifically noting the presence of large-volume caustic chemical storage adjacent to navigable waters
- Formally recommend to the Washington State Department of Ecology and Washington State Department of Labor & Industries that PTPC be required to conduct and publicly disclose a seismic vulnerability assessment of all white liquor tanks and chemical infrastructure, conducted by an independent engineering firm
- Incorporate industrial chemical storage facilities like PTPC into Washington Department of Natural Resources (DNR)'s Cascadia Subduction Zone preparedness guidance as a secondary hazard — the chemical release risk following a major earthquake is as significant as structural collapse

The Cascadia Subduction Zone will rupture again. When it does, the industrial facilities along Washington's waterways will be among the highest secondary hazard risks. PTPC's white liquor tanks — whose age and seismic design we cannot confirm because they are not publicly disclosed — represent exactly that risk for Port Townsend Bay and Admiralty Inlet.

Respectfully,

**David Ginsberg**

[address redacted]

Port Townsend WA 98368

[phone redacted]

davidbginsberg@gmail.com