

June 5, 2026

Washington State Military Department
Emergency Management Division (EMD)
Building 20, Camp Murray
Tacoma, WA 98430
800-258-5990 | mil.wa.gov/emergency-management-division

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

Dear Emergency Management Division 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 Emergency Management Division (EMD) about an industrial chemical hazard that I believe should be incorporated into Washington's statewide Cascadia Subduction Zone preparedness planning.

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.

Washington's Cascadia Rising exercise series has modeled statewide response to a magnitude 9.0 Cascadia Subduction Zone earthquake. I am writing to ask whether those exercises and response plans specifically address the secondary hazard of industrial chemical releases from facilities like PTPC — where a Cascadia event could rupture white liquor tanks, contaminate Port Townsend Bay, close Admiralty Inlet to vessel traffic, and require mass decontamination capability that Jefferson County does not currently have confirmed.

The Jefferson County Local Emergency Planning Committee (LEPC) — which under Emergency Planning and Community Right-to-Know Act (EPCRA) is required to maintain a hazardous materials emergency response plan for Jefferson County — is described on the county's own website as being 'in its formative stage' after 35 years. There is no functioning Local Emergency Planning Committee (LEPC), no active emergency response plan, and no white liquor release scenario on file.

What I Am Requesting from Emergency Management Division (EMD):

- Formally assess whether Washington's statewide Cascadia Subduction Zone preparedness plans adequately address the secondary hazard of industrial chemical releases from facilities like PTPC, and whether Jefferson County's lack of a functioning Local Emergency Planning Committee (LEPC) creates a gap in statewide response capability
- Exercise Emergency Management Division (EMD)'s authority to require Jefferson County to activate its Local Emergency Planning Committee (LEPC) and develop a white liquor emergency response plan, in coordination with the Washington State Emergency Response Commission (SERC)
- Include Port Townsend Paper Company's white liquor storage as a specific secondary hazard scenario in the next Cascadia Rising exercise, modeling chemical release, bay contamination, decontamination requirements, and Admiralty Inlet navigation closure
- Formally coordinate with Naval Magazine Indian Island — which sits directly across Admiralty Inlet from PTPC — on response planning for a white liquor release into Admiralty Inlet

A Cascadia earthquake that also triggers a white liquor release at PTPC would be a compounding disaster requiring capabilities Jefferson County has not confirmed it possesses. Emergency Management Division (EMD) has both the authority and the mission to close that gap before it becomes a catastrophe.

Respectfully,

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