

June 5, 2026

Washington State Emergency Response Commission (SERC)  
Washington Military Department  
Building 20, Camp Murray  
Tacoma, WA 98430  
253-512-7000 | [mil.wa.gov/state-emergency-response-commission-serc](https://mil.wa.gov/state-emergency-response-commission-serc)

**RE: Jefferson County Local Emergency Planning Committee (LEPC) — 35 Years in Formative Stage — Request for Washington State Emergency Response Commission (SERC) Action — V\_1.17**

Dear Washington State Emergency Response Commission (SERC) Chair and Members,

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 Response Commission (SERC) about a critical failure in Jefferson County's emergency planning infrastructure that Washington State Emergency Response Commission (SERC) has the authority and the obligation to address.

The Jefferson County Local Emergency Planning Committee (LEPC) — required under the Emergency Planning and Community Right-to-Know Act (EPCRA) since 1986 — is described on the Jefferson County website as currently being '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.. There is no public roster, no meeting minutes, no active chair, and no public emergency response plan on file.

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 — which stores white liquor (sodium hydroxide and sodium sulfide) in tanks of undisclosed size and age bordering Port Townsend Bay — has a required seat on the Jefferson County Local Emergency Planning Committee (LEPC). The company files annual Tier II chemical inventory reports with Jefferson County Emergency Management under Emergency Planning and Community Right-to-Know Act (EPCRA). Those reports are public records. No emergency response plan for a white liquor release near Port Townsend Bay has been developed or made public.

### **What I Am Requesting from Washington State Emergency Response Commission (SERC):**

- Exercise Washington State Emergency Response Commission (SERC)'s oversight authority to formally require Jefferson County to immediately appoint Local Emergency Planning Committee (LEPC) members, establish a functional committee structure, and convene an emergency session within 30 days
- Review whether Jefferson County's Local Emergency Planning Committee (LEPC) — or lack thereof — constitutes a compliance failure under Emergency Planning and Community Right-to-Know Act (EPCRA), and if so, take appropriate action
- Direct that the Jefferson County Local Emergency Planning Committee (LEPC)'s first substantive agenda item be the development of an emergency response plan specifically addressing a catastrophic white liquor release from PTPC into Port Townsend Bay
- Formally request that PTPC provide its full Tier II chemical inventory and facility emergency response plan to the Jefferson County Local Emergency Planning Committee (LEPC) within 30 days of its convening

The Longview disaster on May 26, 2026 demonstrated exactly what an active, functioning Local Emergency Planning Committee (LEPC) exists to prevent. Jefferson County has had 35 years to prepare for this scenario and has not done so. Washington State Emergency Response Commission (SERC) has the authority to change that. We are asking you to use it.

Respectfully,

**David Ginsberg**

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