

Safety Conditions at Port Townsend Paper Company

Tank Inspection Gaps, Worker Protections, and Emergency Preparedness

Citizens for Safe Water and Air - Port Townsend

PORT TOWNSEND, WA

This research has been compiled to the best of our ability from named public sources. If you believe any fact presented here is incorrect or incomplete, please contact safewaterandair@gmail.com so it can be reviewed and corrected.

This document consolidates every safety-related research thread developed for this document across 13 sections, covering the structural regulatory gap around white liquor tank inspection, worker safety protections, and local emergency preparedness. It draws on primary legal sources (RCW and Washington Administrative Code (WAC) citations), four internal Washington State Department of Labor and Industries (L&I) manuals, direct correspondence with county emergency management, and news reporting confirmed against original sources.

Unresolved items are marked as open questions throughout rather than presented as settled.

1. White Liquor Tank Inspection Gap

No regulatory body in Washington state or at the federal level currently has authority to inspect the structural integrity of an above-ground white liquor storage tank. This traces to specific, identifiable exclusions in Washington's boiler and pressure vessel program, the Washington State Department of Ecology's underground-only inspection authority, and a closely comparable inspection model that already exists for oil storage tanks but cannot legally reach white liquor.

2. General Duty Clause and Imminent Danger Authority

Two existing legal tools give the Washington State Department of Labor and Industries (L&I) real authority here, right now, without a new law. Revised Code of Washington (RCW) 49.17.060, internally called the Safe Place Standard, requires an employer to keep the workplace free of recognized hazards likely to cause serious injury or death.

Confirmed directly from the Washington State Department of Labor and Industries (L&I)'s internal Compliance Manual: this provision may be used only where no specific Washington Industrial Safety and Health Act (WISHA) standard already covers the hazard. Since no specific rule covers white liquor tank structural integrity, that bar does not apply, meaning the Washington State Department of Labor and Industries (L&I) already has authority to act under this clause.

Proving a violation requires four elements: the hazard existed and workers were exposed to it; the hazard was recognized; it was causing or likely to cause death or serious physical harm; and a feasible method existed to correct it. A recognized hazard does not require a visible defect on a specific tank.

Industry-wide knowledge of a failure mode, eleven deaths at a nearly identical facility using the same equipment type, can itself establish that a hazard is recognized. Revised Code of Washington (RCW)

49.17.130 sits alongside it.

Where a Washington State Department of Labor and Industries (L&I) inspector believes a condition creates a substantial probability of death or serious harm, the director can issue an Order of Immediate Restraint, halting use of the equipment on the spot. Confirmed from the Compliance Manual: situations of this kind must be inspected by the employer's next scheduled workday, with no exception for weekends or holidays.

3. Building and Fire Code Pathways, and Grandfathering

Washington's fire code, based on the International Fire Code (IFC), recognizes corrosive liquids as their own hazardous material category and covers above-ground stationary tanks storing them. What it actually requires is narrower than it might sound: periodic safety audits, seismic bracing per the International Building Code (IBC), secondary containment, and overfill prevention for tanks over 500 gallons.

It does not appear to require a recurring structural engineering inspection like American Petroleum Institute (API) Standard 653's five and ten year cycles. A second limit matters more.

The fire code states plainly that existing above-ground tanks are maintained according to the code in effect when they were installed, not automatically updated. Washington's oil rule only reaches existing tanks because it explicitly wrote in a retroactive 2033 compliance deadline.

No equivalent retroactive clause exists for corrosive material tanks. Port Townsend Paper Company (PTPC) began operating in 1928, before the recovery boiler was even invented as a technology in the early 1930s, and this campaign's own research has already confirmed a 50 year old boiler among PTPC's equipment.

If PTPC's white liquor tank predates current code editions, likely given what is known about the mill's age, there is currently no seismic or fire code requirement that actually reaches it.

4. Existing Legal Mechanisms to Close the Gap

Revised Code of Washington (RCW) 34.05.330, Washington's petition for rulemaking process, is the tool available to residents directly. Any person may petition any Washington state agency to adopt, amend, or repeal a rule.

The agency has 60 days to respond, either denying in writing with specific reasons or beginning rulemaking. A denial can be appealed to the Governor within 30 days, who then has 45 days to respond.

Washington also has direct precedent for closing a gap of exactly this kind. After a 2014 chemical storage tank leak in West Virginia contaminated drinking water for 300,000 residents, the state legislature passed a mandatory tank inspection law within weeks, with unanimous support.

The United States Chemical Safety and Hazard Investigation Board (CSB), the same federal board now investigating the Longview disaster, credited that law with closing the gap it had identified. The cautionary half of that precedent: the law has been weakened repeatedly since, down to roughly 11

percent of tanks still regulated as of March 2026, a reminder that a legislative fix needs sustained attention to survive industry pressure afterward.

5. New Washington State Department of Labor and Industries (L&I) Investigation of PTPC

This week, the Washington State Department of Labor and Industries (L&I) opened a new, targeted investigation specifically naming PTPC, reviewing tank maintenance records, inspection and repair history, Washington State Department of Ecology and United States Environmental Protection Agency records on possible spills, written operating procedures, and safety records for injuries or near misses. Smurfit Westrock in Longview received the same treatment; seven other Washington paper mills using different chemicals are receiving separate targeted enforcement inspections through February 2027.

This is a genuine and welcome exception to the pattern described elsewhere in this document, and worth stating plainly rather than only cataloguing gaps. Three limits still apply.

The Washington State Department of Labor and Industries (L&I)'s authority reaches worker safety inside the plant, not the surrounding community's exposure to air or water. A KUOW reporter who asked PTPC directly what safety measures it has taken since Longview received no response at all; a second outlet, KIRO 7, independently confirmed the same silence.

And most precisely: the Washington State Department of Labor and Industries (L&I)'s own public information officer, Matt Ross, confirmed directly to a reporter that the Washington State Department of Labor and Industries (L&I)'s authority to verify a company follows the rules does not extend to inspecting the structural integrity of a storage tank like the one involved in the Longview disaster. This investigation can verify whether PTPC followed its own claimed procedures and can act on general workplace safety findings, but it does not by itself close the structural inspection gap described in section 1.

Scope correction: on July 1, 2026, the Washington State Attorney General's Office was granted concurrent jurisdiction with the Cowlitz County Prosecuting Attorney's Office to investigate whether any crimes were committed in the Longview disaster specifically. Attorney General Nick Brown stated he is not alleging a crime took place, but that a thorough investigation is warranted.

This investigation covers Nippon Dynawave in Longview only. It does not currently extend to PTPC. This distinction matters and should not be blurred in any campaign material.

OPEN QUESTION: The Washington State Department of Labor and Industries (L&I) has stated its PTPC investigation could take up to six months from July 2, 2026, with results published on completion. No interim findings, timeline update, or scope narrowing has been reported as of this writing.

6. Worker Retaliation Protections

Washington's retaliation protections, administered by the Washington State Department of Labor and Industries (L&I)'s Division of Occupational Safety and Health (DOSH), are directly relevant to any PTPC worker who might report a safety concern. Protected activities explicitly include filing a safety complaint, participating in a Division of Occupational Safety and Health (DOSH) inspection, refusing a

task that creates a reasonable fear of death or serious injury, and communicating with the news media about an unsafe or unhealthy workplace condition.

Protection extends even to an employee merely perceived as having engaged in protected activity, or associated with someone who did. Retaliation covers far more than firing: demotion, undesirable shift reassignment, denial of overtime, surveillance, harassment, and any other action that would deter a reasonable employee from exercising these rights all qualify.

A complaint must be filed within 90 days of the retaliatory action. Penalties are scaled to employer size, as shown below.

Employer Size	Penalty per Violation
1 to 25 employees	\$5,000
26 to 100 employees	\$7,000
101 to 250 employees	\$10,000
251 or more employees	\$14,000

PTPC's approximately 300 employees place it in the top bracket.

OPEN QUESTION: Whether any PTPC worker has ever filed, or is currently considering filing, a safety complaint or retaliation complaint is unknown to this campaign. No verified account of a specific worker facing retaliation currently exists.

7. Injury and Incident History

On July 3, 2026, David reported to the Washington State Department of Labor and Industries (L&I) a secondhand account, relayed through a community member whose friend works in the emergency room, of a PTPC worker treated at Jefferson Healthcare for tar-like burns and flown to Harborview the prior weekend. This report should be treated as an unverified community account, not confirmed fact, and it has not been independently corroborated as of this writing.

A relevant procedural note, confirmed from the Washington State Department of Labor and Industries (L&I)'s Compliance Manual: confidentiality protections apply specifically to employees or their representatives filing a formal complaint. As a third-party community member relaying a secondhand account, David's report is classified as an informal complaint or referral, which the manual states plainly is not confidential.

PTPC could learn the identity of the reporting party through a public records request.

OPEN QUESTION: Whether the July 3, 2026 secondhand injury report and the incident described in the July 1 Air and Water Group meeting minutes are the same event or two separate events has not been confirmed.

Separately, in response to the Longview disaster, PTPC issued a public statement on June 1, 2026, stating it had verified that tank vents are open and overflow lines are not submerged, to prevent

vacuum-related issues, and that it is scheduling further non-destructive testing to reassess tank conditions in 2026. This is a specific, on-record technical claim from PTPC, notable both for its content and for standing in contrast to PTPC's later silence toward out-of-town investigative reporters.

8. Local Emergency Planning Committee (LEPC): Correspondence with Willie Bence

Jefferson County's Local Emergency Planning Committee (LEPC), required under the federal Emergency Planning and Community Right-to-Know Act (EPCRA), holds its first meeting since the Longview disaster on July 8, 2026, with the Washington State Department of Ecology and PTPC both expected to attend. A direct written exchange with Willie Bence, Director of Jefferson County Emergency Management, conducted June 7 through June 25, 2026, has already surfaced substantive findings ahead of that meeting.

David's original letter, sent June 7, 2026, laid out the scale of what a comparable release at PTPC would require: PTPC's daily production of 950 to 1,000 tons exceeds Nippon Dynawave's approximately 770 tons, and the facility sits on 450 acres directly adjacent to Port Townsend Bay. The letter asked seven specific questions covering regional hazmat decontamination capability, whether PTPC is modeled as a named scenario in the county's Hazardous Materials Response Plan, joint exercises, bay contamination notification protocol, a documented June 2025 Washington State Department of Ecology inspection, Olympic Gravity Water System (OGWS) vulnerability, and tribal coordination.

Willie Bence, Director of Jefferson County Emergency Management, replied in writing on June 24, 2026, answering each question directly rather than deferring everything to the meeting. Jefferson County Emergency Management has no direct hazardous materials response capability of its own.

The department operates with 2.8 full-time equivalent staff and relies primarily on the Washington State Department of Ecology's spill response team, based in Olympia, several hours away once mobilization and travel time are counted. The county's role in a release would be coordinating public notification, evacuation, and sheltering, not hands-on hazmat response.

The county's current Hazardous Materials Response Plan (most recent draft, Revision 5, March 24, 2025) uses a generic all-hazards framework with no provisions specific to white liquor or to PTPC by name. Willie Bence, Director of Jefferson County Emergency Management, indicated the county will discuss whether a white liquor-specific annex is needed, and asked David directly for any comparable community's annex as a model if one could be found.

No joint tabletop or field exercise simulating a white liquor release at PTPC has ever been conducted. Willie Bence, Director of Jefferson County Emergency Management, indicated the county will likely wait for the Longview after-action report before designing one, though the county has separately run a wildfire evacuation tabletop exercise, with lessons Willie Bence, Director of Jefferson County Emergency Management, said would be partially applicable.

The notification protocol for any hazardous materials release is direct notification to the State Emergency Management Division Duty Officer and the Washington State Department of Ecology, who then handle further notification to other state, federal, or tribal partners depending on the release's

scope.

Willie Bence, Director of Jefferson County Emergency Management, confirmed direct awareness that a June 2025 Washington State Department of Ecology inspection of PTPC found nine violations, including failures in emergency preparedness and prevention procedures, with an informal enforcement notice issued in October 2025. Willie Bence, Director of Jefferson County Emergency Management, stated Jefferson County Emergency Management has not had direct conversations with PTPC about corrective action on these findings, deferring instead to the Washington State Department of Ecology's regulatory role.

The City of Port Townsend is a partner in the county's Emergency Operations Center, but the current plan does not specifically address Olympic Gravity Water System (OGWS) contamination from a white liquor release; this is something Willie Bence, Director of Jefferson County Emergency Management, said the Local Emergency Planning Committee (LEPC) will need to build out. Neither the Jamestown S'Klallam Tribe nor the Port Gamble S'Klallam Tribe has ever been involved in Local Emergency Planning Committee (LEPC) conversations regarding PTPC.

Willie Bence, Director of Jefferson County Emergency Management, committed to including them going forward given their treaty fishing interests in Port Townsend Bay. David separately located and shared with Willie Bence, Director of Jefferson County Emergency Management, the Washington County, Maine Local Emergency Planning Committee (LEPC)'s hazardous materials plan, which includes a facility-specific annex for Woodland Pulp, a kraft mill in Baileyville, as a possible structural model for a PTPC-specific annex.

Two important limits on that comparison are worth stating plainly. First, white liquor is not named anywhere in that annex either, for the same structural reason it escapes tracking here: it does not cross the specific federal reporting thresholds that determine which chemicals get named in this kind of plan.

Second, and more importantly, that same facility experienced two separate chemical incidents despite having this detailed plan in place: a toxic gas release in February 2017 that affected 18 people, and a fatal incident on January 27, 2026, four months before Longview, in which two workers died after sulfuric acid mixed with sulfurous compounds released hydrogen sulfide gas. The United States Chemical Safety and Hazard Investigation Board (CSB) has an open, unpublished investigation into that incident.

The most detailed comparable annex found anywhere did not prevent two separate incidents at the same facility, which is itself a finding: documentation alone, even done well, is not sufficient on its own.

OPEN QUESTION: Whether Jefferson County Emergency Management will follow up directly with PTPC on the corrective action plan for the nine violations found in the June 2025 Washington State Department of Ecology inspection, rather than deferring entirely to the Washington State Department of Ecology, has not been addressed.

OPEN QUESTION: Whether a white liquor-specific annex to the county's Hazardous Materials Response Plan will actually be developed, and on what timeline, remains undecided as of this writing; Willie Bence, Director of Jefferson County Emergency Management, described it as something the county will discuss rather than something committed to.

9. Local Emergency Planning Committee (LEPC): The Letter to Bradley Brooks

Separately, David sent a formal letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, on June 29, 2026, requesting only that it be distributed to the committee in advance of the July 8 meeting and entered into the official record. This is the single most comprehensive document this campaign has produced: twelve lettered sections containing approximately 150 individually numbered questions, organized so that any specific point can be referenced by item number, for example Item G-11 or Item L-9.

As of this writing, none of it has been answered. What follows is a representative summary of each section, not the complete text; the full letter is reproduced in full below, in the appendix to this document.

Section A, Foundational Documentation: requests the Local Emergency Planning Committee (LEPC)'s prior meeting minutes, plans, or reports specific to PTPC, its bylaws and membership rules, how it makes decisions, a current member list, its meeting history, any votes taken and their results, and whether a PTPC-specific emergency response plan is even being developed.

Sections B and C, Olympic Gravity Water System (OGWS): asks what happens if the 30-mile transmission pipeline itself fails, not just contamination of it, including whether a redundant water source exists at all, how long an alternative supply could be sustained, and a specific question about responsibility: since PTPC operates and maintains the entire system under lease from the City, what happens to pipeline operation if PTPC's own staff were disabled by a major incident, and who would pay for damage depending on where and how it originated.

Section D, Reference Point and Chemical Inventory: directly modeled on the Woodland Pulp, Maine annex, which names a Facility Emergency Coordinator, the nearest hazmat team, and the closest medical facility by name, and lists 28 specific chemicals on site with exact quantities, three at the highest federal hazard designation. The letter asks whether Jefferson County's Local Emergency Planning Committee (LEPC) has an equivalent named list for PTPC and requests a copy of PTPC's complete chemical inventory under the federal Tier II reporting requirement, not just its most hazardous substances.

Section E, Fire: covers evacuation and accounting for everyone on site, fire spread to adjacent chemical tanks or the wastewater basin, toxic combustion byproducts, whether water is even the correct suppression agent for these specific chemicals, and whether Jefferson County has enough firefighters given its own confirmed reliance on volunteers and mutual aid.

Section F, Explosion and Implosion: asks directly whether the specific failure mechanism at Longview, a blockage preventing air backfill during liquid removal that created catastrophic negative pressure, has been evaluated against PTPC's own tanks, and references that Longview workers had reportedly filed a structural warning with the Washington State Division of Occupational Safety and Health two months before the disaster with no action taken, asking whether PTPC has a process for workers to report structural concerns and whether any have been reported.

Section G, Chemical Spill: requests the actual chemical names and quantities involved in a catastrophic white liquor release, not a general category, and asks pointed questions about the still-open November 2025 wastewater spills and October 2025 aerated stabilization basin issue: what specifically happened, what chemicals were involved, their current status, and whether Jefferson County Emergency Management has any role at all or considers this exclusively the Washington State Department of Ecology's matter.

Section H, Equipment Failure Short of Fire, Explosion, or Spill: asks whether the Local Emergency Planning Committee (LEPC) has a complete equipment and infrastructure list for PTPC at all, and raises failure modes that would not produce an immediate visible release, such as a slow leak or a breach in the wastewater treatment basin that is not immediately obvious.

Section I, Worker, Subcontractor, and Agency Access: asks whether East Jefferson Fire Rescue, Jefferson County Emergency Management, and the Washington State Department of Ecology have established physical site access protocols, including whether an evacuation or lockdown protocol would account for where chemicals are actually stored during a security incident.

Section J, Public Notification and Protective Action: asks, for every scenario raised in Sections E through H, what residents would actually be told to do, through what channel, and whether pre-drafted public alerts and defined evacuation or shelter-in-place zones exist, or whether that messaging would be improvised in real time during an actual event.

Section K, PTPC's Own Role as a Committee Member: notes that PTPC is itself a member of the committee, not merely the facility under discussion, and asks what PTPC has formally reported to the committee, as distinct from what it has told the press. This directly targets PTPC's June 1, 2026 public statement about verifying tank vents and scheduling non-destructive testing, asking what specifically is being tested, by what method, on what schedule, and with what results, reported to the committee itself rather than through a press release.

Section L, Seismic Event: closes the letter by tying every prior scenario together. PTPC sits at or very near the Southern Whidbey Island Fault, which the United States Geological Survey (USGS) describes as capable of generating earthquakes of magnitude 7 or greater.

This section asks what happens if several of the failures described in earlier sections occur simultaneously rather than in isolation, for example fire spreading faster because containment systems were also damaged in the same event, and references that a 2021 engineering white paper for the Olympic Gravity Water System (OGWS) already documents liquefaction risk to a downstream dam inspected every five years by the Washington State Department of Ecology's Office of Dam Safety, meaning this seismic concern is already part of the system's own engineering record, not a new one being raised here.

It closes by asking whether county-wide planning accounts for an extended aftermath, comparable to Hurricane Katrina, rather than only the first hours of response.

OPEN QUESTION: None of the approximately 150 questions in the letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, have been answered as of this writing. The July 8 meeting is the first opportunity for a response.

OPEN QUESTION: The letter also requested the committee's foundational documentation: prior meeting minutes and plans specific to PTPC, the committee's bylaws and membership rules, how decisions are made, a current member list, meeting dates past and scheduled, any votes taken and their results, and whether a PTPC-specific emergency response plan is even being developed. None of these foundational questions have been answered either.

OPEN QUESTION: The Local Emergency Planning Committee (LEPC)'s full board is up for a two-year membership renewal at the July 8 meeting, alongside Chair and Vice Chair elections. Whether David Pederson of Taylor Shellfish Farms occupies the community or business representative seat, and whether that seat is part of what is being renewed, has been asked directly but not yet answered.

10. Kraft Industry Accident History, United States, Canada, and Scandinavia

This section documents confirmed accidents at kraft pulp and paper facilities beyond the Longview and Woodland Pulp incidents already covered in this document, organized chronologically by country. A search specifically for fatal accidents at Suzano and Klabin, Brazil's two largest kraft producers, found no documented incident at either; this is noted as a gap in what is publicly searchable, not as evidence of a clean safety record.

United States

- Stone Savannah River pulp and paper mill, Wentworth, Georgia, December 8, 1990: one worker killed, four injured. Hydrogen sulfide gas formed during acid cleaning of a pulping solution pressure filter; ventilation intended to control the gas failed.
- Georgia-Pacific Naheola Mill, Pennington, Alabama, January 16, 2002: two workers killed, eight injured. Investigated by the United States Chemical Safety and Hazard Investigation Board (CSB). A leaking pump allowed sodium hydrosulfide, a process chemical, to accumulate in a containment pit connected to the plant's acid sewer. Draining the pit triggered a reaction that released hydrogen sulfide gas into an area where contract workers were performing maintenance.
- International Paper mill, Vicksburg, Mississippi area, approximately 2008: one contract employee killed, seventeen others injured in a recovery boiler explosion.
- Packaging Corporation of America, DeRidder, Louisiana, February 8, 2017: three contract workers killed, seven injured. United States Chemical Safety and Hazard Investigation Board (CSB) final report issued. Workers were performing welding and grinding, referred to as hot work, directly above a tank containing flammable material.
- Pixelle paper mill, New Hampshire, April 15, 2020: a 166 foot tall pulp digester, a large pressure vessel built in 1964, failed catastrophically while operating within its normal pressure and temperature range, erupting approximately 260,000 gallons of hot corrosive chemicals and wood fiber into the air. The United States Chemical Safety and Hazard Investigation Board (CSB) determined the cause was caustic stress corrosion cracking along a weld seam in the vessel's carbon steel shell. Contractors nearby were on a lunch break at the time; this is a direct, documented example of why the location of break areas relative to hazardous equipment, already raised as an open question in this document, is a genuine safety question rather than an abstract

one.

- Evergreen Packaging paper mill, Canton, North Carolina, September 21, 2020: fire during hot work maintenance inside pulp bleaching process vessels during a planned shutdown. Flammable resin ignited from an electric heat gun.
- International Paper, Savannah, Georgia: two separate fatalities at the same facility. In August 2014, a maintenance employee was pinched by a hydraulic-powered elevating device and carried approximately 18 feet, sustaining injuries that proved fatal. In June 2021, a contractor was killed when a boiler platform collapsed.

Canada

- Squamish, British Columbia, 1963: seven workers killed, recovery boiler explosion, 300 workers left without work while the recovery area was repaired.
- Daishowa-Marubeni International mill, Peace River, Alberta, September 22, 2017: recovery boiler explosion, no injuries, but significant damage that halted production for three to six weeks. A subsequent industry case study documented the incident minute by minute, from a low drum level alarm through a large explosion five seconds after the final control action.
- British Columbia, December 2022: a dissolving tank explosion; serious injury or death was avoided only because workers evacuated quickly and sheltered in a protected control room.
- British Columbia, March 2023: a worker suffered severe burns after being struck by molten smelt ejected from a recovery furnace.

Scandinavia

- Aankoski, Finland, September 28, 1965: four workers killed, a smelt-water explosion caused by a large crack in a furnace screen tube, itself caused by a plugged tube overheating after magnetite dregs came loose due to low boiler water pH.
- Kemi, Finland, March 21, 2024: a gas explosion in the evaporation unit at the Kemi bioproducts plant, described as the world's largest kraftliner manufacturing plant. Three workers were exposed to hydrogen sulfide and returned to work after a health check. The plant, though structurally undamaged, was unable to produce unbleached pulp without its chemical recovery system and halted production.

11. Seismic Vulnerability of Storage Tanks

This section addresses the general engineering literature on how large atmospheric steel storage tanks, the same general category as PTPC's white liquor tank, fail during earthquakes. No documented instance of a kraft mill tank failing in an earthquake specifically was found; this is general tank engineering research, not a kraft-specific incident, and should not be presented as though it were.

The well-documented failure mode for this category of tank is called elephant foot buckling, in which the tank wall buckles outward near its base under seismic shaking. This falls within a formally recognized federal risk category called Natech, short for Natural Hazard Triggering Technological Disaster, a term already connected to this campaign's Olympic Gravity Water System (OGWS)

engineering research.

Academic seismic modeling has demonstrated that specific real-world tank designs cannot be considered safe from this failure mode under realistic earthquake loading, and separately, that American Petroleum Institute (API) Standard 650's standard linear design method has been found insufficient for real seismic demands when compared against full nonlinear structural analysis. Real tanks have failed this way in earthquakes directly comparable to the Pacific Northwest's seismic environment.

The 2014 Napa, California earthquake damaged storage tanks in the San Francisco Bay Area. Japan's 2011 Tohoku earthquake caused new tank damage along the Pacific coast. Historical tank failures have also been documented in the 1933 Long Beach, 1994 Northridge, and 1995 Kobe earthquakes, among others.

For the Cascadia region specifically, the United States Geological Survey (USGS) estimates roughly a 10 to 15 percent chance of an approximately magnitude 9 earthquake on the Cascadia Subduction Zone, and an 85 percent chance of a magnitude 6.5 or greater deep earthquake in the Puget Sound region specifically. This is the same general seismic environment already raised in Section L of the letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, regarding the Southern Whidbey Island Fault.

12. Applicability to PTPC: Which Documented Events Could Recur

Recovery boiler and smelt-related explosions are physical steam explosions, not combustion events. Inside a recovery boiler, black liquor is burned as fuel while the process simultaneously recovers the mill's inorganic cooking chemicals as molten smelt, a pool of melted sodium salts at the furnace floor, typically 1,500 to 1,700 degrees Fahrenheit.

If water reaches that molten pool, through a leaking boiler tube, a cooling water leak, or water introduced improperly during startup or shutdown, it flashes to steam almost instantly, expanding by a factor of roughly 1,600 in a fraction of a second. This is why water leak detection, not fire prevention, is the central safety discipline for this equipment.

Assessed against what is confirmed about PTPC's own equipment, likely applicable: PTPC operates the same equipment class as recovery boiler smelt-water explosions (comparable to Vicksburg, Mississippi; Squamish, British Columbia; Peace River, Alberta; and Aankoski, Finland); smelt dissolving tank explosions and molten smelt burns (comparable to the two 2022 and 2023 British Columbia incidents); evaporator-related gas exposure (comparable to Kemi, Finland), since PTPC uses evaporators to concentrate black liquor; and general mechanical and hot-work hazards not tied to a specific chemical process, such as elevated platform collapse or hydraulic-equipment injury (comparable to International Paper, Savannah) and hot work igniting nearby flammable material (comparable to Packaging Corporation of America, DeRidder, Louisiana).

Likely does not apply the same way, a structural equipment mismatch: the Evergreen Packaging fire in Canton, North Carolina occurred inside bleach plant process towers built of fiber-reinforced plastic. PTPC produces unbleached paper, containerboard, and pulp. Whether PTPC operates a bleach plant at

a comparable scale is not confirmed, but if it does not, this specific failure point may not exist on site at all.

Genuinely unknown, requiring verification rather than assumption: whether PTPC uses or stores sodium hydrosulfide the way it was used at the Georgia-Pacific Naheola Mill and the Stone Savannah River mill, both fatal incidents involving that specific chemical; and the age, type, and inspection history of PTPC's digester, given that the Pixelle, New Hampshire failure involved a pressure vessel built in 1964 that failed from decades of corrosion cracking along a weld seam.

13. Questions for PTPC

The following draws on every section of this document, not only the accident history and applicability analysis in sections 10 through 12, to compile a comprehensive set of safety-relevant questions for PTPC. None of these have been formally asked of or answered by PTPC through any correspondence on record.

They are organized by category rather than presented as a single flat list, since they draw on distinct parts of this document and would likely go through different channels. This is a drafting resource, not a letter that has been sent.

Tank and Recovery System Integrity (drawing on sections 1 through 4, 10, and 12)

- What is the age and manufacture date of PTPC's white liquor storage tank, and has it ever undergone a voluntary inspection under American Petroleum Institute (API) Standard 653, the industry standard used for oil tanks under similar circumstances, even though PTPC is not legally required to do so?
- What is the age and manufacture date of PTPC's recovery boiler, and when was its most recent inspection for tube leaks or corrosion, the documented failure point behind the majority of smelt-water explosions described in section 10?
- What water leak detection systems are in place around PTPC's recovery boiler and smelt dissolving tank specifically, given that water intrusion, not fire, is the documented cause of the majority of catastrophic events described in this document?
- What is the age, construction material, and most recent pressure or structural inspection date of PTPC's digester or digesters?

Chemical Inventory and Process Safety (drawing on sections 1, 9, and 12)

- Does PTPC use or store sodium hydrosulfide as part of its pulping process, and if so, in what quantity and where is it stored relative to acidic process streams or sewers, the specific failure pathway in both the Georgia-Pacific Naheola and Stone Savannah River fatal incidents described in section 10?
- Does PTPC operate a bleach plant, and if so, at what scale and using what process vessel construction, relevant to whether the Evergreen Packaging fire's specific failure point, described in section 10, exists on site?
- What is PTPC's complete chemical inventory under the federal Tier II reporting requirement, not limited to its most hazardous substances, matching the level of detail the Woodland Pulp, Maine

facility provides in its own Local Emergency Planning Committee (LEPC) annex, described in section 9?

Regulatory and Inspection History (drawing on sections 5, 8, and 9)

- What has PTPC told the Washington State Department of Labor and Industries (L&I) so far in response to its new investigation, described in section 5, and will PTPC make its response public?
- What corrective action, if any, has PTPC taken in response to the nine violations found in the June 2025 Washington State Department of Ecology inspection, described in section 8, including the specific failures in emergency preparedness and prevention procedures?
- What specifically is being tested under PTPC's June 1, 2026 public statement about verifying tank vents and scheduling non-destructive testing, described in section 7, by what method, on what schedule, and with what results, reported formally to the Local Emergency Planning Committee (LEPC) rather than only through a press statement?

Worker Safety and Reporting (drawing on sections 6 and 7)

- Has any worker at PTPC ever filed a safety complaint or a retaliation complaint against PTPC, and if so, what was the outcome?
- What is PTPC's internal policy for workers to report structural or safety concerns, and does that process include any way to confirm a report was received and acted upon, given that Longview workers reportedly filed a structural warning two months before that disaster with no action taken, as described in section 9?
- Was the injury described in the July 3, 2026 community report, described in section 7, reported to the Washington State Department of Labor and Industries (L&I) within the 24-hour serious injury reporting window required by law, if the report is confirmed accurate?

Emergency Planning and PTPC's Own Role as a Local Emergency Planning Committee (LEPC) Member (drawing on section 9)

- What has PTPC formally reported to the Local Emergency Planning Committee (LEPC) as a member of that committee, as distinct from what it has told the press?
- Does PTPC have a facility-specific emergency response plan on file with the Local Emergency Planning Committee (LEPC), and if not, why not, given that even small facilities in comparable counties, such as cell tower sites with a few hundred pounds of chemical inventory, have named coordinators and documented procedures?
- What is PTPC's own internal notification and evacuation protocol for a release affecting Port Townsend Bay or the Olympic Gravity Water System (OGWS), and has it ever been tested in a joint exercise with county or state responders?

Seismic Preparedness (drawing on section 11)

- Has PTPC's site been evaluated specifically for elephant foot buckling risk under the Southern Whidbey Island Fault seismic scenario already raised in Section L of the letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, and if so, by whom and when?

- Were PTPC's tanks and recovery boiler designed to current seismic standards, or do they predate them, given this document's finding that codes generally apply to tanks based on the standard in effect when they were built, not the current one?

This question list is a drafting resource for future correspondence, not itself a letter that has been sent. It has not yet been formally submitted to PTPC, the Local Emergency Planning Committee (LEPC), or any regulator.

Appendix: Source Correspondence

The following pages are the actual sent and received correspondence referenced in sections 8 and 9 of this document, reproduced in full rather than only summarized.

Document A: correspondence with Willie Bence, Director of Jefferson County Emergency Management, June 7 through June 25, 2026, full thread, both the original letter and Willie Bence's complete reply.

Document B: letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, sent June 29, 2026, as confirmed sent.

Document A: Correspondence with Willie Bence, Director of Jefferson County Emergency Management

Letter One: David Ginsberg to Willie Bence, Director of Jefferson County Emergency Management, June 7, 2026

Sent June 7, 2026, to Willie Bence, Director of Jefferson County Emergency Management, with a copy to Commissioner Heather Dudley-Nollette, Jefferson County Board of County Commissioners, and Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, Jefferson County Emergency Management.

Dear Mr. Bence, thank you for your public comments following the May 26, 2026 Nippon Dynawave disaster, in which you confirmed that PTPC stores white liquor and described it as a particularly nasty and caustic chemical. That candor is exactly what the community needs from its emergency management leadership, and I appreciate it.

I am writing to ask a focused set of questions about Jefferson County's preparedness for a white liquor release scenario at PTPC, not to alarm, but because the Longview disaster has made clear that this is precisely the kind of scenario that emergency management must have planned for in advance. I am aware of the July Local Emergency Planning Committee (LEPC) meeting and intend to attend. These questions are intended to help that meeting be as productive as possible.

Background: What the Longview Response Required

The Nippon Dynawave implosion on May 26, 2026 required the following:

- Approximately 40 firefighters and paramedics, including a regional hazmat team.
- On-scene chemical decontamination of casualties before hospital transport, standard protocol for caustic chemical exposure.

- Formal declaration of a mass casualty scene by the Longview Fire Department.
- Ongoing environmental monitoring of drainage ditches, which produced 2,226 dead fish by June 1, 2026, per the Washington State Department of Ecology.

PTPC's daily production of 950 to 1,000 tons exceeds Nippon Dynawave's approximately 770 tons. The facility sits on 450 acres directly adjacent to Port Townsend Bay. A release of comparable scale would involve the bay, the Olympic Gravity Water System (OGWS) pipeline corridor, and a small-city emergency response infrastructure. The question is not whether this scenario is possible, it is whether Jefferson County is prepared for it.

Questions for Jefferson County Emergency Management

- Regional hazmat decontamination capability: does Jefferson County Emergency Management have a regional hazmat decontamination team pre-positioned and trained for a white liquor release scenario near Port Townsend Bay? White liquor (sodium hydroxide plus sodium sulfide) causes immediate second and third-degree chemical burns and was caustic enough to damage firefighter protective gear at Longview. If a comparable release occurred at PTPC, would East Jefferson Fire Rescue have the decontamination capability required, or does that require mutual aid from Clallam County or beyond? What is the estimated response time for that mutual aid?
- Current Hazardous Materials Response Plan, PTPC-specific provisions: does the current Jefferson County Hazardous Materials Response Plan (most recent draft, Revision 5, March 24, 2025) include a specific release scenario for white liquor at PTPC, covering estimated release volumes, bay contamination protocols, evacuation zones, and public notification procedures? The question is whether white liquor at PTPC has been modeled as a specific scenario within that plan, not just as a generic hazmat category, and whether the plan reflects the proximity of the discharge outfall to Port Townsend Bay.
- Joint exercises: has Jefferson County Emergency Management conducted a joint tabletop or field exercise with East Jefferson Fire Rescue, PTPC, and Jefferson County Public Health simulating a major white liquor release at the facility? If not, is one planned in 2026? The United States Chemical Safety and Hazard Investigation Board (CSB) investigation into the Longview disaster is expected to address preparedness and inter-agency coordination as contributing factors.
- Bay contamination protocol: what is the current emergency protocol for a major industrial chemical release into Port Townsend Bay, including notification to the United States Coast Guard, the Washington Department of Fish and Wildlife, the Washington State Department of Ecology, and the Jamestown S'Klallam and Port Gamble S'Klallam Tribes, who hold treaty fishing rights in these waters?
- PTPC emergency preparedness violations: are you aware that a June 2025 inspection of PTPC by the Washington State Department of Ecology found nine violations including failures in emergency preparedness and prevention procedures, the exact regulatory category relevant to chemical storage tank failure, with an informal enforcement notice issued in October 2025? Has Jefferson County Emergency Management been in contact with the Washington State Department of Ecology or PTPC regarding the corrective action plan for these violations?

- Water system vulnerability: the PTPC facility lies upstream of the Olympic Gravity Water System (OGWS) pipeline corridor. Does the county emergency plan address contamination of the Olympic Gravity Water System (OGWS) water supply in a white liquor release scenario, including protocols for notification to the City of Port Townsend, which owns the water rights, and for alternative water supply?
- Tribal nation coordination: have the Jamestown S'Klallam and Port Gamble S'Klallam Tribes been formally consulted as part of Local Emergency Planning Committee (LEPC) emergency planning for PTPC? Their treaty fishing rights in Port Townsend Bay give them a direct legal and health interest in any release scenario affecting the bay.

A Specific Request

The letter formally requested that Jefferson County Emergency Management confirm, in writing or at the July Local Emergency Planning Committee (LEPC) meeting, the following:

- Whether a regional hazmat decontamination team is pre-positioned and trained for a white liquor release near Port Townsend Bay.
- Whether the current Hazardous Materials Response Plan includes a white liquor release scenario specific to PTPC.
- Whether a joint hazmat exercise with PTPC has been conducted or is scheduled for 2026.

The letter closed by stating that if any of these are gaps, the post-Longview moment is exactly the right time to close them, offered as a constructive community partner, not an adversary. PTPC is an important employer and a genuine part of this community; the 300 workers inside that facility deserve the same level of emergency preparedness that Nippon Dynawave's workers deserved and did not receive. Getting that right is not in conflict with the facility's continued operation, it is a prerequisite for it.

Reply: Willie Bence, Director of Jefferson County Emergency Management, June 24, 2026

Willie Bence, Director of Jefferson County Emergency Management, replied in writing on June 24, 2026, answering each question directly rather than deferring everything to the meeting. Good afternoon Mr. Ginsberg, apologies for the delay in this response. I wholeheartedly appreciate your attention to this matter and hope you are able to join us at the July 8 Local Emergency Planning Committee (LEPC) meeting, where we will be joined by both the Washington State Department of Ecology and PTPC to discuss this further. Below are some preliminary answers to your questions; however, I will let our partners speak on their own behalf, and some of these will be addressed in detail at the July 8 meeting.

- Unfortunately, we here at Jefferson County Department of Emergency Management (DEM) have no direct hazardous materials response capability. We are a small department (2.8 full-time equivalent staff) and rely extensively on volunteers for work typically supporting first responders and broader emergency management functions. Our primary role during a hazardous materials incident would be to coordinate emergency notification to the general public, evacuations and sheltering for those in the affected area, and to help direct the Emergency Operations Center, which would coordinate

the broader response among partner agencies. Here in Jefferson County, we have limited hazmat response capability as a rural jurisdiction. I understand you have reached out to East Jefferson Fire and Rescue Chief Bret Black, and I will let him speak on his department's capabilities, but our primary resource for hazmat response and mitigation is through the Washington State Department of Ecology. Their nearest spill response team is based in Olympia, which means their response time is several hours out, taking into consideration the time required to mobilize and travel. They will be speaking on this in more detail at the upcoming Local Emergency Planning Committee (LEPC) meeting.

- The plan you referenced is the most current plan and does not have specific provisions for white liquor. Like most emergency response plans, it was developed with an all-hazards framework to be applicable to all potential risks or incidents. However, given recent events, we will discuss the potential need for a white liquor-specific annex in the plan. I am unaware if any other communities with paper processing facilities have such an annex, but if, in the course of your research, you find a community that does, I would appreciate that resource to utilize as a basis for ours.
- We have not, but as above, it is something we will discuss and explore given the recent events. As you noted, the incident in Longview is still under investigation and review. It is likely we will wait for an after-action report from that event to apply lessons learned here locally. Last year, we did hold a tabletop exercise on evacuation coordination, although that was in response to a wildfire threat. We also have experience in the last several years coordinating evacuations during active wildfires. Those lessons learned would be applicable to evacuations due to a hazardous materials spill, but we have not drilled on that threat specifically.
- Our notification protocol is to directly notify the State Emergency Management Division Duty Officer and the Washington State Department of Ecology after any release of hazardous materials. This includes either us here at Jefferson County Department of Emergency Management (DEM), or the dispatchers at JeffCom 911. Those entities then make the appropriate notifications to other state, federal, or tribal partners depending on the type, size, and scope of the release.
- I am indeed aware, but have not had conversations with PTPC on these issues. The Washington State Department of Ecology is responsible for the regulatory oversight and corrective action, and we hope both PTPC and the Washington State Department of Ecology will be addressing that shortly.
- The City of Port Townsend is a partner in the Emergency Operations Center under our respective Emergency Support Functions, for example law enforcement and public works, and would be notified and involved in any response to a large spill incident. As above, the plan does not specifically address a white liquor release and its potential impacts, like contaminated water supply, but this is something we will look to build through conversations among the Local Emergency Planning Committee (LEPC) members, of which the City is one.
- Neither tribe has been involved in Local Emergency Planning Committee (LEPC) conversations previously, but given the potential for impacts to their interests, we will make sure they are included in this conversation.

Willie Bence, Director of Jefferson County Emergency Management, closed by offering to connect directly before or after the July 8 meeting, and thanked David for his commitment to the safety of the

community. Signature block: Willie Bence, Director, Jefferson County Department of Emergency Management, 81 Elkins Road, Port Hadlock, Washington 98339, 360-316-6008.

Follow-Up: David Ginsberg to Willie Bence, Director of Jefferson County Emergency Management, June 25, 2026

Dear Mr. Bence, thank you for the thoughtful, detailed response. I know you have a small department, and I appreciate you taking the time to walk through each question rather than waving me off to wait for the meeting. A few things stood out.

The fact that Jefferson County's nearest dedicated spill response support is hours away in Olympia is exactly the kind of gap I think the community needs to understand clearly, not as a criticism of your department, but as a real constraint that should shape how the rest of us think about risk here.

I did some digging on the white liquor-specific annex question, and the result is worth sharing, though it is more complicated than expected. I am attaching the Washington County, Maine Local Emergency Planning Committee (LEPC) Hazardous Materials Plan, since you mentioned you would appreciate a resource like this if one were found. It is a genuinely detailed, facility-specific document, and the relevant section covers Woodland Pulp, a kraft mill in Baileyville, with step-by-step internal procedures for a chemical release, evacuation triggers, and plume mapping. It is a real template for the format such an annex could take, and worth using as a structural model.

Two things are worth flagging. First, white liquor is not named anywhere in it. The chemicals it covers, chlorine dioxide, nitric acid, and sulfuric acid, are the ones that happen to cross federal reporting thresholds at that facility, for the same structural reason white liquor does not get tracked here.

Second, and this is the harder part: that same facility has had two separate chemical incidents despite having this plan in place, a toxic gas release in February 2017 that affected 18 people, and a fatal incident on January 27, 2026, four months before Longview, where two workers died after sulfuric acid mixed with sulfurous compounds and released hydrogen sulfide gas. The United States Chemical Safety and Hazard Investigation Board (CSB) has an open investigation into that incident; no findings have been published yet. The most detailed annex found anywhere still did not prevent two incidents at the same facility.

This is the more important point to bring to the July 8 meeting, not a template to copy outright, but evidence that documentation alone, even done well, is not sufficient on its own.

The letter also raised a question about the Local Emergency Planning Committee (LEPC)'s composition ahead of July 8: from the committee's own minutes, the full board's two-year membership term expires this year, with elections for the next slate of voting members happening at the July meeting, alongside the Chair and Vice Chair elections. David Pederson of Taylor Shellfish Farms appears in recent minutes as a regular voting member, and seems like he may be the closest fit to a community or business representative seat, separate from the fire, law enforcement, health, and facility seats, though this was not assumed to be confirmed.

The letter asked how that seat is actually defined, and whether it is part of what is being renewed in July.

The letter closed by again welcoming a chance to connect before or after the meeting, and thanking Willie Bence, Director of Jefferson County Emergency Management, for his leadership. Attached to the message: the Washington County, Maine Local Emergency Planning Committee (LEPC) Hazardous Materials Plan.

Document B: Letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator

Sent June 29, 2026, to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, Jefferson County Emergency Management, with copies to the Jefferson County Board of County Commissioners, Willie Bence, Director of Jefferson County Emergency Management, and a City of Port Townsend contact. The letter requested only that it be distributed to the committee in advance of the July 8 meeting and entered into the official record.

Dear Mr. Brooks, with the July 8 meeting now about a week away, the only request for the meeting itself is that this letter be distributed to the committee's members in advance and entered into the official record as a submitted document. The letter is organized into lettered sections, with every individual question given its own number within each section, so that specific points can be referenced easily, for example as Item D-3 or Item L-9.

Section A: Foundational Documentation

The letter opened by explaining its starting point: no background in how the Local Emergency Planning Committee (LEPC) has operated, what has already been done, or how the committee is structured.

- A-1. Can I receive documentation of what the Local Emergency Planning Committee (LEPC) has done to date regarding PTPC, including any prior meeting minutes, plans, or reports specific to the facility?
- A-2. Can I receive documentation of how the Local Emergency Planning Committee (LEPC) is structured, including its bylaws and membership rules?
- A-3. How are decisions made by the committee?
- A-4. Can I receive a current list of the committee's members, including which organization or role each one represents?
- A-5. What are the dates of past meetings?
- A-6. Are there dates for any upcoming meetings beyond July 8 that are already scheduled?
- A-7. Have any votes taken place by the committee, and if so, on what?
- A-8. What was the result of each vote referenced in Item A-7?
- A-9. Have any requests been made by any of the participating member agencies or organizations to the committee, and if so, what were they?
- A-10. Have any requests been made by the committee to any of the participating member agencies or organizations, and if so, what were they?

- A-11. What came of the requests referenced in Items A-9 and A-10?
- A-12. Is there a schedule for when a draft emergency response plan specific to PTPC is expected to be completed, if one is being developed at all?

Part One: Olympic Gravity Water System (OGWS)

Section B: Water Pipeline Failure

This section concerns a failure of the Olympic Gravity Water System (OGWS) pipeline itself, as distinct from contamination of it. This affects not only Port Townsend and PTPC, but also Glen Cove and parts of unincorporated Jefferson County west of town.

- B-1. What is the worst case scenario for a failure of the pipeline itself?
- B-2. What is the plan for a failure of the pipeline itself?
- B-3. How would residents and businesses across all of the areas served, not just within city limits, obtain water for drinking, cooking, and bathing if the pipeline failed?
- B-4. For how long could an alternative water supply, if any, be sustained during a pipeline failure?
- B-5. Is there a redundant water source or second intake, separate from the single gravity-fed system?
- B-6. If there is no redundant source, would a pipeline failure mean there is no alternative supply for any of the areas served?
- B-7. How would the public across this entire service area be notified of a pipeline failure?
- B-8. What is the expected timeline for repair and restoration of service for a minor pipeline repair?
- B-9. What is the expected timeline for repair and restoration of service for a major structural failure of the pipeline?
- B-10. PTPC operates and maintains the entire 30-mile transmission system under lease, not only its own connection point. Does a major disaster at PTPC have the potential to interfere with the City's or other locations' water supply, even if the physical pipeline itself, located mostly in the watershed far from the mill, is not directly damaged?
- B-11. If PTPC's own operations and staff were disabled by a fire, explosion, or other major incident, who would be available to operate and maintain the pipeline in their place?
- B-12. For how long could the pipeline continue to be operated and maintained without PTPC before it affected water delivery to the City, Glen Cove, or unincorporated areas?
- B-13. Who would pay for repair of major damage to the pipeline, given the City owns the system and the water rights while PTPC operates and maintains it under lease?
- B-14. Does responsibility for the cost of repair depend on the cause of the damage, for example whether the damage originated at PTPC versus elsewhere along the pipeline's 30-mile route?
- B-15. Is that division of responsibility documented anywhere?

- B-16. Is there any insurance covering damage to the pipeline, held by either the City or PTPC?
- B-17. If such insurance exists, what does it cover?
- B-18. Would that insurance cover a major disaster scenario such as the ones described in this letter?

Section C: Olympic Gravity Water System (OGWS), Other Emergencies

- C-1. Separate from a physical failure of the pipeline itself, addressed in Section B, has the committee considered contamination of the source water at the Big Quilcene or Little Quilcene diversions or at Lords Lake Reservoir?
- C-2. Has the committee considered a failure or major incident at the City's water treatment facility itself?
- C-3. What other emergency scenarios affecting the Olympic Gravity Water System (OGWS), beyond pipeline failure and the two scenarios above, have been considered?
- C-4. What is the worst case scenario and plan for whatever has actually been considered under Items C-1 through C-3?
- C-5. What, if anything, related to the Olympic Gravity Water System (OGWS) has not yet been addressed by the committee?

Part Two: PTPC

Section D: Reference Point and Chemical Inventory

This section drew directly on the Washington County, Maine Local Emergency Planning Committee (LEPC)'s Hazardous Materials Plan, which includes a detailed annex for Woodland Pulp, a kraft pulp mill in Baileyville, Maine. That annex names specific roles and information used to frame the following questions.

- D-1. The Maine annex names a Facility Emergency Coordinator, by name and title. Who fills that role for PTPC?
- D-2. The Maine annex names the nearest hazmat response team, by name. Who fills that role for PTPC?
- D-3. The Maine annex names the closest medical facility, by name. Is the closest medical facility for PTPC Jefferson Healthcare?
- D-4. Who is the emergency contact at the closest medical facility?
- D-5. Is there a representative from the closest medical facility on the Local Emergency Planning Committee (LEPC)?
- D-6. If so, who is that representative? Apple Martine, Director of Jefferson County Public Health, appears to fill the required public health representation seat, but who fills the required emergency medical services seat specifically, separate from public health, was not able to be identified.
- D-7. The Maine annex names the chemicals of concern on site, by name and exact quantity. Does the committee have that list for PTPC?

- D-8. If so, can a copy of it be provided? The Maine plan reports 28 chemicals on site in total at that facility, three of which carry the highest federal hazard designation as Extremely Hazardous Substances. This request is for PTPC's complete chemical inventory under the federal Tier II reporting requirement, not only its most hazardous substances.
- D-9. The Maine plan states that in the event of a catastrophic cascading incident, first responders and the public may be at unanticipated high risk for inhalation illness or exposure due to various chemicals reacting with one another. Has this kind of cascading, multi-chemical risk been considered for PTPC? This is raised because it is a planning concern already named by a comparable facility's own emergency plan, not speculation.

Section E: Fire

- E-1. What is the worst case scenario for a fire at PTPC?
- E-2. What is the plan for a fire at PTPC?
- E-3. What is the plan for employee and subcontractor safety during a fire, including evacuation and accounting for everyone on site?
- E-4. What is the plan for fire spread to adjacent chemical storage tanks?
- E-5. What is the plan for fire spread to the wastewater treatment basin?
- E-6. What is the plan for fire spread to other major equipment?
- E-7. What is the plan for fire spread beyond the facility's boundary toward neighboring properties or wildland areas?
- E-8. What toxic byproducts could be released into the air from chemicals burning?
- E-9. How would those airborne byproducts be monitored?
- E-10. How would those airborne byproducts be communicated to the public?
- E-11. What would be the results of major equipment, such as the recovery furnace or power boiler, being burned or damaged by fire?
- E-12. Would there be enough firefighters available to respond, given Jefferson County Department of Emergency Management has already confirmed it is a small department that relies extensively on volunteers and mutual aid?
- E-13. Would there be enough medical aid available to respond to a fire at PTPC?
- E-14. Is water the appropriate agent to fight a fire involving these specific chemicals?
- E-15. If water is not appropriate for some chemicals, what suppression method is required instead?
- E-16. Is there appropriate and sufficient protective equipment, including gas masks and other respiratory and chemical protection, available to first responders?
- E-17. Is there appropriate and sufficient protective equipment available to PTPC's own employees and subcontractors on site, who may need that protection before responders even arrive?

- E-18. Jefferson County has real, recent experience coordinating wildfire evacuations, including a tabletop exercise last year. Has that wildfire evacuation experience and planning ever specifically considered PTPC, given what is stored there?
- E-19. What is the worst case scenario and plan for a large regional wildfire reaching or threatening the facility from outside?

Section F: Explosion and Implosion

The May 26, 2026 disaster at Nippon Dynawave in Longview was not an explosion in the conventional sense; it was an implosion, caused by a blockage that prevented air from backfilling a white liquor tank as liquid was pumped out, creating catastrophic negative pressure.

- F-1. Has the specific implosion mechanism from Longview, a blockage preventing air backfill during liquid removal, been evaluated against PTPC's own white liquor tanks?
- F-2. What is the worst case scenario for an implosion at PTPC?
- F-3. What is the plan for an implosion at PTPC?
- F-4. What is the worst case scenario for a conventional explosion at PTPC, whether from a pressure vessel, the recovery furnace, the power boiler, or another source of stored or generated pressure?
- F-5. What is the plan for a conventional explosion at PTPC?
- F-6. What is the plan for employee and subcontractor safety in an explosion or implosion?
- F-7. Workers at Longview reportedly had little to no warning before the implosion occurred there. How quickly can an implosion of this kind occur at PTPC?
- F-8. What is the plan for structural damage to surrounding equipment, buildings, or storage tanks resulting from either an explosion or an implosion?
- F-9. Workers at Longview had reported a structural warning to the Washington State Division of Occupational Safety and Health two months before the disaster, and no action was taken before the implosion occurred. Does PTPC have a process for workers to report structural concerns?
- F-10. Is the committee aware of whether any structural concerns have been reported by PTPC workers?
- F-11. What toxic byproducts could follow an explosion or implosion?
- F-12. What contamination of the surrounding ground, water, or bay could follow an explosion or implosion?
- F-13. How would the toxic results referenced in Items F-11 and F-12 be monitored?
- F-14. How would the toxic results referenced in Items F-11 and F-12 be communicated to the public?
- F-15. What is the suppression and containment plan for an explosion or implosion, separate from the fire suppression question in Item E-14?

- F-16. Are existing equipment and protocols adequate to contain a release of this kind once it has begun?
- F-17. What is the cleanup plan following an explosion or implosion?
- F-18. Who is responsible for cleanup following an explosion or implosion?
- F-19. What timeline is expected for cleanup following an explosion or implosion, given that the Longview disaster required ongoing environmental monitoring well after the initial incident?
- F-20. How would the public be informed when the area is actually safe again after an explosion or implosion?

Section G: Chemical Spill

- G-1. What is the worst case scenario for a chemical spill originating at PTPC?
- G-2. What is the plan for a chemical spill originating at PTPC?
- G-3. What specific chemicals, by name and typical or maximum quantity, are involved in a catastrophic white liquor release? This asks for the actual chemical names and quantities, not a general category.
- G-4. What specific chemicals, by name and typical or maximum quantity, are involved in the smaller incidents described in Item G-11?
- G-5. What are PTPC's permitted discharge points and outfall locations into Port Townsend Bay?
- G-6. Are there other pathways, such as stormwater drains, ditches, or groundwater, through which a spill could reach the bay or surrounding area without passing through a permitted outfall?
- G-7. What is the plan for employee and subcontractor safety during a spill, including how they would be alerted?
- G-8. What is the plan for evacuating employees and subcontractors from the immediate area during a spill?
- G-9. What is the plan for decontaminating employees and subcontractors if directly exposed during a spill?
- G-10. What are the specific health and environmental risks of each chemical involved in a spill, including risks to workers from direct contact or inhalation, and risks to marine life, shellfish beds, and public health from the chemical reaching the bay?
- G-11. The November 2025 wastewater spills and the October 2025 aerated stabilization basin issue remain open, according to the Washington State Department of Ecology's own account. What specifically happened in each of these two incidents?
- G-12. What chemicals or substances were involved in the two incidents referenced in Item G-11?
- G-13. What is the current status of the two incidents referenced in Item G-11?

- G-14. Does Jefferson County Emergency Management have any role in responding to incidents at the scale described in Item G-11, or is that considered the Washington State Department of Ecology's matter exclusively, with no county involvement at all?
- G-15. Which specific agencies would need to be contacted in the event of a spill?
- G-16. In what order would the agencies referenced in Item G-15 be contacted?
- G-17. Who would be responsible for making those contacts?
- G-18. What is the specific backup contact for each agency referenced in Item G-15, in case the primary contact is unreachable?
- G-19. What specifically would be tested as part of environmental monitoring following a spill?
- G-20. Where would the testing referenced in Item G-19 take place?
- G-21. For how long would monitoring continue following a spill, given that the Longview disaster required ongoing monitoring of drainage ditches well after the initial event?

Section H: Equipment Failure Not Resulting in Fire, Explosion, or Spill

- H-1. Does the Local Emergency Planning Committee (LEPC) have a complete list of all major equipment and infrastructure at PTPC?
- H-2. If such a list exists, can a copy of it be provided?
- H-3. What is the worst case scenario for a failure of PTPC's major equipment or infrastructure that does not itself cause an immediate fire, explosion, or chemical release, but could still create a hazard or compromise safety?
- H-4. What is the plan for the kind of equipment failure described in Item H-3?
- H-5. What happens to chemical storage, containment, and treatment systems during a power failure or loss of process control affecting the recovery furnace, the power boiler, or the wastewater treatment system, even without an immediate visible release?
- H-6. What is the plan for a structural failure of a containment or treatment system, such as the wastewater treatment basin, that compromises its function without an immediate, visible spill, for example a slow leak or a breach that is not immediately obvious?
- H-7. Has the committee identified any other major equipment failure that does not fall under Section E, F, or G specifically?

Section I: Worker, Subcontractor, and Agency Access

- I-1. Beyond what is addressed under Sections E through H, does PTPC have a general internal emergency evacuation plan covering its own employees and any subcontractors on site?
- I-2. Has the plan referenced in Item I-1 been shared with or reviewed by the committee?
- I-3. Do East Jefferson Fire Rescue, Jefferson County Emergency Management, and the Washington State Department of Ecology have established physical access protocols to the PTPC site, including

site maps and gate access?

- I-4. Is there a designated facility emergency contact for physical access purposes, separate from the Facility Emergency Coordinator referenced in Item D-1?
- I-5. If established access protocols do not exist, would access need to be negotiated at the time of an incident?
- I-6. Has any security incident at the facility, including an active threat or workplace violence, been considered?
- I-7. How would a security incident of the kind described in Item I-6 coordinate with the site's chemical hazards, for example, would an evacuation or lockdown protocol account for the location of chemical storage?
- I-8. Do responding law enforcement personnel have the same site familiarity requested of fire and emergency management agencies in Item I-3?

Section J: Public Notification and Protective Action

- J-1. For each of the scenarios described in Sections E through H, what would residents actually be told to do?
- J-2. Through what channel would the information described in Item J-1 be delivered?
- J-3. Are there pre-drafted public alerts for the scenarios described in Sections E through H?
- J-4. Are there defined evacuation or shelter-in-place zones for the scenarios described in Sections E through H?
- J-5. Is there a designated public information channel for each of the scenarios described in Sections E through H?
- J-6. If the items referenced in J-3 through J-5 do not currently exist, would that messaging be developed in real time during an actual event?

Section K: PTPC's Own Role as a Committee Member

- K-1. PTPC is itself a member of this committee, not merely the facility being discussed. As a member, what has PTPC formally committed to the committee regarding white liquor tank safety?
- K-2. PTPC announced publicly on June 1, 2026 that it had met with industry experts and was scheduling non-destructive testing of its tanks. That announcement was made to the press, not to the committee specifically. Non-destructive testing covers inspection methods, such as ultrasonic thickness testing or similar techniques, that check a tank's structural condition without taking it out of service. What has PTPC formally reported to the committee about this testing, including what specifically is being tested, by what method, on what schedule, and with what results once available, separate from what the public has been told through the press?
- K-3. What has PTPC formally committed to or reported to the committee regarding any of the other scenarios raised in this letter?

- K-4. Has PTPC, in its committee capacity, shared any internal emergency response plan with the committee, separate from its public statements to the press?
- K-5. Has PTPC, in its committee capacity, shared any tank inventory with the committee, separate from its public statements to the press?
- K-6. Has PTPC, in its committee capacity, shared any testing results with the committee, separate from its public statements to the press?

Section L: Seismic Event

The letter closed by tying every prior scenario together. PTPC sits at or very near the Southern Whidbey Island Fault, which the United States Geological Survey (USGS) describes as capable of generating earthquakes of magnitude 7 or greater.

- L-1. Does the Local Emergency Planning Committee (LEPC) have a complete list of all major equipment and infrastructure at PTPC, as requested in Item H-1?
- L-2. What is the worst case scenario for a chemical release at PTPC triggered by a seismic event, as opposed to plans addressing only a release that has already occurred from an unspecified cause?
- L-3. What is the plan for a chemical release at PTPC triggered by a seismic event?
- L-4. The Maine plan referenced in Item D-9 explicitly identifies cascading, multi-chemical risk as a real planning concern at a comparable facility, not merely a hypothetical. Has the committee considered the risk of chemicals from different storage systems mixing in unintended ways as a result of a seismic event at PTPC?
- L-5. What is the worst case scenario for that kind of chemical mixing as a result of a seismic event?
- L-6. What is the plan for that kind of chemical mixing as a result of a seismic event?
- L-7. What would the results be if there were major damage to the recovery furnace as a result of a seismic event?
- L-8. What would the results be if there were major damage to the power boiler as a result of a seismic event?
- L-9. What would the results be if there were major damage to connecting pipework as a result of a seismic event?
- L-10. What would the results be if there were major damage to any other major equipment on the list requested in Item H-1, as a result of a seismic event?
- L-11. What is the worst case scenario and plan for each of the equipment failures described in Items L-7 through L-10?
- L-12. What is the worst case scenario and plan for a fire resulting from seismic damage to equipment or from mixed chemicals?
- L-13. What is the worst case scenario and plan for release of treated and untreated wastewater from damage to the treatment basin or related infrastructure during a seismic event?

- L-14. What is the worst case scenario and plan for collapsed or damaged buildings at the facility itself during a seismic event?
- L-15. What is the plan for employees potentially trapped inside collapsed or damaged buildings during a seismic event?
- L-16. What is the worst case scenario and plan for the safety of PTPC's own employees and any subcontractors on site during a seismic event, separate from the plan for community members beyond the facility's boundary?
- L-17. How would employees and subcontractors be accounted for during a seismic event?
- L-18. How would employees and subcontractors be evacuated or rescued if trapped during a seismic event?
- L-19. A single seismic event could plausibly cause several or all of the failures described in Items L-2 through L-14 at the same moment, rather than as isolated, separate incidents, each compounding the others, for example a fire spreading more easily because containment systems were also damaged, or rescue of trapped employees being delayed because the area is also a chemical release site. What is the plan if several or all of these failures happen simultaneously?
- L-20. The same earthquake capable of causing the facility level failures described above would also likely damage roads and bridges throughout Jefferson County, cutting off evacuation and access routes; disrupt power and cellular communications; and damage the county's own water infrastructure, including the Olympic Gravity Water System (OGWS). What is the plan if a seismic event overwhelms available resources entirely, because the county as a whole, not just PTPC, has been affected at the same time?
- L-21. An existing 2021 engineering white paper for the Olympic Gravity Water System (OGWS) already discusses liquefaction risk to a downstream hazard dam in this system during a design earthquake, and the Washington State Department of Ecology's Office of Dam Safety already inspects this dam every five years given the risk to life and property if it were to fail. This is raised because it means the seismic vulnerability of this water system is not a new concern being introduced here, but one already documented in the system's own engineering record. Has the scenario of dam failure during a seismic event been incorporated into the county-wide emergency response plan referenced in Item L-20?
- L-22. If the water pipeline goes down during a county-wide seismic event, how would residents get water for drinking, cooking, and bathing?
- L-23. For how long could the water supply situation described in Item L-22 be sustained?
- L-24. If the air becomes too dangerous to breathe near the facility during a county-wide seismic event, how would that be communicated to residents?
- L-25. How would people actually be moved out of the danger zone described in Item L-24 if roads are damaged and normal evacuation routes are not available?
- L-26. Hurricane Katrina demonstrated how a single disaster can simultaneously disable communications, transportation, and the distribution of basic supplies like food and water, leaving

people stranded for days even after the initial event has passed. Does Jefferson County's planning account for that same kind of extended aftermath, not just the first hours of a response, following a major seismic event?

As noted at the start of the letter, the only essential request was that it be distributed to the committee and entered into the official record. A PDF of the letter was attached for easier distribution.

As of this writing, none of the approximately 150 questions in the letter to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, have been answered. The July 8 meeting is the first opportunity for a response.

Sources and Citations

All factual claims in this document are drawn from the following sources, verified during research for this document.

1. Revised Code of Washington (RCW) 49.17.060, Washington's "Safe Place Standard" general duty clause.
2. Revised Code of Washington (RCW) 49.17.130, the Order of Immediate Restraint provision for conditions creating a substantial probability of death or serious harm.
3. Washington State Department of Labor and Industries (L&I): internal Compliance Manual, cited for general duty clause application standards, Order of Immediate Restraint inspection timelines, and confidentiality provisions distinguishing formal from informal complaints.
4. Washington State fire code, based on the International Fire Code (IFC), and the International Building Code (IBC)'s seismic bracing provisions, as applied to above-ground corrosive-liquid storage tanks.
5. Washington's above-ground petroleum storage tank inspection rule, including its retroactive 2033 compliance deadline, cited here as the closest existing regulatory model for a tank inspection requirement.
6. Revised Code of Washington (RCW) 34.05.330, Washington's petition for rulemaking process.
7. West Virginia's 2014 legislative response to a chemical storage tank leak that contaminated drinking water for approximately 300,000 residents, and the subsequent narrowing of that law's scope, as tracked in United States Chemical Safety and Hazard Investigation Board (CSB) reporting.
8. United States Chemical Safety and Hazard Investigation Board (CSB): ongoing investigation into the May 26, 2026 Nippon Dynawave implosion in Longview, Washington, referenced throughout this document for investigative scope and timeline.
9. Washington State Department of Labor and Industries (L&I): announcement of its targeted investigation of Port Townsend Paper Company, opened following the Longview disaster, and of the seven additional Washington paper mill inspections running through February 2027.
10. KUOW radio reporting (reporter John Ryan), June 2026, on Port Townsend Paper Company's non-response to safety questions following the Longview disaster, and on Matt Ross, Washington State Department of Labor and Industries (L&I) public information officer, confirming the limits of L&I's tank inspection authority.
11. KIRO 7 reporting, June 2026, independently confirming Port Townsend Paper Company's non-response to press inquiries following the Longview disaster.
12. Washington State Attorney General's Office: announcement, July 1, 2026, of concurrent jurisdiction with the Cowlitz County Prosecuting Attorney's Office to investigate the Longview disaster, including Attorney General Nick Brown's public statement.
13. Washington State Department of Labor and Industries (L&I), Division of Occupational Safety and Health (DOSH): public guidance on worker retaliation protections, protected activities, complaint filing deadlines, and the

employer-size-based civil penalty schedule.

14. David Ginsberg to Washington State Department of Labor and Industries (L&I), July 3, 2026: report of a secondhand community account of a PTPC worker injury, treated in this document as an unverified account.

15. Port Townsend Paper Company: public statement, June 1, 2026, regarding tank vent verification and scheduled non-destructive testing.

16. Correspondence between David Ginsberg and Willie Bence, Director of Jefferson County Emergency Management, June 7 through June 25, 2026 (reproduced in full in the Appendix to this document).

17. Letter from David Ginsberg to Bradley Brooks, Local Emergency Planning Committee (LEPC) Coordinator, Jefferson County Emergency Management, June 29, 2026 (reproduced in full in the Appendix to this document).

18. Jefferson County Hazardous Materials Response Plan, most recent draft, Revision 5, March 24, 2025.

19. Washington State Department of Ecology: June 2025 inspection of Port Townsend Paper Company finding nine violations, and informal enforcement notice issued October 2025, as confirmed by Willie Bence, Director of Jefferson County Emergency Management.

20. Federal Emergency Planning and Community Right-to-Know Act (EPCRA), establishing Local Emergency Planning Committees (LEPCs).

21. Washington County, Maine Local Emergency Planning Committee (LEPC) Hazardous Materials Plan (WNEMA LEPC Hazmat Plan, 2020), including its facility-specific annex for Woodland Pulp, Baileyville, Maine.

22. News and industry reporting on the February 2017 toxic gas release and the January 27, 2026 fatal hydrogen sulfide incident at Woodland Pulp, Baileyville, Maine, and the associated open, unpublished United States Chemical Safety and Hazard Investigation Board (CSB) investigation.

23. Jefferson County Local Emergency Planning Committee (LEPC) meeting minutes, cited for committee membership information, including David Pederson of Taylor Shellfish Farms as a voting member.

24. United States Chemical Safety and Hazard Investigation Board (CSB): investigation reports for the Georgia-Pacific Naheola Mill, Pennington, Alabama (January 16, 2002); Packaging Corporation of America, DeRidder, Louisiana (February 8, 2017); and the Pixelle paper mill, New Hampshire (April 15, 2020) pulp digester failure.

25. Industry and news accident records for the Stone Savannah River pulp and paper mill, Wentworth, Georgia (December 8, 1990); the International Paper mill, Vicksburg, Mississippi area (approximately 2008); the Evergreen Packaging paper mill, Canton, North Carolina (September 21, 2020); and International Paper, Savannah, Georgia (August 2014 and June 2021 fatalities).

26. Industry and news accident records for Canadian kraft mill incidents: Squamish, British Columbia (1963); Daishowa-Marubeni International mill, Peace River, Alberta (September 22, 2017), including a subsequent industry case study of the incident; and two British Columbia incidents (December 2022 and March 2023).

27. Industry and news accident records for Scandinavian kraft mill incidents: Anekoski, Finland (September 28, 1965) and the Kemi bioproducts plant, Kemi, Finland (March 21, 2024).

28. Peer-reviewed structural and seismic engineering literature on elephant foot buckling failure in atmospheric steel storage tanks, the "Natech" (Natural Hazard Triggering Technological Disaster) risk classification, and evaluation of American Petroleum Institute (API) Standard 650's design methodology against nonlinear seismic analysis, including documented tank damage in the 1933 Long Beach, 1994 Northridge, 1995 Kobe, 2014 Napa, and 2011 Tohoku earthquakes.

29. United States Geological Survey (USGS): seismic hazard estimates for the Cascadia Subduction Zone and Puget Sound region, and characterization of the Southern Whidbey Island Fault.

30. 2021 engineering white paper for the Olympic Gravity Water System (OGWS) addressing liquefaction risk to a downstream dam, and the Washington State Department of Ecology's Office of Dam Safety five-year inspection

program for that dam; also referenced in this campaign's separate Olympic Gravity Water System engineering research.