

July 9, 2020

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This letter is in response to the June 24, 2020, Washington State Department of Ecology Public Hearings regarding the expansion of the Sabey Data Center in Quincy, Washington.

I have followed the data center construction in Quincy since the first public hearings regarding the operation of the Microsoft Columbia facility. Since that first construction, the Washington State Department of Ecology has made constant comments to assure the Quincy public that these data centers, and their diesel generators, are safe as permitted. I have contended, and will continue to declare, that these diesel generators, as permitted, are not safe.

Quincy is a rural, agricultural community with a population of 7,930 as reported by the City of Quincy (7/1/20). The footprint of the City is 5.1 square miles and all 8 of the computer data centers are clustered tightly inside the Quincy City limits. With the Sabey addition, Quincy will have 335 diesel generators, and that means that there is one diesel generator for every 23.67 residents of Quincy. All of these generators are operated regularly and emit various levels of toxic emissions, many exceeding the ASIL. Ecology regularly cites the railroad and the highway as sources of dangerous emission in Quincy. That is true, however, the emissions from the 335 generators is from a constant, static position as opposed to irregular emissions from vehicular traffic.

In the June 24, 2020, presentation Ecology submitted a map showing the areas in and around Quincy in which “ambient impacts from Sabey's project-related diesel emissions exceed the ASIL”. (Chart labeled “Sabey’s proposal required a higher level or review”) The map shows most of the town of Quincy affected by emissions above the ASIL. And, as usual, Ecology tells the community that these “health risks are considered acceptable according to Washington rules” and bad things are “unlikely to occur” and “not likely to occur frequently or for sustained periods”. I believe the effects of diesel contaminants in the air have seriously and negatively impacted the health of Quincy citizens.

Ecology documents regarding the health impacts of Sabey's Diesel Engine Exhaust (Palcisko, June 24, 2020) include:

- Effects on respiratory systems
- Allergic reactions to particles in the lungs become worse
- Heart attack and stroke in people who already have heart disease
- Higher chance of lung infections
- Impaired lung growth in children
- Lung cancer and other forms of cancer

In air quality metrics, Ecology regards cancer as the measuring tool for diesel emissions. Cancer is a long-term disease that might take years to measure. I believe respiratory disease is more measurable and more immediate in the Quincy community, especially because of COVID-19.

The COVID-19 outbreak in Washington State has affected all residents but the number of cases in Quincy is greatly elevated above other communities in Grant County.

Grant County Department of Health information from July 8, 2020

QUINCY: Population 7930. 168 confirmed cases of COVID-19: one (1) in 47 residents test positive for COVID-19. The rate of infection is 2.11%

MOSES LAKE: Population 24,009. 193 confirmed cases of COVID-19: The rate of infection is .80%

I am requesting Ecology study and report back discussing the disparity in infection rates between Quincy and Moses Lake. I want the Washington State Health Department to make an official comment on the probable effects of diesel emissions on the health of Quincy residents, specific to COVID-19.

Given the communities of Quincy and Moses Lake are similar in most respects, the most important difference in health implications is the presence, in Quincy, of 335 diesel generators, each operating at frequent random times throughout the year. If each engine is tested monthly, there is not one day without at least one, if not numerous, locomotive-size diesel engines operating. Throughout the years, Ecology has allowed data center developers to use cost analysis (too expensive) to avoid putting on emission controls to lower the toxic emissions over Quincy residents. It is morally

and ethically wrong to put a value on the quality of human life but that is the effect of not requiring the best (not the least expensive) available emission controls on these diesel engines. I am asking Ecology to respond to the tons of emissions from Sabey without the best, most effective emissions controls, not the cheapest emission controls. Is Ecology going to continue to allow these levels of emissions to continue in Quincy without making the companies install better quality controls? This is a request for better controls on the emissions of PM 10, DEEP and NOX. I am requesting the reasons for your not requiring better emission controls. Unofficial sources report that more data centers are being considered for Quincy as well as rural George. Is Ecology going to allow data center development to continue with substandard emission controls for community protection? Please respond to this specific question.

Ecology documents presented on-line for the Public Hearing list the potential Maximum One Year Emissions from the (Sabey) Expansion Project: 75.37 tons of emissions.

75.37 tons is the tonnage from Sabey's 69 diesel engines and that would be 1.09 average tons per engine.

Because Ecology has permitted 266 diesel engines in Quincy, (not counting Sabey) the total emissions over Quincy would be 289.94 tons of material containing Nitrogen Oxide (NOX), Carbon Monoxide (CO), Particulate Matter (PM10), Volatile Organic Compounds (VOC), and Diesel Engine Exhaust Particulate (DEEP).

Adding the 75.37 tons from Sabey to the other data center emissions, the yearly tons of emissions over Quincy are 365.31 TONS.

Over ten years, that is 3,653.1 tons and the expected life of the data centers is 20 + years.

That is an incredible amount of toxic material spread out, every year, day after day, on my community. [On a housekeeping note: Ecology did not list the DEEP tons (1.71) on the Notice of Comment Period for Sabey. Since Ecology focuses on the DEEP materials for their measurement of cancer, this is an important omission in a public notice.]

The Seattle Times newspaper printed an article on June 19, 2020, (Page D-1) by Laura Watson, Director, Washington State Department of Ecology. Her Opinion piece in the newspaper was in reference to the "massive rollback of our nation's environmental protections". Ms. Watson writes that by rolling back protections: "Who pays the price? Often communities of color and

people living in underprivileged neighborhoods. These populations are disproportionately burdened by air and water pollution, and by exposures to toxics in their communities and at their jobs.” ...”More that 1,000 Washingtonians die each year from outdoor air pollution. Studies show that diesel and industrial emissions exact a disproportionate toll on communities ...and have been linked to higher cancer risk, asthma and other health concerns. And several national studies have linked increased air pollutions exposure to worse outcomes for people who have contracted COVID-19.” The Watson article concludes: “We (Washington State) commit to making decisions that do not place disproportionate burdens on communities of color, and we seek to lift the weight of pollution and contaminations borne by those communities today.” I am requesting that Ms. Watson comment on my letter outlining the disproportionate toxic pollution in Quincy that could be prevented by the instillation of higher quality and more effective emission controls.

Data provided by the City of Quincy lists the July 2019, percentage of Hispanic population of Quincy as 76.6% The Hispanic school population in Quincy has been as high as 86%. This is a community of color. This is an underprivileged community, exactly the type of community Ms. Watson focuses on to protect and to “lift the weight of pollution”. I want to know if, under her guidance, the City of Quincy will see more protections from toxic air pollution and enforcement of stricter ruler regarding emissions, specifically NOX, PM10 and DEEP.

SPECIFIC COMMENTS AND QUESTIONS

I appreciate the inclusion of the map with the entire distribution of data centers and their diesel engines presented by Gary Palcisko. (“Background Sources of Diesel Particulates in Quincy”)

I intensely dislike like the maps presented in the Sabey documents that utilize “dots” for information on emissions. The “dots” blur the landforms and structures under the “dots” and make the maps less than useful, actually make the information unusable: Figure 4-1 DPM First Tier Model Results, Figure 4-2 No2 First Tier Modeling Results. The maps prepared by Mr. Palcisko are informative and allow for reader understanding of the landforms and structures under emission spread. Mr. Palcisko makes good maps.

I object to the use of meteorological data from the airport in Moses Lake and Spokane. I would like weather data to be local, not 50 to 150 miles away. Please comment.

Does Quincy still have an air monitoring station? How do I access that information? Please comment.

I could not read the Trinity Consultant posting online. The format was not possible to read. Please comment.

I want to know if Ecology is still going to allow expense to drive the selection of emission controls. Please comment.

I am looking forward to hearing from Laura Watson regarding her Seattle Times Opinion piece and my observations about the lack of environmental protection for Quincy residents. Please comment.

As I guessed at the total tons of toxic emissions based on an average of Sabey's emission tons, I want Ecology to give me a break down of yearly emission tons for NOX, PM10, and DEEP from each of the data centers located in Quincy. Please respond.

I want to know if Quincy and George are getting more data centers. I saw one newspaper article about another expansion at Microsoft but no public notice about that expansion. Is there more expansion at Microsoft? Please comment.

I want it in the record that the City of Quincy is still working on the water recycle/reuse system. Each of these data centers uses huge amounts of water and, as of today, the City of Quincy recycle/reuse of this water is not resolved. The Sabey Project Description has a paragraph about water use. (Page 8 of 13 TSD) "Sabey will include 176 Munters Model PV-W35-PVT cooling units... Each of the units has a design recirculation rate of 80 gallons per minute (gpm) ..." Simple calculations of 176 multiplied by 80 gallons per minute equal 14,080 gallons of water per minute. That is a huge amount of water and I am not clear if that water is recirculated within the Sabey facility and reused. Please provide me clarification of that important distinction on Sabey water use. I have been told in the past that the Ecology data center Public Hearing is for air quality ONLY and will not address other related issues. Perhaps it is time to look into any other environmental

issues surrounding the location of industrial facilities and their affect on local communities and economies, such as water availability and water quality. If water access becomes an issue, I have on record that the regional agricultural facilities would loose water before the data centers would loose water. The resulting cascade of economic and personal loss would be huge. If the processing plants loose water, all workers, farmers and the entire economy of Quincy would be at risk. I want to know if anyone in a position of authority is considering these issues. I am asking for the name and phone number/email address of a person at Ecology to contact in order to discuss my Quincy water access issues. Please respond.

The Sabey documents contain various numbers regarding the increased cancer risk for Quincy residents.

The May 29, 2020. Letter from Chris Hanlon-Meyer (Ecology) to David Knight (Ecology) has a bullet point that says: “The increase in emissions of TAPs is not likely to result in an increase cancer risk of more than 5 one in one hundred thousand (10 in one million) which is the maximum risk allowed by a Second Tier review.”

The document “Sabey Intergate-Quincy Bldgs D & E Project: Review of Estimated Health Impacts from Sabey’s Diesel Engine Exhaust, Gary Palcisko has two numbers regarding cancer. Sabey’s increased emissions: Increased cancer risk of up to 5.6 in one million. Exposure to cumulative diesel emissions: Increased cancer risk of about 70 in one million.

As a reader, I cannot determine the cancer risk based on these various numbers. Please clarify the cancer risk with one determinate number. I would appreciate one number that is consistent through out the document to see how well, or how poorly, Ecology is protecting the health of Quincy residents.

Thank you for considering my comments. I look forward to the Response to Comments.

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