

Danna Dal Porto

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Please accept these comments on the Cyrus One Revised Permit Application.

Cyrus One is using the Monte Carlo simulators to model and analyze air quality data. I had to look this procedure up and, although the references say it can be used for some analysis, the focus was not on large industrial emissions but on air pollutants like PAHs, incomplete combustion of organic materials like coal, oil and wood, in indoor environments. Other uses of Monte Carlo are to analyze data from mobile monitoring to minimize error in pollutant concentrations as well as to understand uncertainty in air quality models. The simulation selects a value from the parameters distribution and runs the process thousands of times. My reading of this explanation does not seem to say the Monte Carlo tests air quality but does a probability of a distribution of the results and identifies the likely outcome. This is the application of statistics to air monitoring and that is not sufficient to know the emissions over my community. Monte Carlo is a computerized mathematical technique that allows risk to be accounted for in quantitative analysis and decision making. All of this monitoring can be done at home, sitting in your jammies. Not acceptable. I want quality industry wide monitoring done in a professional manner, not Monte Carlo.

I am referencing Part 2 Technical Information. I consider this document incomplete.

Reading the application this is what I see.

Section V. Emissions Estimations of Criteria Pollutants.

Section VI. Emissions Estimations of toxic Air Pollutants.

Does your project generate toxic pollutant emissions? Marked YES

If Yes, please provide the following information regarding your toxic air pollutant emissions in your application.

Ramboll replied: Ramboll: See previous application for list of TAPs and potential emissions.

I have read almost every Data Center Permit since 2009 +/- . Never has an application required me to look up and refer to any other document held by the Washington State Department of Ecology.

An applicant is to provide a document that is complete and available to the Public for consideration.

This application is not complete. The Applicant is either lazy or not considering the Public, who want to review their document. I think this lack of required information is disrespectful to the Department of Ecology, the Public and the application process. I want to see this required information included in their application as it should be. I request this document be redone accurately.

Moving on, page 5 of 5 in Part 2: Technical Information, Section VI.1. Best Available Control Technology and Section 1X. Ambient Air Impacts Analyses. Ramboll has, once again, decided to take a short-cut and refer readers to a previous document or previous information. I will say the same things as before: lazy, disrespectful, and inconsiderate of the reader. This information, especially BACT, should be readily available during the reading of the document. Air Quality permits have lasting effects on this community. We have the right to accurate, not speculative, facts. The air effects all of us, especially the children. I reject this haphazard application and request the applicant resubmit the document in complete, as requested by the Department of Ecology. No short-cuts, please.

Because we do not have complete data in the application, I do not see any mention of pollution

controls. No SCRs, DPFs or DOCs are being used at Cyrus One. Why not? Not knowing the BACT determination, this document is not informative to the Public.

Thank you for an opportunity to comment on yet another data center change in my community. I look forward to the Response to Comments.

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