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This is a comment on the 2025 Overburdened Communities Highly Impacted by Air Pollution.

The Ecology 's twenty-six page 2025 report regarding the environmental impact on air quality in George and West Grant County was detailed and comprehensive. My comments refer to another community Overburdened in Grant County, only 10 miles north of George. That community is Quincy, home to 8 industrial data centers and more.

I live three miles north of George and I cannot name one source of air pollution affecting George other than the I-90 freeway. The George And West Grant County area is 118 square miles and the pollution source is affecting 3,392 people.

Quincy has over 450 permitted diesel engines operating within the city limits, an area of 6.05 square miles affecting 8,033 people. Contrary to what people think, the Quincy diesel engines must be tested each month. With the number of engines in town, at least 10 or more engines are running to test each day. The most emissions are released at the "cold start" of an engine, before the controls are operational. Quincy has State Highway 28 and Highway 281 travelling through town plus the Burlington Northern Santa Fe railroad (BNSF) with 24 daily trains. The numbers cited for Quincy are from the 2020 US Census.

Both Communities are affected by the most dangerous emissions, Fine Particles (PM2.5) Both Communities are equally affected by wildfire smoke, a source of PM2.5 particles.

This is a comparison of the two communities.

GEORGE

Hispanic 57%

Poverty level 3%

No Health Insurance 23%

QUINCY

Hispanic 80.3%

Poverty Level 21%

No Health Insurance 20.6%

The sociodemographic characteristics of these communities is very similar. The biggest difference is the amount of PM2.5 emitted in the towns. For example, to qualify as an Overburdened Community, the threshold for data per year, in tons, (tpy) for two criteria

pollutants is 40 tpy for Nitrogen Oxide emissions and 10 tpy of direct PM2.5 emissions:  
Preliminary Draft Rule Language, November 2025, pages 7-8.

I am unable to determine the amount of PM 2.5 in George as the units are not in the same metric units as other PM 2.5 tpy units I have available. The George and West Grant county data is from an air monitoring unit located close to Interstate 90. The reporting data is in Units Ug/m3. No other criteria air pollutants are currently monitored in George. The data I have from the Quincy data centers is from the Department of Ecology's Approval Orders and Notices of Construction for the 8 data centers located inside the City of Quincy's official city limits.

Comparing the Quincy tpy to the Overburdened Communities threshold:

<u>Overburdened Threshold</u>	<u>Quincy</u>
Nitrogen Oxide 40 tpy	Nitrogen Oxide 429 tpy
PM 2.5 10 tpy	PM 2.5 32.46 tpy
	2025 EJ Screen Particulate matter (95%ile)

The Quincy numbers do not factor in the 2 highways, the 24 daily trains or the wildfire smoke.

The numbers do not lie. Quincy is a low income, Hispanic community that is being developed at the expense of local health and wellbeing. The Washington State Department of Ecology is delinquent in caring for the residents of Quincy and permitting more industry than the air quality can take for human health and the environment. Quincy should be added to the list of Overburdened Communities by the Department of Ecology.

I offer these comments for the record regarding the Overburdened Communities 2025 Washington State Department of Ecology Report.

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Attachment: Annual Emissions of Criteria Pollutants Permitted to be Released by Data Centers in Quincy.

