

February 15, 2026

Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Overburdened Communities Rulemaking

To Whom It May Concern,

Please accept my comments regarding overburdened communities.

Regarding the proposed rulemaking, the amended section under WAC 173-448-090 Emission Baselines, I support using “the highest two-year average of the combined emissions of the criteria air pollutant and its precursors.” However, the 5 year window should not be 2018-2022, but the most recent 5-year data available.

Additionally, this rulemaking focuses on high emitters and stationary sources, but fails to consider the air quality issues caused by agricultural operations. From the aerial application of pesticides and the windborne contaminants from waste-derived fertilizers, air quality is much broader and concerning than looking at permitted sources. Unpermitted sources, such as agriculture also impact air quality and the health of communities that it surrounds.

This rule needs to look at **cumulative** air quality impacts on communities, regardless of the source, i.e., permitted or not permitted. To do otherwise, significantly underestimates exposures.

Regarding the selection of overburdened communities, it is difficult to determine if Quincy is included in the West Grant County and George designation. Assuming that Quincy has not been included, I submit the following information from the EJ Screen in support of including Quincy.

- Quincy ranks in the 95-100 percentile for PM_{2.5} (see attached page 3)
- Quincy ranks in the 80-90 percentile for NO₂
- Quincy ranks in the 80-90 percentile for RMP facilities
- Quincy and surrounding area ranks between 40-80 percentile for heart disease

In addition to over 400 permitted locomotive size diesel engines at the various data centers in Quincy, the community has at least three Title V facilities that rely on natural gas, and a proposed natural gas electric generation facility in the works. In addition to NO_x, a precursor to PM_{2.5}, natural gas emissions also release formaldehyde. Moving away from diesel is not necessarily an improvement, as evidenced in the emission estimates from the natural gas electric generation facility found below:

Project Emissions Summary: Annual Emissions (tpy - total) ¹													
Source	Pollutant												
	VOC	NO _x	CO	SO ₂	PM	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	CO ₂ e	Max. Single HAP Formaldehyde	Total HAPs
Jenbacher J620 Engines	10	0.7	41	6.2	6.2	6.2	6.2	106,699	3.5	0.35	106,691	6.2	9.4
MESA Solutions Black Start Emergency Engine	4.4E-03	6.3E-03	1.5E-03	1.4E-04	4.6E-03	4.6E-03	4.6E-03	41	0.063	3.0E-03	47	4.9E-03	0.010
Plant Roads (Unpaved)	--	--	--	--	2.5	0.6	0.06	--	--	--	--	--	--
Total Site-Wide Annual Emissions	10	0.7	41	6.2	9	6.9	6.3	106,740	3.6	0.35	106,924	6.2	9.4
New Source Review (NSR) Major Source Threshold ²	250	250	250	250	250	250	250				100,000		
Below NSR Major Source Threshold?	YES	YES	YES	YES	YES	YES	YES				NOTE (4)		
Title V Major Source Threshold ³	100	100	100	100	100	100	100					10	25
Below Title V Major Source Threshold?	YES	YES	YES	YES	YES	YES	YES					YES	YES

Notes:

¹ Total facility-wide short-term emissions include emissions from all J620 and BS engines and include all modes of operation (startup and steady state operation). Fugitive PM emissions from roads are also included.

² Major source New Source Review threshold is 250 tons/year per 40 CFR 52.21 and WAC 400-720. Facility-wide potential emissions are well below this threshold.

³ Title V major source threshold is 100 tons/year for any criteria pollutant (for sources located in attainment areas) or 10 tons/year for any single HAP or 25 tons/year for combined HAPs.

⁴ While the GHG emissions are above the major source threshold, USEPA's July 24, 2014 memo (<https://www.epa.gov/sites/default/files/2015-08/documents/2014scotus.pdf>) notes that PSD review cannot be triggered for GHGs alone.

Quincy is one of many overburdened communities that are disproportionately impacted by polluting industries. To get a complete picture of the exposures that exist, a cumulative review of all air pollution sources should be conducted. The purpose is not to reduce responsibility or accountability for polluters, but to fully understand the exposures that occur in these communities.

Thank you for the opportunity to comment.

Patricia Martin
Quincy, WA

Attachment below:

EJ Screen PM2.5 greater than 95 percentile



Source: <https://pedp-ejscreen.azurewebsites.net/>

