

Danna Dal Porto

These are comments from Danna Dal Porto, Quincy, WA, related to the Sabey Data Center (Quincy) Building "E" expansion of 13 diesel generators.

I have several specific questions. Has the Federal Environmental Protection Agency approved the use of the Monte Carlo method to determine emissions from diesel generators? Since Monte Carlo uses math and probability to determine emissions, is this a tested and authorized method to determine emissions in Quincy? Please answer those two questions. I am requesting a tested and true method to determine emissions and I reject using Monte Carlo. Actually, the name of that testing method is close to correct. Monte Carlo is an historic gambling center and using Monte Carlo is like gambling on the answer based not on actual testing, but gambling on probability and math to get the right answer.

In looking for the determination of BACT, I understand that BACT can be plus 30% the cost of controls. Where are the controls on Quincy emissions? What did Ecology use to determine the BACT for Sabey? What is BACT on the original generators and the 13 new generators? Please answer these questions. With a total of 105 diesel generators how can Sabey not be Title 5? Please explain

According to the Environmental Justice Screen, Quincy is ranked a 92% in our level of pm2.5. What is Ecology's intent? Will Quincy be allowed to violate the National Ambient Air Quality Standards (NAAQS) in toxic emissions? Ecology continues to permit data center expansion and construction without requiring controls. Residents are living in a deadly mix of toxins over us and our children. My clear understanding is that the Washington State Department of Ecology had a mission, to protect community health. To my mind, Ecology is not protecting the people in Quincy.

Quincy is a perfect fit for data center construction. Lots of cheap land, use of City of Quincy Water, compliant local leadership, low income working people, and an immigrant population. Added to this, the State of Washington has made the tax advantage attractive for this type of construction. Unfortunately, the environmental and health dangers for local residents has been understated. Initially, Ecology listed stroke, heart attack and breathing problems as concerns from emissions. Those health concerns can be seen easily and can be readily identified in local residents. Now, Ecology does not list those problems (stroke, heart attack, breathing) but focuses on the dangers of cancer from the data center emissions. Cancer is a long term disease, mostly not noticed for even several years. The cancer dangers are there but not in the same way as a deadly stroke or heart attack. The focus of disease favors the data center developer as cancers can show up long after a person moves away from Quincy. The effects are not direct and the connection not as easy to see. Do not be fooled, The emissions from over 460 permitted diesel generators inside the Quincy City limits is deadly and Ecology must know this.

I want to point out the number of Washington State Department of Ecology documents that have landed on my computer very recently. First was an opportunity to write to the General Data Center Document update. Then came the opportunity to write to the issue of Overburdened Communities outreach. Then came the request for comments on Cyrus data center changes. Next was the eagerly awaited Governor's Working Group report on Data Centers. Now I am commenting on changes at Sabey. All of these "opportunities" for Comment happened over the Thanksgiving and Christmas

seasons. Several of us have noticed this in the past. When we asked about the timing of documents, we were told that Ecology could not determine when data center developers would file for permits. I would have you look to see that most of these are from Ecology, not companies. I trust that this pile-up of documents is not intentional but I would request that consideration be made to the timing of Ecology requests so they are scattered in the rest of the year, not piled up at Christmas.

Thank you for considering my comments.

Danna Dal Porto
Quincy