

Anonymous Anonymous

I've been reviewing the VoltaGrid LLC – QWA1 Electrical Generation Plant Notice of Construction application and have some questions and concerns about how the project's emissions and impacts are being evaluated.

1. Diesel Truck Emissions and Air Quality

In the Revised Air Quality Impact Assessment (March 11, 2026) (Tables 6-2 and 6-3), VoltaGrid mentions 56 daily round-trip diesel truck deliveries to transport compressed natural gas (CNG) to the Quincy facility. However, I don't see any modeling or analysis of the emissions from these trucks (e.g., NO_x, PM_{2.5}, CO, or diesel particulate matter). How is Ecology accounting for the air quality impacts of these 56 daily diesel truck trips? Given that Quincy already faces challenges with wildfire smoke and agricultural burning, wouldn't these additional emissions contribute to local pollution? If these emissions aren't included in the modeling, how can we be confident that the project won't push Quincy closer to violating the NAAQS for PM_{2.5} or NO₂?

2. Cumulative Impacts with Nearby Sources

The Revised NOC Application (January 2026) states (below Table 6):

"Nearby sources are not required to be considered in cumulative modeling."

Why are Vantage Data Centers' 61 diesel-fired emergency generators (located less than 2 miles away and authorized under Approval Order 23AQ-E056) not included in the cumulative impact analysis? Given that these generators emit NO_x, PM_{2.5}, and SO₂, wouldn't their emissions combine with VoltaGrid's to affect local air quality? How does Ecology plan to ensure that the combined emissions from VoltaGrid's plant, the diesel trucks, and Vantage's generators won't exceed the NAAQS for PM_{2.5} or NO₂, especially during wildfire season?

3. Upstream Methane Leakage and GHG Emissions

VoltaGrid's Project Emissions Summary only accounts for 3.5 tons/year of methane slip from the turbines. However, the gas is likely sourced from British Columbia's fracked gas fields, where methane leakage rates average 2.5–3% (per IEA Methane Tracker 2024).

How is Ecology accounting for the upstream methane leakage associated with the gas supply chain? Given that this could add ~87,500–100,000 tons/year of CO_{2e}, wouldn't excluding this underestimate the project's true climate impact? Does Ecology believe that WA's GHG reporting rules (WAC 173-441) require a full lifecycle emissions analysis for this project?

4. The "Short-Term" Contract and Climate Loopholes

In Section 4.9 of the Revised NOC Application, VoltaGrid states:

"The proposed project would contract with the local electric utility for a short-term period of less than five (5) years. As such, the GHG EPS law will not apply."

How does Ecology justify allowing a 187,108-ton/year CO_{2e} emitter to bypass WA's Greenhouse Gas Emission Performance Standard (RCW 80.80) simply by calling it "short-term"? Given that Williams Pipeline is planning a major expansion to Quincy by ~2030 (Williams Rockies Columbia Connector Project), isn't this project likely to become permanent? Would Ecology consider requiring VoltaGrid to commit to shutting down when the pipeline arrives to avoid locking in

decades of fossil fuel use?

5. Public Participation and Transparency

The 30-day comment period seems like a short window for a project with such complex and far-reaching impacts. Given the unanswered questions about emissions, cumulative impacts, and climate loopholes. Would Ecology consider extending the comment period or holding a public hearing to ensure all concerns are addressed? Under WAC 173-400-171(3)(n), a hearing is required if there is significant public interest or potential air quality impacts—both of which seem to apply here.