

August 23, 2026

Ryan Vicente
Washington Department of Ecology Central Regional Office
1250 West Alder Street
Union Gap, WA 98903-0009

RE: Sabey NOC

Dear Mr. Vincente,

Please accept my comments on Sabey's Notice of Construction Order (NOC) to add additional diesel backup generators at its East Wenatchee location.

As you are aware, the Wenatchee area is designated an "Overburdened Community" for PM_{2.5} pollution. Even with this designation, Ecology has failed to consider:

- the secondary formation of PM_{2.5} from NO_x, which is a precursor to its formation, and
- Sabey's engines' contribution to the annual NAAQS for PM_{2.5} (9 ug/m³), currently estimated to be as high as 7.5 ug/m³

Please revise the emission estimates to include these omissions.

Additionally, the use of a "cold start" factor of 1 minute is inappropriate, since it takes an engine up to 30 minutes to reach its operating temperature. This is especially true when engines are operated in colder weather. Please revise the "cold start" emissions to more accurately reflect real engine operations and the increased emissions of PM_{2.5}, VOCs, and carbon monoxide.

As part of the requirement for an NOC a BACT analysis must be conducted. Sabey's BACT analysis concludes that using DPFs, SCR's or DOCs is cost prohibitive. The financial availability for BACT is a range that is plus or minus 30%, which would reduce the current cost estimation of a DOC to approximately \$23,640/ton. Please review the BACT analysis again after correcting for the "cold start" emissions, and secondary formation of PM_{2.5}.

While it may be true that the BACT, using a calculated formula, may not be considered financially acceptable, the public perception is that the cost of the controls are a necessity of doing business. The Clean Act was promulgated with the goal of making the polluter pay for the controls, so that the cost of pollution was not externalized on the surrounding community through increased health costs, or illness. Whether BACT requires controls, the public expects them as a cost of doing business, especially by a large multi-billion dollar company like Sabey.

Finally, Ecology states on its website, "To find out if there are more records for this project, contact our Public Records Office." This is totally inappropriate, as all documents related to this

NOC should be available without the need to request them. This action on the part of Ecology denies commenters access to necessary background documents. For example, none of Sabey's earlier air quality permits, technical support documents or NOCs are linked on Ecology's website. Therefore, there is no way for a commenter to review past permit estimations of background levels of NAAQS pollutants such as NO₂, PM_{2.5}, etc., to see how background has changed over time. Commenters also cannot determine if past permits included front- and back-half particulate matter, or other such nuances for permit compliance.

The deficiencies pointed out in these comments must be corrected, or explained, whichever is most appropriate.

The NAAQS levels as established are not as protective as they could be, they are just as low as could be politically supported.

The people of the Wenatchee Valley deserve clean air. Please do everything within your power to either strengthen this permit, or pull it. Ecology is charged with protecting health, not protecting business interests.

Thank you for considering my comments.

Patty

Patricia Martin

