



Response to Comments New Source Review for Intergate Quincy – Sabey Data Center Properties Project

Washington State Department of Ecology
Olympia, Washington

March 2026, Publication 26-02-004

Publication Information

This document is available on the Department of Ecology's website at:

<https://apps.ecology.wa.gov/publications/summarypages/2602004.html>

Related Information

- Approval Order No. 26AQ-E016
- Data Center Webpage: <https://ecology.wa.gov/air-climate/air-quality/data-centers>

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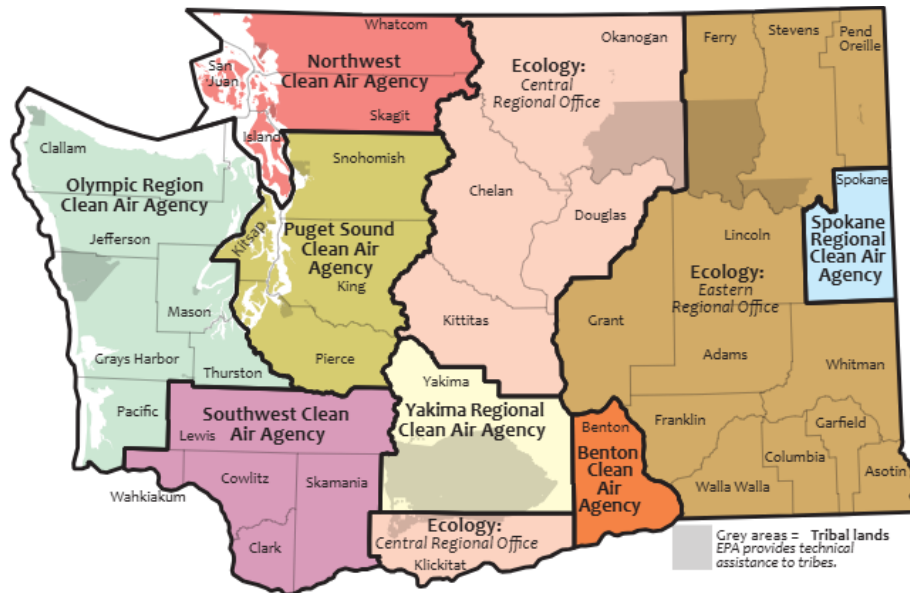
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¹ www.ecology.wa.gov/contact

Washington Clean Air Agencies

Map of Counties Served



Clean Air Agency	Counties served	Mailing Address	Phone
Benton Clean Air Agency	Benton	526 S. Steptoe St. Kennewick, WA 99336	509-783-1304
Ecology Central Regional Office	Chelan, Douglas, Kittitas, Klickitat, Okanogan	1250 W. Alder St. Union Gap, WA 98903	509-575-2490
Ecology Eastern Regional Office	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, Whitman	4601 N. Monroe St. Spokane, WA 99205	509-329-3400
EPA Region 10	Tribal lands	1200 Sixth Avenue, Suite 155 Seattle, WA 98101	
Northwest Clean Air Agency	Island, San Juan, Skagit, Whatcom	1600 South 2 nd St. Mount Vernon, WA 98273	360-428-1617
Olympic Region Clean Air Agency	Clallam, Grays Harbor, Jefferson, Mason, Pacific, Thurston	2940 Limited Lane Olympia, WA 98502	360-539-7610
Puget Sound Clean Air Agency	King, Kitsap, Pierce, Snohomish	1904 Third Ave., Suite 105 Seattle, WA 98101	206-343-8800
Southwest Clean Air Agency	Clark, Cowlitz, Jefferson, Lewis, Skamania, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Spokane Regional Clean Air Agency	Spokane	1610 S. Technology Blvd., Suite 101 Spokane, WA 99224	509-477-4727
Yakima Regional Clean Air Agency	Yakima	186 Iron Horse Court, Suite 101 Yakima, WA 98901	509-834-2050

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DEPARTMENT OF
ECOLOGY
State of Washington

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Acronyms

Abbreviation	Definition
BACT	Best Available Control Technology
CCA	Climate Commitment Act
CEPCI	Chemical Engineering Plant Cost Index
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DOC	Diesel Oxidation Catalyst
DPF	Diesel Particulate Filter
EPA	Environmental Protection Agency
HIA	Health Impact Assessment
NAAQS	National Ambient Air Quality Standards
NO ₂	Nitrogen Dioxide
NOC	Notice of Construction
NO _x	Nitrogen Oxides
PM	Particulate Matter
PM _{2.5}	Particulate Matter with diameter less than or equal to 2.5 micrometers
PM ₁₀	Particulate Matter with diameter less than or equal to 10 micrometers
SCR	Selective Catalytic Reduction
SEPA	State Environmental Policy Act
SIL	Significant Impact Level
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

Introduction

Intergate Quincy – Sabey Data Center Properties (Sabey) is a data center classified with 96 previously permitted emergency generators and 280 previously permitted evaporative cooling emissions units. The New Source Review for this project was for the addition of 13 diesel-powered emergency generators.

An initial Notice of Construction (NOC) application, dated April 7, 2025, was submitted by Sabey for additional generators for Building E. The Washington State Department of Ecology (Ecology) reviewed the initial application and found it incomplete per Washington Administrative Code (WAC) 173-400-111 on April 25, 2025. Supplemental information was received by Ecology on June 18, 2025, and the application was found to be complete on July 1, 2025. The application moved onto Tier 2 review with a Health Impact Assessment (HIA) report submitted by Sabey. The HIA report was found to be incomplete on July 28, 2025. Supplemental information was received by Ecology on September 25, 2025, and the Tier 2 application was found to be complete on September 25, 2025. The source accepted a limit of 25 hours of operation per generator, on average, for Building E.

Comments were accepted during a formal public comment period that ran from November 3, 2025, to December 14, 2025. A total of 102 comments were submitted during the formal public comment period. Oral testimony was also accepted at a virtual public hearing held on December 9, 2025. A total of four oral testimonies were submitted during the public hearing. This document responds to the 106 public comments and oral testimonies we received during the formal public comment period and public hearing.

This publication is separated into four sections:

- A list of recurring topics from the comments received by the public.
- A list of the commenters during the public comment period and public hearing.
- Responses to the comments received.
- Comments received from the public, included in Appendix A.

Comment Topics

Comments and responses were grouped together by topic. The following topics were used:

- Public Hearing Request
- Public Notification Timing
- Document Visibility
- Number of Proposed Generators
- Additional Expansions
- General Opposition
- Climate
- Health Impacts
- Equity
- Resource Considerations and SEPA
- Air Quality Program Authority
- Noise
- Underestimated Emissions
- PM10 Emissions
- Manufacturer-Guaranteed Emission Rates
- Startup and Shutdown Emissions
- Piecemeal Permitting Approach
- Emergency Nature of Generators
- Alternative Power Sources and Controls
- BACT Analysis
- Previous BACT Determinations
- Previous BACT Cost Estimations
- NAAQS Analysis
- Monte Carlo Analysis
- Modeling Software
- Title V Status

List of Commenters

Table 1. List of Commenters

Comment Number	Commenter	Comment Submittal Method
1	Lauren Redfield	Online
2	Suraj Mirpuri	Online
3	Anonymous	Online
4	William Campbell	Online
5	Wendy Gao	Online
6	Diana Rempe	Online
7	Nicole Baich	Online
8	Tiffany Alexander	Online
9	Brynn Armbruster	Online
10	A. G.	Online
11	Priya Dhawka	Online
12	Olivia Rosane	Online
13	Samual So	Online
14	Carrie	Online
15	Thomas Chartrand	Online
16	Janet Lennon-Jones	Online
17	Elizabeth Verdier	Online
18	Yael Yanich	Online
19	Jennifer Schwarz	Online
20	Alice Lockhart	Online
21	Forest Galloway	Online
22	Adam Hudak	Online
23	Sara Trujillo	Online
24	Carol Doerr	Online
25	Patricia Martin	Online
26	Madeline Goodwin	Online
27	Karyn Olivarras	Online
28	Darlene Schanfald	Online
29	Deb Martinson	Online
30	Elaine Packard	Online
31	Jean Mendoza	Online
32	Jacqueline Rasmussen	Online
33	Teresa Aronson	Online
34	Savannah Elmore	Online
35	Michael Apfelbeck	Online
36	Robert Whitner	Online
37	Mike Huff	Online
38	Linda Takamine	Online

Comment Number	Commenter	Comment Submittal Method
39	Nicole Huff	Online
40	Jhoana Duran	Online
41	Roberto Guillen	Online
42	Paul Birkeland	Online
43	Megan Dunn	Online
44	John Rose	Online
45	Carol Reynolds	Online
46	Janelle Gavin	Online
47	Karen Gibson	Online
48	Suraj Mirpuri	Online
49	Luke A.	Online
50	Lauren R.	Online
51	Cole Johnston	Online
52	Bradley Dosch	Online
53	Lauren Redfield	Online
54	Leslie Zavisca	Online
55	Jackson Hall	Online
56	Sevens Baertsch Kovalchick	Online
57	Jason Arnhill	Online
58	Allison Bell	Online
59	Alexa Loyola	Online
60	Marilyn Boyd	Online
61	Melissa Howard	Online
62	Linda Avis Scott	Online
63	Anonymous	Online
64	Alex C.	Online
65	Patrick James	Online
66	Gabriel Kennedy-Gibbens	Online
67	Jesse French	Online
68	Daniel Haas	Online
69	Simon Knaphus	Online
70	Aven Frey	Online
71	Anthony Andrews	Online
72	John Bito	Online
73	Andrea M. O'Ferrall	Online
74	Theo McGillivray	Online
75	Abraham Miller	Online
76	Desiree Stefens	Online
77	Margo Polley	Online
78	Sabrina Sandberg	Online
79	Carrie	Online

Comment Number	Commenter	Comment Submittal Method
80	Stephanie Tejas	Online
81	Patricia Martin	Online
82	Devon Endsley	Online
83	Alice Lockhart	Online
84	Emily Johnston	Online
85	Danna Dal Porto	Online
86	Kathleen McMillan	Online
87	Susan Lawless	Online
88	Lisa Koch	Online
89	Stefanie Cook	Online
90	Danielle Gembala	Online
91	Lea Kent	Online
92	Erin King	Online
93	Evelina Babcock	Online
94	Savannah Elmore	Online
95	Darlene Schanfald	Online
96	Meryl Farrar	Online
97	Cory Wilmarth	Online
98	Scott McClay	Online
99	Rachel Budelsky-Olson	Online
100	Margie Bone	Online
101	Maddy	Online
102	Alice Lockhart	Email
103	Patricia Martin	Public Hearing
104	Anny	Public Hearing
105	Suraj Mirpuri	Public Hearing
106	Lauren Redfield	Public Hearing

Response to Comments

Comments and responses are grouped together by topic. Under each topic heading, there are the comment number(s) relevant to the topic, a summary of the comment(s) received, and a response. You can see original content of the comments we received in Appendix A.

Public Hearing Requests

Comments: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 36, 37, 38, 39, 40, 41, 42, 44, 46, 50, 102

Summary: Commenters requested that a public hearing be held for the project so that testimony could be given.

Response to comments: Ecology's Air Quality Program held a virtual public hearing on December 9, 2025, concerning Sabey's proposal to add 13 emergency generators to its facility.

Public Notification Timing

Comment: 85

Summary: One commenter asked for Ecology to consider the timing of public notices, and to try and spread them out throughout the year if possible.

Response to comment: Sabey's Notice of Construction (NOC) application was submitted on April 7, 2025, and was not determined fully complete until September 25, 2025. Ecology cannot control when an applicant submits an application and supplemental documents, which can impact when review is available to the public. Your comment is noted.

Document Visibility

Comment: 95

Summary: One commenter asked that health impact analyses be made visible to the public for input prior to permitting.

Response to comment: Documents associated with Sabey's proposal were available on Ecology's website for public review from November 3, 2025 to December 14, 2025. The Health Impact Assessment was included in this documentation.

Number of Proposed Generators

Comments: 73, 81, 84, 98, 103, 105

Summary: Commenters claimed that the applicant is proposing to add 19 generators to its facility.

Response to comments: In its Notice of Construction application, Sabey has proposed adding 13 diesel-powered emergency generators to Building E at its facility.

Additional Expansions

Comment: 7

Summary: One commenter asked how many more expansions Sabey will have in the future.

Response to comment: Sabey has not indicated plans for additional expansions to Ecology at this time.

General Opposition

Comments: 47, 49, 52, 53, 63, 64, 68, 94, 105, 106

Summary: Commenters expressed concern and general opposition to the approval of the proposed emergency generators.

Response to comments: This permitting action is limited to evaluating the emissions from proposed emergency engines. We evaluate the proposal that is provided by the applicant and determine whether it meets applicable air quality regulatory requirements. If the requirements are met, we will approve the project.

Climate

Comments: 1, 35, 51, 52, 53, 56, 60, 61, 63, 64, 66, 67, 70, 71, 72, 74, 75, 78, 79, 82, 84, 86, 89, 90, 91, 92, 93, 96, 98, 99, 100, 101

Summary: Commenters expressed concern that approving this project would negatively contribute to climate change. Some commenters also asserted that approving this project runs counter to the goals of Washington State's Climate Commitment Act (CCA).

Response to comments: To support achievement of Washington's decarbonization mandate, the legislature passed the CCA in 2021, which authorizes Ecology to implement the Cap-and-Invest Program. The Cap-and-Invest Program establishes a declining, economy-wide cap on Greenhouse Gas emissions. The

Program caps are aligned with statewide statutory emission limits. The Program caps are set by the annual allowance budgets, where one allowance equals one metric ton of Carbon Dioxide equivalent.

Covered entities must obtain allowances, and a limited number of offsets, equal to annually reported covered emissions. Diesel fuel suppliers are covered by Cap-and-Invest. This means a fuel supplier will have to purchase allowances equivalent to the combustion emissions from any diesel fuel they supply, including fuel supplied to diesel generators.

The Cap-and-Invest Program is designed to minimize overall costs to achieve emissions reductions. The CCA and the Cap-and-Invest Program do not set emission limits for specific entities or facilities. Rather, the declining caps create an economy-wide price signal to reduce emissions dependent upon the balance of allowance supply and demand. For context, the caps are set to decrease by over 10 percent annually each year from 2026 through 2030. The price signal throughout the economy incentivizes near-term lower-cost emissions reductions and creates a long-term signal for decarbonization investments.

If a proposed project undergoing New Source Review meets state and federal air quality requirements, Ecology's Air Quality Program will issue a Notice of Construction Approval Order.

Health Impacts

Comments: 1, 3, 7, 8, 9, 10, 11, 13, 16, 35, 47, 49, 50, 52, 53, 54, 55, 58, 59, 60, 61, 62, 63, 64, 65, 66, 68, 73, 74, 81, 83, 84, 85, 87, 90, 93, 94, 95, 96, 98, 100, 101, 104

Summary: Commenters expressed concern over the potential emissions resulting from the project and the impact they would have on public health. Some commenters specifically expressed concern about the health conditions and diseases linked to some of the project's potential emissions, including cardiovascular diseases, respiratory illnesses, and cancer.

Response to comments: Sabey submitted a Health Impact Assessment for its 13 proposed diesel-powered emergency generators. Ecology reviewed the assessment and determined that the health risk from emissions of toxic air pollutants from the generators' engines meets acceptability criteria under Washington Administrative Code (WAC) 173-460-090. Considering the permit operating conditions and the certified engine ratings of the proposed generators, Ecology concluded that the cancer risk from Sabey's emissions is less than the maximum risk allowed (10 in one million), and that the non-cancer hazard is acceptable.

Equity

Comments: 50, 53, 56, 58, 59, 63, 64, 65, 70, 72, 73, 74, 76, 78, 79, 81, 85, 86, 87, 88, 89, 90, 92, 94, 96, 99, 101

Summary: Commenters expressed concern with Ecology approving this project given the location of vulnerable and overburdened populations relative to pollution sources.

Response to comments: Ecology's Air Quality Program's mission is to equitably protect outdoor air quality to ensure clean air and a healthy and vibrant Washington. Ecology's authority over Sabey's project is limited to reviewing proposed changes to air emission sources and ensuring the proposal meets state and federal air quality requirements. If the requirements are met, we will approve the project.

Our permitting process includes steps to gather and consider input from diverse populations. We begin by consulting Ecology's Limited English Proficiency map and Washington Department of Health's Environmental Health Disparities Map to identify primary languages other than English and socio-economic factors of the area. This allows us to ensure that communities with limited English proficiency and vulnerable and overburdened communities have access to information and public input processes.

We take steps to demonstrate our commitment to equity by connecting with and meaningfully engaging potentially impacted populations, including the Hispanic/Latino community and delivering reliable data collection and scientific evaluation of the airshed. Specifically, we:

- Strive to ensure our public participation opportunities are accessible to as many members of the community as possible; this includes reducing barriers to participation and providing input for Hispanic/Latino Spanish-speaking and Spanish-only community members. For example, we advertise comment periods in both English and Spanish in the local Quincy newspaper and at the local library, translate information for online access, and provide interpretation services during our public meetings when requested.
- Perform scientific analyses required by state and federal law to issue Notice of Construction permits. As part of the permitting process, we review the application and local air quality data to ensure the project will meet ambient air quality standards that are intended to protect public health. We also make sure that the project complies with the air toxics rule, which minimizes increased risk to the community.

- Monitor air quality at a representative location in Quincy, which is at 330 3rd Avenue NE. The monitor is operational with data available 24 hours a day, each day of the week. You can view the information from this monitoring site at: <https://enviwa.ecology.wa.gov/home/map>. Currently the site records weather and PM2.5 data.
- Analyzed and completed a report on the impacts of diesel-powered backup power generators used at data centers in the Quincy area. The report, “Health Risks from Diesel Emissions in the Quincy Area” is available at: <https://apps.ecology.wa.gov/publications/SummaryPages/2002019.html>. We translated and published the Executive Summary in Spanish. See <https://apps.ecology.wa.gov/publications/SummaryPages/2002019ES.html>. The goal of our assessment was to determine community locations experiencing the highest exposure to diesel engine emissions, estimate health risks from that exposure, and to determine sources that contribute the most to those risks.
 - We developed a visual tool summarizing the information in the report that the community can access online. See <https://ecology.wa.gov/Air-Climate/Air-quality/Data-Centers>
 - Appendix C of the report provides the results from our air monitoring of Particulate Matter less than or equal to 2.5 micrometers in diameter (PM2.5), Nitrogen Oxides (NOx), and black carbon from August 2017 through December 2018. We monitored black carbon because there is no method to measure diesel particulate. Black carbon measures particulate matter from combustion sources such as engines. Data from the 2017-2018 study show PM2.5 and NO2 levels meet the National Ambient Air Quality Standards (NAAQS). PM2.5 levels found in the Quincy area are similar to Moses Lake and the Wenatchee area. An individual source of diesel exhaust emissions could not be identified.

If you want to learn more about Ecology’s environmental justice efforts, visit our Environmental Justice webpage:

<https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice>

Additionally, visit Ecology’s webpage for overburdened communities impacted by criteria air pollution: <https://ecology.wa.gov/air-climate/climate-commitment-act/overburdened-communities>

Resource Considerations and SEPA

Comments: 30, 45, 68

Summary: Commenters expressed concern over impacts to additional resources besides air quality, including water, electricity, farmland, property value, and habitat.

Response to comments: The Department of Ecology’s Air Quality Program reviews air emissions associated with equipment proposed by a facility when they submit a Notice of Construction application. This air permit update is specifically concerned with the proposed addition of 13 emergency generators at the applicant’s site. Other environmental resource considerations are regulated by other programs within the Department of Ecology, or other entities in the State of Washington.

The City of Quincy was the State Environmental Policy Act (SEPA) Lead Agency for Building E at Sabey’s facility when it was reviewed years ago. As such, they were responsible for evaluating the SEPA checklist and forming a threshold determination. The City determined that an Environmental Impact Statement was not necessary and issued a Determination of Non-significance on March 3, 2021, for the construction of Building E at Sabey’s facility.

Air Quality Program Authority

Comment: 45

Summary: One commenter asserted that a project of this size should be approved by voters in the State of Washington.

Response to comment: Ecology’s Air Quality Program has authority to issue permits that meet state and federal air quality requirements. Our permit process includes an opportunity for the public’s participation through a comment period. The public may appeal an air quality permit within 30 days of issuance following the instructions listed in the final permit.

Noise

Comments: 35, 48, 74

Summary: Commenters expressed concern with noise pollution that would result from the project.

Response to comments: Noise pollution is regulated by local governments, such as the City of Quincy. The State Environmental Policy Act (SEPA) checklist for Building E included Sabey’s plan to address noise:

1. The generator systems will be equipped with mufflers. The combined noise sources (diesel generators and exterior cooling and air handling equipment) will be designed to comply with the applicable City of Quincy night time noise ordinance limits at the property lines and the closest dwellings, during a power outage when all equipment operates at its design load.

Underestimated Emissions

Comments: 56, 59, 61, 63, 72, 75, 77, 78, 79, 86, 88, 89, 90, 92, 99

Summary: Commenters were concerned that the application underestimates or downplays actual emissions from the proposed generators.

Response to comments: Potential emission calculations submitted by the applicant are based around a worst-case scenario for all pollutants. The worst-case value for parameters like air flow, temperature, and loading rate are used in the calculations and modeling. The emission calculations are conservative in nature and do not underestimate the potential impact of the generators, as they are proposed in the application.

PM10 Emissions

Comment: 81

Summary: One commenter suggested that emissions for Particulate Matter with aerodynamic diameters less than or equal to 10 micrometers (PM10) are underestimated in the applicant's calculations.

Response to comment: PM10 also includes all Particulate Matter with aerodynamic diameters less than or equal to 2.5 micrometers (PM2.5). Combustion sources emit both PM10 and a smaller amount of PM2.5 emissions. To be conservative, all PM2.5 emissions were assumed to be equal to the larger amount of PM10 emissions in the applicant's calculations. PM10 is not being undercounted, but rather PM2.5 is being overcounted.

Manufacturer-Guaranteed Emission Rates

Comment: 81

Summary: One commenter asserted that manufacturer-guaranteed emission rates underestimate emissions.

Response to comments: Manufacturer-guaranteed emission rates are representative of engine operations and suitable for use in potential emission calculations.

Emissions from startup, shutdown, and other operating scenarios are considered and incorporated into the applicant's potential emission calculations.

Startup and Shutdown Emissions

Comments: 56, 59, 61, 63, 72, 77, 78, 79, 81, 86, 89, 90, 92, 99

Summary: Commenters asserted that the application fails to account for emissions during startup and shutdown of the proposed generators.

Response to comments: Engine emissions during startup are considered in the applicant's potential emission calculations. Engine emissions during shutdown are not higher than any emissions that are modeled in the Notice of Construction (NOC) application. To safely shut down an engine, the power load is removed before turning off the engine. This NOC application evaluates each hour of operation with the highest possible emission of each pollutant, even at low load operations that potentially have higher Carbon Monoxide (CO) than at higher loads with more complete combustion.

Piecemeal Permitting Approach

Comments: 53, 56, 59, 61, 63, 65, 72, 73, 77, 78, 79, 83, 84, 86, 87, 89, 90, 92, 98, 99)

Summary: Commenters expressed concern over the project-specific approach of the permit review process. Commenters asserted that the "piecemeal" approach to permitting ignores the cumulative impacts from the applicant's facility-wide emissions.

Response to comments: The background concentrations of a pollutant are incorporated into the applicant's modeling analysis to predict the overall air quality in the local area after the proposed generators are installed. The resulting modeled concentrations are then compared to the National Ambient Air Quality Standards (NAAQS) to ensure compliance with federal air rules. The incorporation of background values helps to avoid a piecemeal approach to air permitting and provides a broader view of the facility's cumulative impacts.

Emergency Nature of Generators

Comments: 15, 80

Summary: Commenters expressed concern that Sabey is using the "emergency" designation for its generators to work around emission limits.

Response to comments: When a Notice of Construction application is submitted by a facility to the Department of Ecology’s Air Quality Program, an air permit engineer reviews the application to ensure it meets federal and state requirements for air emissions. Conditions are included in the drafted approval order that require the generator’s engines to be installed and operated as emergency stationary internal combustion engines, as defined in 40 CFR 60.4219. Emission limits and “hours of operation” limits are included in the drafted approval order, as well. The 13 emergency generators, when considering the voluntary restrictions proposed by the applicant, meet federal and state air regulations.

Ecology inspectors regularly visit or review reports to ensure facilities do not exceed emission limits. If a facility exceeds emission limits, then Ecology uses a variety of compliance and enforcement tools or re-permitting to bring the facility back into compliance.

Alternative Power Sources and Controls

Comments: 24, 48, 53, 55, 56, 57, 60, 62, 63, 64, 65, 66, 67, 71, 72, 73, 74, 75, 76, 78, 79, 83, 84, 86, 87, 89, 90, 91, 92, 93, 96, 98, 99, 100, 101, 106

Summary: Commenters asked Ecology to require the applicant to use alternative power sources and/or emission controls, rather than the diesel-fueled emergency generators that were proposed. Some commenters asserted that if the applicant cannot commit to lower-emission backup power sources, the project should not be approved.

Response to comments: The Department of Ecology’s Air Quality Program reviews the emission units and control technologies proposed in the facility’s Notice of Construction application. Ecology’s air quality permit engineer cannot propose alternative operating units or control technologies during their review. For emission controls, the permit engineer determines if the proposed control measures meet Best Available Control Technology (BACT) requirements. BACT review is performed on a case-by-case basis and considers the technical and financial feasibility of the control measure. If a proposed control measure does not meet BACT requirements, the applicant must propose an alternative control measure that meets BACT.

If a proposed project meets state and federal emission requirements, Ecology’s Air Quality Program will issue a Notice of Construction Approval Order.

Existing data centers in Quincy, Washington sometimes have battery backup as a bridge from the time power is interrupted until the diesel engines can be started (usually a few seconds). But battery backup power alone is not sufficient for long-term power outages.

Best Available Control Technology (BACT) Analysis

Comments: 63, 81, 85, 103, 105, 106

Summary: Commenters expressed concern over the BACT analysis and what was used for the determination of BACT.

Response to comments: The Department of Ecology’s Air Quality Program reviews the emission units proposed in the facility’s Notice of Construction (NOC) application. Ecology cannot approve an NOC application unless the proposed emission units and operations meet BACT requirements. If state and federal air quality requirements are met, we will approve the project.

Sabey presented an analysis of the technical and financial feasibility of various control technologies in its NOC application. In the analysis, Sabey successfully demonstrated Tier-4 engines were cost prohibitive. Sabey proposed and successfully demonstrated BACT as engines meeting the Environmental Protection Agency’s Tier-2 emission standards. Ecology placed conditions in the approval order to limit fuel usage, limit hours of operation, and require the engines be operated as emergency stationary internal combustion engines, as defined in 40 CFR 60.4219.

Previous BACT Determinations

Comment: 85

Summary: One commenter asked what has been determined as the Best Available Control Technology (BACT) for proposed and previously approved emergency generators at Sabey’s facility.

Response to comment: The BACT for all previously approved and proposed engines for the Sabey Data Center in Quincy is meeting the Environmental Protection Agency’s Tier-2 engine emission standards.

Previous BACT Cost Estimations

Comment: 81

Summary: One commenter asserted that Ecology must require add-on controls for all diesel engines used by data centers in Quincy. The commenter also asked what the cost estimations for various control technologies were in the Best Available Control Technology (BACT) analyses for Sabey’s emergency generators in 2010 and 2025.

Response to comment: Ecology is not authorized to require more than BACT on an applicant’s emission unit(s). Because BACT is determined on a “case-by-case”

basis, Ecology does not have official BACT cost thresholds. Ecology may make a presumptive BACT determination based on what other similar sources have determined for BACT. However, while presumptive BACT is the preferred starting point for minor source BACT determinations, Ecology may require a top-down analysis like it did for this proposal by Sabey. Ecology considers current costs and technologies in its analysis and decision-making. While certain technologies may not be feasible for emergency engines used intermittently today, they may be feasible in the future.

When cost thresholds are considered (keeping in mind that cost is not the only consideration for BACT determinations), there have been incremental increases over time as shown below.

1. 1980s: Costs over about \$2,000 per ton considered unreasonable.
2. 1990s – mid 2000s: Costs over \$4,000 - \$7,000 per ton considered unreasonable.
3. Approximately 2017:
 - a. Costs below \$5,000 per ton considered reasonable.
 - b. Costs between \$5,000 and \$10,000 per ton, Ecology evaluates.
 - c. Costs over \$10,000 per ton are considered unreasonable.
4. 2021: Costs over \$12,000 per ton considered unreasonable for most criteria pollutants, except Carbon Monoxide (CO) had a lower threshold, closer to \$6,000 per ton.
5. 2022 – 2025: Updated to align with the most recent Chemical Engineering Plant Cost Index (CEPCI) updates. The most recent CEPCI value was published for June 2024. BACT cost thresholds for Nitrogen Oxides (NOx), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), and Particulate Matter (PM) are around \$14,000 per ton of pollutant removed. The BACT cost threshold for CO is around \$6,100 per ton of pollutant removed.

The cost estimates for Diesel Particulate Filters (DPFs), Diesel Oxidation Catalysts (DOCs), and Selective Catalytic Reduction (SCR) for Sabey's applications in 2010 and 2025 are listed below.

1. Diesel Particulate Filter:
 - a. PM control by DPF in 2010 was estimated to cost Sabey \$1,214,805 per ton of PM controlled.
 - b. PM control by DPF in 2025 was estimated to cost \$316,804 per ton of PM controlled.

- c. CO control by DPF in 2025 was estimated to cost \$230,263 per ton of CO controlled.
 - d. VOC control by DPF in 2025 was estimated to cost \$236,060 per ton of VOC controlled.
2. Diesel Oxidation Catalyst:
- a. CO control by DOC in 2010 was estimated to cost \$9,736 per ton of CO controlled.
 - b. VOC control by DOC in 2010 was estimated to cost \$133,078 per ton of VOC controlled.
 - c. NOx control by a unique, two-stage Oxidation Catalyst in 2010 was estimated to cost \$12,400 per ton of NOx controlled.
 - d. CO control by DOC in 2025 was estimated to cost \$178,865 per ton of CO controlled.
 - e. VOC control by DOC in 2025 was estimated to cost \$183,369 per ton of VOC controlled.
 - f. PM control by DOC in 2025 was estimated to cost \$836,706 per ton of PM controlled.
3. Selective Catalytic Reduction:
- a. NOx control by SCR in 2010 was estimated to cost \$37,804 per ton of NOx controlled.
 - b. NOx control by SCR in 2025 was estimated to cost \$65,509 per ton of NOx controlled.

NAAQS Analysis

Comments: 81, 85

Summary: Commenters expressed concern over National Ambient Air Quality Standards (NAAQS) being met for various pollutants. One commenter asserted that annual Nitrogen Dioxide (NO₂) and annual Particulate Matter with aerodynamic diameters less than or equal to 2.5 micrometers (PM_{2.5}) were not accounted for in the modeling analysis submitted by the applicant. This commenter asked for evidence that NAAQS were being met for annual NO₂ and annual PM_{2.5}.

Response to comments: The Department of Ecology's Air Quality Program reviews the emission units proposed by a facility when it submits a Notice of Construction (NOC) application. Ecology cannot approve an NOC application unless the proposed emission units and operations meet state and federal requirements, including NAAQS. If state and federal air quality requirements are met, we will approve the project.

Each criteria pollutant with an increase in emissions was modeled against its respective Significant Impact Level (SIL) to determine whether or not a cumulative impact analysis was required for each pollutant and its averaging period. Modeled concentrations of Carbon Monoxide (CO), Sulfur Dioxide (SO₂), annual PM_{2.5}, and annual NO₂ were below their respective SIL. A cumulative impact analysis was not necessary for these pollutants and their respective averaging period. These results are included in Table 6-3 of the applicant's Notice of Construction application.

The background concentration developed by the applicant for one-hour NO₂ was 55.6 micrograms per cubic meter. The NAAQS for one-hour NO₂ is 188 micrograms per cubic meter. The NAAQS for annual NO₂ is 53 parts per billion, which are notably different units than micrograms per cubic meter. The resulting design value for one-hour NO₂ from the Monte Carlo analysis, which is used for comparison to the NAAQS of 188 micrograms per cubic meter, was 171.1 micrograms per cubic meter. With the addition of the proposed generators, the NAAQS was still met.

Monte Carlo Analysis

Comments: 81, 85

Summary: Commenters requested documentation of the Environmental Protection Agency's (EPA) support for the use of Monte Carlo analysis by the Department of Ecology.

Response to comments: Ecology does not require EPA approval for the use of Monte Carlo post-processing of modeling for determining National Ambient Air Quality Standard compliance for minor sources in permit applications. Ecology has discussed the methodology with EPA. They have not provided any formal approval but have also not provided any statement that it should not be used for minor sources.

Modeling Software

Comment: 81

Summary: One commenter requested a list of the air modeling software used by Sabey in its modeling analysis, as well as the year each software was last updated.

Response to comment: Sabey used the most recent versions of the AERMOD modeling system (AERMOD version 24142, AERMET version 24142, and AERMAP version 24142) for its air quality analysis. The EPA released these versions of the modeling system components on November 20, 2024.

Title V Status

Comment: 85

Summary: One commenter asked how Sabey could not be a Title V source, given the amount of generators they will have on site.

Response to comment: Title V status is dependent on the facility-wide potential emissions for a facility and whether the facility has voluntarily taken a limit to reduce emissions. The limit could be an operational limitation or the addition of controls to keep potential emissions of the facility below Title V thresholds. Sabey's facility-wide potential emissions remain below Title V thresholds even with the addition of the proposed emergency generators.

Appendix A. Comments Received

Comment 1 – Lauren Redfield

Dear Washington State Department of Ecology,

I am a concerned community member and climate professional urging the Department of Ecology to hold a public hearing regarding Sabey Data Center's request to add additional diesel generators at their Quincy facility.

While the department has indicated that this application may be approved, this decision would result in increased emissions, including:

9.67 tons per year nitrogen oxides (NO_x)

2.04 tons per year particulate matter (PM_{2.5})

2.04 tons per year particulate matter (PM₁₀)

0.97 tons per year nitrogen dioxide (NO₂)

0.78 tons per year diesel engine exhaust particulates

As someone who works professionally on energy transition and climate solutions, I am deeply concerned that expanding fossil-fuel-based backup power infrastructure locks in additional emissions and undermines efforts to decarbonize our energy system. Even if emissions remain within regulatory thresholds, these generators pose a real risk to the health of nearby residents and exacerbate the climate and air pollution crisis.

Decisions like this are about more than compliance—they are about how we manage public resources, protect community health, and shape our energy future. Large infrastructure projects that increase emissions should be subject to transparent public review. A public hearing allows community members to formally voice concerns, ask questions, and participate in decisions that affect their environment and long-term wellbeing.

Please consider this comment as an official request to hold a public hearing before approving this permit. The community deserves an opportunity to weigh in before any final decision is made.

Thank you for your attention and consideration.

Comment 2 – Suraj Mirpuri

Im very concerned with air quality in our state. Bringing generators online seems very unnecessary. I for one, am requesting a hearing.

Comment 3 – Anonymous

I am a community member concerned about the potential increased emissions impact on public health. I request a public hearing before this permit for more diesel generators is approved.

Comment 4 – William Campbell

Any additional pollution generation on this scale needs a public hearing, or should be outright denied.

Comment 5 – Wendy Gao

Dear Ecology,

Public hearings on this request for 13 new DIESEL generators is needed. This is significant increase in pollution and green house gas emissions in our state. All of us will be affected, not just Grant County. Please let the public voice their opinions.

Thank you

Wendy

Comment 6 – Diana Rempe

I am writing to request a public hearing for the Sabey Data Center's request for additional diesel generators. This project needs public discussion.

please set a public hearing.

thank you

Diana Rempe

White Salmon, WA 98672

Comment 7 – Nicole Baich

Curious that your would skip a public comment hearing.

How many more expansions will they have?

Where's the historical impact study these days centers will have in health and ecology?

Hate this.

Comment 8 – Tiffany Alexander

Please hold a public hearing and study the environmental impacts deeper.

Comment 9 – Brynn Armbruster

I'm a community member who is concerned about data centers and their emissions. Adding additional diesel generators onsite would lead to more air pollution that could hurt my community. I would like there to be a public hearing before this application is approved. Consider this public comment as an official request to the Department of Ecology to host a public hearing.

Comment 10 – A. G.

I am a community member concerned about the environmental impacts of data centers, particularly their emissions. Adding more onsite diesel generators will increase air pollution and potentially harm different communities. I am requesting that a public hearing be held before this application is approved. Please consider this comment an official request to the Department of Ecology to convene a public hearing

Comment 11 – Priya Dhawka

I'm a community member who is concerned about data centers and their emissions. Adding additional diesel generators onsite would lead to more air pollution that could hurt my community. I would like there to be a public hearing before this application is approved. Consider this public comment as an official request to the Department of Ecology to host a public hearing.

Comment 12 – Olivia Rosane

As a Washington resident and environmental journalist, I think it is essential to hold a public hearing before installing any new diesel generators that will contribute to the state's climate emissions and to air pollution for the surrounding community. In the name of environmental stewardship and public health, I request a public hearing.

Comment 13 – Samuel So

I am a community member who is concerned about construction of data centers due to their emissions and offsetting costs to residents. Adding additional diesel generators onsite would lead to more air pollution that could hurt my community. I would like a public hearing before this application is approved. Please consider this public comment as an official request to the Department of Ecology to host a public hearing.

Comment 14 – Carrie

Please hold a public hearing on this. The community deserves a say in this!

Comment 15 – Thomas Chartrand

Please hold a public hearing on this proposal - it's unacceptable to allow companies to use "emergency" generators to work around emissions limits.

Comment 16 – Janet Lennon-Jones

This is a terrible proposal and the public deserves the hearing to make our voices heard. We must prioritize our health over corporate wealth!

Comment 17 – Elizabeth Verdier

This project is significant enough that a public hearing should be called, so questions can be answered real-time. Thank you.

Comment 18 - Yael Yanich

A public hearing is needed. Air quality should not be compromised..

Comment 19 – Jennifer Schwarz

Requesting a public hearing regarding the Sabey Data center

Comment 20 – Alice Lockhart

Please consider this my request for a public hearing, thanks!

Comment 21 – Forest Galloway

I'm requesting a public hearing regarding the Sabey data collection center. I oppose the construction. Across our country data centers cause major problems in the communities they are built in. When a company builds a data center, they often promise jobs, investment, and innovation. But the reality is less rosy. Data centers are not major job creators—they're mostly automated. What they do bring is increased pressure on local utilities, infrastructure, and real estate markets.

In many cases, local taxpayers end up subsidizing the power and water needs of a multi-billion-dollar corporation, while receiving little in return.

Comment 22 – Adam Hudak

No data center!

Comment 23 – Sara Trujillo

Our priority needs to be protecting what is essential and critical to survival. The environment is, AI is not.

Comment 24 – Carol Doerr

PLEASE schedule a public hearing on this issue. In this era of global warming, adding fossil fuel sources to power an energy-intensive data center is irresponsible. It jeopardizes not only air quality but also would increase CO2 emissions. Sabey should power their center with renewable sources - which should be easy given their location: solar and wind in abundance.

Comment 25 – Patricia Martin

I am writing to request a Public Hearing. Those of us who attend always appreciate the presentation that Ecology provides. The documents can be overwhelming to residents, so presentations help to level the playing field for those who might want to comment, but don't want to take the time necessary to read and/or understand the documents.

Thank you.

Patty

Comment 26 – Madeline Goodwin

Please hold a public hearing on this application! We do not need additional greenhouse gas emissions in our atmosphere.

Comment 27 – Karyn Olivarrias

Public hearing is needed.

Comment 28 – Darlene Schanfald

I request there be a public hearing on the air quality permit to allow the addition of more diesel engines at the Sabey Data Center, and that citizens be able to join both in person and on line.

The increased number of these centers are gulping up water needed for public use and fire. They are taking up huge acreage and minimizing habitat that could be used by wildlife. And the public is fully aware that the public utility bills will be costed to the public, leaving the companies financially better off.

Please add me to your contact list to joining the hearing on line.

Thank you.

Comment 29 – Deb Martinson

Please schedule a hearing. Data centers are incredibly resource-intensive and bad for the environment. Making one bigger just means it will consume even more resources.

Comment 30 – Elaine Packard

In addition to air quality concerns, I have concerns about the overuse of our local resources, i.e., water, farmlands, and electricity.

Comment 31 – Jean Mendoza

Please schedule a hearing. Data centers are incredibly resource-intensive and bad for the environment. Making one bigger just means it will consume even more resources.

Comment 32 – Jacqueline Rasmussen

I would like to attend a public hearing to learn more about the growing concern of air pollution and air quality with the need you have for more diesel engines.

Comment 33 – Teresa Aronson

I strongly urge the Dept. of Ecology to hold a public hearing on Sabey's construction application. The projected increases in emissions are significant. The community should have the opportunity to express their concerns in a public hearing.

Comment 34 – Savannah Elmore

This is an important issue and needs to have a public hearing.

Comment 35 – Michael Apfelbeck

The diesel generators will cause noise pollution, particulate pollution, and spew large amounts of greenhouse gasses; all this harms the public while benefiting private interests and should not be allowed.

Comment 36 – Robert Whitner

Any data center project is impactful to the community and warrants public review and comment.

Comment 37 – Mike Huff

This issue is important to the community and it deserves a public hearing!

Comment 38 – Linda Takamine

Yes, please have a public hearing

Comment 39 – Nicole Huff

I would like a public hearing on this matter. As residents, we want less emissions and fewer data centers eating up our energy resources.

Comment 40 - Jhoana Duran

A public hearing is needed.

Comment 41 – Roberto Guillen

Public hearing is needed.

Comment 42 – Paul Birkeland

You definitely need to hold a public hearing on this. Data centers are eating our power, polluting our air, and wrecking the climate. Not to mention corrupting the infosphere. Data center operation is a much bigger deal than it used to be. We all see it now, and we want some say in things like this.

Yeah, do the public hearing.

Comment 43 – Megan Dunn



Comment 44 – John Rose

This is an important issue for the community and needs a public hearing.

Comment 45 – Carol Reynolds

I feel strongly that a project of this magnitude should require an environmental impact statement, but more than that, it should be approved by the voters of Washington state.

Comment 46 – Janelle Gavin

This project should have a public hearing. It will cause a major disruption to the surrounding area and should not go unchecked.

Comment 47 – Karen Gibson

No. Enough is enough. More data centers using up space and resources for technology that will destroy jobs is not what WA needs. The public that will have to live around these proliferating centers deserve to be protected, not encroached upon simply to deliver processing speed for technologies that serve no benefit to the regular janejoes. Just say no.

Comment 48 - Suraj Mirpuri

In Oregon, when data centers seek permitting for these kinds of backup generator systems, there are incentives that fast track permitting if the operators install catalytic convertors, filters, and scrubbers / other technological mitigations (example included via attached screenshots).

Have the operators been asked to install such mitigations such that when backup power is enabled the environmental impact is minimal, as a condition of permitting; and that the public cost of bearing air pollution externalities are addressed somewhat via the operator's increased capital expenditure?

Before this was even requested, has the operator been asked to invest the same capital expenditure in solar with backup systems or other renewable sources?

Furthermore, has noise pollution been studied? What are the results and have mitigations been requested so as not to disturb local residents or wildlife?

Comment 49 – Luke A

This should not be approved. Data centers are already wreaking havoc on the environment, and the companies that utilize them do not pay their fair share of taxes or reinvest in the community.

Comment 50 – Lauren R.

I do not support this project due to the environmental and equity issues that surround it. I also believe strongly in having a public hearing and environmental impact study done. This industry creates far more problems than it solves and this will not only destroy the livelihood for so many of us but also cause more pollution to humans and animals alike.

Comment 51 – Cole Johnston

Adding unnecessary fossil fuel generation in the middle of a climate crisis is a horrible idea. The health of the general public has been repeatedly sacrificed for profit. This practice needs to end.

Comment 52 – Bradley Dosch

Washington residents do not need more data centers, we need clean air. We cannot afford to emit more harmful pollutants into the air, even if it is within allowed emissions thresholds. Every year gets warmer and warmer and putting more greenhouse gases into the atmosphere for rich peoples' benefit is not the answer. As a young person, I am extremely concerned about the cleanliness of our air and climate for future generations. This approval seems to completely ignore all of Washington's climate goals and put more power into the hands of wealthy corporations. This is a tale as old as time and history seems to be repeating itself. Air pollution does not stay within city borders. It affects ALL of us, especially the local community members. Please do not add additional generators for data centers.

Comment 53 – Lauren Redfield

I urge Ecology not to approve this project unless there are far stronger protections for community health and a clear shift away from diesel dependence.

Ecology's own outreach materials highlight serious concerns about diesel exhaust, fine particulate pollution, and the cumulative impacts of data-center generators in Quincy. If Ecology is genuinely concerned, as it has stated, then approving another set of diesel generators is inconsistent with those concerns.

At a minimum, Ecology should require modern emission-control technologies, such as diesel particulate filters, and should strongly consider requiring a transition to cleaner backup-power alternatives, including battery storage or renewable-based systems. These technologies already exist and are in use elsewhere. If Sabey cannot or will not commit to cleaner alternatives, then this project simply should not move forward.

Another core issue is process. Quincy is experiencing the combined impacts of multiple data-center expansions, yet each permit is evaluated in isolation, as if it has no relationship to the dozens of generators already installed or being proposed. This piecemeal approach hides the true cumulative burden on a small rural community.

We need a permitting framework that evaluates a project's full lifecycle environmental impact, including cumulative air-quality degradation, health risks, long-term diesel reliance, and climate implications, rather than treating each generator request as a standalone event.

This proposal also conflicts with Washington's climate commitments. Under the Climate Commitment Act, our state is legally obligated to reduce emissions and accelerate the transition away from fossil-fuel infrastructure. Adding 13 more diesel generators, especially when cleaner technologies are available, runs directly counter to those commitments. Every new diesel unit locks in years of pollution, carbon emissions, and ongoing fossil-fuel dependency. Ecology should not approve infrastructure that undermines the climate goals the state has set and the public overwhelmingly supports.

Finally, I urge Ecology to center the people who actually live with these impacts. Diesel pollution disproportionately harms children, elders, agricultural workers, and community members with asthma or respiratory challenges. Quincy deserves the same health protections afforded to larger or more politically powerful communities.

For these reasons, I ask Ecology to require cleaner technologies, conduct a full cumulative-impact review, and, if those protections cannot be met, to deny the permit.

Thank you for your time and consideration.

Comment 54 – Leslie Zavisca

Do NOT approve. Do the right thing and put humans in the local community first. Do not prioritize businesses and wealthy technocrats over the health, safety, and well being of local residents.

Comment 55 – Jackson Hall

The emission of literally tons of nitrous oxides will be horrible for the air quality. There are also cleaner backup alternatives like battery storage. Please deny the permitting.

Comment 56 – Sevens Baertsch Kovalchick

As a resident of Washington who wants the government to make good rational decisions that will steward our state into a sustainable, equitable future, I urge Ecology to deny the permit for proposed diesel generators in Quincy. Approving the permit would be a decision made with no regard to the well being of Quincy's ecosystem and the futures of the people who live there.

The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

There is no reason not to be thorough with the permitting process and ensure that the project truly is in the best form it could be and fulfills the requirements that Washington's constituency has agreed upon. Create a renewable emergency generator that will serve the community cleanly for generations, or don't build it at all.

Comment 57 – Jason Arnhill

While I agree that emergency power is important for the efficient running of a data center, diesel generators are the worst solution for our environment, health, and sustainability. A battery storage system fueled by renewable energy sources, hydrogen fuel cells, or natural gas generators would provide a much cleaner alternative to the diesel generators that will keep Washington on the path toward a carbon neutral or even carbon negative future. Thank you.

Comment 58 – Allison Bell

Quincy already faces disproportionately high air pollution burdens and ranks in the 92nd percentile nationally for PM2.5 exposure. Diesel exhaust is a regulated toxic pollutant linked to cardiovascular disease, respiratory illness, and cancer. Permitting additional uncontrolled diesel generators in a largely rural community raises serious environmental justice concerns and contradicts Ecology's duty to protect public health.

Comment 59 – Alexa Loyola

Please deny or revise the permit for Sabey's proposed diesel generators in Quincy. This application underestimates real world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy already faces high air pollution and ranks nationally for PM2.5 exposure. Diesel exhaust is a toxic pollutant linked to cardiovascular disease, respiratory illness, and cancer- all major killers of people in the US. Permitting additional uncontrolled diesel generators in a largely rural community raises serious environmental justice concerns and contradicts Ecology's duty to protect public health. Please consider. Thank you

Comment 60 – Marilyn Boyd

I am writing to urge you to NOT APPROVE more diesel generators at Sabey Data Centers in Quincy, WA.

Having any diesel generators at this point of our climate emergency is abominable. Adding more in Quincy, already disproportionately affected by pollution, is egregious! Our Climate Commitment Act, <https://ecology.wa.gov/air-climate/climate-commitment-act> states, "the Washington State Climate Commitment Act represents a comprehensive approach to tackling climate change through regulatory measures, financial investments, and a focus on equity, aiming to create a sustainable future for all residents."

Diesel emissions increase carbon dioxide emissions which decreases air quality affecting asthma sufferers and those with other respiratory illnesses.

It seems apparent that a clean, sustainable energy source, like solar or wind power, would be both less expensive and less damaging to the Quincy community.

Again, please DO NOT APPROVE diesel generators at Sabey Data Centers in Quincy, WA.

Comment 61 – Melissa Howard

I urge the Department of Ecology to reconsider approving the permits to add new diesel generators for the Sabey data center in Quincy. We must avoid diesel backup power for the health of the community. The current proposal underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 62 – Linda Avis Scott

Considering the increase in polluting emissions being proposed, please deny this permit and require use of battery powered generators.

Reducing the impacts of increased emissions on nearby neighborhoods is much more important than allowing a profit making entity to use a dirty technology when less environmentally impactful technologies are available.

Comment 63 – Anonymous

There is no good reason to approve this application when considering its impacts on community health and overall pollution, especially the way this impacts some of our most vulnerable communities in a gross expression of ecological racism and classism. That's not even to mention the ways in which new diesel infrastructure undermines Washington's Climate Commitment Act and the state's legally binding obligation to reduce fossil-fuel dependence across all sectors. Each new diesel generator locks in years of pollution and carbon emissions at a time when cleaner alternatives are available and necessary. Is the Department of Ecology truly not beholden to the Climate Commitment Act? Is Ecology truly more devoted to the profit of the very few who would benefit from this new diesel infrastructure than they are to protecting our environment and the communities that call this place home?

Claims about the negative impact of diesel on people and environment aren't speculative, they are grounded in science. Even if the federal government has become a fully anti-science machine, I expect better of Washington State and its departments. It is known that diesel backup generators produce significant local air pollution, including fine particulate matter (PM2.5), nitrogen oxides (NO_x), and toxic diesel exhaust, all of which are linked to asthma, heart disease, and cancer. Quincy already faces disproportionately high air-pollution burdens and ranks in the 92nd percentile nationally for PM2.5 exposure. Why exactly would Ecology want to make this worse? Diesel exhaust is a regulated toxic pollutant linked to cardiovascular disease,

respiratory illness, and cancer, and as such additional uncontrolled diesel generators should under no circumstances be permitted. The potential impact of these extra generators on largely rural community raises serious environmental-justice concerns and contradicts Ecology's duty to protect public health, and raises serious questions about the Department of Ecology's stated intent to approve the application, presumably regardless of what feedback is received during public comment. Are these extra diesel generators really worth sidelining democratic processes by making a decision before public comment has even heard?

Furthermore, because this kind of permitting is often done piecemeal, the cumulative impact on communities like Quincy is often hidden. Quincy is experiencing the cumulative impacts of many data-center expansions, yet each diesel generator permit is evaluated in isolation. This approach hides the true burden on community health, air quality, and long-term sustainability - to what end? Why go about this in a way which seemingly knowingly underestimates the long term impact of these generators? Who exactly benefits? Who profits? Ecology must evaluate projects based on their full lifecycle and cumulative environmental impacts, including routine generator testing, startup and shutdown emissions, and the growing concentration of diesel infrastructure in Quincy.

Communities hosting data centers are frequently rural, agricultural, or communities of color, raising serious environmental-justice concerns when diesel pollution is concentrated there.

Cleaner alternatives exist, including battery energy storage systems and renewable-based backup power, but regulators often fail to require them. Approving this application would be a betrayal of these communities and a gross demonstration of environmental racism and classism. Ecology must NOT approve this application, despite its undemocratic stated intent.

Comment 64 – Alex C.

hell no - no more air pollution in Quincy and Washington state. It really pisses me off that you (the Ecology!) are not denying this kind of outrageous requests on the spot, wasting everyone's time. Surprised you are still not requiring these super-rich innovative MicroMetaAmaGooglaSoft subsidiaries to buy clean backup battery banks (even my neighbor has a Powerwall by now) instead of noisy dirty diesel. They will test-run it monthly and drain/replace diesel fuel. Then, they will run it for days during power outages. Diesel is the worst, it's toxic, cancerogenic and causing all kinds of diseases. This is direct sale of our health to profit these few CryptoAI billionaires expanding these data centers.

Please, check this out carefully: <https://www.enabledemissions.com/>

Disturbingly, they're also enjoying enormous tax breaks in Washington, approved by mistake over a decade ago on broken promises to create jobs. They didn't and don't create any jobs, it's all automated, like refrigerators:

<https://www.kuow.org/stories/data-centers-put-wa-clean-energy-goals-in-jeopardy>

<https://www.kuow.org/stories/washington-has-a-data-center-problem>

<https://www.kuow.org/stories/u-s-electricity-demand-is-set-to-explode-that-will-make-it-harder-to-cut-climate-pollution>

<https://www.kuow.org/stories/climate-pollution-surges-in-washington-state-after-pandemic-lull>

It's a sad story of lobbying and gross incompetence of WA lawmakers who made this disastrous taxbreak decision 15 years ago, rewarding a billion dollars (or more) taxbreaks to these climate polluters in the Pacific Northwest.

MICROSOFT alone received half a Billion tax break to create under 500 jobs...

Shortsighted lawmakers attracted so many useless datacenters to Washington that as a state we're now emitting more GHG than 20 years ago!

So who were you sworn in to protect, these billionaire corporations or the general public?

It is often the most disadvantaged and vulnerable members of our community, such as low-income households, elderly, immigrants, students and workers themselves who are breathing the harmful exhaust.

And don't even get me started on climate change. You folks at the state Dept. of Ecology should know better than anyone else that they (fossil fuels) are destroying our only habitable planet before our eyes. Ironically, the droughts, disappearing glaciers and snowmelt in Cascades are also reducing our hydro power outputs at the hundreds of Washington dams, at a time when these power-hungry data centers consume more and more power. This is all like shooting ourselves in the foot, short-term thinking. Don't say you can't stop it. When there's a will, there's a way.

California did it. They've deployed battery banks at scale. They are even repurposing old EV batteries because they are so good that even old they can still be used for this purpose.

They've even banned all SORE (small off-road internal combustion engines), all the online and in-person retailers were prohibited from selling SORE equipment to California residents.

There are more and more cities banning the sale of new SORE, and portable diesel generators are out by 2028 per CARB (California Air Resources Board).

<https://www.lovelafayette.org/city-hall/commissions-committees/environmental-task-force/leaf-blowers>

<https://www.thecooldown.com/green-business/colorado-gas-powered-lawn-equipment-ban/>

<https://www.thecooldown.com/green-business/ban-on-gas-powered-lawn-equipment-lafayette/>

<https://guide.thecooldown.com/polls/do-you-think-the-government-should-ban-gas-powered-lawn-tools/>

<https://www.usatoday.com/story/news/nation/2023/04/30/gas-leaf-blower-mower-bans-spread-us-fight-climate-change/11746893002/>

<https://coloradonewslines.com/briefs/limited-ban-on-government-use-of-gas-powered-lawn-equipment-approved-by-colorado-regulators/>

<https://www.fastcompany.com/90972850/why-leaf-blowers-are-being-banned-across-the-country>

<https://www.axios.com/2021/12/10/california-gas-powered-zero-emissions>

You must understand that every new year for the rest of our lives will be the hottest, or one of the hottest, on record. Since land mass is heating up faster than ocean, parts of the U.S. have already heated up by a whopping +5F (+3C) just in the last 65 years. Oceans warming up slower due to higher evaporative cooling and heat absorption, taking in 90% of heat (and about half of CO₂) so the average global mean of +1.6°C from pre-industrial is like a downplay. We see more extreme jumps over +10°C above average around the world on more days. People dying in heat waves. A global average temperature of 2024 was 0.12°C higher than in 2023. At this alarming rate of temperature increase, we're looking at 1°C added per decade, which is extremely concerning, as both terrestrial and ocean CO₂ sinks are getting saturated and becoming less effective. It can also accelerate due to feedback loops. CO₂ is a stubborn gas that, once emitted, remains in the atmosphere for millennia.

Unbelievably, we are now living through the hottest temperatures in 125,000 years. Atmospheric CO₂ concentrations are higher than at any time in at least 2,000,000 years. Our planet's changing climate has become the single most important problem for the humanity to solve in the XXI century and beyond. Military called it a "threat multiplier" because it is making everything worse, affects every other aspect of our life and society, and is mutually reinforced by socio-economic injustice. It's our duty as Washingtonians to be on the right side of history that will be judged by the future generations.

Comment 65 – Patrick James

Diesel is the steroidal version of fossil fuels. Please consider the below and seek alternatives...

Policy research on data centers shows that diesel generators are one of the most harmful and least scrutinized parts of data-center infrastructure:

Diesel backup generators are a major source of local air pollution, including fine particulate matter (PM2.5), nitrogen oxides (NO_x), and toxic diesel exhaust, pollutants linked to asthma, heart disease, and cancer.

While labeled "emergency" equipment, diesel generators are routinely tested, creating ongoing emissions that add up across dozens of facilities.

Permitting is often done piecemeal, approving one set of generators at a time, which masks the cumulative impact on communities like Quincy.

Communities hosting data centers are frequently rural, agricultural, or communities of color, raising serious environmental-justice concerns when diesel pollution is concentrated there.

Cleaner alternatives exist, including battery energy storage systems and renewable-based backup power, but regulators often fail to require them.

Comment 66 – Gabriel Kennedy-Gibbens

Ecology must deny the permit for Sabey's proposed diesel generators in Quincy. Diesel generators create more air pollution, which will negatively affect the local community of Quincy, which is already experiencing and adjusting to unprecedented growth and pressures from data centers. These generators will also contribute to worsening the climate crisis. We must not set a precedent of adding more fossil fuel infrastructure to meet our growing need for electricity. This need must be met with clean, cheap wind and solar projects!

Comment 67 – Jesse French

I urge the Dept of Ecology to deny the application for diesel generators, because there are cleaner alternatives available (e.g. battery backup) that do not conflict with Washington state's climate commitments and don't contribute to pollution in vulnerable communities.

Thank you!

Comment 68 – Daniel Haas

This project puts Washington residents and fragile ecosystems at risk for no discernable benefit. These generators will devalue land and destroy habitat. Their purpose is to provide power to a data center that exists only to empower the already powerful and rob hard working people everywhere of their livelihoods. This cannot be allowed.

Comment 69 – Simon Knaphus

Please deny the permit for additional generators.

Comment 70 – Aven Frey

We do not need any more data centers, and we especially do not need any more pollution spewing diesel generators in under-resourced neighborhoods. What an obscene break from the climate commitment act. This project takes us in the exact opposite direction we need to go to avoid catastrophic climate change.

Comment 71 – Anthony Andrews

I strongly oppose the approval of new diesel generators for this data center. We can't allow diesel to become the default power source for new data centers. We must require cleaner energy sources. Approving this application would undermine the state's climate commitments. We must do better.

Comment 72 – John Bito

Ecology should not approve the permit for Sabey's proposed diesel generators in Quincy as written. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Backup generators must be started several times each month as part of their maintenance, and the application doesn't account for the higher rate of emissions during startup and shutdown of the engines. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 73 – Andrea M O'Ferrall

I am extremely concerned that Sabey Data Centers seeks approval to add 19 new diesel generators, increasing air pollution in a community already facing disproportionate environmental and health burdens.

This proposal reflects a broader problem with how data centers are being permitted: diesel backup power is treated as unavoidable. Policy research on data centers shows that diesel generators are one of the most harmful and least scrutinized parts of data-center infrastructure. For example, diesel backup generators are a major source of local air pollution, including fine particulate matter (PM_{2.5}), nitrogen oxides (NO_x), and toxic diesel exhaust, pollutants linked to asthma, heart disease, and cancer. Also, permitting is often done piecemeal, approving one set of generators at a time, which masks the cumulative impact on communities like Quincy. To top it off, communities hosting data centers are frequently rural, agricultural, or communities of color, raising serious environmental-justice concerns when

diesel pollution is concentrated there. All this, even though there are cleaner, more resilient alternatives.

Ecology should not treat diesel generators as the default or inevitable choice for data-center backup power. Diesel is not the only option. Battery energy storage systems and renewable-based backup power are viable and increasingly cost-effective, and avoid locking communities into long-term diesel pollution. If Sabey cannot commit to cleaner backup technologies, this project should not be approved.

Comment 74 – Theo McGillivray

Diesel generators are major polluters for air and noise. The WA Dept of Ecology needs to look at the long-term impacts of this on the community (including equity), agriculture, the environment, and wildlife. There are many other energy sources for generators. Even if these are "emergency only," they will regularly be tested.

Quincy is already in the 92% for toxic air and fast approaching PM10 and PM2.5 NAAQS limits. Rural communities shouldn't be left out to dry from WA's Climate Commitments or bullied by big corporations to be the dumping grounds for their environmental crimes.

Comment 75 – Abraham Miller

This is not the standard I accept for the WA dep of ecology decisions. Washington's Climate Commitment Act obligates the state to reduce fossil-fuel dependence across all sectors, and in this case there are cleaner alternatives for emergency energy such as battery storage.

Diesel pollution and emissions are often underestimated. Let's set an example in Quincy, showing that data centers can be run fully with clean energy.

Comment 76 – Desiree Stefens

Communities hosting data centers are frequently rural, agricultural, or communities of color, raising serious environmental-justice concerns when diesel pollution is concentrated there.

Cleaner alternatives exist, including battery energy storage systems and renewable-based backup power, but regulators often fail to require them.

Comment 77 – Margo Polley

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Comment 78 – Sabrina Sandberg

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 79 – Carrie

I strongly urge the Ecology department to either deny or significantly revise the permit for Sabey's proposed diesel generators in Quincy. The application downplays actual particulate emissions, neglects the pollution generated during startup and shutdown phases, and perpetuates a pattern of fragmented permitting that overlooks cumulative and lifecycle impacts in a community that is already close to NAAQS limits.

Quincy bears an undue burden of air pollution, raising critical concerns related to environmental justice and public health. Ecology has the authority to mandate the use of Best Available Control Technology or to explore cleaner backup power alternatives, such as battery storage, rather than committing to long-term diesel pollution. Moreover, approving new diesel infrastructure contradicts Washington's Climate Commitment Act and the state's emissions-reduction objectives. If these essential protections cannot be guaranteed, this project should not be approved.

Comment 80 – Stephanie Tejas

I want to express my concerns about the idea these generators are "emergency" but they are saying to produce multiple tons of emissions per year? As if the generators are supposed to be supplying power regularly? Are they that unreliable? If this is the way Quincy is doing business it's no wonder everyone's moving away! No one is listening to longtime residents at all but want facebook \$. Support this if you love big power bills.

Comment 81 – Patricia Martin

December 14, 2025

David Finley
Washington Department of Ecology Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295

RE: Comments Sabey Data Center

Dear Mr. Finley,

Please accept my comments regarding the proposed addition of 19 diesel engines at the Sabey Data Center. Because I have a number of concerns, I will itemize them so that you can respond in kind.

PM10 Emissions appear to be under estimated. Review of particulate matter emission estimates, as seen below, shows PM10 and PM2.5 emissions to be equal. This is, however, inaccurate. While it is true that all PM2.5 is counted as PM10, diesel engines emit both PM2.5 and PM10. The additional PM10 is not accounted for in the emission estimates.

Table C-4. Criteria Pollutants Emission Estimate - Main Gensets - Worst Case - Building E (New Project)

Pollutant	Emission Factor	Maximum Engine Emission Rate Across Any Load/Vendor ^a			Annual Total for All Engines (tpy)
		Warm Engine (lb/hr/engine)	Cold-Start (lb/hr/engine)	(tpy/engine) ^a	
Particulate Matter (PM) ^b	Maximum Vendor Hourly Emission Rate	1.12	4.76	0.06	0.78
Condensable PM ^b	Maximum Vendor Hourly Emission Rate for Total Hydrocarbon	1.79	7.76	0.10	1.27
Particulate Matter <10 microns (PM ₁₀) ^b	Maximum Vendor Hourly Emission Rate	2.90	12.52	0.16	2.04
Particulate Matter < 2.5 microns (PM _{2.5}) ^b	Maximum Vendor Hourly Emission Rate	2.90	12.52	0.16	2.04

This omission is documented to have occurred in the previous issued permits as well.

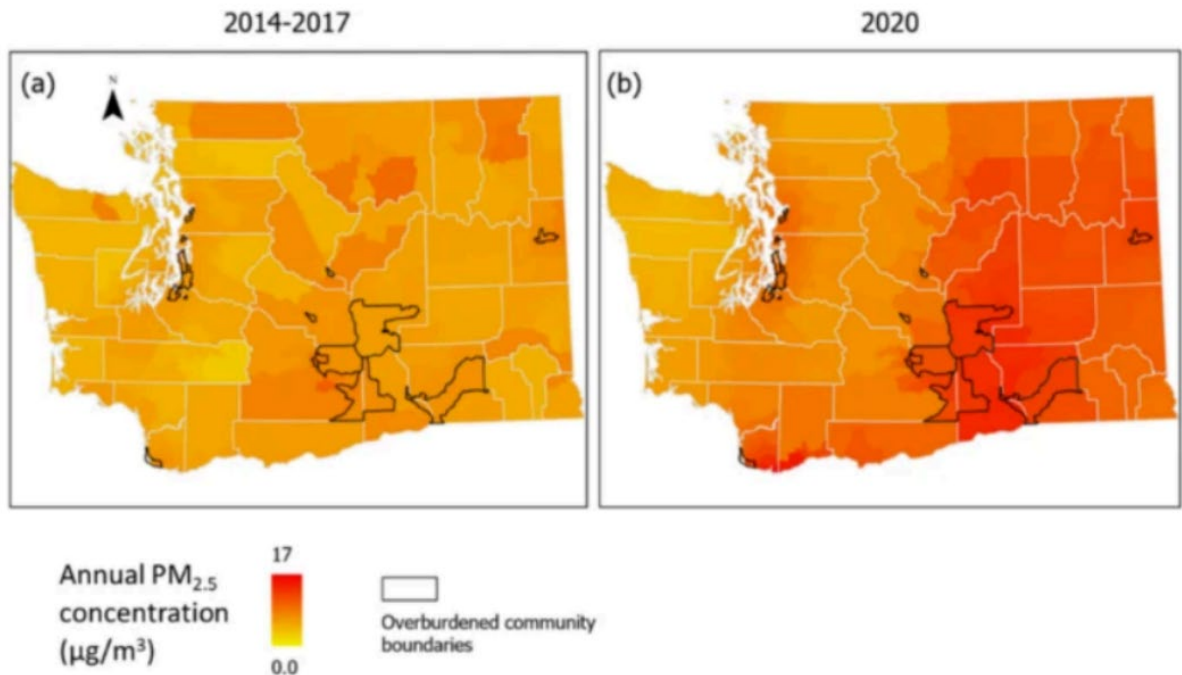
It should be noted that during the prelude to December 8th’s Public Hearing, I specifically asked whether diesel engines produced PM10 and, as I recall, Ecology was not able to answer the question. Because Quincy is rapidly approaching the PM10 NAAQS, this omission is unconscionable, and potentially a violation of the NAAQS.

Engine Shut Downs are not accounted for in the emission estimates. Ecology was remiss in earlier permits by not accounting for cold-start emissions, i.e., start-up, and is equally remiss in not accounting for shut-down emissions. During shut-down, products of incomplete combustion increase, i.e., particulate matter, carbon monoxide and hydrocarbons. Every engine start has a shut-down that must be accounted for. This is especially important since there are no controls on any of the engines permitted at the Sabey data center. Please require these emissions to be included in the permit. Shut down emissions have not been accounted for in any of Ecology’s past permits issued for data centers in Quincy.

PM2.5 Background Levels are higher than cities in Western Washington. Ultra fine particulate matter triggers cardiovascular, respiratory and other health affects, and disproportionately

impacts communities of color like Quincy. According to the EJScreen, Quincy is in the 92nd percentile for PM_{2.5}. Adding to the community’s burden by permitting additional uncontrolled diesel engines is irresponsible, especially from an agency charged with protecting human health.

Fig. 3



<https://link.springer.com/article/10.1007/s11869-024-01664-6>

Annual NAAQS criteria pollutants. The draft permit does not account for annual PM_{2.5}, and NO₂. Are the annual standards for these criteria pollutants being met? Please provide evidence, Since the background for NO₂ exceeds the annual standard of 53 ppb, is the NAAQS being violated?

Table 6-4. Background Concentrations for NAAQS Analysis

Pollutant	Averaging Period	Background Concentration		NAAQS (µg/m³)
PM ₁₀	24-hour	77.9	µg/m ³	150
PM _{2.5}	24-hour	18.5	µg/m ³	35
NO ₂	1-hour	55.6	µg/m ³	188

Manufacturer guaranteed emission rates underestimate emissions. Using the 5-load weighted average to guarantee engines can meet the Tier 2 standards is misleading at best. During the testing, a 5-load weighted average is used obscuring the real emissions at any given load. Additionally, as part of the testing manufacturers use to guarantee emissions, start-up, shut-

down and malfunctions are excluded. Additionally, the emission tests always begin after a 30 minute warmup period. Relying on guaranteed emission rates for modeling purposes, underestimates the emissions released. Ecology should use data from engine tests that are conducted by trusted Ecology, EPA or CARB employees to ascertain the real emissions at any given load.

Monte Carlo analysis used for dispersion modeling. Please provide documentation of EPA's support for the use of the Monte Carlo analysis for NAAQS criteria pollutants and citation to its adoption into Appendix W of 40 Part 51.

Best Available Control Technology. The BACT process involves the impact on the environment, which includes the airshed and the surrounding community. As Quincy's air quality is approaching the NAAQS for PM2.5 and others, it is imperative that Ecology insist that controls be placed on all diesel engines used by the data centers. Contrary to Ecology's assertion that they cannot require controls, WAC 173-400-030(13) states otherwise:

(13) "Best available control technology (BACT)" means an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source ... (emphasis added)

Since BACT is based on a cost/ton of pollutant emitted, and with technologies becoming more affordable over time, please provide the cost estimations used for DPFs, DOCs and SCRs in the BACT analysis applied in Quincy in 2010 and in 2025, as well as, the "acceptable" BACT cost/ton for those years.

Changes to air modeling and NAAQS. There have been changes to several of the air quality models, e.g., AERMOD, etc., that are used for compliance purposes. Please list the models Sabey used in its modeling, and the year the model was last updated.

Finally, Quincy is a largely minority community that must trust Ecology to protect them. Instead it appears that Ecology will continue to allow diesel and other hazardous air polluting facilities to contaminate Quincy's airshed until it is out of attainment. Quincy being held to a less protective cancer-rate standard than other communities reeks of environmental injustice.

Environmental laws were established such that the polluter was to pay to protect the surrounding community, rather than "externalizing" the cost of pollution on existing residents, leading to increased health problems and expense.

The pressure Ecology is undoubtedly under to permit these facilities must not override the mission of the agency to protect the citizens of Washington State. Please keep the mission front and centered.

Thank you for considering my comments. I look forward to your response.

Sincerely,

Patricia Martin
Quincy, WA

Comment 82 – Devon Endsley

I don't approve of this motion. Please fight for climate change and anti-data centers which are contributing to growing climate issues.

Comment 83 – Alice Lockhart

I'm writing to ask that the Sabey data center permit be denied, because the cumulative effects of multiple data centers, and concomitant pollution from testing and running diesel generators on the Quincy community has not been sufficiently studied or included in the evaluation. Similarly, the effects on the grid and on utility prices of data centers that advertise "clean" power when they are actually using BPA power with the result of less clean hydropower available for cities, towns, agriculture and existing industrial uses, should be considered: data centers should be built with adequate renewable power, not power purchased from existing and limited sources at the expense of the rest of us. Please deny this harmful permit.

Comment 84 – Emily Johnston

I urge you to deny the permit for Sabey's 19 new diesel generators in Quincy, which is already suffering an undue burden from the use of fossil fuels for data centers.

Allowing new "emergency" generators ensures that they will be used for years—and permitting these without regard to the cumulative impact of existing "emergency" generators makes no sense. With each additional generator, we create new incentives for maximal use of data centers that are already polluting our communities and risking our climate commitments.

Quincy already faces disproportionately high air-pollution burdens and ranks in the 92nd percentile nationally for PM2.5 exposure—an exposure that we know greatly increases the risk of heart disease, Parkinson's, and cancer.

Solar power is now the cheapest form of energy worldwide, and battery storage came down 40% in 2024 alone, with a 2025 figure that is expected to be similar. If Sabey is unwilling to build solar or other renewables, then they're not committed to our communities; there is no reason we should allow them to not only continue polluting, but expand their polluting activities.

Please deny the permit.

Comment 85 – 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

Comment 86 – Kathleen McMillan

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 87 – Susan Lawless

You must stop the new diesel generators in Quincy. They will increase dangerous air pollution like NOx and toxic diesel exhaust. You need to require cleaner backup power--not more diesel. Evaluate the cumulative effects of the diesel--instead of the piecemeal permit approach of approval. Public health must be seriously considered in all your decisions, as well as environmental injustice. Human lives are at stake.

Comment 88 – Lisa Koch

I urge the committee to reject this proposal. It substantially underestimates emissions, which will disproportionately affect rural and poor communities. If there are not strict conditions to mitigate these harms, the project should not be approved.

Comment 89 – Stefanie Cook

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 90 – Danielle Gembala

I am writing to ask Ecology to deny or completely alter the permit for Sabey's proposed diesel generators in Quincy. Sabey's proposal does not address the real-world particulate emissions it will create. For example, it does not account for startup and shutdown pollution. Approving this project is one of many in a string of irresponsible permitting that ignores cumulative and lifecycle impacts in a community already bearing the brunt of systemic pollution.

The community of Quincy is disproportionately impacted by air-pollution already, so adding more with systems that are known to heavily impact community health goes against the environmental-justice and public-health stance the Washington State government purports to promote. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals.

If these protections cannot be guaranteed, this project should not be approved.

Comment 91 – Lea Kent

I oppose permitting more diesel generators for this data center project. Increasing fossil fuel generation capacity is contrary to the State's climate commitments and is entirely unnecessary with the broad availability of battery backup technology. Data centers should not routinely be allowed to saddle the environment and communities with dangerous externalities when alternatives are available.

Comment 92 – Erin King

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 93 – Evelina Babcock

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy.

The disproportionate air pollution burdens Quincy is facing should be a concern for us all. As both a long time resident of this beautiful state and a parent to a child who suffers from asthma I know how detrimental an uptick in air pollution can be to nearby residents and the environmental health of the state as a whole. They are cleaner and better backup power alternatives we should definitely be investing in rather than antiquated high pollution options. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

As someone who works in the tech industry as well, and someone who has had experience in data center use it is imperative that we invest longer term in our future rather than always optimizing for next quarter's profits.

Comment 94 – Savannah Elmore

I am urging the Department of Ecology to deny permits for diesel generators at the Sabey data center in Quincy. A move like adding diesel generators is opposite to the stated goals of the State of WA in regards to environmental impact and sustainability, and also would have a heavy impact on an already disadvantaged rural community. There honestly shouldn't be new data centers anyhow as they're hugely awful for the environment, but making them diesel powered adds insult to injury.

Comment 95 – Darlene Schanfald

RE: Sabey Data Center

Mr. Finley:

I am concerned about particulate emissions, of any size. They will have consequential human health, wildlife and environmental impacts. Emissions do not stay local; they circulate and, depending on the weather, drift in different directions and distances. In-depth analysis is

needed on these likelihoods prior to approving permits. And those analysis should first be shared publicly for public input, prior to permitting.

Thank you,

Comment 96 – Meryl Farrar

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Comment 97 – Cory Wilmarth

Do not allow additional diesel generators in Quincy, WA. You know this is wrong.

Comment 98 – Scott McClay

Ecology must do better! Deny the permit for 19 new diesel generators:

they pollute an already overburdened area, esp concerning are PM2.5 emissions, and more research shows how severe their health impacts are;

there are clean alternatives! eg, battery backups are an excellent alternative;

your process must consider the entire impact of the project--ie, currently these 19 generators could be approved w/o considering they add to the impact of the many current generators at the site;

you can require BACT to greatly reduce the impacts of diesel exhaust;

finally, WA has climate goals that must be considered if we have any hope of a livable future.

Comment 99 – Rachel Budelsky-Olson

Dear Department of Ecology,

I'm writing to express my dismay at the possibility of a data center permit approval that includes using diesel backup generators.

I urge Ecology to deny or substantially revise the permit for Sabey's proposed diesel generators in Quincy. The application underestimates real-world particulate emissions, fails to account for startup and shutdown pollution, and continues a pattern of piecemeal permitting that ignores cumulative and lifecycle impacts in a community already nearing NAAQS limits.

Quincy faces disproportionate air-pollution burdens, raising serious environmental-justice and public-health concerns. Ecology has the authority to require Best Available Control Technology or cleaner backup power alternatives, such as battery storage, instead of locking in long-term diesel pollution. Approving new diesel infrastructure also conflicts with Washington's Climate Commitment Act and the state's emissions-reduction goals. If these protections cannot be guaranteed, this project should not be approved.

Thank you for your consideration of these concerns.

Comment 100 – Margie Bone

Out of concern for the residents in the area, additional diesel generators should not be approved. Generators cause significant pollution, including with fine (

There are cleaner alternatives, for example battery storage and renewable energy, that are better for health and also do not add so much planet-warming pollution. We, as a state, cannot afford to allow this additional pollution if we are to meet our goals.

Please reject this proposal. It's bad for health and the climate, and would be unfair to the people of Quincy.

Comment 101 – Maddy

This project should not be approved, as it will add to the already disproportionate burden of pollution on Quincy. There are safer, cleaner, more renewable sources of backup energy that should be used instead of diesel generators! This project goes against the Washington Climate Commitment Act and perpetuates climate injustice against Quincy

Comment 102 – Alice Lockhart (received by email on November 16, 2025)

Good morning Mr. Finley,

Please consider this email my request for a public hearing on Sabey Corporation's request to add additional fossil fuel generators to their Quincy WA facility.

Thank you,

Alice Lockhart
10016 Interlake Ave N, Seattle, WA 98133
206-427-7884

Comment 103 – Patricia Martin (transcribed from December 9, 2025 public hearing)

Yeah my name is Patricia Martin Patricia Martin and I guess my um. The one thing I'd like to say is I think that Ecology is remiss in allowing Tier 2 engines to um uh take the place of more protective engines I understand that they were playing the BACT game and you know they can

reduce the number of hours that means the less emissions divided by the right the cost and you know dadadadada so then they don't have the controls on but 109 uncontrolled engines realizing this is talking about just 19 of them when our air quality is approaching the NAAQS for the one-hour NO₂ as well as the 24-hour PM₁₀. And considering the fact that the PM 2.5 standard has reduced to 9 so we're now getting much closer to that um I think it's shameful that there is not um a better use of BACT Ecology has continued to um stick to numbers that have not used the puzzle book as Jim Wildwood Jim Wilder would have said + or - 30% each time that you do a BACT analysis and so we are never going to be at a place where BACT requires controls on these engines. And that will be my testimony for the evening thank you.

Comment 104 – Anny (transcribed from December 9, 2025 public hearing)

Hi my name is Anny I want to echo Patricia Martins comments and I want to say that I am also concerned about the outsized impact of these generators and I'm concerned that for a lot of the questions that we asked there was not a ready answering available ummm which makes me think a more thorough job uh should be done when there is a risk in increase of cancer. Thank you.

Comment 105 – Suraj Mirpuri (transcribed from December 9, 2025 public hearing)

Hello thank you my name is Suraj Mirpuri spelled Suraj Mirpuri. I want to point out that the mission statement for the Washington Department of Ecology is to protect preserve and enhance Washington 's environment for current and future generations I believe that allowing a private company to bring online Tier 2 uncontrolled generators is in diametric opposition to that mission statement. Air pollutants do not stay neatly within city or state boundaries they cross into water sources into the food we eat and I am not convinced that the analysis provided has adequately addressed all of the concerns with where this pollution could end up for 19 generators additionally I would like to state that the revenue increase from this is certainly not in proportion to the cost of this environmentally and that is what I would like to state my opposition to these the permitting bringing online these additional generators thank you.

Comment 106 – Lauren Redfield (transcribed from December 9, 2025 public hearing)

Hi my name is Lauren Redfield Lauren Redfield. And I. Sorry. Trying to find my notes yeah I urge Ecology not to approve this project unless our far stronger protections for community health and a clear shift away from diesel dependence Ecology's own outreach materials highlight serious concerns about diesel exhaust umm you don't sound all that confident about this project in terms of your analysis to be honest. And I want to echo Patty Martin's comment that ecology should be requiring modern emission control technologies including particulate filters and should strongly consider requiring a transition to cleaner backup power alternatives including battery storage and renewable based systems. These technologies already exist they are in use elsewhere if Sabey cannot or will not commit to cleaner alternatives and this project should not move forward. Thank you.