



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 16, 2015

Ms. Karen Wood
Department of Ecology
Eastern Regional Office
4601 N. Monroe Street
Spokane, WA 99205-1295

**Re: Second Tier Petition by Sabey Corporation Regarding TAP Emissions Increases
Associated with Permit Revisions Requested for the Sabey Intergate-Quincy Data
Center in Quincy, WA**

Dear Ms. Wood:

The Washington State Department of Ecology's Air Quality Program (Ecology) has completed a review of health risks from diesel engine exhaust particulate (DEEP) emissions from the Sabey Corporation (Sabey) Intergate-Quincy Data Center in Quincy, WA. Sabey had previously obtained a permit to install and operate:

- Several cooling units
- Forty-four generators rated at up to 2,000 kilowatt (kW) electrical output

In March 2015, Sabey submitted an application to revise the permit to allow generators to operate over a wider range of operating loads. This wider range results in an increase in the amount of air pollution the facility could emit. Ecology required Sabey to revise the health impact assessment to evaluate the health risks from exposure to diesel engine exhaust particles.

The revised diesel particle emissions resulted in an increase lifetime cancer risk from the previous estimate of seven in one million to a new estimate of about 9.9 in one million. The maximum risk was estimated on a portion of a residential parcel located north of Sabey Intergate-Quincy Data Center. Ecology allows an increased risk of up to 10 in one million from new sources of air pollutants.

As part of the community-wide approach in Quincy, Ecology also considered the cumulative impacts of DEEP emissions in the area. Emissions from Sabey and other local sources of DEEP could result in lifetime increased cancer risk of up to approximately 58 in one million (58×10^{-6}) at a location about $\frac{3}{4}$ mile south of Sabey Intergate-Quincy Data Center and just south of State

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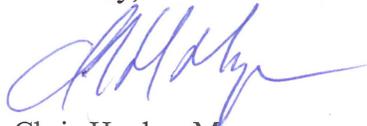
Route 28. Most of the DEEP exposure at this residence is estimated to come from heavy duty trucks travelling on the highway. The cumulative non-cancer hazard quotient at this location is much lower than unity (one) meaning that non-cancer adverse health effects are unlikely.

Ecology recommends approval of the proposed project because project-related health risks are permissible under WAC 173-460-090 and the cumulative cancer risk from DEEP emissions in Quincy is less than the cumulative maximum risk threshold established by Ecology for permitting data centers in Quincy (100 per million or 100×10^{-6}).

This project has satisfied all requirements of a Second Tier analysis. Ecology recommends that you incorporate our findings as part of your ambient air impacts analysis and you may begin the public comment period when you are ready to do so.

If you would like to discuss this project further, please contact Gary Palcisko at (360) 407-7338 or gary.palcisko@ecy.wa.gov.

Sincerely,



Chris Hanlon-Meyer
Science and Engineering Section Manager
Air Quality Program

gp/te

Enclosure

cc: Jolaine Johnson, Ecology
Gary Palcisko, Ecology
Dale Spencer, Sabey
Jim Wilder, Landau Associates