



# Oregon

Tina Kotek, Governor

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October 29, 2024

Amazon Data Services, Inc.  
79539 Rippee Rd.  
Boardman, OR 97818  
*Sent via email only*

Shannon Moore,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Emissions Inventory (Inventory) for the Amazon Data Services, Inc. PDX-4 facility in Boardman, OR on September 23, 2024, and has completed an initial review.

In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ has determined that the following additional information, corrections, and updates are required by November 27, 2024, in order to approve the Inventory:

1. Submit to DEQ a revised Inventory (AQ520), along with all supporting calculations in Excel format, as well as all information required under [OAR 340-245-0040\(4\)](#). Include the following updates to the AQ520:
  - a. Cold Starts: Incorporate emissions from engine cold starts into the Inventory. Per footnote 7 in the letter provided with the Inventory submittal, emissions from cold starts will be included in emissions assessed for risk. As such, emissions from engine cold starts must be incorporated into the Inventory for approval.
  - b. 2023 Annual Fuel Usage: Review of annual fuel usage for the engines against information submitted in both the 2023 annual reporting and the Air Toxics Emissions Inventory (ATEI) show discrepancies between fuel usage for multiple engine groups. Review and revise fuel usage rates as appropriate to resolve discrepancies. Discrepancies were noted with the following TEUs:
    - i. Type A
    - ii. Type B
    - iii. Type E
    - iv. Type F
  - c. 2023 Daily Fuel Usage: Provide maximum daily fuel usage rates for each of the engine TEUs (TEU IDs: Type A through Type I). Per [OAR 340-245-0040\(4\)\(a\)\(B\)\(i\)\(I\)](#), existing sources are required to submit maximum daily production activities and usage for the calendar year preceding the DEQ call in.
  - d. Diesel Tanks-Exempt TEU: Provide unique TEU identifiers for each of the diesel storage tank TEUs on Worksheet 2.
  - e. Belly Tanks-Exempt TEU: Provide unique TEU identifiers for each of the engine oil storage tank TEUs on Worksheet 2.
  - f. Type F Engine: Update references on Worksheet 3 to distinguish the source of the emission factor for each Toxic Air Contaminant (TAC) for the Type F engines.

Currently, all of the TAC emission factors have the reference of “2019 and 2021 Stack test data and Toxics ATEI Combustion Tool Emission Factor.” Update the reference for each TAC emission factor to clarify the specific source of the data.

2. Type F Engine Source Test: Provide a copy of the source test report for testing conducted by CAT on the CAT 3516C 2,500 kW generator in March 2019. Also provide a copy of correspondence with the DEQ approving use of these source test results for permitting purposes.
3. Generator Specifications: Provide vendor specifications for all generator types. Specifically, provide data supporting both particulate matter (PM) and hydrocarbon (HC) emission rates used in development of diesel particulate matter (DPM) emission rates.
4. Facility Wide Limitation (TEU ID: FWL): Provide explanation supporting the development of the annual and maximum daily PTE fuel usage rates and emission estimates for the facility-wide fuel use limitation.
5. Engine Oil Belly Tanks: Provide the following information necessary for DEQ to make an Exempt TEU determination for the engine oil belly tanks:
  - a. Safety data sheet(s)
  - b. Estimated annual throughput volume (facility-wide)

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadline above may result in a violation of [OAR 340-245-0030\(1\)](#).

If you have any questions regarding this letter please contact me directly at 971-300-3653 or [amy.devita-mcbride@deq.oregon.gov](mailto:amy.devita-mcbride@deq.oregon.gov), and I look forward to your continued assistance with this process.

Sincerely,

*Amy DeVita-McBride*

Amy DeVita-McBride  
Cleaner Air Oregon Project Engineer

Cc: Shri Vani Sripada, Amazon  
Jason Bowker, Amazon  
Darren Wilton, Amazon  
Beth Ryder, Trinity Consultants  
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