



Oregon

Tina Kotek, Governor

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January 6, 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 December 16, 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 **January 24, 2024**, 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:
 - i. For all engines and applicable Toxic Air Contaminants (TACs), update the reference in Column I of Worksheet 3 to note that PTE and Capacity emission estimates include cold start emission estimates.
 - ii. Update maximum daily PTE emission estimates for all engines to include cold start calculations.
 - iii. To aid in DEQ's review, include an active version of the cold start emissions worksheet "Screening Emission Calculations" to supplement the AQ520.
 - b. Pyrene (CASRN 129-00-0): Include the DEQ-approved emission factor of 0.00125 pounds per thousand gallons diesel fuel for all engines types, excluding Type F.
 - c. Type A Engines (TEU ID: Type A): Confirm fuel usage rate at 100 percent load against manufacturer engine specifications provided to DEQ.
 - d. Type F Engines (TEU ID: Type F):
 - i. Update fuel usage for Type F engines to match Facility Wide Limitation of 269,503 gallons per year. Also ensure the appropriate fuel usage is used for annual emission estimates in worksheet "Screening Emission Calculations."
 - ii. Update calculations for annual PTE and Capacity emission estimates for the Type F engines to include all 79 engines in this category. As presented, calculations are for 15.53 engines.
 - iii. Update calculations for maximum daily PTE and Capacity emission estimates for the Type F engines to include all 79 engines in this category. As presented, calculations are for 5 engines. Alternatively, provide supporting information describing the assumption of only 5 cold starts per day.

- e. Facility Wide Limitation (TEU ID: FWL):
 - i. Update TEU ID in Column A of Worksheet 3 to match TEU ID in Column A of Worksheet 2.
 - ii. Update reference in Column I of Worksheet 3 to remove language referencing the Modeling Protocol and Work Plan as these documents have not yet been submitted.
2. Facility Wide Limitation (TEU ID: FWL): Provide explanation supporting the annual and maximum daily PTE fuel emission estimates for the facility-wide fuel use limitation. Please include how this calculation method was developed and why it represents a conservative estimate of emissions.

DEQ requests 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 in this letter 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, and I look forward to your continued assistance with this process.

Sincerely,



Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

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