



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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May 30, 2025

Amazon Data Services, Inc.
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Sent electronically only

Shannon Moore,

Amazon Data Services, Inc.'s (ADS) PDX-4 facility was called in to the Cleaner Air Oregon (CAO) program on June 27, 2024. ADS submitted a CAO Emissions Inventory (Inventory) on September 23, 2024. DEQ reviewed the Inventory and issued a Comment Letter on October 29, 2024, requesting a revised Inventory and additional supporting information. ADS submitted a revised Inventory and the requested information on December 16, 2024. DEQ reviewed the revised Inventory and issued a second Comment Letter on January 6, 2025, requesting additional revisions to the Inventory and additional supporting information. ADS submitted the requested information on January 24, 2025, and revisions to the Inventory on January 24 and January 29, 2025. DEQ approved the Inventory on January 31, 2025. DEQ received the submittal of the combined CAO Modeling Protocol (Protocol) and Risk Assessment Work Plan (Work Plan) on February 26, 2025, 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 **June 27, 2025**, to approve the Protocol and Work Plan:

1. Update the Protocol and Work Plan to reference Toxic Emission Unit (TEU) IDs consistent with those used by ADS in the approved Inventory.
2. The Protocol and Work Plan references "auxiliary generators" in multiple instances – update the Protocol to include a list of those TEUs which are considered part of this category.
3. Ensure that the most recent version of AERMAP (v24142) is used for modeling. The Protocol and Work Plan references AERMAP version 18081 in Sections 2.1.3 and 2.4.
4. Review building identifications in Figure 2-1 and correct as appropriate. The building identified as "PDX-56" in this figure is named as "PDX055" in information provided with the Inventory and in Appendix B of the Protocol and Work Plan.
5. DEQ notes there is another facility (Columbia River Processing) immediately north of the PDX-4 facility with buildings that could contribute to downwash. Provide justification for not including these buildings or update the Protocol and Work Plan to include these structures.
6. The description of the proposed modeling approaches presented in Sections 3.2 and 3.3 appears inconsistent. Section 3.2 indicates that sources will be modeled using a unit emission rate for the chronic risk assessments and calculated REERs for the acute risk assessment, while section 3.3 indicates that all sources will be modeled with a unit emission rate. Review and revise as appropriate.
7. Revise Section 3.3.1 to clarify that this is focused on Chronic Cancer Risk exclusively.
8. Include a discussion of Chronic Noncancer Risk.

9. The total for the individual generator fuel throughputs presented in Tables 3-2 and 3-3 exceed the facility's annual fuel usage limit of 269,504 gallons. Review and revise as appropriate.
10. Review "Emission Unit" names used in Tables 3-2 through 3-5 and ensure that identification for individual generators is consistent. As an example, in Tables 3-2 and 3-3 the Ski Lodge generator is identified as "C18 750 kW – Ski Lodge 1" and as "C18 750 kW – SKILOGD1" in Table 3-4.

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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