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*RE: Response to Oregon DEQ's Review of ADS's Modeling Protocol and RAWP*

Trinity submitted the Modeling Protocol (MP) and Risk Assessment Work Plan (RAWP) on February 26, 2025, for Amazon Data Services, Inc.'s (ADS) PDX-4 facility. ADS received a response from the Oregon Department of Environmental Quality (ODEQ) on May 30, 2025, regarding the MP and RAWP. The MP and RAWP report was revised in response to the comment letter. The comment letter's points are below in italics and the responses in bold. This cover letter serves to answer the points made in the comment letter and address where changes were made in the report.

*1. Update the Protocol and Work Plan to reference Toxic Emission Unit (TEU) IDs consistent with those used by ADS in the approved Inventory.*

**A column has been added to display each generator's TEU ID in Tables 2-1, 2-2, 3-2, 3-3, 3-4, and 3-5 that is consistent with 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.*

**The TEU ID's for the auxiliary generators have been specified on page 3-5. These are the generators being referred to in all instances when the term is subsequently used.**

*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.*

**It has been verified that AERMAP version 24142 was used for modeling. Section 2.1.3 and 2.4 were updated accordingly.**

*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.*

**Figure 2-1 has been revised to match the Facility Layout provided in Appendix B.**

*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.*

**The analysis and justification for why downwash from these buildings were not included in the modeling has been provided in Section 2.2.4, pages 2-5 through 2-7.**

*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.*

**These sections have been revised to more clearly specify that all sources under both chronic, and acute scenarios will be modeled using a unit emission rate while using Approach D: Unit Emission Rate with REER provided in *Recommended Procedures for Toxic Air Contaminant Health Risk Assessments*.**

*7. Revise Section 3.3.1 to clarify that this is focused on Chronic Cancer Risk exclusively.*

**This section has been revised to discuss only chronic cancer risk and an additional section was added to discuss chronic non-cancer risk accordingly.**

*8. Include a discussion of Chronic Noncancer Risk*

**Section 3.3.2 has been added on page 3-8 to address 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.*

**The fuel throughputs for the type F generators, in Tables 3-2 and 3-3 were edited so that the total fuel used equals the fuel limit of 269,504.**

*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 – SKILOG1" in Table 3-4.*

**The emission unit names in these tables have been revised to remain consistent. A column displaying the generators' TEU ID has also been added for reference.**

If you have any questions or comments about the information presented, please do not hesitate to contact Beth Ryder at (458) 206-6770 or me at [khounnal@amazon.com](mailto:khounnal@amazon.com) or (509) 619-8838

Sincerely,

*Shannon Moore*

Shannon Moore  
Regional Environmental Manager, AMER West and Canada

cc: Beth Ryder, Trinity Consultants  
Jason Bowker, Amazon Data Services