



40 Kenwood Circle
Franklin, MA 02038

Tel: (508) 429-4552
Fax: (508) 429-4553

January 8, 2024

Weston Li
Oregon Department of Environmental Quality
Northwest Region, Air Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232 – 4100

**Re: NTT Global Data Centers HI, LLC
HI2 Moderate Technical Permit Modification Application**

Dear Mr. Li:

The purpose of this letter to the Oregon Department of Environmental Quality (ORDEQ) is to provide documentation of the expected control efficiencies used by NTT Global Data Centers HI, LLC (NTT) in its moderate technical permit application for its HI2 data center.

The percent construction efficiencies provided in Table 1 reflects the expected construction efficiencies for pollutants controlled by the Rypos Model ADPF-9 diesel oxidation catalyst (DOC) and diesel particulate filter (DPF) when equipped to a 3,250-electrical kilowatt (kWe) Cummins Model C3250D6e emergency generator, with 4,701 brake horsepower (bhp) Model QSK95-G12 Cummins engine combusting ultra-low sulfur diesel (ULSD) fuel. Rypos expects that the control efficiencies for the hazardous air pollutants will be higher than what are listed in Table 1, but our understanding is that NTT included a 15% buffer to be conservative. NTT then applied these efficiencies to emissions factors provided by ORDEQ and Cummins.

Thank you for your cooperation in this matter.

Sincerely,
Rypos, Inc.

Paul Anderson
Chief Executive Officer

Table 1
Rypos Control Efficiencies
For NTT Global Data Centers HI, LLC – HI2 Data Center

Pollutant	Destruction Efficiency
Filterable PM	90%
VOC	80%
CO	92%
Benzene	63%
1,3-Butadiene	68%
Cadmium and compounds	70%
Formaldehyde	59%
Chromium VI, chromate, and dichromate particulate	70%
Arsenic and compounds	70%
Lead	70%
Nickel and compounds	70%
Naphthalene	63%
PAHs (excluding Naphthalene)	63%
Benzo[a]pyrene	63%
Acetaldehyde	59%
Acrolein	66%
Ethyl benzene	63%
Hexane	55%
Hydrochloric acid	70%
Manganese and compounds	70%
Mercury and compounds	70%
Selenium and compounds	70%
Toluene	63%
Xylene (mixture), including m-xylene, o-xylene, p-xylene	63%
Antimony	70%
Beryllium	70%
Cobalt	70%
Phosphorus	70%
Acenaphthene	63%
Acenaphthylene	63%
Anthracene	63%
Benz[a]anthracene	63%
Benzo[b]fluoranthene	63%
Benzo[e]pyrene	63%
Benzo[g,h,i]perylene	63%
Benzo[k]fluoranthene	63%
Chrysene	63%
Dibenz[a,h]anthracene	63%
Fluoranthene	63%
Fluorene	63%
Indeno[1,2,3-cd]pyrene	63%
2-Methyl naphthalene	63%
Perylene	63%
Phenanthrene	63%
Pyrene	63%
Benzene	63%
1,3-Butadiene	68%
Cadmium and compounds	70%