

DEVITA-MCBRIDE Amy * DEQ

From: DEVITA-MCBRIDE Amy * DEQ
Sent: Tuesday, November 25, 2025 10:25 AM
To: Moore, Shannon; Beth Ryder
Cc: Bowker, Jason; Wilton, Darren; Koehler, Garrett; Bui, Doka; RUBIO REGALADO Carlos * DEQ; RUDLOFF Owen * DEQ; GISKA JR * DEQ; POULSEN Mike * DEQ
Subject: ADS PDX-4 - 10.31/2025 CAO Risk Assessment Review

Good morning,

DEQ has completed a review of the Cleaner Air Oregon (CAO) Risk Assessment for the Amazon Data Services, Inc. (ADS) PDX-4 facility submitted on October 31, 2025. DEQ is requesting minor edits/corrections to the report and appendices which I have outlined below. Please submit the updated report and appendices by **December 12, 2025**. Submission of the revised Risk Assessment should be done through YDO and I will make the application available to ADS through a send back.

Please reach out if you have any questions or would like to discuss any of the requested updates further.

Best,
Amy

Requested Updates to Report:

1. **Section 3.1.1:** For documentation purposes, include a note with the second bulleted item that the AQ521 and AQ522 exposure location variance forms were included with the first Modeling Protocol and Risk Assessment Work Plan submittal on February 26, 2025.
2. **Table 3-1:** Include REER units (g/s per $\mu\text{g}/\text{m}^3$).
3. **Table 4-1:** The following chronic noncancer risks are shown as “<0.1” in the table, but should round to “0.1” following the rounding rules in [OAR 340-245-0200\(4\)](#):
 - a. Residential chronic noncancer risk; and
 - b. Nonresidential work chronic noncancer risk.
4. **Section 4.1:** Include mention of annual verification of land use changes since ADS has requested changes to exposure locations.

Requested Updates to Appendices:

5. **Appendix C:** Update table names in Appendix C to reflect appropriate Appendix number. Currently formatted as “Table Dx.x”.
6. **Appendix E:**
 - a. Update table names in Appendix E to reflect appropriate Appendix number. Currently formatted as “Table Fx.x”.
 - b. Include REER units (g/s per $\mu\text{g}/\text{m}^3$) in the Screening REER tables.
7. **Appendix G:**
 - a. Update table name to reflect appropriate Appendix number. Currently formatted as “Table H-5”.
 - b. Correct rounding errors for the following:
 - i. Residential chronic noncancer risk rounds to 0.1; and

- ii. Nonresidential work chronic noncancer risk rounds to 0.1.



Amy DeVita-McBride | Cleaner Air Oregon Project Engineer

Oregon Department of Environmental Quality

700 NE Multnomah St., Suite 600

Portland, Oregon 97232 - 4100

P: 971.300.3653

Pronouns: She/Her