GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Cynthia Dorrough

FROM: Renee Browne

DATE: October 17, 2024

Facility Name:	**The Keep Campus**
AIRS No.:	04-13-097-00091
Location:	Lithia Springs, GA (Douglas County)
Application #:	29449
Date of Application:	October 1, 2024

Background Information

Permit No. 7375-097-0091-S-01-0 was issued February 9, 2018, to The Keep Campus for the construction and operation of a data center to be located at 580 Douglas Hills Road in Lithia Springs, Georgia 30168 (Douglas County). The Keep Campus which is owned by Switch Ltd. was issued Permit No. 7375-097-0091-S-01-1 on June 28, 2019, to the company for authorization to construct and operate a new diesel-fired emergency back-up generator (Source Code: CGEN) and diesel belly tank to provide back-up power to the corporate offices at 580 Douglas Hills Road, Lithia Springs 30168 (Douglas County). Permit No. 7375-097-0091-S-01-2 was issued on January 31, 2022, to construct and operate additional emergency generators that will provide back-up power to The Keep Campus. The company is planning to install additional new emergency generators that will provide back-up power to The Keep Campus.

Purpose of Application

Switch Ltd. submitted on behalf of The Keep Campus Application No. 28159, dated October 21, 2021, and received on October 27, 2021, requesting the installation of additional new emergency generators (Source Code: EG-A) that will provide back-up power to the location at 580 Douglas Hills Road in Lithia Springs, GA 30168 (Douglas County). Additional information regarding the number of generators is considered confidential by the company.

The 25 tpy threshold was removed from Georgia Air Quality Rule 391-3-1-.03(10)(a)4(ii) in June 2018. The Title V major source threshold for each criteria pollutant has been increased to 100 tpy, according to Georgia Air Quality Rule 391-3-1-.03(10)(b)1(i) and 40 CFR 70.2. With the 100 tpy major source threshold in place for Douglas County, the Keep Campus maintains its synthetic minor source status.

Pursuant to Condition 1.3 of the Permit, the facility is submitting this SIP Construction Permit Application No. 29449 dated October 1, 2024, to request authorization to construct and operate additional emergency generators at The Keep Campus. Information on the new generators is included in Appendix B of the application.

As a part of this permitting action, the facility is also requesting to update the model of and number of generators permitted at the Keep Campus. In January 2022, the facility received the Permit.

Amendment No. 7375097-0091-S-01-2 authorized the construction and operation of additional emergency generators to provide backup power to the facility. At this time, the facility wishes to update the specific model information on record for these generators. The facility has also been made aware that the number of generators initially permitted at the facility under Permit No. 7375-097-0091-S-01-0 has been reduced, and the facility wishes to update the number of generators previously permitted at The Keep Campus.

The facility is submitting this permit application to authorize construction and operation of the new generators and to update the existing emergency generator information and generator counts. The facility is also proposing to remove the existing fluid coolers from the listed equipment at the facility, as these fluid coolers have not been installed and will not be installed. A summary of the changes to each portion of the Keep Campus is shown in Table 2-1 of the application.

The company submitted forms with the application to include the application in the Expedited Permitting Program. The application was accepted into the expedited program on October 7, 2024.

The public advisory expired on November 8, 2024. No comments were received.

Updated Equipment List

Emission Units		Associated Control Devices	
Source Code	**Description**	**Source Code**	**Description**
1 Switch Way	2 Identical Models **Reduced/Existing** Diesel-Fired Emergency Generators mounted with Diesel Belly Tanks	N/A	N/A
2 Switch Way	**New Identical Diesel-Fired Emergency Generators mounted with Diesel Belly Tanks**	**N/A**	**N/A**
3 Switch Way	**Updated Identical Diesel-Fired Emergency Generators mounted with Diesel Belly Tanks**	**N/A**	**N/A**
4 Switch Way	**New Identical Diesel-Fired Emergency Generators mounted with Diesel Belly Tanks**	**N/A**	**N/A**
FP-01 and FP-02	**2** Fire Pump Engines	N/A	N/A
C-GEN	Corporate Diesel-Fired Emergency Generator and associated diesel tank for back-up power to Corporate Offices	N/A	N/A

***Items in Bold installed/revised with current permit amendment**

Emissions Summary

The proposed diesel-fired emergency back-up generators and diesel storage tanks will result in NOx, carbon monoxide (CO), particulate matter (PM), PM with aerodynamic diameter less than ten microns (PM_{10}), PM with an aerodynamic diameter less than two and a half microns ($PM_{2.5}$), sulfur dioxide (SO_2), VOC, and hazardous air pollutant (HAP) emissions. The following sections describe emission calculation methodologies associated with the new proposed sources at The Keep Campus. Detailed emission calculations are provided in Appendix C of this application.

Emergency Back-Up Generator Engines

Calculations for the criteria pollutants are based on the annual hours of operation for all engines and are conservatively quantified based on a worst-case estimate of use for monthly and quarterly generator testing and other activities. The annual hours of operation for each generator used in the potential emissions quantification far exceed the actual annual generator usage upon startup and are a conservative estimate of usage to quantify potential emissions and are included in Appendix C.

The NOx, CO, filterable PM, SO_2, CO_2, and VOC emissions rates are calculated using the factors provided in the raw emissions data on the emergency back-up engine emission sheet at various power loads. The manufacturer's raw emissions data for SO_2 guarantees a fuel sulfur content of 5 parts per million (ppm). Raw emissions data and associated emissions factors can be found in Appendix B of the application. This factor has been conservatively scaled up by a factor of three to account for up to 15 ppm of sulfur content in diesel. The manufacturer provided only filterable PM emission factors. Total PM_{10} and $PM_{2.5}$ emissions are assumed to be equivalent to the sum of the filterable PM component and condensable PM calculated by using AP-42 Section 3.4 for Large Stationary Diesel and All Stationary Dual-Fuel Engines, Table 3.4-2. HAP emissions are based on the maximum heat input and annual hours of operation. Emission factors for HAPS are obtained from AP-42, Section 3.4, Tables 3.4-3 and 3.4-4.

The 100 tpy NOx limit ensures all pollutants remain below 100 tpy and HAP emissions remain below 10/25 tpy. Performance tests for NOx were conducted on two of the existing engines at the facility on July 7, 2021, and determined actual emission rates are approximately 60% of the new not-to-exceed emission factors at 100% load. No additional testing will be required. The permit was updated to include the new emission factors.

Diesel Tanks

As discussed in Section 2.2.2 of the application, the proposed emergency engines have diesel belly tanks. These tanks are within the engine house and emissions are expected to be minimal. While these tanks are exempt from permitting, the facility has estimated emissions from these sources for inclusion in the facility-wide emissions quantification in order to more conservatively estimate facility-wide emissions. Potential emissions are estimated using emission factors from EPA's WebFIRE database.[1] The tank throughput was estimated by multiplying the maximum fuel consumption rate by the expected total annual hours of operation of all emergency generators included in this project.

[1] Emission factors from FIRE (http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main) for above-ground diesel tanks (SCC code 40400302/40400301).

Facility-Wide Emissions
(in tons per year)

Pollutant	Potential Emissions		
	Before Mod.[1]	After Mod.[4]	Emissions Change
$PM/PM_{10}/PM_{2.5}$	1.31/1.39/1.39	1.45/1.63/1.63	+0.14/0.24/0.24
NOx	100	100	-
SO_2	0.27	0.12	-0.15
CO	10.18	16.70	+6.52
VOC	8.74	17.43	+8.69
Max. Individual HAP	0.01	0.05	+0.04
Total HAP	0.16	0.13	-0.03

1. As detailed in SIP Construction Permit Application for Permit No. 7375-097-0091-S-01-2 as well as emissions for the 2 Fire Pumps outlined in the "No Permit Required" submittal sent August 2023.
2. Note that the potential emissions for emergency back-up generators conservatively include VOC emissions from the belly tanks that are exempt from SIP construction permitting pursuant to GRAQC-391-3-1-.03(6)(c)(2) as all storage tanks have a capacity of less than 40,000 gallons storing diesel, which has a true vapor pressure of less than 2.0 psia as stored.
3. Existing equipment that has been permitted in the past and is not being updated as part of this application includes emergency back-up generators, the corporate generator, and emergency fire pumps, along with associated tanks. As outlined in SIP Construction Permit Applications for Permit No. 7375-097-0091-S-01-0 and 7375-097-0091-S-01-1, as well as the "No Permit Required" submittal sent August 2023.
4. Facility-Wide Potential to Emit following submittal of this application is the sum of the new generators included in this application, the updated model generators included in this application and the existing generators as previously permitted.

Regulatory Applicability

Georgia State Rules:

391-3-1-.02(2)(b) – The allowable visible emission from the generators is 40% in accordance with Georgia Rule 391-3-1-.02(2)(b)1.

391-3-1-.02(2)(g) – The allowable fuel sulfur content is 2.5 weight percent in accordance with Georgia Rule 391-3-1-.02(2)(g)2. This requirement is subsumed by NSPS IIII requirement, which requires maximum fuel oil sulfur requirement of 15 ppm (0.0015% by weight).

391-3-1-.02(2)(n) – The percent opacity from any fugitive dust source shall not equal or exceed 20 percent. The facility should take precautions to limit fugitive dust from becoming airborne.

391-3-1-.02(2)(yy) – The Facility is located in Douglas County, which is included in the former 13-county Atlanta 1-hour ozone non-attainment area and has the potential to emit NOx emissions exceeding 25 tpy. A demonstration of appropriate RACT for NOx emissions from the source had been submitted to EPD since the Facility's PTE exceeded 25 tpy. Per part 5 of this regulation, Rule (yy) is not applicable to individual equipment subject to subsections (jjj), (lll), (mmm), or (nnn). Therefore, the generator engines were not subject to Rule (yy) since they are subject to rule (mmm).

To date, as the Keep Campus is located in Douglas County, which was previously classified as being in attainment with the NAAQS or unclassifiable for all regulated pollutants, with the exception of ozone. Douglas County was classified as part of the former Atlanta ozone non-attainment area during the original permitting for The Keep Campus. On June 2, 2017, Douglas County was redesignated as attainment for the 2008 8-hour ozone standard.[2] Douglas County has also been designated as attainment with respect to the 2015 8-hour ozone standard.[3] Until June 2018, GRAQC 391-3-1-.03(8)(c)(13) still specified the ozone NNSR provisions for counties part of the former I-hour Atlanta ozone non-attainment area, which includes Douglas County, and this was followed during the original permitting of The Keep Campus. In June 2018, the ozone NNSR provisions were specified in GRAQC 391-3-1-.03(8)(c)(14) for several Georgia counties that were a part of the former Atlanta ozone non-attainment area.[4] These ozone NNSR provisions impacted the precursor pollutants NOx and VOC. In other words, ozone NNSR permitting was still potentially required for the construction of new ozone NNSR major sources and major modifications to existing ozone NNSR major source sources at that time. In May 2023, Georgia EPD adopted a final rule focused on removing provisions for ozone NNSR permitting in the metro Atlanta area. As of May 2023, there are no longer any provisions in the GRAQC referencing Douglas County as a NAA for ozone, and Douglas County is considered in attainment with the effective ozone NAAQS.

391-3-1-.02(2)(mmm) – Each generator that operates less than 200 hours per twelve consecutive months will meet the definition of Rule (mmm)4(i) for "Emergency standby stationary engines" and will operate only during routine testing, maintenance, and emergencies. Each generator that operates between 200 and 500 hours per twelve consecutive months will meet the definition of Rule (mmm)8 for engines at data centers and will additionally be limited to the hours of 10 p.m. and 4 a.m. for routine testing and maintenance during the months of May through September.

<u>*Federal Rules:*</u>

40 CFR 60 Subpart IIII – The emergency generators were constructed after July 11, 2005 and manufactured after April 1, 2006. They are subject to the requirements of NSPS Subpart IIII and meet the definition of emergency stationary ICE in 60.4219. The company must comply with the emission standards and opacity requirement under NSPS Subpart IIII by purchasing certified engines. The generators shall only use diesel fuel that has a maximum sulfur content of 15 parts per million (ppm) (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent. The accumulated non-emergency service (maintenance check and readiness testing) time for the generator shall not exceed 100 hours per year. Non-resettable hour meters and records of the time and reason of operation are required.

[2] CFR 81.311. Please note that on June 2, 2017, Douglas County was reclassified to attainment with respect to the 2008 8-hour ozone standard. Please refer to Federal Register Vol. 82, No. 105, pages 25523-25529 (published June 2, 2017).

[3] Federal Register vol. 83, No. 107, pages 25776-25848 (published June 4, 2018).

[4] GRAQC 391-3-1-.03(8)(c)(14) was titled "Additional Provisions for Ozone Non-Attainment Areas" while the counties included in this provision are currently in attainment with the 2008 8-hr ozone NAAQS.

40 CFR 63 Subpart ZZZZ (RICE MACT) - The emergency generators are constructed after June 12, 2006. Therefore, they are considered new emergency stationary reciprocating internal combustion engines (RICE), and they are subject to 40 CFR 63 Subpart ZZZZ. 40 CFR 63 Subpart ZZZZ [40 CFR 63.6590(c)] states that new emergency stationary RICE located at an area source, must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII.

Permit Conditions

7. Notification, Reporting and Record Keeping Requirements

Modified Conditions

Condition 7.6 was modified to update the emission factors to calculate NOx emissions using current manufacture's raw emissions data.

Toxic Impact Assessment

EPD regulates the emissions of TAPs under the provisions of Georgia Air Quality Rule 391-3-1-.02(2)(a)3(ii). A TAP is defined as any substance that may have an adverse effect on public health, excluding any specific substance that is covered by a State or Federal ambient air quality standard.

Procedures governing the EPD's review of toxic air pollutant emissions as part of air permit reviews are contained in EPD's *Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions*. The procedures included in the Proposed Toxic Impact Assessment and Modeling Procedures – The Keep Campus submitted to Georgia EPD on April 12, 2024, and approved on April 18, 2024 were followed for this assessment.

According to the Guideline, further analysis is required for each TAP that has a facility-wide emission rate above the MER established in Appendix A.

The facility-wide emission rate (lb/yr) for each TAP was calculated using the total heat input capacity for the entire site (MMBtu/hr) multiplied by the maximum hours of operation (500 hours per year) per generator as listed in Condition 2.2 of the permit. Emission factors for each of the TAPS are pulled from EPA's AP-42, Section 3.4 for Large Stationary Diesel and All Stationary Dual-Fuel Engines. The total heat input capacity (MMBtu/hr) is the sum of each engine's heat input capacity (MMBtu/hr) multiplied by the respective number of generators. This conservatively includes the fire pump engines although the fire pumps are exempt from permitting. The Toxic Impact Assessment utilized the maximum hours per generator per year as written in the permit. This represents the worst-case potential emissions of each TAP.

The only toxic emission sources at the site are point sources with horizontal stacks and vertical stacks with a flapper lid that will be open at 45 degrees when operating to prevent rain from entering. Because all of the facility wide emissions are from horizontal stacks and obstructed vertical stacks, air toxics which are part of the permit application (i.e., increasing as part of this permit application) will have their facility wide

emissions evaluated and compared to 20% of the Minimum Emission Rate (MER) threshold values to determine which toxic pollutants will require an evaluation.[5]

Table 1-1 summarizes the facility-wide emission rates for each TAP and compares them to 20% of the respective MER.

Table 1-1. Facility-Wide TAP Emissions and Respective MERs

Pollutant	Minimum Emission Rate[6] (lb/yr)	20% Minimum Emission Rate[7] (lb/yr)	Facility-Wide Potential Emissions (lb/yr)	Is PTE > 20% MER[6]
Benzene	3.16E+01	6.33E+00	7.95E+02	Yes
Toluene	1.22E+06	2.43E+05	2.88E+02	No
Xylenes	2.43E+04	4.87E+03	1.98E+02	No
Formaldehyde	2.67E+02	5.34E+01	8.08E+01	Yes
Acetaldehyde	1.11E+03	2.21E+02	2.58E+01	No
Acrolein	4.87E+00	9.73E-01	8.07E+00	Yes
Napthalene	7.30E+02	1.46E+02	1.33E+02	No

Determination of Toxic Air Pollutant Impact

Based on the comparison of TAPS emitted by the facility to 20% of the MERs, three pollutants (Benzene, Formaldehyde, and Acrolein) required further analysis. SCREEN3 (version 13043) was used to evaluate the short-term (I-hour) concentration average for the pollutants. The modeled I-hour average concentration was then converted to concentrations in both shorter and longer-term averaging periods for each pollutant. The flat terrain option of SCREEN3 was used for the analysis. Based on a review of the area surrounding the facility, complex terrain will not have a significant influence on the results for the following reasons. First, the stack parameters all have high exhaust flow rates and high exhaust temperatures which will lead to thermal buoyancy from the plume and result in a high plume rise. Additionally, complex terrain surrounding the facility is located over 100 meters northwest from the facility. The representative surface station for AERMOD modeling for this area (Douglas County) is the Atlanta airport. Review of a wind rose for the Atlanta airport surface station data from 2018-2022[8] indicates that the predominant wind directions for this period are from the north and the east, leading to more prevalent wind directions pushing plumes from the facility away from the areas of higher complex terrain to the north and northwest. The pollutants modeled have primary annual AACs, with Acrolein at 0.02, Benzene at 0.13, and Formaldehyde at 1.1 ug/m^3. Given the direction of the prevailing winds for this area, on a long-term basis the plumes from the facility sources should not be directed as much towards the areas of complex terrain on a long-term basis.[9]

[5] Pursuant to prior requests from Georgia EPD, to use the MER evaluation for a particular TAP, more than 80% of the facility-wide emissions of that TAP must come from unobstructed vertical point sources.

[6] From Appendix A of EPD's Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions.

[7] Because all of the facility wide emissions are from horizontal stacks and obstructed vertical stacks, air toxics which are part of the permit application (i.e., increasing as part of this permit application) will have their facility wide emissions evaluated and compared to 20% of the Minimum Emission Rate (MER) threshold values to determine which toxic pollutants will require an evaluation. Pursuant to prior requests from Georgia EPD, to use the MER evaluation for a particular TAP, more than 80% of the facility-wide emissions of that TAP must come from unobstructed vertical point sources.

[8] https://epd.georgia.gov/air-protection-branch-technical-guidance-0/air-quality-modeling/georgia-aermet-meteorologicaldata

[9] The Division reviewed and concurred with the modeling procedures and use of flat terrain in the SCREEN3 model in an e-mail to Trinity Consultants sent on April 18, 2024.

There are five types of engines at the Keep Campus with unique stack parameters, some of which are vertical, and some are horizontal, the stack parameters for each of these engine types are included in Table 5.2 of the application.

For the horizontal stacks, the methodology in EPD's Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions, Section 4.1.B is followed. This includes calculating an adjusted stack diameter that keeps the volume flow unchanged. The calculation is as follows:

Adjusted Stack Diameter (ft) = 31.6 * Original Stack Diameter (ft) * Square Root of [Original Stack Exit Velocity (ft/sec)]

For the vertical stacks, the exhaust has a flapper to prevent rain from entering the stack. The lid will be open at 45 degrees when operating. Pursuant to Section 3.4.2 of South Carolina Modeling Guidelines for Air Quality Permits (October 2018), the vertical component of the actual velocity for stacks that discharge at an angle between vertical and horizontal can be calculated as follows:

Vertical Component of Actual Velocity = Actual Exit Velocity as Reported * cos [angle of the stack from vertical (degrees)]

All emissions from each generator stack type are assumed to be emitted from the stack closest to the property line. As such, five generator stack types were modeled. The sum of impacts from the five modeled stacks will be combined and compared to the applicable Allowable Ambient Concentration (AAC) levels, following application of the published correction factors for converting hourly SCREEN3 result values to different averaging periods (e.g., 0.08 for annual and 1.32 for short-term 15-minute). This will be extremely conservative since it will assume that individual stack sources will have coincident maximum ambient air impacts at the same time and place for each generator stack type.

Pursuant to Section 3.3 of the Guideline, there are prescribed procedures for quantifying the maximum emission rate in units of grams per second (g/s) for processes that vary significantly over time, or batch processes. The maximum short-term emission rate for 15-minute AAC evaluations is the emission rate during the highest emitting portion of the batch, where batch processes which routinely emit simultaneously should be considered together when determining the maximum emission rate to use in the evaluation. The maximum short-term emission rate for annual AAC evaluations is the total emissions from the worst-case batch times the maximum number of batches per year divided by 8,760 hr/yr. As emergency standby stationary generators are not run continuously and are only operated sparingly throughout the year for testing and maintenance, these emission units are considered batch processes. The short-term and annualized rates for each of the pollutants requiring modeling are included in Table 5-3 of the application.

The modeling results are included in Table 5-4 of the application. The maximum 1-hour impact equals the modeled 1-hour impacts at 1.00 g/s multiplied by the actual emission rate of each source/source group. The resulting maximum impact was adjusted using the multiplying factors in the Guideline to obtain the estimated maximum impacts for the 15-minute and annual averaging periods. Note that annualized emission rates were used to derive annual impact while short-term emission rates were used to derive 15-minute impact. Total facility-wide impact is the sum of impacts from the five modeled stacks. The 15-minute impact equals the 1-hour impact times 1.32 and the annual impact equals the 1-hour impact times 0.08.

As shown in Table 5-4 of the application, the impacts of Benzene, Formaldehyde, and Acrolein from the Facility are well below the annual and 15-minute AACs. Electronic SCREEN3 modeling files are included in Appendix D of the application.

The Division reviewed the HAP emissions, stack data, and the SCREEN3 modeling files and agrees with the results.

Summary & Recommendations

Therefore, I recommend issuing proposed Air Quality Permit No. 7375-097-0091-S-01-3 for the operation of emergency generators at The Keep Campus.

Addendum to Narrative

The 30-day public review started on February 5, 2025 and ended on March 7, 2025. Comments were received by the Division.

Sierra Club Comments, Part One

Comments were received from the Sierra Club on behalf of itself, and it's 9,000 Georgia members. The first letter was received during the Public Advisory on November 8, 2024 and was signed by Isabella Ariza, Staff Attorney.

Please refer to Appendix A to view the entire comments. EPD will only address the comments relevant to the draft permit and application below.

Comment 1: EPD should require Switch to disclose the number of emergency generators to be permitted.

EPD Response to Comment 1

The Division interprets Official Code of Georgia Section 12-9-19 "Protection of Confidential Information Obtained by Division" and Georgia State Rule 391-3-1-.08 "Confidentiality of Information" to provide that substantiated "trade secrets" will be treated as confidential, but that "reports on the nature and amounts of stationary source emissions obtained by the division" will not. The Division has determined that the number of emergency generators are substantiated trade secrets and will be treated as confidential.

Comment No. 2: The Application, if approved, will allow local air quality to be degraded.

EPD Response to Comment 2

The Division regulates toxic air pollutant (TAP) emissions to protect public health under the provisions of Georgia Air Quality Rule 391-3-1-.02(2)(a)3(ii). Procedures governing the Division's review of TAP emissions as part of air permit reviews are contained in EPD's *Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions*. The facility performed a Toxic Impact Analysis (TIA) assessment, and the results were well below the acceptable ambient concentrations (AACs); therefore, there is no concern with TAP emissions from the project.

The Division issues an enforceable permit that adheres to the requirements of the Clean Air Act, federal regulations, and Georgia air quality regulations to assure that the facility will maintain its emissions to the standards required by federal and state regulations, and which will protect public health and the environment.

Comment No. 3: Batteries are a better, cleaner alternative that should be considered before Switch's Application is granted.

EPD Response to Comment 3

The Division is responsible for protecting Georgia's air quality through the regulation of emissions from industrial and mobile sources according to state and federal regulations. The Division cannot dictate to the facility how to design or build the facility.

The Division believes that batteries alone are not yet a viable replacement for diesel generators. The facility must have an adequate footprint to install a battery. Batteries that remain fully charged waiting for an extended outage will result in accelerated degradation over time. It is complex and costly to maintain the grid infrastructure needed to charge these batteries after an extended outage while simultaneously powering a data center.

Comment No. 4: This application should be considered in the larger context of Georgia's growing number of data centers.

EPD Response to Comment 4

The Division is aware of and monitoring the new developments in the MSA area. The Division required the performance of a TIA assessment of the project TAP emissions from the source. The applicant performed the TIA assessment and the results were well below the AACs. The TIA analysis does not require a cumulative impact analysis. The Division issues enforceable air permits that adhere to the requirements of the Clean Air Act, federal regulations, and Georgia air quality regulations to assure that the facility will maintain its emissions to the standards required by federal and state regulations, and which will protect public health and the environment.

Sierra Club Comments, Part Two

Comments were received from the Sierra Club on behalf of itself, and it's 9,000 Georgia members. The second letter was received during the Draft Permit Public Notice on March 7, 2025, and was signed by Dori Jaffe, Managing Attorney.

Please refer to Appendix A to view the entire comments. EPD will only address the comments relevant to the draft permit and application below.

Comment 1: The Draft Permit Amendment fails to acknowledge or consider public comments.

EPD Response to Comment 1

The Division experienced an e-mail glitch resulting in a non-receipt of the letter dated November 8, 2024, that was sent at the end of the application public advisory period ending November 8, 2024, and thus the comments were erroneously noted as "no comments received" during the public advisory period in the narrative.

Comments from the public were also received during the draft public notice period ending March 7, 2025. The Division is obligated to consider all public comments, and responses to the comments are addressed in the narrative addendum at the end of the public notice period. The Division addressed the Sierra Club comments submitted on the application during the public advisory period in "Part One" above.

Comment 2: EPD should require Switch to disclose the number of emergency generators to be permitted.

EPD Response to Comment 2

This is the same as Comment 1 presented in the November 8, 2024, letter. See that response above.

Comment No. 3: The Application, if approved, will allow local air quality to be degraded.

EPD Response to Comment 3

This is the same as Comment 2 presented in the November 8, 2024, letter. See that response above.

Comment No. 4: Batteries are a better, cleaner alternative that should be considered before Switch's Application is granted.

EPD Response to Comment 4

This is the same as Comment 3 presented in the November 8, 2024, letter. See that response above.

Comment 5: In the alternative, Switch should be required to use diesel generators with the most stringent emissions control technology.

EPD Response to Comment 5

The Division is responsible for protecting Georgia's air quality through the regulation of emissions from industrial and mobile sources according to state and federal regulations. For this permit application, the use of diesel generators with the most stringent emissions control technology is not required by any state or federal regulations, nor is it necessary to protect public health.

Comment No. 6: This application should be considered in the larger context of Georgia's growing number of data centers.

EPD Response to Comment 6

This is the same as Comment 4 presented in the November 8, 2024, letter. See that response above.

APPENDIX A

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD