GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Cynthia Dorrough

FROM: Taylor Crocker

DATE: August 7, 2025

Facility Name:	The Keep 2 Campus
AIRS No.:	015-00156
Location:	Cartersville, GA (Bartow County)
Application #:	29677
Date of Application:	April 23, 2025

Background Information

The Keep 2 Campus (hereafter the facility), which is owned by Switch Ltd., is a proposed greenfield facility to be located in Cartersville, Georgia (Bartow County), which is in attainment for all criteria pollutants. The facility will consist of advanced technology ecosystem data centers that use diesel-fired emergency generators, diesel-fired fire pump engine, and associated diesel fuel storage tanks that are exempt from SIP permitting under 391-3-1-.03(6)(c). The facility proposes to be a major source under Title V [40 CFR 70], however the facility has requested to limit facility-wide NOx emissions to 249 tpy to be classified as a synthetic minor source in respect to Prevention of Significant Deterioration (PSD) [40 CFR 52.21]

Purpose of Application

Application No. 29677 was submitted on April 23, 2025, for the construction and operation of diesel-fired emergency generators to support primary and house functions within the facility, associated fuel storage tanks, and a diesel-fired emergency fire pump. The primary function of the diesel-fired emergency generator engines is to serve as a backup source in the case of power loss and will be used primarily in emergency situations and for maintenance and testing purposes. All proposed emergency generators have been certified by the EPA to be 80 CFR Part 1039 compliant.

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 May 7, 2025.

As stated in the background information section of the narrative, Switch is proposing a facility-wide emission limit of 249 tpy of NOx to avoid classification as a major source under PSD. Since NOx is the limiting pollutant, other criteria pollutants and hazardous air pollutants/toxic air pollutants fall below the major source threshold for SIP/Title V. NOx emissions from the facility will exceed the 100 tpy major source threshold for Title V, therefore upon start-up, The Keep 2 Campus will be required to submit a complete application to the Division for a Part 70 (Title V) operating permit within twelve months of startup.

A Public Advisory was issued on May 6, 2025, and expired on June 6, 2025, with comments received by The Sierra Club that have been considered during the drafting of the permit and associated narrative.

Equipment List

Source Code	Description	Installation Date	Construction Date
MGEN	Various Manufacturers Diesel-Fired Main Emergency Generators	--	2025
HGEN	Various Manufactures Diesel-Fired House Emergency Generators	--	2025
FP	Various Manufactures Diesel-Fired Emergency Fire Engine	--	2025

Emissions Summary

The proposed diesel-fired emergency back-up generators and diesel-fired emergency fire pump 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 2 Campus. Emission calculations are provided in Appendix C of the application of the application.

Main Emergency Generators (Source Code: MGEN)

NOx, CO, PM, and VOC emissions for the proposed Main emergency generators are calculated using emissions factors provided by the manufacturer at expected operational loads and corresponding post-commissioning testing, maintenance, similar other non-emergency use, and anticipated emergency hours of operation. SO_2 emissions are based on a fuel sulfur content of 15 parts per million (ppm) for ultra-low sulfur diesel (ULSD) fuel, as defined under 40 CFR Part 1090, Subpart D, Section 1090.305. SO_2 emission factor from AP-42 Section 3.4, Table 3.4-1 (10/96) is used in order to account for the fuel sulfur content. PM_{10} and $PM_{2.5}$ emissions are conservatively assumed to be equal to PM emissions, as calculated using the manufacturer-provided emission factor. It is conservatively assumed the emission factor for VOC is equivalent to the emission factor for hydrocarbons (HC). Total HAP emissions are calculated using the emission factors (lb/MMBtu) obtained from AP-42, Section 3.4, Table 3.4-3, and Table 3.4-4 (10/96). Greenhouse Gas (GHG) emissions were calculated using 40 CFR Part 98 Table A-1, C-1, and C-2.

House Emergency Generators (Source Code: HGEN)

NOx, CO, PM, and VOC emissions for the proposed House emergency generators are calculated using emission factors provided by the manufacturer at 100% operational loads. SO_2 emissions are based on a fuel sulfur content of 15 ppm for USLD fuel, as defined under 40 CFR Part 1090, Subpart D, Section 1090.305. The SO_2 emission factor from AP-42 Section 3.4, Table 3.4-1 (10/96) is used in order to account for the sulfur content. PM_{10} and $PM_{2.5}$ emissions are conservatively assumed to be equal to PM emissions, as calculated using the manufacturer-provided emission factor. It is conservatively assumed the emission factor for VOC is equivalent to the emission factor for hydrocarbons (HC). Total HAP emissions are calculated using the emission factors (lb/MMBtu) obtained from AP-42, Section 3.4, Table 3.4-3, and Table 3.4-4 (10/96). Greenhouse Gas (GHG) emissions were calculated using 40 CFR Part 98 Table A-1, C-1, and C-2.

Emergency Fire Pump (Source Code: FP)

NOx, CO, PM, and VOC emissions factors for the proposed emergency fire pump are per manufacturer specifications using the maximum emission factors from the certificate data and rating data. SO_2 emissions are based on a fuel sulfur content of 15 ppm for USLD fuel, as defined under 40 CFR Part 1090, Subpart D, Section 1090.305. The SO_2 emission factor from AP-42 Section 3.4, Table 3.4-1 (10/96) is used in order toa account for the sulfur content. PM_{10} and $PM_{2.5}$ emissions are conservatively assumed to be equal to PM emissions, as calculated using the manufacturer-provided emission factor. It is conservatively assumed the emission factor for VOC is equivalent to the emission factor for hydrocarbons (HC). Total HAP emissions are calculated using the emission factors (lb/MMBtu) obtained from AP-42, Section 3.4, Table 3.4-3, and Table 3.4-4 (10/96). Greenhouse Gas (GHG) emissions were calculated using 40 CFR Part 98 Table A-1, C-1, and C-2.

The facility requested to limit the facility-wide NOx emissions to 249 tpy of NOx during any consecutive twelve-month period to be a synthetic minor source under PSD. By limiting NOx emissions to 249 tpy, other criteria pollutants and hazardous air pollutants will remain under the major source threshold for Title V and PSD.

Facility-Wide Emissions
(in tons per year)

Pollutant	Potential Emissions			Actual Emissions		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
$PM/PM_{10}/PM_{2.5}$	1.65	--	--	< 1.65	--	--
NOx	249.00	--	--	< 249.00	--	--
SO_2	0.31	--	--	< 0.31	--	--
CO	15.41	--	--	< 15.41	--	--
VOC	4.51	--	--	< 4.51	--	--
Max. Individual HAP	--	--	--	--	--	--
Total HAP	0.26	--	--	< 0.26	--	--
Total GHG (if applicable)	27,297.55	--	--	< 27,297.55	--	--

Regulatory Applicability

40 CFR 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023

Subpart Kc applies to owners and operators of storage vessels that store volatile organic liquids (VOL) and that are above certain capacity and/or vapor pressure thresholds. However, this subpart does not apply to

vessels that only store VOL with a maximum true vapor pressure less than 0.25 psia. The proposed emergency generators and emergency fire pump will be equipped with diesel belly tanks that have a maximum true vapor pressure of less than 0.25 psia. Therefore, the diesel belly tanks associated with the emergency generators are not subject to NSPS Subpart Kc.

40 CFR 60 Subpart IIII – Standards for Performance for Stationary Compression Ignition Internal Combustion Engines

Subpart IIII regulates the compression ignition (CI) engines constructed after July 11, 2005, and manufactured after April 1, 2006. The proposed emergency generator engines and emergency fire pump engine are CI engines and will have manufacture/construction dates after April 1, 2006, and July 1, 2006, respectively. As such, both the proposed emergency generators and emergency fire pumps will be subject to NSPS Subpart IIII. The facility must operate the engines are emergency-use only and comply with the emission standards and opacity requirements under NSPS Subpart IIII by purchasing certified engines. The engines and fire pump 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 emergency generators shall not exceed 100 hours per year. Non-resettable hour meters and records of the time and reason of operation are required.

40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Subpart ZZZZ regulates emissions from reciprocating internal combustion engines at major and area sources of HAPs. The Facility is an area source of HAP emissions and thus the facility's emergency generators and emergency fire engine are subject to this regulation. 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. In accordance with 40 CFR 63.6590(c), compliance with Subpart ZZZZ for the new engines will be shown by showing compliance with 40 CFR 60 Subpart IIII.

391-3-1-.02(2)(b) – Visible Emissions

Rule (b) limits the opacity of visible emissions from any air containment source that is subject to some other emission limitation under 391-3-1-.02(2). The opacity of visible emissions from regulated sources may not exceed 40 percent under this general visible emission standard. The proposed emergency generators and emergency fire pump will be subject to this rule.

391-3-1-.02(2)(g) – Sulfur Dioxide

Rule (g) provides SO_2 emission limitations for all fuel-burning sources with heat input capacities less than 100 MMBtu/hr. shall not burn fuel containing more than 2.5% sulfur by weight. The facility will use ULSD fuel with a sulfur content less than or equal to 0.0015% by weight to fire the proposed engines. Since the proposed engines are also subject to NSPS Subpart IIII, the more stringent fuel sulfur content limitation in Subpart IIII will subsume the limit in Rule (g).

391-3-1-.02(2)(n) – Fugitive Dust

Rule (n) applies to all persons responsible for any operation, process, handling, transportation or storage facility which may result in fugitive dust shall take all reasonable precautions to prevent such dust from becoming airborne. It also states that the percent opacity from any fugitive dust listed in paragraph (n)2 shall not equal or exceed 20 percent.

391-3-1-.02(2)(bb) – Petroleum Liquid Storage

Rule (bb) applies to storage tanks with capacities greater than 40,000 gallons storing materials with a true vapor pressure greater than 1.52 psia. The proposed emergency generators and emergency fire pump engine will be equipped with diesel belly tanks that are less than 40,000 gallons. The diesel belly tanks will also be used exclusively to store diesel fuel, which has a maximum true vapor pressure less than 1.52 psia. There, the diesel storage tanks will not be applicable to this rule.

391-3-1-.02(2)(yy) – Emissions of Nitrogen Oxides from Major Sources

Rule (yy) applies to sources located in the former 13-county Atlanta 1-hour ozone non-attainment area, which includes Bartow County, which have potential NOx emissions exceeding 100 tpy. It is required to submit to Georgia EPD a demonstration of appropriate reasonably available control technology (RACT) for NOx emissions from the source if the facility exceeds 100 tpy. However, Rule (yy) is not applicable to individual equipment which are subject to subsections (jjj), (lll), (mmm), or (nnn) of GRAQC 391-3-1-.02(2). Since the proposed emergency engines are subject to Rule (mmm), the facility will not be applicable to Rule (yy).

For determining applicability of Rule (yy), the emissions of NOx from any source exclude all NOx emissions subject to subsections (jjj), (lll), (mmm), or (nnn) of GRAQC 391-3-1-.02(2). The potential emissions of NOx from the proposed Facility will not exceed 100 tpy after excluding the proposed generator engines which are subject to Rule (mmm).

391-3-1-.02(2)(mmm) – NOx Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity

Rule (mmm) applies to stationary engines used to generate electricity whose nameplate capacity is between 100 kilowatts (kW) and 25 megawatts (MW) located in the area within metro-Atlanta, including Bartow County. The proposed generator engines are considered emergency engines and are expected to operate less than 200 hours per year. The facility has chosen to comply with Georgia Rule (mmm) through compliance with (mmm)7, where 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 operate only during

routine testing, maintenance, and emergencies is exempt from the NOx emission standard of 80 ppm corrected to 15% O_2.

Permit Conditions

Permit Condition Number	Explanation
2.1	Limits the NOx emissions from the emergency generators and emergency fire pump to 249 tpy to avoid PSD applicability.
2.2	Limits the total annual hours of operation of each emergency generator to not exceed 200 hours per generator during any twelve consecutive months and outlines the emission standard for engines that do not meet the requirements of an emergency standby engine according to Georgia Rule (mmm).
2.3	Specifies that the emergency engines are only allowed to burn diesel fuel that has a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent.
2.4	Addresses the applicability of NSPS Subpart IIII for the emergency engines.
2.5	Addresses the applicability of NESHAP Subpart ZZZZ for the emergency engines.
2.6	Includes the opacity standards of 40 CFR 60 Subpart IIII and subsume Georgia Rule (b)1.
2.7	Limits the emergency and non-emergency hours of operation of the emergency engines (Source Codes: MGEN and HGEN).
2.8	Lists the emission standards of 40 CFR 60 Subpart IIII, applicable to the emergency generators (Source Codes: MGEN and HGEN) and emergency fire pump (Source Code: FP).
2.9	Outlines the criteria for the diesel fuel allowed to be fired in the emergency generators (Source Code: MGEN and HGEN) and fire pump (Source Code: FP).
2.10	Limits the total annual hours of operation of the fire pump (Source Code: FP) to not exceed 100 hours per generator during any twelve consecutive months.
3.1	Incorporates Georgia Rule (n), which requires the facility to minimize fugitive dust emissions.
4.1	Requires the operation and maintenance of the emergency engines according to manufacturer's specifications/instructions.
5.1	Contains the Division's standard requirements for any continuous monitoring system.
5.2	Requires the installation of a non-resettable hour meter to monitor the hours of operation of the emergency generators and emergency fire engine and a system to monitor generator output load. The meter must also be able to record the type of service the engine was in as well as the hours associated with that service. The condition is a requirement of NSPS Subpart IIII.
5.3	Contains maintenance and operational standards for the emergency generators (Source Codes: MGEN and HGEN)
5.4	Requires the Permittee to verify each shipment of diesel fuel oil received for combustion in the emergency generators (Source Codes: MGEN and HGEN) and fire pump (Source Code: FP) complies with the requirements of Condition No. 2.9.
6.1	Contains the requirements for conducting a performance test.
7.1	Requires the facility to submit written notification to Division within 15 days of start-up.

7.2	Establish detailed record keeping, emission calculation/compliance demonstration and report requirements for the annual operating time limits. Demonstrates applicability with NSPS Subpart IIII and NESHAP Subpart ZZZZ.
7.3	Requires the Permittee to calculate the twelve-month rolling total of operating time for any emergency generators (Source Codes: HGEN or MGEN) on a monthly basis, for each consecutive twelve-month period,
7.4	Requires the Permittee to calculate the twelve-month rolling total of operating time for the fire pump (Source Code: FP) on a monthly basis, for each consecutive twelve-month period.
7.5	Requires the Permittee to calculate the twelve-month rolling total of non-emergency service operating time for the emergency generators (Source Codes: MGEN and HGEN) and fire pump (Source Code: FP) on a monthly basis, for each consecutive twelve-month period,
7.6	Requires the Permittee to demonstrate compliance with emission standards in 40 CFR 60 Subpart IIII for emergency generators (Source Codes: MGEN and HGEN).
7.7	Requires the Permittee to demonstrate compliance with emission standards in 40 CFR 60 Subpart IIII for the fire pump (Source Code: FP).
7.8	Establishes the compliance demonstration requirements for firing distillate fuel oil in the emergency generators and emergency fire engine.
7.9	Provides the equation for calculating monthly NOx emissions from the emergency generators and emergency fire engine.
7.10	Requires the Permittee to calculate total NOx emissions (in tons) from the emergency generators and emergency fire engine during the last twelve consecutive calendar months, using the equation in Condition 7.9.
7.11	Requires the Permittee to maintain a copy of the manufacturer's written operating and maintenance instructions or operating and maintenance procedures developed by the Permittee that are approved by the engine manufacturer for the emergency generators and fire pump.
7.12	Requires the submission of an annual report if the Permittee operates the emergency generators as specified in Condition 2.7.c.i.
8.2	Requires Permittee to calculate and pay an annual Permit fee to the Division.
8.3	Within 12 months of start-up for the emergency generators and emergency fire engine, the Permittee is required to submit a complete application to the Division for a Part 70 (Title V) permit.

Toxic Impact Assessment

EPD regulates the emissions of toxic air pollutants (TAP) 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 EPDs 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*. [1]

The facility-wide emission rate (lb/yr) for each TAP was calculated using the sum of the annual TAP emissions for all diesel-fired emergency generators and the diesel-fired fire pump. Emission factors for each of the TAPs are pulled from EPA's AP-42, Section 3.3 for Gasoline and Diesel Industrial Engines and

[1] *Guideline for Ambient Impact Assessment Impact Assessment of Toxic Air Pollutant Emissions*. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Revised, May 2017.

Section 3.4 for Large Stationary Diesel and All Stationary Dual-Fuel Engines. This assessment conservatively includes the proposed fire pump engine although the proposed fire pump is exempt from air permitting. [2]

The only toxic emission sources at the site are point sources with vertical stacks equipped with a flapper lid to prevent rain from entering. The flapper lid is open when the engine is operating and is thus effectively an unobstructed vertical stack when operating. However, for the purpose of this analysis, it is conservatively presumed these release points to be obstructed vertical stacks. Therefore, the air toxics which are part of this permit application will have their facility wide emissions evaluated and compared to 20% of the MER threshold values to determine which toxic pollutants will require an evaluation.

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 [3] (lb/yr)	20% Minimum Emission Rate [4] (lb/yr)	Facility-Wide Potential Emissions (lb/yr)	Is PTE > 20% MER [4]
Benzene	31.6	6.33	259	Yes
Toluene	1,216,650	243,330	93.8	No
Xylenes	24,333	4,867	64.5	No
Formaldehyde	22.1	4.42	26.5	Yes
Acetaldehyde	1,107	221	8.52	No
Acrolein	4.87	0.97	2.64	Yes
Napthalene	730	146	43.4	No
1,3 – Butadiene	7.30	1.46	0.0056	No

Based on the comparison of TAPs emitted by the facility to 20% of the MERs, pollutants (Benzene, Formaldehyde, and Acrolein) required further analysis.

SCREEN3 (version 13043) was used to evaluate the short-term (1-hour) concentration average for the pollutants. The modeled 1-hour average concentration was then converted to concentrations in both 15-minute and annual averaging periods for each pollutant. The flat terrain option of SCREEN3 was used for the analysis. Based on a review of the site plans for the proposed Facility with respect to the area surrounding the sources, complex terrain is not expected to have a significant influence on modeled results since there are intentions to grade the acquired property to a similar elevation as the property develops in the future. Additionally, the stacks 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.

There are three (3) types of engines proposed at the Facility with unique stack parameters: Main emergency generators, House emergency generators, and the emergency fire pump. Pursuant to 4.1 of the *Guideline*,

[2] GRAQC 391-3-1-.03-(6)(b)13

[3] From Appendix A of EPD's *Guideline for Ambient Impact Assessment Impact Assessment of Toxic Air Pollutant Emissions.* Using updated MER for formaldehyde.

[4] Per guidance from Ms. Susan Jenkins (Georgia EPD) to Mr. Chris Pool (Trinity) on March 3, 2023, the MER method is only valid for facilities with 80% or more of its TAP emissions being emitted via unobstructed vertical vents. As all of the proposed stacks at the Switch Cartersville facility employs capped stacks. Switch has opted to compare all project potential emissions to its respective MER multiplied by 20%.

capped and horizontal stacks that are not subject to building downwash influences are allowed to apply a screening approach where the exit velocity is set to 0.001 m/s and the stack diameter is adjusted to keep the volume flow unchanged. This approach is highly conservative since the flapper lid on each of the proposed units is open when the engine is operating and is thus effectively an unobstructed vertical stack when operating. For the purpose of this analysis, all of the stacks for the engines were considered obstructed vertical stacks, and this screening method was utilized to account for the reduced air velocity from the "capped" stacks. All emissions from each stack type are assumed to be emitted from a single stack using the worst-case (shortest) minimum distance to the fence line. Per recent guidance supplied by EPD's Air Protection Branch Chief [5], building downwash analysis was not conducted since it was specified that building downwash analysis is not required for SCREEN3. As previously mentioned, the stacks 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 and will significantly mitigate any building downwash impacts on pollutant dispersion.

All emissions from each stack type are conservatively assumed to be emitted from a representative stack closest to the property line. The sum of the impacts from the 3 modeled stacks were combined and compared to the applicable AAC levels, following application of the published correction factors for converting hourly SCREEN3 result values to different averaging periods. This analysis is highly conservative since it assumes that individual stack sources will have coincident maximum ambient air impacts at the same time and place for each proposed 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, also known as "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 per year divided by 8,760 hr./yr. As emergency stationary engines do not run continuously and are only operated intermittently throughout the year for testing and maintenance, these emission units are considered batch processes.

The modeling results are presented below in Table 1-2. 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. Annualized emissions 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 3 modeled stacks.

As shown in the table below, the impacts of Benzene, Formaldehyde, and Acrolein from the Facility are below the annual and 15-minute AACs. Further discussion for the Toxic Impact Analysis (TIA) is provided in Section 5 of Application No. 29677.

[5] TAP Modeling Guideline presentation on December 10, 2024, at the GIEC Air Workshop, Jim Boylan (Chief, Air Protection Branch) stating that building downwash analysis is not required for SCREEN3.

Table 1-2. SCREEN3 Model Results

	Maximum 1-Hour Concentration Distance (m)	Modeled Maximum 1-Hour Impact at 1g/s (µg/m³)	Maximum 1-Hour Impact Using Short-Term Emission Rates (µg/m³)	Maximum 1-Hour Impact Using Annualized Emission Rates (µg/m³)	Calculated 15-Minute Impact [6] (µg/m³)	15-Minute AAC [6] (µg/m³)	Impact AAC? (Yes/No)	Calculated Annual Impact [6] (µg/m³)	Annual AAC [6] (µg/m³)	Exceeds AAC? (Yes/No)
Benzene										
1	103	389.0	507.83	1.52	670.3	--	--	0.113	--	
2	152	215.8	1.48	8.34E-02	1.9	--	--	1.35E-03	--	
3	69	1476.0	0.25	1.42E-02	0.3	--	--	2.28E-04	--	
Total	--	2080.8	509.56	1.62	672.6	1600	No	0.115	0.130	No
Formaldehyde										
1	103	389.0	51.63	0.144	68.16	--	--	0.012	--	--
2	152	215.8	0.15	1.71E-03	0.198	--	--	1.37E-04	--	--
3	69	1476.0	0.32	3.60E-03	0.417	--	--	2.88E-04	--	--
Total	--	2080.8	52.10	0.150	68.8	245	No	0.012	0.091	No
Acrolein										
1	103	389.0	5.16	0.014	6.807	--	--	0.001	--	--
2	152	215.8	1.50E-02	1.71E-04	0.0198	--	--	1.37E-05	--	--
3	69	1476.0	0.02	2.82E-04	0.0327	--	--	2.26E-05	--	--
Total	--	2080.8	5.20	0.015	6.9	23	No	0.001	0.020	No

[6] From Appendix A of EPD's Guideline for Ambient Impact Assessment of Toxic Air Pollutants. Using updated annual AAC for formaldehyde.

Calculated 15-Minute Impact = Maximum 1-Hour Impact Using Short-Term Emission Rates * 1.32
Calculated Annual Impact = Maximum 1-Hour Impact Using Annualized Emission Rates * 0.08

Summary & Recommendations

I recommend issuing SIP Permit No. 7375-015-0156-E-01-0. The facility is required to submit an initial Title V Permit application within 12 months of the startup of emergency generators (MGEN and HGEN) and emergency fire pump (FP).

Addendum to Narrative

The 30-day public review started on August 13, 2025, and ended on September 12, 2025. Comments were received by the Division.

On September 12, 2025, the Division received comments from The Sierra Club via electronic submission.

Comment No. 1:

Georgia EPD should release guidance suggesting more stringent emissions control technology for diesel backup generators at data centers.

Georgia EPD Response to Comment No. 1:

The Division is in receipt of the comment and will take it under advisement.

ATTACHMENT A

PUBLIC COMMENTS RECEIVED BY THE DIVISION