

NARRATIVE

TO: Cynthia Dorrough
FROM: Bradley Prinsen
DATE: November 25, 2025

Facility Name: **ATL2 Data Center**
AIRS No.: 217-00079
Location: Covington, GA (Newton County)
Application #: 29898
Date of Application: October 3, 2025

Background Information

ATL2 Data Center proposes to construct a hyperscale data center facility on a greenfield site located at 10835 Hazelbrand Rd NE Covington, Georgia (Newton County). Newton County is designated as an attainment area for all criteria pollutants. The proposed development will consist of a single building designed to house IT infrastructure and operations. To ensure continuous power availability during electric utility outages or system failures, the facility is designed to operate thirty-seven (37) diesel-fired emergency generators, each equipped with a dedicated diesel belly tank. Construction of the facility is expected to commence in 2026 following permit issuance.

Purpose of Application

Serverfarm LLC submitted permit application No. 29898, dated October 8, 2025, for the construction and operation of thirty-seven (37) diesel-fired emergency generators at a proposed data center located at 10835 Hazelbrand Rd NE in Covington, Georgia. The generator set includes thirty-six (36) emergency standby generators rated at 3.3 megawatts (MW) each to support data center operations, and one (1) administrative generator rated at 2.25 MW for ancillary facility support. The facility will be classified as a synthetic minor source with respect to Title V (40 CFR 70) and a minor source with respect to PSD regulations (40 CFR 52.21). The applicant is requesting to take a site-wide limit of 99 tons per year of nitrogen oxide (NO_x) emissions from all generators to avoid Title V major source permitting requirements. Each generator will be fueled by a dedicated diesel belly storage tank during operation.

A public advisory was issued due to the proposed construction of new emissions units, and the public advisory period ended November 14, 2025. The Division received comments from Sierra Club on November 14, 2025,

Updated Equipment List

Source Code	Capacity (MMBtu/hr)	Descriptions	Installation Date	Applicable Requirements
A01	22.3	Baudouin 12M55G4D2/6 Diesel-Fired Emergency Generator	2026	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm)
G01	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G02	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G03	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G04	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G05	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G06	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G07	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G08	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G09	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G10	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G11	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G12	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G13	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G14	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G15	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G16	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G17	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G18	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G19	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G20	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G21	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G22	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G23	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G24	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G25	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G26	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G27	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G28	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G29	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G30	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G31	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G32	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	

Source Code	Capacity (MMBtu/hr)	Descriptions	Installation Date	Applicable Requirements
G33	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm)
G34	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G35	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	
G36	32.1	Baudouin 16M55G8D2/6 Diesel-Fired Emergency Generator	2026	

Storage Tanks

Source Code	Capacity (gallons)	Contents	Installation Date	True Vapor Pressure (psia)
ST01-ST37	12,000	Ultra-Low Sulfur Diesel (ULSD)	2026	0.02

Emissions Summary

Emissions for the ATL2 facility were calculated based on the proposed installation of thirty-seven (37) Tier 2-compliant diesel-fired emergency generators, consisting of thirty-six (36) units rated at approximately 3.3 megawatts (MW) and one (1) unit rated at 2.25 MW. Each generator is equipped with a dedicated belly tank containing ultra-low sulfur diesel (ULSD) fuel. The facility has requested a synthetic minor limit of 99 tons per year (tpy) of nitrogen oxide (NO_x) emissions, and the Division has elected to grant a 99 tons per year limit for NO_x emissions.

To conservatively estimate potential emissions, the facility's potential-to-emit (PTE) was calculated assuming 200 hours of operation per generator per year, consistent with longstanding U.S. Environmental Protection Agency (EPA) guidance on the definition of "potential to emit" for emergency generators. Although EPA has historically considered 500 hours per year to be an appropriate default assumption, use of a 200-hour basis provides a conservative estimate for characterizing worst-case emissions. It should be noted that if each generator operated at a 200 hours per year, the uncontrolled facility-wide PTE for NO_x would exceed the major source threshold under Title V and Prevention of Significant Deterioration (PSD) regulations.

Maximum hourly emission rates for NO_x, CO, PM, VOC, and SO₂ were taken from manufacturer engine performance data at 100% load. For the 3.3 MW units, these were based on specifications for the Baudouin 16M55G8D2/6 engine model; for the 2.25 MW unit, values were based on the Baudouin 12M55G4D2/6 model. GHG emissions (CO₂, CH₄, N₂O) were calculated using fuel-specific factors from AP-42 and 40 CFR Part 98, while hazardous air pollutant (HAP) emissions were estimated using emission factors from U.S. EPAs AP-42 Chapter 3.4, "Large Stationary Diesel and All Stationary Dual-Fuel Engines." Sulfur dioxide emissions were derived using a fuel-based formula assuming ULSD with a sulfur content of 15 ppm.

Each pollutant's potential emissions were calculated individually using its respective emission factors and operating assumptions. To establish enforceable PTE values under the requested synthetic minor limit, the uncontrolled NO_x PTE (309.93 tpy) was scaled to the 99 tpy facility-wide NO_x limit. Since NO_x is the pollutant that drives major-source applicability, the same scaling factor/operating fraction was applied to all other criteria pollutants (CO, PM, VOC, SO₂), greenhouse gases, and HAPs, and the resulting enforceable PTEs remain below Title V major source thresholds. The Division has reviewed the applicant's PTE calculations. Example calculations for the uncontrolled NO_x and CO PTEs, as well as calculations for the remaining pollutants based on the 99 tpy NO_x limit, are provided below.

Facility-Wide Emissions
(in tons per year)

Pollutant	Potential-to-Emit (based on 200 hr/yr)	Facility-Wide Emissions (based on 99 tpy NO_x limit)
PM/PM ₁₀ /PM _{2.5}	2.13	0.68
NO _x	309.93	99.0
SO ₂	0.18	0.06
CO	16.77	5.36
VOC	8.41	2.69
Max. Individual HAP (Benzene)	0.09	0.03
Total HAP	0.18	0.06
Total GHG (if applicable)	19,612	6,256

Uncontrolled Potential to Emit (PTE) Based on 200 hr/year/generator:

- Uncontrolled NO_x PTE (lb/year) = NO_x emission rate (lb/hr/gen) × # of generators × 200 hr/year

- 3.3 MW units: 84.50 lb/hr × 36 generators × 200 hr/year
- 2.25 MW unit: 51.26 lb/hr × 1 generator × 200 hr/year

$$(84.50 \times 36 \times 200) + (51.26 \times 1 \times 200) = 609,600 + 10,252 = 619,852 \text{ lb/year}$$

$$619,852 \text{ lb/year} \div 2,000 \text{ lb/ton} = \mathbf{309.93 \text{ tpy of NO}_x}$$

- Uncontrolled CO PTE (lb/year) = CO emission rate (lb/hr/gen) × # of generators × 200 hr/year

- 3.3 MW units: 4.52 lb/hr × 36 generators × 200 hr/year
- 2.25 MW unit: 4.96 lb/hr × 1 generator × 200 hr/year

$$(4.52 \times 36 \times 200) + (4.96 \times 1 \times 200) = 32,544 + 992 = 33,536 \text{ lb/year}$$

$$33,536 \text{ lb/year} \div 2,000 \text{ lb/ton} = \mathbf{16.77 \text{ tpy of CO}}$$

Facility-Wide Emissions Based on 99 tpy NO_x limit:

- Operating fraction = NO_x limit (tpy) ÷ Uncontrolled NO_x PTE (tpy)

$$99 \text{ tpy} \div 309.93 \text{ tpy} = \mathbf{0.319}$$

- Enforceable PTE = Uncontrolled PTE (tpy) × Operating fraction

$$\text{PM/PM}_{10}/\text{PM}_{2.5} \text{ (tpy)} = 2.13 \text{ tpy} \times 0.319 = \mathbf{0.68 \text{ tpy}}$$

$$\text{SO}_2 \text{ (tpy)} = 0.18 \text{ tpy} \times 0.319 = \mathbf{0.06 \text{ tpy}}$$

$$\text{CO (tpy)} = 16.77 \text{ tpy} \times 0.319 = \mathbf{5.36 \text{ tpy}}$$

$$\text{VOC (tpy)} = 8.41 \text{ tpy} \times 0.319 = \mathbf{2.69 \text{ tpy}}$$

$$\text{Max. HAP (tpy)} = 0.09 \text{ tpy} \times 0.319 = \mathbf{0.03 \text{ tpy}}$$

$$\text{Total HAP (tpy)} = 0.18 \text{ tpy} \times 0.319 = \mathbf{0.06 \text{ tpy}}$$

$$\text{Total GHG (tpy)} = 19,612 \text{ tpy} \times 0.319 = \mathbf{6,256 \text{ tpy}}$$

Regulatory Applicability**State Rules:****Georgia Rules for Air Quality Control (GRAQC) 391-3-1-.02(2)(b) – “Visible Emissions”**

This rule limits opacity to 40 percent from any air contaminant source, except as provided in other more restrictive or specific rules or subdivisions of the regulation. All the permitted sources are subject to this regulation.

GRAQC 391-3-1-.02(2)(g) – “Sulfur Dioxide”

This rule regulates the sulfur content of fuel. For a fuel burning source with a heat input capacity less than 100 MMBTU/hr, the regulation limits the fuel sulfur content to less than 2.5 percent, by weight. All emergency generators within the facility are subject to this regulation.

GRAQC 391-3-1-.02(2)(n) – “Fugitive Dust”

This rule requires facilities to take reasonable precautions to limit fugitive dust from becoming airborne. Further, opacity from fugitive dust sources, such as roads and the handling of dusty materials, are limited to 20% opacity. The applicant will comply with the requirements of this rule, including during periods of construction, through appropriate mitigative measures.

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

This rule limits emissions of NO_x from stationary gas turbines and stationary engines used to generate electricity, with nameplate capacity ≥ 100 kWe and ≤ 25 MWe, to 80 ppm NO_x at 15% O₂, dry basis for stationary engines installed or modified on or after April 1, 2000.

ATL2 Data Center proposes to construct and operate generators with a nameplate capacity of 2.25 and 3.3 MWe, which is within the applicability range of Georgia Rule (mmm). Therefore, this regulation is applicable to all proposed emergency generator engines.

The facility is classified as a datacenter, therefore it is eligible for exemption from the NO_x emission standard in subparagraph 1 of this rule, if the Permittee meets all of the criteria outlined in (mmm)8.

- (i) Operate only for routine testing and maintenance, when electric power from the local utility is not available, or during internal system failures;
- (ii) Total annual operation for the engine is less than 500 hours per year;
- (iii) Operation for routine testing and maintenance during the months of May through September occurs only between 10 p.m. to 4 a.m. Operation for routine testing and maintenance during the months of January through April and October through December may be done during any time of day; and
- (iv) The facility maintains records of all operations, including the reason for the operation.

In the event the engines cannot meet the criteria outlined in Georgia Rule (mmm)8 to qualify as a ‘stationary engine at a data center,’ they are subject to the NO_x emissions limitations of paragraph 1 of Georgia Rule (mmm).

GRAQC 391-3-1-.03(1) – “Construction SIP Permit”

The regulation requires that a permit be obtained before an air-pollutant source is constructed or modified. The facility has submitted an application to comply with this regulation.

GRAQC 391-3-1-.03(2) – “Operating SIP Permit”

The regulation requires that a permit be obtained before an air-pollutant source is operated. The facility has submitted an application to comply with this regulation.

GRAQC 391-3-1-.02(2)(d) – “Fuel Burning Equipment”

Rule (d) provides standards for particulate matter emissions and visible emissions from fuel-burning equipment. Fuel-burning equipment is defined as “equipment the primary purpose of which is the production of thermal energy from the combustion of any fuel” The proposed emergency generators do not meet this definition of fuel-burning equipment and, therefore, are not subject to the limitations in Rule (d).

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

This regulation provides standards for petroleum liquid storage vessels with capacities greater than 40,000 gallons storing a petroleum liquid with a true vapor pressure greater than 1.52 psia. The diesel-belly storage tanks associated with the emergency generators will not exceed this capacity, and the vapor pressure for diesel fuel is less than the applicability threshold (0.02 psia). Therefore, the provisions of Rule (bb) do not apply.

GRAQC 391-3-1-.02(2)(vv) – “Volatile Organic Liquid Handling and Storage”

Rule (vv) provides standards for volatile organic liquids handling and storage operations that occur at facilities within certain Atlanta metropolitan area counties. The regulation is only applicable for stationary storage tanks with a capacity greater than 4,000 gallons located at a facility subject to other state-specific VOC requirements. Newton County is listed in this regulation, and the storage capacity for each of the diesel belly storage tanks located at the facility will exceed the 4,000-gallon applicability threshold; however, the facility will not be subject to another state-specific VOC requirement. As such, the proposed diesel belly storage tanks will not be subject to the provisions of Rule (vv).

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

Rule (yy) prohibits the emission of NO_x from any source to exceed the levels specified in (yy)2 unless such source has been approved by the Director as meeting the appropriate requirement for all reasonably available control technology (RACT) in controlling NO_x emissions. For facilities located in Newton County, the potential NO_x emissions cannot exceed 100 tons per year without submitting a demonstration of appropriate RACT to the Division for approval.

Potential NO_x emissions from the facility will not exceed 100 tons per year, and per GRAQC 391-3-1-.02(2)(yy)(5), the requirements of this rule do not apply to individual equipment at the source which are subject to (jjj), (lll), (mmm), or (nnn). The proposed emergency generators will be subject to Rule (mmm); therefore, as the proposed emergency generators will be the only sources of NO_x at the facility, the provisions of Rule (yy) will not apply.

Federal Rules:*40 CFR 52.21 New Source Review (NSR)*

NSR requires that federal construction permitting of new emission sources or modifications to existing emission sources be completed when significant net emission increases result. Two distinct NSR permitting programs apply depending on whether the facility is located in an attainment or nonattainment area for a particular pollutant. Nonattainment new source review (NNSR) permitting applies to new construction or modifications that result in emission increases of a particular pollutant for which the area in which the facility is located is classified as “nonattainment” for that pollutant. The PSD permitting program applies to project increases of those pollutants for which the area the facility is located in is classified as “attainment” or “unclassifiable”.

The facility is located in Newton County, which has been classified as in attainment with the NAAQS or unclassified for all regulated pollutants. Therefore, the facility is not subject to NNSR permitting requirements for any criteria pollutants. The facility is potentially subject to PSD permitting requirements.

Under PSD permitting rules, the major source threshold is 250 tons per year (tpy) for criteria pollutants, unless the source category is specifically listed in 40 CFR 52.21 as having a lower 100 tpy threshold. Data centers are not among the 28 listed source categories with a lower threshold. At uncontrolled emission levels, the facility's potential NO_x emissions would exceed the 250 tpy PSD major source threshold. To limit facility-wide potential emissions and maintain minor source status under PSD, the applicant has proposed a federally enforceable site-wide NO_x emissions cap of 99 tpy from all emergency generators.

New Source Performance Standards (NSPS)

Georgia EPD has received delegation from EPA to regulate facilities subject to NSPS. Regulatory requirements for facilities subject to NSPS are incorporated by reference in Georgia's Rules for Air Quality Control, 391-3-1-.02(8) and located in 40 CFR Part 60. NSPS require new, modified, or reconstructed sources to control emissions to the level achievable by the best-demonstrated technology as specified in the applicable provisions.

Part 60, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 60) New Source Performance Standard (NSPS) Subpart A- "General Provisions"

Except as provided in subparts B, Ba, and C of 40 CFR 60, the provisions of this part apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.

The ATL2 Data Center is subject to 40 CFR 60 Subpart IIII, therefore the facility is also subject to the applicable provisions of 40 CFR 60 Subpart A.

Part 60, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 60) New Source Performance Standard (NSPS) Subpart IIII – "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"

NSPS Subpart IIII regulates compression ignition engines (on emergency generators) constructed after July 11, 2005, and manufactured after April 1, 2006. The ATL2 Data Center operates compression ignition internal combustion engines manufactured after April 1, 2006, solely for use as emergency generators. Therefore, the proposed emergency generators are subject to the applicable provisions of 40 CFR 60 Subpart IIII. The facility must operate the engines as emergency-use only and comply with the emission standards and opacity requirement under NSPS Subpart IIII by purchasing certified engines.

Non-Applicability of All Other NSPS

NSPS standards are developed for particular industrial source categories and the applicability of a particular NSPS to a facility can be readily ascertained based on the industrial source category covered. All other NSPS are categorically not applicable to the proposed project.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

NESHAP are emission standards for HAP and are applicable to major and area sources of HAP. A HAP major source is defined as having potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. An area source is a stationary source that is not a major source. Part 63 NESHAP allowable emission limits are established on the basis of a Maximum Achievable Control Technology (MACT) determination for a particular source category. NESHAP apply to sources in specifically regulated industrial source categories (CAA Section 112(d)) or on a case-by-case basis (Section 112(g)) for facilities not regulated as a specific industrial source type. Potential emissions at the facility will be below 25 tpy for total HAP and 10 tpy for all individual HAP. Therefore, the facility is an area source of HAP emissions.

Regulatory requirements for facilities subject to Part 61 and Part 63 NESHAP are incorporated by reference in Georgia's Rules for Air Quality Control, 391-3-1-.02(9).

40 CFR 63 Subpart A "General Provisions"

NESHAP Subpart A, General Provisions, contains national emission standards for HAP defined in Section 112(b) of the Clean Air Act. All affected sources which are subject to another NESHAP are subject to the general provisions of NESHAP Subpart A, unless specifically excluded by the source-specific NESHAP.

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

The facility is subject to this subpart because it owns or operates a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

- A stationary RICE is an internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work, and which is not mobile. Stationary RICE differs from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30 and is not used to propel a motor vehicle or a vehicle used solely for competition.

The facility's HAP emissions are under the major source threshold, classifying it as an area source. The proposed emergency generators meet the criteria established by 40 CFR 63.6590(c)(1) because they are classified as new or reconstructed stationary RICE.

In accordance with 40 CFR 63.6590(c), an affected source that meets any of the criteria in paragraphs (c)(1) through (7) of 40 CFR 63.6590 must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines.

Non-Applicability of All Other NESHAP

NESHAP standards are developed for particular industrial source categories and the applicability of a particular NESHAP to a facility can be readily ascertained based on the industrial source category covered. All other NESHAP are categorically not applicable to the proposed project.

Permit Conditions

Permit Condition 2.1 requires the Permittee to limit NO_x emissions to below 99 tons per year to avoid being subject to Part 70 (Title V).

Permit Condition 2.2 requires the Permittee to comply with NSPS Subpart A and Subpart IIII for the operation of the compression ignition emergency generators.

Permit Condition 2.3 requires the facility to fuel the emergency generators with distillate fuel oil that has a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or maximum aromatic content of 35 percent (by volume).

Permit Condition 2.4 outlines the limits for diesel generators emissions of non-methane hydrocarbons and nitrogen oxides (NMHC+NO_x), hydrocarbons (HC), nitrogen oxides (NO_x), carbon monoxide (CO), and particulate matter (PM) in accordance with 40 CFR 60 Subpart IIII.

Permit Condition 2.5 requires the Permittee to operate the emergency generators in accordance with the requirements outlined in 40 CFR 60.4211(f).

Permit Condition 2.6 prohibits the Permittee from discharging into the atmosphere from the emergency generators, any visible emissions of which the opacity is equal to or greater than 20 percent during the acceleration mode, 15 percent during the lugging mode, and 50 percent during the peaks in either the acceleration or lugging modes.

Permit Condition 2.7 requires the Permittee to purchase engines certified to meet applicable emission standards and to install and configure them in accordance with the manufacturer's emission-related specifications.

Permit Condition 2.8 requires the Permittee to comply with all applicable provisions of NESHAP Subpart A and Subpart ZZZZ for the operation of the emergency generators.

Permit Condition 2.9 limits opacity from the emergency generators to 40 percent to ensure compliance with Georgia Rule (b).

Permit Condition 2.10 requires the Permittee to fire distillate fuel oil in the emergency generators that meet the specifications for fuel oil No. 1 and 2 as defined by ASTM D396.

Permit Condition 2.11 establishes operating limits for the emergency generators to the criteria outlined in rule (mmm)8. If the generators ever fail to meet the criteria outlined in Georgia Rule (mmm)8 to qualify as a stationary engine at a data center, they will instead be subject to the NO_x emission limit in paragraph 1 of Rule (mmm)."

Permit Condition 3.1 requires the Permittee to take all reasonable precautions to prevent fugitive dust from becoming airborne during installation or construction.

Permit Condition 3.2 limits the percent opacity from any fugitive dust source to 20 percent.

Permit Condition 4.1 requires the Permittee to operate the emergency generators according to the manufacturer's written specifications, instructions or procedures developed by the Permittee that are approved by the engine manufacturer over the entire life of the engine.

Permit Condition 5.1 requires the continuous operation of any continuous monitoring system required by the Division and is installed by the Permittee except during calibration checks, zero and span adjustments or period of repair. Any maintenance performed on any continuous monitoring system should be conducted expeditiously.

Permit Condition 5.2 requires the Permittee to install a non-resettable hour meter for each emergency generator to track and record the cumulative hours of operation during emergency service as well as non-emergency service and to record the reason the generator was in operation.

Permit Condition 5.3 requires the Permittee to verify that each shipment of fuel oil received for the emergency generators is distillate oil, No. 2 diesel fuel, or another very low sulfur diesel fuel.

Permit Condition 6.1 provides guidelines for performance and compliance testing.

Permit Condition 6.2 establishes compliance standards that include maintenance, performance testing, and record keeping if the Permittee operates outside the emergency generator's manufacturer emission-related instructions or emission-related settings.

Permit Condition 7.1 requires the Permittee to notify the Division in writing within 15 days after startup.

Permit Condition 7.2 outlines that per-unit initial notifications are not required and requires monthly operating records from non-resettable hour meters (emergency/non-emergency and testing/maintenance), retained for at least 5 years.

Permit Condition 7.3 requires the Permittee to use the records in Permit Condition 7.2 to calculate NO_x emissions monthly and notify the Division if the monthly total equals/exceeds 8.25 tons, or the twelve-month rolling total equals/exceeds 99 tons.

Permit Condition 7.4 requires the Permittee to use monthly non-emergency service operating data to calculate and record the twelve-month rolling total of the non-emergency service operating time for the emergency generators and notify the Division if it equals or exceeds 100 hours per year.

Permit Condition 7.5 requires the Permittee to keep a copy of the manufacturer's operating and maintenance instructions, or instructions approved by the engine manufacturer for the emergency generators.

Permit Condition 7.6 requires verification for each diesel shipment to demonstrate compliance with Condition 2.3.

Permit Condition 7.7 requires the Permittee to demonstrate compliance with the applicable emission standards in 40 CFR 60 Subpart IIII for the emergency generators.

Permit Condition 7.8 requires an annual report (when operating under 2.5.c.i) with specified engine and activity details. Report is due by March 31 and must be submitted via CEDRI/CDX (or in writing if a CEDRI form is unavailable).

Permit Condition 8.1 grants the Division the right to amend the Permit as deemed necessary.

Permit Condition 8.2 requires the Permittee to pay an annual fee to the Division.

Toxic Impact Assessment

Georgia Toxic Air Pollutant Modeling Analysis

Georgia EPD regulates the emissions of toxic air pollutant (TAP) emissions through a program covered by the provisions of Georgia Rules for Air Quality Control, 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 Georgia EPD's review of TAP emissions as part of air permit reviews are contained in the agency's "Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions (Revised)."

TAP Emissions and MER Screening

The proposed emergency diesel generators at the facility are expected to emit several Toxic Air Pollutants (TAPs), including benzene, formaldehyde, toluene, xylene, acetaldehyde, acrolein, and naphthalene. Each TAP is assigned a Minimum Emission Rate (MER) and an Acceptable Ambient Concentration (AAC) by Georgia EPD. If the projected annual emissions of a TAP exceed its MER, the facility must conduct dispersion modeling to demonstrate compliance with the applicable AAC.

In this case, benzene emissions exceeded the MER, and formaldehyde emissions exceeded 20 percent of the MER. While formaldehyde did not trigger mandatory modeling under Georgia EPD's guidance, the facility conservatively chose to evaluate it alongside benzene. All other TAP emissions were well below their MERs and did not require additional analysis. Table 1 below provides a summary comparison of TAP emissions to their respective MER thresholds.

Table 1: Comparison of Facility TAP Emissions to Georgia MERs

Pollutant	Potential to Emit (lb/yr)	GA MER (lb/yr)	Above MER?
Benzene	58.55	3.16E+01	Yes
Formaldehyde	5.95	2.21E+01	No
Toluene	21.20	1.22E+06	No
Xylenes	14.56	2.43E+04	No
Acetaldehyde	1.90	1.11E+03	No
Acrolein	0.59	8.51E+01	No
Naphthalene	9.81	7.30E+02	No
Total HAP	171.00	50,000	No

Dispersion Modeling Analysis

Because benzene emissions are greater than the MER, Georgia EPD guidance requires refined dispersion modeling to demonstrate compliance with the benzene AACs. Formaldehyde emissions exceed 20 percent of the MER and were also included in the refined analysis. Benzene and formaldehyde emissions from all 37 emergency diesel generators were modeled using AERMOD with five consecutive years of representative meteorological data, rural dispersion options, and terrain elevations based on site grading plans and surrounding topography. Each generator stack was represented as an individual POINTCAP source to account for the presence of rain caps, and building downwash effects were characterized using BPIP-PRIME.

Short-term modeling used the maximum 1-hour emission rate for each pollutant, assuming all generators operate simultaneously at 100 percent load. For the annual analysis, emission rates were based on the maximum 1-hour emission rates and 500 hours per year of operation for each generator, consistent with Georgia EPD's toxic impact assessment methodology for emergency engines. These assumptions provide a conservative representation of potential ambient impacts from benzene and formaldehyde.

TIA Analysis Results

The refined AERMOD analysis indicates that the 15-minute average Maximum Ground-Level Concentration (MGLC) for benzene at any off-property receptor is $8.00 \mu\text{g}/\text{m}^3$, compared to the 15-minute AAC of $1,600 \mu\text{g}/\text{m}^3$. The annual average MGLC for benzene is $2.07 \times 10^{-2} \mu\text{g}/\text{m}^3$, which is below the annual AAC of $0.13 \mu\text{g}/\text{m}^3$.

For formaldehyde, the 15-minute average MGLC is $0.81 \mu\text{g}/\text{m}^3$ and the annual average MGLC is $2.11 \times 10^{-3} \mu\text{g}/\text{m}^3$. These values are below the respective 15-minute and annual AACs of $245 \mu\text{g}/\text{m}^3$ and $0.0909 \mu\text{g}/\text{m}^3$. A summary of the modeled benzene and formaldehyde impacts compared to the applicable AACs is provided in Table 2.

Table 2: Summary of Ambient Impact Assessment of Toxic Air Pollutant Emissions

Pollutant	15-minute MGLC ($\mu\text{g}/\text{m}^3$)	15-minute AAC ($\mu\text{g}/\text{m}^3$)	Impact?	Annual MGLC ($\mu\text{g}/\text{m}^3$)	Annual AAC	Impact?
Benzene	8.00	1600	Acceptable	0.021	$0.13 \mu\text{g}/\text{m}^3$	Acceptable
Formaldehyde	0.81	245	Acceptable	0.002	$0.09 \mu\text{g}/\text{m}^3$	Acceptable

Because the refined AERMOD modeling demonstrates that maximum predicted 15-minute and annual average concentrations of benzene and formaldehyde are below their respective AACs at all modeled receptors, no additional (refined) modeling or risk assessment is required under Georgia's Air Toxics program. The toxic impact assessment therefore indicates that operation of the proposed emergency generators will not result in ambient toxic air pollutant concentrations above levels considered protective of air quality and public health.

Summary & Recommendations

I recommend that Permit No. 7374-157-0079-S-01-0 be issued to Serverfarm ATL2, LLC for the construction and operation of 37 new diesel-fired emergency generators at a proposed data center in Covington, Georgia (Newton County). The facility will be classified as a synthetic minor source with respect to Title V by limiting NO_x emissions below major source thresholds. The Public Advisory period ended on November 14, 2025, with comments received from the Sierra Club. All comments were considered in the drafting of this permit.

Addendum to Narrative

The 30-day public review started on January 28, 2026 and ended on February 27, 2026. Comments were received by the Division.

Permit Comments: Received Electronically by Landau Associates on February 26, 2026

Comment 1:

The title page currently lists the mailing address as 155 NE 100th Street, Suite 302, Seattle, Washington 30014. Please update this address to 444 Nash Street, El Segundo, California 90245.

EPD Response to Comment 1:

The Division agrees and has updated the mailing address in the permit to “444 Nash Steet, El Segundo, California 90245.

Narrative Comments: Received Electronically by Landau Associates on February 26, 2026

Comment 1:

- The Background Information section describes the facility as a greenfield site. It is actually a retrofit, converting an existing building into a data center. Proposed revisions are provided below with the additions indicated in **bold**:

Serverfarm ATL2, LLC proposes to **retrofit an existing building** into a hyperscale data center facility located at 10835 Hazelbrand Rd NE, Covington, Georgia (Newton County).

EPD Response to Comment 1:

The Division agrees with the comment. The narrative has been updated to reflect the change.

Comment 2:

- In the Emissions Summary section, the third paragraph states that hourly emission rates for nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), volatile organic compounds (VOCs), and sulfur dioxide (SO₂) were taken from manufacturer engine performance data at 100 percent load. Maximum hourly emissions calculations use the worst-case load, which varies per pollutant. Proposed revisions are provided below with the additions indicated in **bold**:

Maximum hourly emission rates for NO_x, CO, PM, VOC, and SO₂ were taken from manufacturer engine performance data at the load which corresponds to the greatest emissions.

EPD Response to Comment 2:

The Division agrees with the comment. The Emissions Summary section of the narrative has been revised to clarify that maximum hourly emission rates for NO_x, CO, PM, VOC, and SO₂ were taken from manufacturer engine performance data at the load corresponding to the greatest emissions.

Public Notice Period Comments Received by Sierra Club on February 26, 2026:

Comments were received from the Sierra Club on behalf of itself, and its 9,000 Georgia members. The second letter was received during the Draft Permit Public Notice on February 26, 2026, 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 No. 1: EPD should release guidance suggesting more stringent emissions control technology for diesel backup generators at data centers.**EPD Response to Comment 1**

The Division acknowledges the recommendation to develop guidance for emission controls for diesel backup generators at new data centers. Should the Division determine that such guidance is necessary, it will be developed with stakeholder engagement.

While 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.

As a part of the permit application review process, the Division requires the performance of a toxic impact assessment (TIA) of the project's facility-wide toxic air pollutant (TAP) emissions from the source in accordance with the *Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions*. The applicant performed the TIA assessment, and the results were below the AACs with the proposed Tier II standard engines. The state is allowed to be more stricter than federal regulations, yet it is not in the Division's procedures to require the type of control technology for the engines as the federal and state regulations are being met.

Comment No. 2: The Draft Permit should be considered in the larger context of Georgia's growing number of data centers and their effect on Georgia's grid planning.**EPD Response to Comment 2**

The Division notes that State and Federal air permitting regulations do not require a cumulative impact analysis of emissions from other existing or future sources as part of an individual permit decision. Each permit application is reviewed on its own merits under the applicable regulatory program, and the Draft Permit includes the operational limits, monitoring/recordkeeping, and other conditions needed to ensure compliance with applicable air quality requirements.

With respect to broader issues such as electric grid planning, load growth, and the selection of generation resources, those matters fall outside the scope of this air permit action. The Division's role in this permitting action is to ensure that the proposed equipment and associated emissions are regulated consistent with

applicable requirements and that the permitted operations will be conducted in compliance with Georgia and federal air quality standards.