

NARRATIVE

TO: Cynthia Dorrough
FROM: Alexander Lagunas
DATE: December 2, 2025

Facility Name: VoltaGrid ATL-1 EGU
AIRS No.: 217-00080
Location: Covington, GA (Newton County)
Application #: 29947
Date of Application: November 12, 2025

Background Information

VoltaGrid LLC proposes the construction and operation of VoltaGrid ATL-1 EGU, a greenfield power generation facility with a maximum power output of 90 MW, consisting of 33 natural gas-fired, four-stroke lean-burn (4SLB) reciprocating internal combustion engines (RICE), two (2) 4 MMBtu/hr natural gas-fired fuel gas heaters, and a natural gas-fired black start emergency generator. The facility will be a baseload facility, operating continuously for 8,760 hours per year. The facility proposes to operate up to five 3,628 hp natural gas-fired temporary engines for two months during the construction of the facility.

The facility will provide prime power to itself and to a nearby Serverfarm facility (AIRS: N/A), owned and operated by an external third party. Based on EPA guidance, the two facilities are considered separate sources because they do not meet the three general conditions: same industrial grouping, contiguous or adjacent, and under common control. The two facilities are not in the same industrial grouping because VoltaGrid ATL-1 EGU is a power plant and the nearby Serverfarm facility is a data center. The two facilities are on adjacent parcels of land but will be fenced off to prevent unauthorized access. The two facilities are not under common control based on the April 2018 Meadowbrook Memo. As a result, the two facilities are considered separate sources.

The mechanical power generated by the RICE units will connect to an on-site generator. The electrical power generated by the generator will be connected to a substation for distribution to the Serverfarm facility. A portion of the power generated by the RICE units will be used to power the ancillary, on-site equipment through a switch gear. The fuel gas heaters will warm up incoming pipeline natural gas to prevent freezing and avoid condensation and formation of moisture. The black start emergency engine will provide power to the ancillary systems to power up the first RICE unit post a black out event.

The RICE units are equipped with a built-in combustion exhaust treatment system, consisting of a selective catalytic reduction (SCR) system and an oxidation catalyst.

The facility proposes a limit of 99.0 tpy of carbon monoxide (CO) emissions in order remain under the major source threshold with respect to Title V. The facility also proposes a limit of 0.022 lb formaldehyde

per hour per engine. This limit has demonstrated that formaldehyde will remain below its allowable ambient concentration (AAC) based on SCREEN3 modeling, thus requiring no further refined modeling.

The facility is a currently unpermitted greenfield project and located in Newton County, which is in attainment for all criteria pollutants.

Purpose of Application

VoltaGrid LLC submitted App. 29947 for the construction and operation of VoltaGrid ATL-1 EGU, a greenfield power generation facility, which consists of 33 natural gas-fired 4SLB combustion engines, two natural gas-fired fuel gas heaters, and one natural gas-fired black start emergency generator. The facility will be a synthetic minor with respect to Title V by limiting CO emissions to 99.0 tpy. The facility will have an emission rate limit for formaldehyde. The Public Advisory period ended on December 19, 2025, and comments were received by the Division.

Updated Equipment List

Emission Units			Associated Control Devices	
Source Code	Description	Installation Date	Source Code	Description
EU1 – EU33	Generators #1 through #33 Jenbacher J620 4,425 hp 4-stroke lean-burn Natural gas-fired	2026*	CD1 – CD33	SCR and Catalytic Oxidation
EU34	Black Start Emergency Generator MESA GV22PU 684 hp 4-stroke rich-burn Natural gas-fired	2026*	--	--
EU35 – EU36	Fuel Gas Heaters #1 & #2 Algas-SDI SH400-LN 4 MMBtu/hr Natural gas-fired	2026*	--	--
TEMPGEN1 through TEMPGEN5	Temporary Engines #1 through #5 Caterpillar G352 3,628 hp 4-stroke, rich-burn Natural gas-fired (Only operating in the months of April and May 2026)	2026*	--	--

*proposed within current application

Fuel Burning Equipment

Source Code	Input Heat Capacity (MMBtu/hr)	Description	Installation Date	Construction Date
EU 35 – EU36	4	Fuel Gas Heater #1 & #2	2026*	2026*

Emissions Summary

Based on 8,760 hours of operation of all emission units, except for 100 hours of operation for the black start engine, the facility would be a major source with respect to Title V. The Permittee proposes a CO emission limit of 99.0 tpy to ensure facility-wide CO emissions remain below the major source threshold. Since CO is the limiting pollutant, limiting CO below the major source threshold for Title V, all other criteria pollutants will be under the major source threshold as a result. The Permittee proposes to operate a SCR and oxidation catalyst system at all times the engines are in operation to control CO emissions, making the facility a synthetic minor source with respect to Title V.

CO emissions will be tracked using the hours of operation of each emission unit and an associated emission factor, in lb/hr. The generators (Source Codes: EU1 through EU33) have two operating modes: startup and steady state. Startup consists of approximately five minutes in which the control devices are not operating at expected efficiency. The facility estimates three (3) startup events for each generator per month. Steady state is the normal operation of the generators and control devices. Each operating mode will have its own emission factor. For the purposes of calculating emissions, startup will consist of five minutes at startup and 55 minutes at steady state for a combined one hour. CO emission factors were provided by the manufacturer and have a safety factor of 5% added. Performance test data provided for Jenbacher J620 demonstrate actual emission rates significantly lower than the emission rate used for the purposes of tacking CO emissions. As a result, the proposed CO emission factors are considered conservative.

Potential emission from the temporary engines (Source Codes: TEMPGEN1 through TEMPGEN5) are based on the two months (April and May 2026) operation. Operation of the temporary engines will not overlap with the operation of the main generators (Source Codes: EU1 through EU33). For the purpose of potential emissions for the year 2026, emissions were calculated from the operation of the temporary engines for two months and the normal operation of the facility for the remaining seven months of the year. All criteria pollutants are below the major source threshold.

Facility-Wide Emissions
(in tons per year)

Pollutant	Potential Emissions without the temporary engines			Potential Emissions in 2026 with the temporary engines		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
PM/PM ₁₀ /PM _{2.5}	--	17.61	+17.61	--	11.09	+11.09
NO _x	--	26.88	+26.88	--	30.38	+30.38
SO ₂	--	8.78	+8.78	--	5.14	+5.14
CO	--	96.01	+96.01	--	75.10	+75.10
VOC	--	26.38	+26.38	--	19.06	+19.06
Max. Individual HAP (Formaldehyde)	--	2.61	+2.61	--	4.47	+4.47
Total HAP	--	6.13	+6.13	--	7.82	+7.82
Total GHG (if applicable)	--	427,859	+427,859	--	255,023	+255,023

Regulatory Applicability

40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Not applicable.

This subpart applies to steam generating units which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less but greater than 10 MMBtu/hr.

The fuel gas heaters (Source Codes: EU35 and EU36) are steam generating units with maximum heat input capacity less than 10 MMBtu/hr and thus are not subject to this subpart.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Applicable to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34).

This subpart applies to spark ignition (SI) internal combustion engines (ICE) constructed after June 12, 2006 and manufactured after July 1, 2007.

The generators and the black start engine are SI ICE constructed and manufactured after July 1, 2007, and thus subject to this subpart. Engines with power greater than 100 HP are subject to emission standards in Table 1 to Subpart JJJJ.

The generators are subject to the following:

- Emission standards in Table 1 to Subpart JJJJ of Part 60, per 40 CFR 60.4233(e)
- Demonstrate compliance through the purchase of a certified engine or purchase of a non-certified engine with a maintenance plan and performance testing, per 40 CFR 60.4243(b)
- Maintain records in 40 CFR 60.4245(a)

The black start engine is subject to the following:

- Emission standards in Table 1 to Subpart JJJJ of Part 60, per 40 CFR 60.4233(e)
- Installation of a non-resettable hour meter, per 40 CFR 60.4237(a)
- Demonstrate compliance through the purchase of a certified engine or purchase of a non-certified engine with a maintenance plan and performance testing, per 40 CFR 60.4243(b)
- Requirements to be an *emergency stationary ICE* under this subpart, per 40 CFR 60.4243(d)
- Maintain records in 40 CFR 60.4245(a) – (b)
- Submit annual report if used for the purposes of 40 CFR 60.4243(d)(3)(i), per 40 CFR 60.4245(e)

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

Applicable to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34).

This subpart applies to stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.

The generators and the black start engine are RICE located at an area source of HAP emissions, and thus subject to this subpart. They are considered *new* because they will commence construction at an area source after June 12, 2006. *New* stationary RICE at an area source meet the requirements of this subpart by meeting the requirements of 40 CFR 60 Subpart JJJJ. The generators and the black start engines will meet the requirements of 40 CFR 60 Subpart JJJJ, thus no further requirements apply to these engines.

40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Not applicable.

This subpart applies to boilers and process heaters located at major sources of HAP emissions.

The facility is not a major source of HAP emissions, and thus the fuel gas heaters (Source Codes: EU35 and EU36) are not subject to this subpart.

40 CFR 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

Avoidance.

This subpart applies to boilers located at an area source of HAP emissions. *Gas-fired boilers* are not subject to this subpart.

The fuel gas heaters (Source Codes: EU35 and EU36) are boilers located at an area source of HAP emissions; however, they will only fire natural gas, meet the definition of a *gas-fired boiler* as stated below, and thus are not subject to this subpart.

“(any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing maintenance, or operator training on liquid fuel)”

391-3-1-.02(2)(b) – Visible Emissions

Applicable to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34).

This rule applies to emission units that are subject to other emission limitation under the Georgia Rules. The generators and the black start engine are subject to Rules (g) and (mmm) and thus subject to this rule.

The fuel gas heaters (Source Codes: EU35 and EU36) are subject to stricter limitation in Rule (d) and are not subject to this rule.

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

Applicable to the fuel gas heaters (Source Codes: EU35 and EU36).

This rule applies to *fuel-burning equipment* as defined in 391-3-1-.01(cc).

The fuel gas heaters are *fuel-burning equipment* and thus are subject to this rule. They are subject to a fly ash and/or particulate matter emission standard defined by the equation $P = 0.5$ pounds per million Btu heat input, and to a visible emissions standard of not equal to greater than twenty (20) percent, except for one six-minute period per hour of not more than twenty-seven (27) percent opacity.

391-3-1-.02(2)(g) – Sulfur Dioxide

Applicable to the generators (Source Codes: EU1 through EU33), the black start engine (Source Code: EU34), and the fuel gas heaters (Source Codes: EU35 and EU36).

This rule applies to fuel-burning sources. The generators, the black start engines, and the fuel gas heaters will fire natural gas and thus are subject to this rule. They are subject to a sulfur fuel content standard of no more than 3 percent sulfur, by weight.

391-3-1-.02(2)(tt) – VOC Emissions from Major Sources

Not applicable.

This rule requires RACT to sources of VOC emissions greater than the threshold for a listed county.

The facility will be located in Newton County, one of the listed counties with a threshold of 100 tpy. The facility has potential emissions of VOC emissions less than 100 tpy and thus is not subject to this rule.

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

Not applicable.

This rule requires RACT to sources of NO_x emissions greater than the threshold for a listed county.

The facility will be located in Newton County, one of the listed counties with a threshold of 100 tpy. The facility has potential emissions of NO_x emissions less than 100 tpy and thus is not subject to this subpart.

391-3-1-.02(2)(lll) – NO_x Emissions from Fuel-Burning Equipment

Not applicable.

This rule applies to *fuel-burning equipment* with a maximum heat input capacity equal to or greater than 10 MMBtu/hr and less than or equal to 250 MMBtu/hr, located in a listed county.

The fuel gas heaters (Source Codes: EU35 and EU36) have heat input capacities less than 10 MMBtu/hr and thus are not subject to this rule.

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

Applicable to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34).

This rule applies to stationary engines used to generate electricity located in a listed county. The generators and the black start engine are used to generate electricity and located in Newton County, one of the listed counties, and thus are subject to this rule.

The generators are non-emergency engines and subject to the emission standard of (mmm)1 during the period of May 1 through September 30. A performance test will be required to demonstrate compliance, as set by PTM 2.120.2. Monitoring of the catalyst inlet temperature, pressure drop across the catalyst, and the reagent injection rate of the SCR of each generator is required by PTM 2.120.3(a) – (c). An annual test measurement to demonstrate compliance prior to ozone season is also required by PTM 2.120.3(d).

The black start engine will be an *emergency standby stationary engine*, as defined in (mmm)4, and will not be subject to the emission standard.

391-3-1-.02(2)(rrr) – NO_x Emissions from Small Fuel-Burning Equipment

Not applicable.

This rule applies to *fuel-burning equipment* as defined in 391-3-1-.01(cc) located in a listed county, installed after May 1, 1999, have a maximum design heat input capacity of less than 10 MMBtu/hr, and have an individual potential emissions of NO_x exceeding one tpy.

The fuel gas heaters are *fuel-burning equipment*, located in Newton County, one of the listed counties, will be installed after May 1, 1999, and has a heat input capacity less than 10 MMBtu/hr; however, each individual fuel gas heater has potential NO_x emissions less than 1 tpy and thus are not subject to this rule.

Permit Conditions

Condition 2.1 limits emissions of CO to 99.0 tpy as part of Title V Avoidance.

Condition 2.2 limits emissions of formaldehyde from each generator (Source Codes: EU1 through EU33) to 0.022 lb/hr, as part of Avoidance of Air Toxics and Avoidance of 40 CFR 63.2.

Condition 2.3 limits the hours of operation of the black start engine (Source Code: EU34) to 100 hours, as part of Avoidance of Air Toxics.

Condition 2.4 establishes the applicability of 40 CFR 60 Subpart A and 40 CFR 60 Subpart JJJJ to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34).

Condition 2.5 sets the emission standards applicable to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34), per 40 CFR 60 Subpart JJJJ.

Condition 2.6 sets the criteria for the black start engine (Source Code: EU34) to be considered an emergency generator in 40 CFR 60 Subpart JJJJ.

Condition 2.7 establishes the applicability of 40 CFR 63 Subpart A and 40 CFR 63 Subpart ZZZZ to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34).

Condition 2.8 requires the fuel gas heaters (Source Codes: EU35 and EU36) to only fire natural gas to be considered *gas-fired boilers* for 40 CFR 63 Subpart JJJJJ Avoidance.

Condition 2.9 sets a visible emission standard to the generators (Source Codes: EU1 through EU33) and the black start engine (Source Code: EU34), per Georgia Rule (b).

Condition 2.10 sets a fly ash and/or PM emissions standard to the fuel gas heaters (Source Codes: EU35 and EU36), per Georgia Rule (d).

Condition 2.11 sets a visible emissions standard to the fuel gas heaters (Source Codes: EU35 and EU36), per Georgia Rule (d).

Condition 2.12 sets a sulfur fuel content limit on all fuel fired in the generators (Source Codes: EU1 through EU33), the black start engine (Source Code: EU34), and the fuel gas heaters (Source Code: EU35 and EU36), per Georgia Rule (g).

Condition 2.13 sets a NO_x emissions standard to the generators (Source Codes: EU1 through EU33), per Georgia Rule (mmm).

Condition 2.14 sets the criteria for the black start engine (Source Code: EU34) to be considered an emergency generator under Georgia Rule (mmm).

Condition 4.1 requires the operation of the SCR and oxidation catalyst (Source Codes: CD1 through CD33) whenever the generators (Source Codes: EU1 through EU33) are in operation, as part of Title V Avoidance.

Condition 5.1a requires a non-resettable hour meter on the black start engine (Source Codes: EU33) as part of Title V Avoidance and 40 CFR 60 Subpart JJJJ.

Condition 5.1b-c requires a system to monitor hours of operation of the generators (Source Codes: EU1 through EU33) and of the fuel gas heaters (Source Codes: EU35 and EU36), as part of Title V Avoidance.

Condition 5.2 requires monitoring of the inlet temperature of the SCR (Source Codes: CD1 through CD33), per PTM 2.120.3(a) for Georgia Rule (mmm).

Condition 5.3 requires monitoring of the pressure drop across the SCR (Source Codes: CD1 through CD33), per PTM 2.120.3(b) for Georgia Rule (mmm).

Condition 5.4 requires monitoring of the reagent injection rate of the SCR (Source Codes: CD1 through CD33), per PTM 2.120.3(c) for Georgia Rule (mmm).

Condition 5.5 requires monitoring of NO_x emissions from the generators (Source Codes: EU1 through EU33) after the initial performance test by performing a test measurement, per PTM 2.120.3(d) for Georgia Rule (mmm).

Condition 6.2 requires an initial performance test for formaldehyde on the generators (Source Codes: EU1 through EU33) to demonstrate compliance with Condition 2.2.

Condition 6.3 requires an initial performance test on the generators (Source Codes: EU1 through EU33) or the black start engine (Source Code: EU34) if the requirements of Condition 7.4 are not met, per 40 CFR 60 Subpart JJJJ.

Condition 6.4 requires an initial performance test for NO_x on the generators (Source Codes: EU1 through EU33) in order to demonstrate compliance with Condition 2.11, per PTM 2.120.2(b) for Georgia Rule (mmm).

Condition 7.2 determines the monthly CO emissions from each emission unit and the total CO emissions from all emission units using three equations and an emission factor table.

Condition 7.3 requires the use of the monthly CO emissions records of Condition 7.2 to determine the 12 consecutive month total CO emissions to demonstrate compliance with Condition 2.1.

Condition 7.4 requires the purchase of a certified engine to demonstrate compliance with Condition 2.5, per 40 CFR 60 Subpart JJJJ.

Condition 7.5 requires a maintenance plan and triggers a performance test in Condition 6.2 if the requirements of Condition 7.4 are not met, per 40 CFR 60 Subpart JJJJ.

Condition 7.6 lists records required per 40 CFR 60 Subpart JJJJ.

Condition 7.7 requires records of the hour of operation using the non-resettable hour meter in Condition 5.1a, per 40 CFR 60 Subpart JJJJ.

Condition 7.8 calculates the monthly and subsequently the calendar year total of the black start engine (Source Code: EU34) using the record of Condition 7.7 to demonstrate compliance with Condition 7.4, per 40 CFR 60 Subpart JJJJ.

Condition 7.9 requires the calculation of the total hours of operation of the black start engine (Source Code: EU34) using the records of Condition 7.7 to demonstrate compliance with Condition 2.3.

Condition 7.10 requires an annual report if the black start engine (Source Code: EU34) is used for the purpose of 40 CFR 60.4243(d)(3)(i), per 40 CFR 60 Subpart JJJJ.

Toxic Impact Assessment

The facility conducted a toxic impact assessment in which the pollutants in the table below were identified as TAPs of interest because the potential emissions of these pollutants were greater than their respective MERs. Potential emissions for formaldehyde are based on the proposed formaldehyde limit.

Pollutant --	Potential emissions (lb/year)	Minimum Emission Rate (MER) (lb/year)
1,3-Butadiene	119	7
Acetaldehyde	3,737	1,107
Acrolein	2,298	85
Ammonia	72,707	24,333
Benzene	197	32
Ethylene Dibromide	20	4
Formaldehyde	11,554	22

The facility conducted further analysis using SCREEN3 modeling software (version 13043), which evaluates the maximum 1-hour average impact. Three models were run, one for each emission unit at the facility: one J620 engine with a unit emission rate of 1 g/s, one black start emergency engine with a unit emission rate of 1 g/s, and one fuel gas heater with a unit emission rate of 1 g/s.

The J620 engine and the fuel gas heater are to operate continuously throughout the year, so the short-term and long-term emission rates are identical. The black start emergency engine will only operate 100 hours per year. The short-term emission rate for this engine is the emission rate found in AP-42 for the TAPs. The long-term emission rate was determined to be the ratio of 100 hours to 8,760 hours.

The table below presents the result of this analysis. The short-term and long-term impacts for all TAPs were determined to be equal to or below their allowable ambient concentration (AAC). No further analysis was conducted.

Pollutant	Short-term (15-min)			Long-term (annual)		
	Impact	AAC	Exceeds?	Impact	AAC	Exceeds?
	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	--	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	--
1,3-Butadiene	0.02	1100	no	0.00	0.03	no
Acetaldehyde	1.73	4500	no	0.04	4.55	no
Acrolein	1.42	23	no	0.02	0.35	no
Ammonia	14.55	2400	no	0.88	100.0	no
Benzene	0.65	1600	no	0.00	0.13	no
Ethylene Dibromide	0.01	23050	no	0.00	0.02	no
Formaldehyde	9.36	245	no	0.09	0.09	no

In the case of formaldehyde, the facility used an emission rate of 0.022 lb/hr, derived from performance test data conducted on six (6) Jenbacher J620 engines of similar size in October 2025 and a safety factor of 20%. Because this emission rate was used to model formaldehyde emissions and because the long-term impact is just under AAC, the facility will be subject to a formaldehyde limit of 0.022 lb/hr, as required in Condition 2.2, and will verify this emission rate by conducting a one-time performance test on each generator, as required in Condition 6.2.

The impact modeling was conducted by limiting the black-start engine to 100 hours of operation per year. As a result, the black start engine is limited to 100 hours of operation, as required in Condition 2.3.

Summary & Recommendations

I recommend that Air Quality Permit No. 7374-217-0078-E-01-0 be issued to VoltaGrid ATL-1 EGU for the construction and operation of greenfield power generation facility consisting of 33 natural gas-fired RICE, two natural gas-fired fuel gas heaters, and one black start emergency generator. The facility will be a synthetic minor with respect to Title V by limiting CO emissions to 99.0 tpy. The facility will be required to limit emissions of formaldehyde. Its Public Advisory period ended on December 19, 2025, and comments were received by the Division.

Addendum to Narrative

The 30-day Public Notice started on February 11, 2026, and ended on March 13, 2026. Comments were received by the Division.

Comments were divided into sections and will be addressed by the heading of each section. Full comments are available in the attachment.

The applicant, VoltaGrid ATL-1 EGU, will be referred to “VoltaGrid” hereafter. The adjacent data center, ATL2 Data Center, owned by ServerFarm, will be referred to as “ATL2” hereafter.

Comments were received from Patrick J. Anderson, on behalf of Southern Environmental Law Center, Sustainable Newton, and the Altamaha Riverkeeper by e-mail on March 13, 2026. The Division’s response to those comments are provided below.

Comment I. EPD Must Require Mitigation or Additional Air Toxic Demonstrations to Address Cancer Risks from Formaldehyde

EPD Response to Comment I:

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 did not exceed the acceptable ambient concentrations (AACs); therefore, there was no need to perform additional air toxic demonstrations.

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 II. EPD Must Require More Stringent Control Efficiency and Monitoring Requirements for Formaldehyde Emissions**A. VoltaGrid’s Formaldehyde Estimates Rely on Overly Optimistic Control Efficiencies**

EPD Response to Comment II.A:

The limit of 0.022 lb/hr formaldehyde, specified in Condition 2.2, was proposed by the facility as a possible and practical emission rate based on performance testing on engines of similar size and controls. The facility is required to demonstrate compliance with this limit by the initial performance test required in Condition 6.2. The facility is responsible for the control efficiency of its equipment to ensure compliance.

B. EPD Must Require More Stringent Monitoring Conditions for Formaldehyde

EPD Response to Comment II.B:

The Division is responsible for protecting Georgia's air quality through the regulation of emission from industrial and mobile sources according to state and federal regulations.

There is no continuous compliance requirements in the applicable State or Federal regulations associated with monitoring formaldehyde emissions; therefore, the installation and operation of a Continuous Emissions Monitoring System (CEMS) is not required for the engines.

No further monitoring of formaldehyde was required because the generators and associated selective catalytic reduction (SCR) systems are expected to be operated in accordance with manufacturer's specifications as outlined in 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ. The formaldehyde performance test requirements in Condition 6.2 will confirm that the generators are operating in accordance with the formaldehyde limitation of Condition 2.2 across the range of operating loads for the generators.

The Division recognizes that the operation at the maximum operating load point may not be the operating load at which formaldehyde emissions are the greatest. As a result, Condition 6.2 was modified to require the performance test to be conducted at one of three different loads (50%, 75%, and maximum load) to demonstrate compliance with Condition 2.2. Each load will be tested on 1/3 of the engines. The engines are not expected to operate below 50% load because the higher temperatures at lower loads will damage the catalyst in the SCR and cause the engine to shut down.

Additionally, the facility has proposed a limit of 262,800 total hours of operation for all generators (Source Code: EU1 through EU33), which results in decreased formaldehyde emissions. A more thorough discussion is in the Toxic Impact Assessment section of Addendum B.

Comment III. EPD Must Permit VoltaGrid and the Adjacent Serverfarm Operation as a Single Source

A. Under EPA's Source Aggregation Guidance, VoltaGrid and Server Farm Are a Single Source

EPD Response to Comment III.A:

Based on a contractual agreement EPD became aware of after the issuance of the draft permit, the Division has determined that VoltaGrid and ATL2 are a single, minor NSR site. VoltaGrid is considered a support facility for the data center and is under common control. The combination of the two facilities will be a synthetic minor source with respect to Title V and will share a NO_x emission limit. VoltaGrid will limit emissions and operating hours to ensure all criteria pollutants remain below the major source threshold for the combined facilities.

B. VoltaGrid and Serverfarm's Proposed Operations Violate Georgia's Territorial Act

EPD Response to Comment III.B:

This comment falls outside the purview and authority of EPD.

Comments were received from L. Maurice Carter, Jr., Co-Founder and President of Sustainable Newton, Inc. by email on March 13, 2026. The Division's response to those comments are provided below.

Comment 1:

“Given that VoltaGrid’s modeling shows its emissions will equal the maximum allowable levels of formaldehyde – and in consideration of other carcinogens present in the area and elevated historical cancer rates in Covington – we believe EPD needs to take extra steps to protect our community. We urge EPD to undertake those protective measures outlined in the comments submitted on our behalf by SELC.”

EPD Response to Comment 1:

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 did not exceed the acceptable ambient concentrations (AACs); therefore, additional protective measures are not required.

Comment 2:

“We are also troubled that EPD is permitting VoltaGrid as a separate business entity from the adjacent ServerFarm datacenter to which VoltaGrid intends to exclusively sell electricity.”

EPD Response to Comment 2:

Based on a contractual agreement between the two entities, the Division has determined that VoltaGrid and ATL2 are a single, minor NSR site. The combination of the two facilities will be a synthetic minor source with respect to Title V and will share a NO_x emission limit, and VoltaGrid will limit emissions and operating hours to ensure all criteria pollutants remain below the major source threshold.

Addendum B:

Updated Background:

In response to Comment III from Southern Environmental Law Center submitted during the Public Notice period, the Division concurs that VoltaGrid ATL-1 EGU (AIRS: 217-00080) and ATL2 Data Center (AIRS: 217-00079) are a single, minor NSR site. Based on a contractual agreement between the two entities, EPD determined that VoltaGrid is under common control of ATL2 and functions as a support facility for ATL2.

The two facilities constitute a single, minor NSR site but will operate under separate permits to distinguish the equipment sources each facility is responsible for. ATL2 will continue to operate under its current permit (Air Quality Permit No. 7374-217-0079-S-01-0). VoltaGrid will operate under this permit.

The following sections discuss the updated emissions, limitations, and toxic impact assessment from the combined site of VoltaGrid and ATL2.

Updated Emissions Summary:

The following table demonstrates the potential-to-emit from the two facilities as a single site, as originally formulated.

Pollutant	Potential Emissions Prior to New Limitations		
	ATL2 Data Center	VoltaGrid ATL-1 EGU	Combined
PM/PM ₁₀ /PM _{2.5}	0.68	17.61	18.29
NO _x	99.0	26.88	125.88
SO ₂	0.06	8.78	8.84
CO	5.36	96.01	101.37
VOC	2.69	26.38	29.07
Max. Individual HAP (Formaldehyde)	0.03	2.61	2.64
Total HAP	0.06	6.13	6.19
Total GHG (if applicable)	6,256	427,859	424,115

The combination of the two facilities would be a major source with respect to Title V because emissions of NO_x and CO are greater than 100 tons per year.

Under this permit, VoltaGrid and ATL2 will be a combined synthetic minor source with respect to Title V by limiting NO_x and CO emissions to 99.0 tpy. Emissions will be divided between the two facilities. Monitoring and recordkeeping will be required.

ATL2 and VoltaGrid will share a 99.0 tpy NO_x limit. ATL2 will retain its current NO_x limit, as specified in Condition 2.1 of its permit. The NO_x emissions limit for the VoltaGrid facility will be defined by the following equation:

$$E_{VoltaGrid} = 99.0 - E_{ATL2, 12 \text{ months}}$$

Where:

- $E_{VoltaGrid}$ = Maximum allowable emissions from VoltaGrid ATL-1 EGU for that rolling 12 consecutive month period, in tons
- 99.0 = NO_x emission limit for the single source, in tons per year
- $E_{ATL2, 12 \text{ months}}$ = Actual emissions emitted by ATL2 Data Center during the same 12 consecutive month period, in tons

Because the NO_x emissions limit is not numerically defined, the Division will require monthly reporting and notification if the monthly emissions are greater than 1/12 of the limit determined by the equation above and require an explanation on how the facility intends to comply with its limit.

For CO, ATL2's potential emissions are 5.36 tpy based on its 99.0 NO_x tpy limit. VoltaGrid originally proposed a limit of 99.0 tpy; however, to account for the potential CO emissions of ATL2, VoltaGrid has proposed a limit of 94 tpy. The total CO PTE will be 99.36, which is below the major source threshold of 100 tpy.

In addition, VoltaGrid has proposed additional limitations. Although the facility has 33 generators, the facility does not plan to operate all 33 generators at any one time. A number of the generators are available as backup and redundancy. Because of this, VoltaGrid proposed to limit the maximum number of generators operated at any one time to 30. This is an equivalent of 262,800 hours of operation per year for all generators combined (calculated by multiplying 30 generators by 8760 hours of operation in one year for each generator).

As a result of the NO_x emission limit, CO emissions limit, and the operating hours limit, the PTE for all criteria pollutants remain below the Title V major source threshold. VOC emissions remain below the applicability threshold of Georgia Rule 391-3-1-.02(2)(tt). The table below demonstrates the PTE of all criteria pollutants are below the major source threshold of Title V for the combination of the two facilities.

Pollutant	Potential Emissions after New Limitations		
	ATL2 Data Center	VoltaGrid ATL-1 EGU	Combined
PM/PM ₁₀ /PM _{2.5}	0.68	16.01	16.69
NO _x	99.0		99.0
SO ₂	0.06	7.98	8.04
CO	5.36	94.0	99.36
VOC	2.69	23.98	26.67
Max. Individual HAP (Formaldehyde)	0.03	2.37	2.40
Total HAP	0.06	5.57	5.63
Total GHG (if applicable)	6,256	388,963	395,219

Updated Toxic Impact Assessment:

ATL2 Data Center and VoltaGrid ATL-1 EGU are now considered a single, minor NSR site. As a result, the toxic impact assessment was re-evaluated as the sum of the previously conducted analyses from each facility. This is considered a conservative approach because the two analyses were based on less stringent conditions. VoltaGrid has proposed a 94.0 tpy CO limit (a decrease from the originally requested 99.0 tpy CO limit) and an operating hours limit of 262,800 hours per year (a decrease from the originally modeled 280,080 hours per year) as new, more stringent limitations. The facility proposed the operating hours limit of 262,800 hours per year to reflect the maximum actual operation of the generators (some generators are only available as backup and redundancy, and all 33 generators will not be operating at any one time). As a result, formaldehyde and all other TAP will remain below their respective AACs. These limitations have been incorporated as Conditions 2.17 and 2.18. There is no change in ATL2's analysis.

Table 1 demonstrates the potential emissions from each facility, the total potential emissions as a single source, and the MER of notable TAP emissions.

Table 1: Potential Single-Site TAP Emissions Comparison to MER:

Pollutant	Potential emissions from VoltaGrid ATL-1 EGU	Potential Emissions from ATL2 Data Center	Total Potential Emissions, as a Single Site	Minimum Emission Rate (MER) (lb/year)	Total PTE Greater than MER?
--	lb/year	lb/year	lb/year	lb/year	Yes/No
1,3-Butadiene	119	--	119	7	Yes
Acetaldehyde	3,737	1.90	3,739	1,107	Yes
Acrolein	2,298	0.59	2,298	85	Yes
Ammonia	72,707	--	72,707	24,333	Yes
Benzene	197	58.55	256	32	Yes
Ethylene Dibromide	20	--	20	4	Yes
Formaldehyde	11,554	5.95	11,560	22	Yes
Naphthalene	27.0	9.81	36.81	729.99	No
PAH	9.7	16.0	25.7	--	--
Toluene	147.8	21.2	169	1,216,650	No
Xylenes	66.67	14.6	81.3	24,333	No

VoltaGrid used SCREEN3 modeling to compare the impacts of 1,3-Butadiene, acetaldehyde, acrolein, ammonia, benzene, ethylene dibromide, and formaldehyde to the respective AAC while ATL2 used AERMOD modeling to compare the impacts of benzene and formaldehyde to the respective AAC. Table 2 demonstrates modeling analysis for the listed TAPs, based on the original operating conditions and limitations.

Table 2: Single-Site TAP Modeling, Based on Originally Proposed Operating Conditions and Limitations

--	Short-term (15-min)			Long-term (annual)		
Pollutant	Impact	AAC	Exceeds?	Impact	AAC	Exceeds?
--	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	yes/no	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	yes/no
1,3-Butadiene	0.02	1,100	no	0.00	0.03	no
Acetaldehyde	1.73	4,500	no	0.04	4.55	no
Acrolein	1.42	23	no	0.02	0.35	no
Ammonia	14.55	2,400	no	0.88	100.0	no
Ethylene Dibromide	0.01	23,050	no	0.00	0.02	no
Benzene (ATL2 Data Center)	8.00	1,600	no	0.00	0.13	no
Benzene (VoltaGrid)	0.65	1,600	no	0.02	0.13	no
Benzene (Total)	8.65	1,600	no	0.02	0.13	no
Formaldehyde (ATL2 Data Center)	0.81	245	no	0.0021	0.0909	no
Formaldehyde (VoltaGrid)	9.36	245	no	0.089	0.0909	no
Formaldehyde (Total)	10.17	245	no	0.0911	0.0909	yes

Under the combined originally modeled conditions, the maximum ground level concentrations (MGLCs) for all TAP, except for formaldehyde, remain below their respective AACs. Because emissions from VoltaGrid for 1,3-Butadiene, Acetaldehyde, Acrolein, and ethylene dibromide are significantly larger than the emissions from ATL2, modeling to incorporate emissions from ATL2 was not conducted. The additional operating limitations of 262,800 hours per year will also decrease emissions of these TAPs and formaldehyde in quantities greater than the total quantities emitted from ATL2.

Table 3 demonstrates that final comparison for formaldehyde after considering the operating hours limitation of 262,800 hours per year.

Table 3: Single-Site Formaldehyde Modeling, Based on Proposed Operating Conditions and Limitations

	Short-term (15-min)			Long-term (annual)		
Pollutant	Impact	AAC	Exceeds?	Impact	AAC	Exceeds?
	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	yes/no	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	yes/no
Formaldehyde (ATL2 Data Center)	0.81	245	no	0.0021	0.0909	no
Formaldehyde (VoltaGrid)	8.51	245	no	0.082	0.0909	no
Formaldehyde (Total)	9.32	245	no	0.0841	0.0909	no

Changes in Permit Conditions:

Condition 2.1 was modified to reflect the new CO emission limit of 94.0 tpy.

- 2.1 The Permittee shall not discharge or cause the discharge into the atmosphere any gases that contain CO emissions in excess of **94.0** tons per 12 consecutive month period.
[Avoidance of Title V]

Condition 2.14 was modified to correct the Source Code of the black start engine:

- 2.14 The Permittee shall limit the operation of the black start engine (**Source Code: EU34**) to the following criteria:
[391-3-1-.02(2)(mmm)7]
- a. Operate only when electric power from the local utility is not available, operates for routine maintenance and testing, and which operates less than 200 hours per year

For each emergency generator that cannot meet the definition of “Emergency standby stationary engine” found in Georgia Rule 391-3-1-.02(2)(mmm)4(i), the Permittee shall not discharge, or cause the discharge, into the atmosphere, from each engine, any gases which contain nitrogen oxides (NO_x) in excess of 80 ppm at 15% oxygen, dry basis, during the ozone season. For purposes of this permit, the ozone season is defined as the time period beginning May 1 and ending September 30.

Condition 2.6 was modified to correct a reference in subparagraph (c).

The Permittee shall operate the black start engine (Source Code: EU34) according to the requirements specified below. Any operation other than emergency operation, maintenance check and readiness testing, and other non-emergency operation, as described below, is prohibited:
[40 CFR 60.4243(d)]

- a. There is no time limit on the use of emergency stationary ICE in emergency situations.
- b. The emergency generator may be operated for maintenance checks and readiness testing for a maximum of 100 hours per calendar year. The Permittee may petition the Division for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- c. The emergency generator may be operated for a maximum of 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing specified in Paragraph b. Except as provided in **Condition 2.6.c.i**, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Condition 2.15 is new and sets a NO_x emission limit to VoltaGrid ATL-1 EGU (AIRS: 217-00080) and ATL2 Data Center (AIRS: 217-00079) combined as a single, minor NSR site.

- 2.15 The combination of VoltaGrid EGU-1 (AIRS: 217-00080) and ATL2 Data Center (AIRS: 217-00079) shall not discharge or cause the discharge into the atmosphere any gases that contain NO_x emissions in excess of 99.0 tons per 12 consecutive month period.
[Avoidance of Title V]**

Condition 2.16 is new and defines the NO_x emission limit for VoltaGrid ATL-1 EGU. VoltaGrid is limited by the 99.0 tpy limit of Condition 2.15 and by the actual emissions of ATL2 which have contributed to the 99.0 tpy.

- 2.16 The Permittee shall not discharge or cause the discharge into the atmosphere any gases which contain NO_x emissions in excess of the quantity determined by the following equation for each rolling 12 consecutive month period:
[Title V Avoidance]**

$$E_{VoltaGrid} = 99.0 - E_{ATL2}$$

Where:

$E_{VoltaGrid}$ = Maximum allowable emissions from VoltaGrid ATL-1 EGU (AIRS: 217-00080) for that rolling 12 consecutive month period, in tons
99.0 = NO_x emission limit for the combination of VoltaGrid ATL-1 EGU (AIRS: 217-00080) and ATL2 Data Center (AIRS: 217-00079), in tons
 E_{ATL2} = Actual emissions emitted by ATL2 Data Center during the same 12 consecutive month period, in tons

Condition 2.17 is new and limits the total hours of operation of the generators (Source Codes: EU1 through EU33) to ensure formaldehyde remains below the long-term AAC, as requested by the facility.

- 2.17 The Permittee shall limit the hours of operation of the generators (Source Codes: EU1 through EU33) to 262,800 hours per 12 consecutive month period.
[Avoidance of Air Toxics]**

Condition 2.18 is new and limits the number of generators (Source Code: EU1 through EU33) allowed to be operated at any one time to ensure formaldehyde remains below the long-term AAC, as requested by the facility.

- 2.18 The Permittee shall not operate more than 30 generators (Source Codes: EU1 through EU33) at any one time.
[Avoidance of Air Toxics]**

Condition 5.1 was modified to include a system to monitor the number of generators (Source Code: EU1 through EU33) operating at any one time. Correction to the Source Codes of the fuel gas heaters was also made.

- 5.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall**

meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. A non-resettable hour meter on the black start engine (Source Code: EU34) [40 CFR 60.4245(b)]
- b. A system to monitor and record the hours of operation of each generator (Source Codes: EU1 through EU33) and the operation condition (i.e. startup or steady state)
- c. A system to monitor and record the hours of operation of the fuel gas heaters (**Source Codes: EU35 and EU36**)
- d. A system to monitor and record the hours of operation of the temporary engines (Source Codes: TEMPGEN1 through TEMPGEN5)
- e. **A system to determine and record the number of generators (Source Code: EU1 through EU33) in operation at any one time.**

Condition 7.5 was modified to change the reference from Condition 6.2 to Condition 6.3

- 7.5 If the Permittee does not meet the requirements of Condition 7.4, the Permittee shall keep a maintenance plan and records of conducted maintenance and must maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. The Permittee shall conduct the performance testing required in **Condition 6.3**. [40 CFR 60.4243(b)(2)(ii)]

Condition 7.11 is new and determines the total monthly NO_x emissions from the generators, black start engine, and fuel gas heaters.

- 7.11 The Permittee shall determine the total monthly NO_x emissions from the generators (Source Codes: EU1 through EU33), the black start engine (Source Codes: EU34), and the fuel gas heaters (Source Codes: EU35 and EU36) using the records of Condition 5.1. Monthly emissions shall be calculated using the following equations: [391-3-1-.02(6)(b)1]**

For monthly emissions from the generators (Source Codes: EU1 through E33):

$$E_j = \frac{EF_{steady,j} \times t_{steady,j}}{2000} + \frac{EF_{startup,j} \times n_{startup}}{2000}$$

Where:

- | | |
|-----------------------------|--|
| E_j | = monthly emissions from generator <i>j</i>, in tons |
| j | = individual unit of the 33 generators |
| EF_{steady} | = emission factor while in steady state, in lb/hr, as found in Table 7.11 |
| t_{steady} | = monthly operating time while in steady state, in hr |
| 2000 | = conversion factor from pounds to tons |
| EF_{startup} | = emission factor while in startup, in lb/event, as found in Table 7.11 |
| n_{startup} | = number of startup events per month |

For monthly emissions from black start engine (Source Codes: EU34), the fuel gas heaters (Source Codes: EU35 and EU36), and temporary engines (Source Codes: TEMPGEN1 through TEMPGEN5):

$$E_j = \frac{EF_j \times t_j}{2000}$$

Where:

E_j = monthly emissions from emission unit j , in tons
 EF_j = emission factor of emission unit j , in lb/hr, as found in Table 7.11
 T_j = monthly operating time of emission unit j , in hr
 2000 = conversion factor from pounds to tons

For the total monthly NO_x emissions from all emission sources:

$$E_m = \sum_{j=1}^n E_j$$

Where:

E_m = total monthly emissions from all emission sources, in tons
 j = individual emission unit number
 E_j = total monthly emissions from emission source j , in tons
 n = total number of emission units, 36 (41 including the temporary engines)

Table 7.11 – NO_x Emission Factors

Source Code	Operating Condition	NO _x Emission Factor, per engine (lb/hr)
EU1 through EU33	Startup mode	0.75
	Steady State mode	0.18
EU34	--	0.13
EU35 and EU36	--	0.05
TEMPGEN1 through TEMPGEN5	--	8.00

The Permittee shall notify the Division if the monthly emissions exceed the amount quantified by the following equation for each calendar month. This notification shall include an explanation of how the Permittee intends to maintain compliance with the emission limits in Conditions 2.15 and 2.16.

$$E_{monthly} = \frac{99.0 - E_{ATL2}}{12}$$

Where:

$E_{monthly}$ = Maximum monthly emissions before notification is required, in tons
 99.0 = NO_x emission limit for the combination of ATL2 Data Center (AIRS: 217-00079) and VoltaGrid ATL-1 EGU (AIRS: 217-00080), in tons
 E_{ATL2} = Actual emissions from ATL2 Data Center (AIRS: 217-00079) from the last 12 consecutive month period, in tons
 12 = Conversion, from yearly to monthly

Condition 7.12 is new and determines the 12 consecutive month period total of NO_x emission to demonstrate compliance with Condition 2.16.

7.12 The Permittee shall use the records calculated in Condition 7.11 to determine the 12 consecutive month period total NO_x emissions for each calendar month.
[391-3-1-.02(6)(b)1]

Condition 7.13 is new and determines the 12 consecutive month period total of NO_x emissions from the combination of VoltaGrid and ATL2 to demonstrate compliance with Condition 2.15.

7.13 The Permittee shall use the records required in Condition 7.12 and records from ATL2 Data Center (AIRS: 217-00079) to determine the 12 consecutive month period total NO_x emissions from the two facilities for each calendar month.
[391-3-1-.02(6)(b)1]

Condition 7.14 is new and determines the monthly total operating hours of all generators, using records from Condition 5.1b. This condition requires notification if the facility operates all the generators more than 1/12 of the limit established in Condition 2.17 in a single month (262,800 hours per year/12 months = 21,900 hours per month) as a safeguard to ensure the facility is not on pace to exceed the limitation and to provide ample time to make any necessary corrections.

7.14 The Permittee shall use the records required in Condition 5.1b to calculate the monthly total operating hours for all generators (Source Code: EU1 through EU33) for each calendar month. The Permittee shall notify the Division in writing if the monthly total of operating hours is equal to or exceeds 21,900 hours per month. This notification shall include an explanation of how the Permittee intends to maintain compliance with limitations of Condition 2.17.
[391-3-1-.02(6)(b)1]

Condition 7.15 is new and determines the 12 consecutive month period total of operating hours of all generators, using records from Condition 7.14 to demonstrate compliance with Condition 2.17.

7.15 The Permittee shall use the records required in Condition 7.14 to calculate the 12 consecutive month period total of operating hours for each calendar month.
[391-3-1-.02(6)(b)1]

Condition 7.15 is new and requires notification whenever more than 30 generators are in operation at any one time, not complying with Condition 2.18.

7.16 The Permittee shall submit a notification if the Permittee operates more than the number of generators (Source Code: EU1 through EU33) specified in Condition 2.18 within 15 days.
[391-3-1-.02(6)(b)1]