



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: TADG – ATL02 / Ellenwood

Facility Address: 4350 E Tanners Church Rd
Ellenwood, Georgia 30294 Clayton County

Mailing Address: 19775 Belmont Executive Plaza
Ashburn, Virginia 20147

Facility AIRS Number: 04-13-063-00154

is issued a Permit for the following:

Construction and operation of a data center consisting of emergency standby stationary generators. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 30104 dated March 11, 2026; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 1 pages.



DRAFT

Jeffrey W. Cown, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not emit nitrogen oxides (NO_x) in an amount greater than 99 tons during any consecutive twelve-month period from all emergency generators at the facility.
[Avoidance of 40 CFR Part 70]
- 2.2 The Permittee shall comply with all applicable provisions of the New Source Performance Standards as found in 40 CFR 60, Subpart A "General Provisions" and 40 CFR 60, Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" for the operation of the emergency generators, as applicable.
[40 CFR 60 Subparts A and IIII]

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- 2.3 The Permittee shall fuel the emergency generators subject to 40 CFR 60 Subpart IIII with distillate fuel oil that has a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent.
[40 CFR 60.4207(b), 40 CFR 1090.305, and 391-3-1-.02(2)(g) (subsumed)]
- 2.4 The Permittee shall not discharge or cause the discharge into the atmosphere from the diesel-fired emergency generators any 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 an amount exceeding the emissions standards specified in 40 CFR 60.4205(b), as indicated in Table 2.4-1:
[40 CFR 60.4205(b), 40 CFR 60.4202(b)(2), and 40 CFR 1039, Appendix I(b)]

Table 2.4-1: NSPS 40 CFR Part 60. Subpart IIII Emission Standards For all Stationary 2007 and later Model Year Diesel Engines with A Displacement Of Less Than 30 Liters Per Cylinder And Maximum Engine Power Of Larger Than 560 kW, with emission limits in terms of g/kW-hr (lb/HP-hr)

Pollutant →	NO _x + NMHC	CO	PM
Emission Limit →	6.4 (0.0105)	3.5 (0.00575)	0.20 (3.29X 10 ⁻⁴)

- 2.5 The Permittee shall operate the emergency generators according to the requirements specified below. Any operation other than emergency operation, maintenance check and readiness testing, as described below, is prohibited:
[40 CFR 60.4211(f)]
- a. There is no time limit on the use of emergency stationary ICE in an emergency situation.
 - b. The emergency generators 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 generators 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 2.5.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 a another entity.
 - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all the following conditions are met:

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- (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (E) The Permittee identifies and records the entity that dispatches the engine and the specific NERC, Regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
- 2.6 The Permittee shall not discharge into or cause the discharge into the atmosphere from the emergency generators, any visible emissions the opacity of which 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 per 40 CFR 1039.105(b).
[40 CFR 60.4205(b), 40 CFR 1039.105(b), 40 CFR 60.4202(b), and 391-3-1-.02(2)(b)1 (subsumed)]
- 2.7 The Permittee shall comply with the emission standards in Condition 2.4 and 2.6 by purchasing an engine certified to the emission standards for the model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's emission-related specifications.
[40 CFR 60.4211(c)]
- 2.8 The Permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for the operation of the emergency generators.
[40 CFR 63, Subparts A and ZZZZ]
- 2.9 The Permittee shall not discharge into or cause the discharge into the atmosphere from the emergency generators, any visible emissions the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)(1)]

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2.10 Fuel oil fired in the emergency generators shall be distillate fuel oil. Distillate fuel oil means fuel oil that complies with the specifications for fuel oil number 1 or 2 as defined by the American Society for Testing and Materials (ASTM) standard ASTM D396, "Standard Specifications for Fuel Oils."
[391-3-1-.03(2)(c)]

2.11 The Permittee must operate the emergency generators only when electric power from the local utility is not available and for less than 200 hours per year.
[391-3-1-.02(2)(mmm)7]

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, the Permittee shall not discharge, or cause the discharge, into the atmosphere, from each engine, any gases which contain nitrogen oxides (NOx) 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.

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne. Some reasonable precautions which could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]

- a. Use, where possible, water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or clearing of land
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles and other surfaces which can give rise to airborne dusts.
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting, or other similar operations.
- d. Covering, at all times when in motion, open bodied trucks, transporting materials likely to give rise to airborne dusts.
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

3.2 The percent opacity from any fugitive dust source listed in Condition 3.1 shall not equal or exceed 20 percent.
[391-3-1-.02(2)(n)]

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4. Process & Control Equipment

- 4.1 Each of the emergency generators shall be operated and maintained according to the manufacturer's emission-related written specifications/instructions or procedures developed by the Permittee that are approved by the engine manufacturer, over the entire life of the engine. In addition, the Permittee shall only change those emission-related settings that are permitted by the manufacturer.
[40 CFR 60.4211(a)]

5. Monitoring

- 5.1 Any monitoring system installed by the Permittee shall be in continuous operation except during calibration checks, zero and span adjustments, or periods of repair. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]
- 5.2 The Permittee shall install, calibrate, maintain, and operate a system to monitor and record the indicated parameters on each emergency generator. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[40 CFR 60.4209(a), 40 CFR 63.6625(f), and 391-3-1-.02(6)(b)1]
- a. A non-resettable hour meter to continuously record and track the hours operated during emergency service and the hours operated in non-emergency service (maintenance and/or testing).
 - b. A system to record the reason the engine was in operation during emergency and/or nonemergency service, and to record the cumulative total hours of emergency operation and non-emergency operation.
 - c. A system to monitor the generator output load (in kilowatts electric, KWe) from each emergency generator. Data shall be recorded at least each hour the generator is operated. The generator output data shall be used to determine the average monthly measured operating load from each emergency generator.

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- 5.3 The Permittee shall operate and maintain emergency generators, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction. The Permittee must monitor continuously at all times each emergency generator is operating, except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities.

A monitoring malfunction is defined as any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not considered to be malfunctions. data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities may not be used in data averages and calculations used to report emission or operating levels. The Permittee must, however, use all the valid data collected during all other periods.
[40 CFR 63.6605(b) and 40 CFR 63.6635(b) and (c)]

- 5.4 The Permittee shall verify that each shipment of diesel fuel oil received for combustion in each emergency generator is distillate oil, No. 2 fuel oil, No. 2 diesel fuel oil or very low sulfur diesel fuel oil and that the oil complies with the requirements of Condition 2.3. Verification shall consist of either of the following:

[391-3-1-.02(6)(b)1]

- a. Fuel oil receipts obtained from the fuel supplier certifying that the oil is distillate oil, No. 2 fuel oil, No. 2 diesel fuel oil, or very low sulfur diesel fuel oil. Fuel supplier certification shall include the following information: (1) the name of the oil supplier and (2) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate fuel oil; or
- b. Analysis of the fuel oil conducted by methods sampling and analysis, which have been specified or approved by the Division.

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
- b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit

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the test and shall provide with the notification a test plan in accordance with Division guidelines.

- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

- 6.2 If the Permittee does not install, configure, operate, and maintain the engine and any associated control device, if applicable according to the manufacturer's emission-related written instructions, or the Permittee changes emission-related settings in a way that is not permitted by the manufacturer, the Permittee must demonstrate compliance as follows:
[40 CFR 60.4211(g)]

- a. The Permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. The Permittee must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter, to demonstrate compliance with the applicable emission standards.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall submit written notification of the startup of the facility to the Division within 15 days after such date. The notification shall be submitted to:

Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354

- 7.2 The Permittee shall maintain monthly operating records for each emergency generator in emergency and non-emergency service, as recorded on the non-resettable hour meter required for each generator in Condition 5.2. The Permittee shall record the time of operation of the engine, including readiness testing and/or maintenance checks, operational load, and the reason the engine was in operation during that time. Records shall be maintained for a period of five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record in a format suitable for inspection by or submission to the Division.
[40 CFR 63.6660, 40 CFR 60.4214(b), and 391-3-1-.02(6)(b)1]

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- 7.3 The Permittee shall use monthly operating time data required by Condition 7.2 to calculate monthly the twelve-month rolling total of operating time for each emergency generator for each consecutive twelve-month period. All the calculations shall be kept as part of the records required in Condition 7.2. The Permittee shall notify the Division in writing within 15 days if the twelve-month rolling total operating time for any emergency generator equals or exceeds 200 hours. This notification shall include an explanation of how the Permittee intends to comply with Condition 2.11.
[391-3-1-.02(2)(mmm)7 and 391-3-1-.02(6)(b)1]
- 7.4 The Permittee shall use monthly non-emergency service operating time records required by Condition 7.2 to calculate monthly the twelve-month rolling total of the non-emergency service operating time for each emergency generator for each consecutive twelve-month period. All the calculations shall be kept as part of the records required in Condition 7.2. The Permittee shall notify the Division in writing within 15 days if the twelve-month rolling total of non-emergency service operating time for any generator equals or exceeds 100 hours. This notification shall include an explanation of how the Permittee intends to comply with Condition 2.5.
[40 CFR 60.4211(f)(3) and 40 CFR 63.6640(f)]
- 7.5 The Permittee shall maintain a copy of the manufacturer's written operating and maintenance instructions or operating and maintenance procedures developed by the Permittee that are approved by the engine manufacturer for the emergency generators. These records shall be maintained in a format suitable for inspection or submittal.
[40 CFR 60.4211(a)]
- 7.6 The Permittee shall keep records verifying that each shipment of diesel fuel received for firing in the emergency generators complies with the applicable requirements in Condition 2.3. Verification shall consist of either the fuel oil receipts and/or fuel supplier certifications or results of analyses of the fuel oils conducted by method of sampling and analysis which have been approved by the EPA or the Division.
[391-3-1-.02(6)(b)1]
- 7.7 The Permittee shall demonstrate compliance with emission standards specified in 40 CFR 60, Subpart IIII for the emergency generators by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. These records shall be maintained in a format suitable for inspection or submittal.
[40 CFR 60.4211(c)]

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- 7.8 The Permittee shall use the operational data (hours and load) measured and recorded per Condition 7.2 and calculate monthly NO_x emissions, each calendar month, from all emergency generators. All demonstration calculations shall be kept as part of the records required by Condition 7.2. The Permittee shall notify the Division in writing within 15 days if the monthly total combined NO_x emissions for the emergency generators exceeds 8.25 tons during any calendar month. This notification shall include an explanation of how the Permittee intends to maintain compliance with the emission limits in Condition 2.1. Monthly NO_x emissions from the facility shall be determined using the following equation:
[391-3-1-.02(6)(b)1 and Avoidance of 40 CFR Part 70]

Total Monthly NO_x Emissions (tons/month):

$$E_j = \sum_{i=10\%}^{100\%} \frac{ER_i \times t_i}{2000}$$

Where:

E_j = Monthly NO_x emissions from emergency generator j (tons)

i = Engine load during operation (10%, 25%, 50%, 75%, 100%). If the measured operating load during any reporting period exceeds a load level specified in Table 1, the test data (emission factor and engine power) corresponding to the next highest load level shall be used; if no test data is available for load levels below 100%, the test data for 100% load shall be used.

ER_i = NO_x emission rate from generator at load i (lb/hr)

t_i = Operating time at load i per month (hr)

2000 = Conversion from pounds to tons

Load Condition	100%	75%	50%	25%	10%
Engine Power (kW)	784	588	392	196	78
NO _x Emission Rate (lb/hr)	10.55	7.46	4.81	2.22	0.90

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

Where:

E_m = Total monthly NOx emissions from all emergency generators (tons)

j = Each individual emergency generator

n = Total number of emergency generators

E_j = Monthly NOx emissions from emergency generator j (tons)

7.9 The Permittee shall use the monthly records required in Condition 7.8 to calculate the twelve-month rolling total of NOx emissions from the facility for each calendar month. All the calculations shall be kept as part of the records required in Condition 7.2. The Permittee shall notify the Division in writing within 15 days if any of the twelve-month rolling total of the NOx emissions exceeds 99 tons for the emergency generators. This notification shall include an explanation of how the Permittee intends to attain future compliance with the NOx emission limits in Condition 2.1.
[Avoidance of 40 CFR Part 70]

7.10 If the Permittee operates the emergency generators as specified in Condition 2.5.c.i. the Permittee shall submit an annual report according to the following requirements:
[40 CFR 60.4211(a), 40 CFR 63.6650(h), and 40 CFR 60.4214(d)]

a. The report must contain the following information:

- i. Company name and address where the engine is located.
- ii. Date of the report and beginning and ending dates of the reporting period.
- iii. Engine site rating and model year.
- iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
- v. Hours operated for the purposes specified in Condition 2.5.c., including the date, start time, and end time for engine operation for the purposes specified in Condition 2.5.c. The Report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

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- vi. If there were no deviations from the fuel requirements in Conditions 2.3 and 2.10 that apply to the engine, a statement that there were no deviations from the fuel requirements during the reporting period.
- vii. If there were deviations from the fuel requirements in Conditions 2.3 and 2.10 that apply to the engine, information on the number, duration, and cause of deviations, and the corrective action taken.
- b. The annual reports must be submitted no later than March 31 of the following calendar year of record.
- c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Division.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."