

NARRATIVE

TO: Cynthia Dorrough
FROM: Bradley Prinsen
DATE: August 8, 2025

Facility Name: **DCB Atlanta West, LLC**
AIRS No.: 097-00102
Location: Douglasville, GA (Douglas County)
Application #: 29723
Date of Application: May 28, 2025

Background Information

DCB Atlanta West, LLC proposes to construct a datacenter on a greenfield site at 1701 North River Rd Douglasville, Georgia (Douglas County). Douglas County is currently designated as an attainment area for all criteria pollutants. The facility will be developed to include two (2) buildings for IT infrastructure/support systems and consisting of a total of seventy-six (76) emergency generators to ensure continuous operation of the data center during power outages. Initial site work began in January 2024, with building construction scheduled to begin in May 2027 following permit issuance.

Purpose of Application

DCB Atlanta West, LLC submitted permit application No. 29723, dated May 23, 2025, for the construction and operation of sixty (60) generators sized at 3.0 MW each, and sixteen (16) generators sized at 2.5 MW to be located at a proposed data center in Douglasville, Georgia. 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 proposes a site-wide diesel fuel consumption limit of 745,286 gallons per any consecutive 12-month period to keep NO_x and SO₂ emissions below 99.9 tpy.

Building 1 will house twenty (20) 3.0 MW generators and six (6) 2.5 MW generators. Fourteen (14) generators are expected to be installed in November 2025, followed by approximately six (6) additional generators per quarter until all twenty-six (26) units are operational, anticipated by September 2026. Building 2 will contain forty (40) 3.0 MW generators and ten (10) 2.5 MW generators. The first two (2) units are planned for December 2026, with the remainder installed every two to three months until December 2027 completion.

A public advisory was issued due to the construction of new emissions units, and the public advisory period ended July 7, 2025. The Division received comments from Sierra Club on July 7, 2025.

Equipment List

Source Code	Capacity (MMBtu/hr)	Descriptions	Installation Phase	Applicable Requirements
EG01	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Nov. 2025	40 CFR 60 Subpart A 40 CFR 60 Subpart III 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)
EG02	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Nov. 2025	
EG03	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Nov. 2025	
EG04	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Nov. 2025	
EG05	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG06	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG07	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG08	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG09	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG10	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG11	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG12	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG13	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG14	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Nov. 2025	
EG15	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Jan. 2026	
EG16	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Jan. 2026	
EG17	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Jan. 2026	
EG18	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Jan. 2026	
EG19	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Jan. 2026	
EG20	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Jan. 2026	
EG21	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	April 2026	
EG22	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	April 2026	
EG23	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	April 2026	
EG24	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	April 2026	
EG25	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	April 2026	
EG26	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	April 2026	
EG27	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Dec. 2026	
EG28	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Dec. 2026	
EG29	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	March 2027	
EG30	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	March 2027	
EG31	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG32	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG33	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG34	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	

Source Code	Capacity (MMBtu/hr)	Descriptions	Installation Phase	Applicable Requirements
EG35	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG36	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG37	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG38	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG39	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG40	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	March 2027	
EG41	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	May 2027	
EG42	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	May 2027	40 CFR 60 Subpart A 40 CFR 60 Subpart III 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)
EG43	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG44	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG45	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG46	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG47	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG48	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG49	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG50	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG51	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG52	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	May 2027	
EG53	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	June 2027	
EG54	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	June 2027	
EG55	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG56	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG57	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG58	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG59	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG60	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG61	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG62	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG63	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG64	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	June 2027	
EG65	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Aug. 2027	
EG66	9.27	Caterpillar 3516C Emergency Diesel Generator (2.5 MW)	Aug. 2027	
EG67	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG68	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG69	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG70	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	

Source Code	Capacity (MMBtu/hr)	Descriptions	Installation Phase	Applicable Requirements
EG71	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	40 CFR 60 Subpart A 40 CFR 60 Subpart III 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)
EG72	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG73	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG74	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG75	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	
EG76	11.2	Caterpillar 3516E Emergency Diesel Generator (3.0 MW)	Aug. 2027	

Storage Tanks

Source Code	Capacity Per Tank (Nominal/Usable)	Contents	Installation Date	True Vapor Pressure (psia)
Day Tanks (7 units)	9,943 gal/ 9,900 gal	Diesel (No. 2 Distillate Fuel Oil)	Nov 2025 – Aug 2027	0.02
Day Tanks (53 units)	6,403 gal/ 5,126 gal	Diesel (No. 2 Distillate Fuel Oil)	Nov 2025 – Aug 2027	0.02
Day Tanks (16 units)	6,403 gal/ 5,126 gal	Diesel (No. 2 Distillate Fuel Oil)	Nov 2025 – Aug 2027	0.02

Emissions Summary

Emissions for the DCB Atlanta West facility were calculated based on the proposed installation of seventy-six (76) Tier 2-compliant diesel-fired emergency generators, consisting of sixty (60) 3.0-megawatt (MW) units and sixteen (16) 2.5-MW units. The applicant is requesting an enforceable site-wide fuel consumption limit of 745,286 gallons during in 12 consecutive month period. This limit is intended to ensure the facility maintains synthetic minor source status and avoids applicability of Title V permitting requirements.

To calculate potential emissions, all emergency generators are conservatively represented as 3.0-megawatt (MW) units operating at 100% load. Maximum hourly emission rates (lb/hr) were developed from manufacturer/AP-42 factors for each pollutant. Enforceable facility-wide potential emissions are calculated from the site-wide diesel fuel limit of 745,286 gallons per any 12-month period, using pollutant-specific per-gallon emission factors (lb/gal) and converting to tpy.

Emission factors for criteria pollutants (nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM₁₀/PM_{2.5}, and volatile organic compounds (VOCs)) were taken from manufacturer-provided engine performance data. Sulfur dioxide (SO₂) emissions were estimated based on emission factors from U.S. EPA's AP-42, Tables 3.4-1, "Large Stationary Diesel and All Stationary Dual-Fuel Engines," and diesel sulfur content with a maximum sulfur concentration of 15 parts per million (ppm) by weight in accordance with AP-42 Section 3.4 guidance. Emission factors for hazardous air pollutants (HAPs) and greenhouse gases (GHGs) were taken from AP-42 Tables 3.4-3 and 3.4-4 and the U.S. EPA's Greenhouse Gas Emissions and Sinks guidance. The Division has confirmed the applicant's PTE calculations and example calculations for NO_x and SO₂ are provided below.

Facility-Wide Emissions
(in tons per year)

Pollutant	Enforceable Facility-Wide Potential Emissions¹
PM/PM ₁₀ /PM _{2.5}	0.88
NO _x	99.5
SO ₂	25.79
CO	11.66
VOC	0.71
Max. Individual HAP	0.04
Total HAP	0.08
Total GHG (if applicable)	8,351.5

PTE based on Site-wide Fuel Limit (tpy):

- NO_x PTE (tpy):

Potential Emissions (tpy) = Emissions Factor (lb/gal) × Fuel Limit (gal/yr) ÷ 2000 lb/ton

Emissions Factor = 0.267 lb/gal
Fuel Limit = 745,286 gal/yr

$$0.267 \text{ lb/gal} \times 745,286 \text{ gal/yr} \div 2000 \text{ lb/ton} = \underline{99.5 \text{ tpy of NO}_x}$$

- SO₂ PTE (tpy):

Potential Emissions (tpy) = Emissions Factor (lb/gal) × Fuel Limit (gal/yr) ÷ 2000 lb/ton

Emissions Factor = 0.0692 lb/gal
Fuel Limit = 745,286 gal/yr

$$0.0692 \text{ lb/gal} \times 745,286 \text{ gal/yr} \div 2000 \text{ lb/ton} = \underline{25.79 \text{ tpy of NO}_x}$$

¹ Enforceable Facility-Wide Potential Emission calculations are based a site-wide fuel usage of 745,286 gallon/year

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 whose nameplate capacity is greater than or equal to 100 kilowatts (kWe) and is less than or equal to 25 megawatts (MWe), to less than 80 ppm at 15% O₂, dry basis for stationary engines installed or modified on or after April 1, 2000.

DCB Atlanta West proposes to construct and operate generators with a nameplate capacity of 2.5 and 3.0 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 one (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 purchase 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. Douglas 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 Rule (yy) 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 Douglas County, the potential NO_x emissions cannot exceed 25 tons per year without submitting a demonstration of appropriate RACT to the Division for approval.

Potential NO_x emissions from the facility will exceed 25 tons per year, however 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 Douglas 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 tpy for criteria pollutants, unless the source category is listed specifically in 40 CFR 52.21 as having a lower 100 tpy threshold. Data centers are not on the list of 28 categories detailed in 40 CFR 52.21 with a lower threshold of 100 tpy for criteria pollutants. Because uncontrolled NO_x potential emissions exceed the PSD major-source threshold (250 tpy), an enforceable 745,286-gallon site-wide fuel consumption limit in any consecutive twelve (12)-month period will keep facility-wide PTE below 250 tpy.

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.

DCB Atlanta West, LLC 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. DCB Atlanta West operates a compression ignition internal combustion engine manufactured after April 1, 2006, solely for use as an emergency generator. 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”

You are subject to this subpart if you own or operate 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 limits the site-wide fuel consumption for all emergency generators to 745,286 gallons in any rolling 12-month period to keep NO_x and SO₂ PTE below major-source thresholds and avoid 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 outlines the limits for diesel generators emissions of non-methane hydrocarbons and nitrogen oxides (NMHC+NO_x), carbon monoxide (CO), and particulate matter (PM) in accordance with 40 CFR 60 Subpart IIII.

Permit Condition 2.4 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 2.5 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 2.6 requires the facility to purchase emission standard, certified engines, which must be installed/configured according to manufacturer's specifications.

Permit Condition 2.7 requires the Permittee to operate the emergency generators in accordance with the requirements outlined in 40 CFR 60.4211(f).

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.

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 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 continuous monitoring system or device 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 keeping the manufacturer's Subpart IIII certification and O&M instructions for each generator. Records shall be maintained for a 5-year period.

Permit Condition 7.3 requires verification for each diesel shipment to demonstrate compliance with Condition 2.5.

Permit Condition 7.4 requires monthly records of all fuel burned in the emergency generators, including supplier certifications/analyses. Records must be kept for a 5-year period.

Permit Condition 7.5 requires the Permittee to use the monthly records in Condition 7.4 to calculate and record the 12-month rolling diesel fuel total, and to notify the Division in writing within 15 days if the rolling total equals or exceeds 745,286 gallons.

Permit Condition 7.6 requires the Permittee to maintain monthly emergency and non-emergency operating records for each generator using the non-resettable hour meter. The Permittee must record the time and reason for operation, retained for five years.

Permit Condition 7.7 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 5 years.

Permit Condition 7.8 requires the Permittee to calculate and record monthly the 12-month rolling operating time for each emergency generator (using data from Condition 7.5) and notify the Division in writing within 15 days if any generator's rolling total equals or exceeds 500 hours, including how the Permittee will comply with Condition 2.11.

Permit Condition 7.9 requires the Permittee to calculate monthly the 12-month rolling non-emergency operating time for each generator using Condition 7.5 records. The Permittee must notify the Division in writing within 15 days if any unit reaches or exceeds 100 hours, including how it will comply with Condition 2.7.

Permit Condition 7.10 requires an annual report (when operating under 2.7.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 7.11 requires the Permittee to demonstrate compliance with Condition 2.4 by complying with the options outlined in 40 CFR 60.4211 (i.e., Part 1039-certified engines, Subpart IIII performance testing, or manufacturer data).

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 emergency diesel generators at the facility have the potential to emit various Toxic Air Pollutants (TAPs), including benzene, toluene, xylene, formaldehyde, acetaldehyde, acrolein, and naphthalene. Georgia's Ambient Impact Assessment Guideline for TAPs provides each pollutant with an Acceptable Ambient Concentration (AAC) and a corresponding Minimum Emission Rate (MER) screening threshold. If a facility's annual emissions of a given TAP exceed its MER, a modeling analysis is required to demonstrate compliance with the AAC.

In this case, the projected emissions of all evaluated TAPs were compared against their respective MERs, as required under Georgia EPD guidelines. Of the TAPs assessed, benzene exceeded its MER, thereby requiring further analysis through air dispersion modeling. All other TAP emissions were below their respective MER thresholds and did not necessitate additional modeling. See Table 1 below for a comparison of the facility's TAP emissions to their respective MERs.

Table 1: Comparison of Facility TAP Emissions to Georgia MERs

Pollutant	PTE – based on fuel limit of 745,286 (gal/yr) (lb/yr)	GA MER (lb/yr)	Above MER
Benzene	78.97	3.16E+01	Yes
Toluene	28.68	1.22E+06	No
Xylenes	19.67	2.43E+04	No
Formaldehyde	8.05	2.21E+01	No
Acetaldehyde	2.57	1.11E+03	No
Acrolein	0.80	8.51E+01	No
Naphthalene	13.26	7.30E+02	No
Total HAP	151.98	5.00E+4	No

Benzene Dispersion Modeling Analysis

As shown in the table above, benzene exceeds the MER. The analysis followed Georgia EPD's tiered modeling approach, beginning with a conservative screening model. The U.S. EPA's SCREEN3 dispersion model was used to predict benzene concentrations from the generators. For all seventy-six (76) engines, TAP emissions were developed using a 745,286 gal/yr fuel limit, which is based on the site-wide diesel fuel limit requested by the facility. In accordance with guidance, the modeling was performed for a representative "worst-case" unit configuration—effectively, the generator with the highest potential ground-level impact—using a standardized unit emission rate (1 g/s) to provide a screening estimate of off-site concentration per unit emission.

Benzene has AAC limits for both short-term (15-minute) and long-term (annual) exposure periods. Since the emergency generators will not operate continuously (they are limited to infrequent use), the modeling had to account for their intermittent operation. Separate emission scenarios were evaluated for short-term and long-term impacts:

- **Short-term (acute):** A 15-minute averaging period was considered to capture a worst-case emergency run scenario. For this, a conservative assumption is that generators could operate at full load during a short timeframe. The SCREEN3 model was used to predict the highest 15-min average benzene concentration at the facility's fence line (using appropriate adjustment factors for a 15-min period). This short-term modeling assumes a peak emission rate during the generator run and yields the maximum expected 15-min benzene concentration in ambient air.
- **Long-term (chronic):** An annual averaging period was evaluated to ensure that even infrequent generator usage will not lead to an excessive annual average benzene concentration. Given the generators are limited to a certain number of hours per year, the annual benzene emission was distributed over the year in the model. In practice, this means the effective annual emission rate for modeling was the total yearly benzene emission (based on the permitted hours/fuel use) spread out over 8760 hours. SCREEN3 was used with a scaled-down emission rate reflecting this intermittent operation, to predict the highest annual average benzene concentration off-site.

The facility's generators are arranged in multiple clusters (stacks associated with different buildings). The screening analysis considered each representative stack to find which location would produce the highest ground-level impact. In this case, one cluster of generators was found to have slightly less favorable dispersion (due to its stack and building configuration), and thus that group was used to estimate the worst-case concentration. By using the most limiting dispersion scenario, the analysis builds in a conservative margin.

Modeling Results and Compliance

The SCREEN3 dispersion modeling results for benzene indicated that predicted concentrations are below the allowable ambient limits. Specifically, the maximum 15-minute benzene concentration at or beyond the property boundary was roughly 0.013 (mg/m³), which is well under the short-term AAC of 1.6 mg/m³. Likewise, the maximum annual average benzene concentration was on the order of 0.001 mg/m³, which is below the annual AAC of 0.03 mg/m³. In other words, the worst-case modeled benzene impacts were within acceptable concentrations set by Georgia's guidelines, for both acute and chronic exposure periods. The 15-minute and annual benzene concentrations for each stack are shown in Table 2 below.

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

Stack #	15-minute (mg/m ³)	15-minute AAC	Impact?	Annual (mg/m ³)	Annual AAC	Impact?
Stack 1-2	0.013	1.6 mg/m ³	Acceptable	0.0011	0.03 mg/ m ³	Acceptable
Stack 3	0.013	1.6 mg/m ³	Acceptable	0.0011	0.03 mg/ m ³	Acceptable
Stack 4-5	0.012	1.6 mg/m ³	Acceptable	0.0010	0.03 mg/ m ³	Acceptable
Stack 6	0.013	1.6 mg/m ³	Acceptable	0.0011	0.03 mg/ m ³	Acceptable

Because the screening-level analysis showed compliance with all AAC criteria, no further refined modeling was required. The benzene impact assessment using SCREEN3 is considered sufficient in this case – the predicted ambient levels are below the state’s acceptable thresholds, and the facility’s emissions meet the Georgia Air Toxics regulatory guidelines. In summary, while benzene emissions warranted a closer look due to exceeding the MER, the dispersion modeling demonstrated that the facility will not cause any exceedance of the AAC for benzene. All other TAPs were below their MER, and thus by definition will not exceed their respective AACs. This outcome confirms that the project complies with Georgia’s air toxics requirements, and no additional (refined) modeling or risk assessment for TAPs was necessary beyond this point.

Summary & Recommendations

I recommend that Permit No. 7374-097-0102-S-01-0 be issued to DCB Atlanta West, LLC for the construction and operation of seventy-six (76) new diesel-fired emergency generators at a proposed data center in Douglasville, Georgia. The facility will be classified as a synthetic minor source with respect to Title V by limiting NO_x and SO₂ emissions below major source thresholds. The Public Advisory period ended on July 7, 2025, with comments received from Sierra Club.

Addendum to Narrative

The 30-day public review started on December 15, 2025, and ended on January 16, 2026. Comments were received by the Division.

Permit Comments: Received Electronically by Terracon Consultants, Inc. on December 30, 2025

Comment 1:

Terracon noted a typographical error in the first sentence of Permit Condition 2.7. Specifically, the citation is listed as 40 CFR 60.421, but it should be 40 CFR 60.4211.

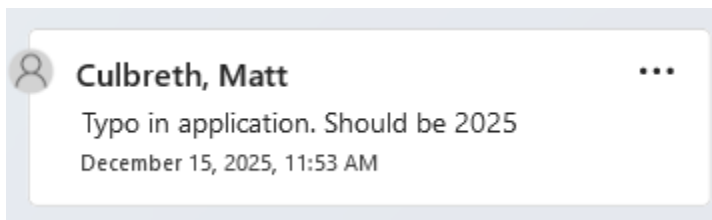
EPD Response to Comment 1:

The Division agrees with the comment and has corrected the citation in Permit Condition 2.7 to reference 40 CFR 60.4211.

Narrative Comments: Received Electronically by Terracon Consultants, Inc. on December 30, 2025

Comment 1:**Background Information**

DCB Atlanta West, LLC proposes to construct a datacenter on a greenfield site at 1701 North River Rd Douglasville, Georgia (Douglas County). Douglas County is currently designated as an attainment area for all criteria pollutants. The facility will be developed to include two (2) buildings for IT infrastructure/support systems and consisting of a total of seventy-six (76) emergency generators to ensure continuous operation of the data center during power outages. Initial site work began in January 2024, with building construction scheduled to begin in May 2027 following permit issuance. 

**EPD Response to Comment 1:**

The Division agrees with the comment and the construction date has been revised from “2027” to “2025” in the narrative.

Public Notice Period Comments Received by Sierra Club on January 16, 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 January 16, 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 is responsible for protecting Georgia's air quality through the regulation of emissions from industrial and mobile sources according to state and federal regulations. For this permit application, the use of diesel generators with the most stringent emissions control technology is not required by any State or Federal regulations, nor is it necessary to protect public health.

Comment No. 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.

APPENDIX A

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD



January 16, 2026

BY ELECTRONIC FILING

Air-Permits.Comments@dnr.ga.gov

Georgia Department of Natural Resources
Environmental Protection Division (EPD)
Air Protection Branch
4244 International Parkway, Suite 120,
Atlanta, Georgia 30354

Re: SIP Draft Air Permit - DCB Atlanta West Data Center

On behalf of its nearly 9,000 Georgia members, the Sierra Club submits these comments on EPD's Draft Permit allowing DC BLOX ("DCB") to install 76 diesel backup generators at its proposed Atlanta West data center. In these comments, Sierra Club argues that EPD should issue guidance suggesting that data centers like DCB Atlanta West install diesel generators with more stringent emissions control technology and consider the cumulative impacts that DCB Atlanta West's diesel generators will have on the greater metropolitan Atlanta area that already has at least 132 proposed or constructed data centers. The issues addressed below are based on publicly available materials, including the Application, and materials cited within this comment letter.

Comment No. 1: EPD should release guidance suggesting more stringent emissions control technology for diesel backup generators at data centers.

DCB plans to install 76 diesel generators at its Atlanta West data center, complying only with EPA's Tier 2 emissions standards.¹ To protect public health for Georgians, Georgia EPD should release guidance suggesting that data centers like DCB Atlanta West move beyond Tier 2 and, at a minimum, install selective catalytic reduction (SCR) technology on their diesel backup generators.

¹ DCB, SIP (Synthetic Minor) Air Permit Application (May 2025) at PDF 67.

Virginia is the state with the largest number of data centers in the country.² In 2025, Virginia’s Department of Environmental Quality (DEQ) released a guidance document recommending that data centers incorporate “controlled” generators (using SCR technology) into their backup generator mix.³ SCR technology significantly reduces air pollution from diesel generators, as shown in the table below:

Table 1: Engine Technology Hierarchy⁴

Table 1: Engine Technology Hierarchy				
Type	Classification		Maximum Operating Service	NO _x Emissions
	State	Federal		
DIESEL ENGINES				
Tier II	Emergency	Emergency	Limit all operation to less than major source levels	18.0 lb/MW
Tier II + SCR*	Non-emergency	Emergency	Limit all operation to less than major source levels	1.8 lb/MW
Tier IV	Non-emergency	Non-emergency	Limit all operation to less than major source levels	1.8 lb/MW
NATURAL GAS ENGINES				
EPA Compliant	Emergency	Emergency	Limit all operation to less than major source levels	6.0 lb/MW
EPA Compliant	Non-emergency	Non-emergency	Limit all operation to less than major source levels	3.0 lb/MW
EPA + Controlled	Non-emergency	Non-emergency	Limit all operation to less than major source levels	0.3-1.5 lb/MW
NATURAL GAS SIMPLE CYCLE COMBUSTION TURBINES				
Low-NOx	Non-emergency	Non-emergency	Limit all operation to less than major source levels	0.3-0.5 lb/MW
Low-NOx with SCR	Non-emergency	Non-emergency	Limit all operation to less than major source levels	0.1 lb/MW
*Where SCR = Selective Catalytic Reduction system = an active air pollution control system that reduces NOx emissions; a Tier II engine equipped with an add-on SCR is sometimes referred to as a "Tier IV equivalent" engine				

While Virginia’s guidance may be useful to facilities navigating the more stringent requirements of the Prevention of Significant Deterioration (PSD) program or the Nonattainment New Source Review (NNSR) (particularly where overlapping issues like generator emissions, source aggregation, or phased construction arise), the guidance applies to all data centers undergoing Virginia’s New Minor Source Review (mNSR) air permitting process.

² Joint Legis. Audit & Rev. Comm’n, Data Centers in Virginia (2024), <https://jlarc.virginia.gov/landing-2024-data-centers-in-virginia.asp#:~:text=Northern%20Virginia%20is%20the%20largest,of%20capacity%20in%20the%20Americas>.

³ Va Dep’t of Env’tl. Quality, Data Center Air Permit Guidelines (Jan. 17, 2025), <https://www.deq.virginia.gov/home/showpublisheddocument/27424> at 3 [hereinafter “Virginia DEQ Guidelines”].

⁴ *Id.* at 2.

Even though data centers in Northern Virginia “have predominantly employed Tier II diesel engine driven generator sets for backup power”, or precisely for that reason, DEQ issued its guidance that prioritizes cleaner technologies going forward.⁵ As DEQ states, the “lower NOx-emitting technologies also typically result in lower emission rates of other pollutants such as carbon monoxide and particulate matter.”⁶ DEQ recommends that “data center applicants consider backup power technologies with lower emissions”⁷ and suggests that “100% controlled generators” may be required.⁸

On December 29, 2025, Virginia DEQ issued a new guidance revision (“Guidance Revision”), defining presumptive Best Available Control Technology (BACT) for diesel backup generators under the Clean Air Act as “use of a selective catalytic reduction (SCR) system or equivalent for nitrogen oxides control, a diesel oxidation catalyst system or equivalent for carbon monoxide control and a diesel particulate filter (DPF) or equivalent for particulate matter control.”⁹ This means that Tier IV-equivalent controls are now the baseline expectation for any primary diesel generator, both emergency and non-emergency generators, seeking a permit in Virginia, and agencies may treat anything less as inadequate to meet BACT.

While EPD’s responses to Sierra Club’s previous data center permit comments stated that “[t]he Division cannot dictate to the facility how to design or build the facility,”¹⁰ it can release guidance simply presenting the emissions data and echoing Virginia DEQ’s directive: “it would be financially and environmentally responsible” for Tier IV generators to be the only technology permitted to operate outside of emergencies.¹¹ It can even issue guidance setting Tier IV as the BACT standard, like Virginia did in its latest Guidance Revision. Using more stringent control technology is feasible and has already been proposed in Georgia: Amazon plans to install SCR on its ATL068 and 078 data center facility in Lithia Springs, Georgia.¹²

Releasing guidance suggesting that new data center developments install SCR technology on their generators will protect air quality and public health for Georgia and falls squarely within EPD’s authority.

⁵ *Id.* at 1.

⁶ *Id.* at 2.

⁷ *Id.* at 1.

⁸ *Id.* at 3.

⁹ Va Dep’t of Env’tl. Quality, APG-576 — Diesel Engine-Generator Set Procedure for Writing New and Modified Permits (Dec. 29,, 2025), https://townhall.virginia.gov/L/GetFile.cfm?File=C:%5CTownHall%5Cdocrout%5CGuidanceDocs_Proposed%5C440%5CGDoc_DEQ_8547_20251231.pdf at PDF 1.

¹⁰ Ga. Env’tl. Prot. Div., Air Quality Permit, Permit No. 7374-097-0101-S-01-0 (Aug. 18, 2025) at 5.

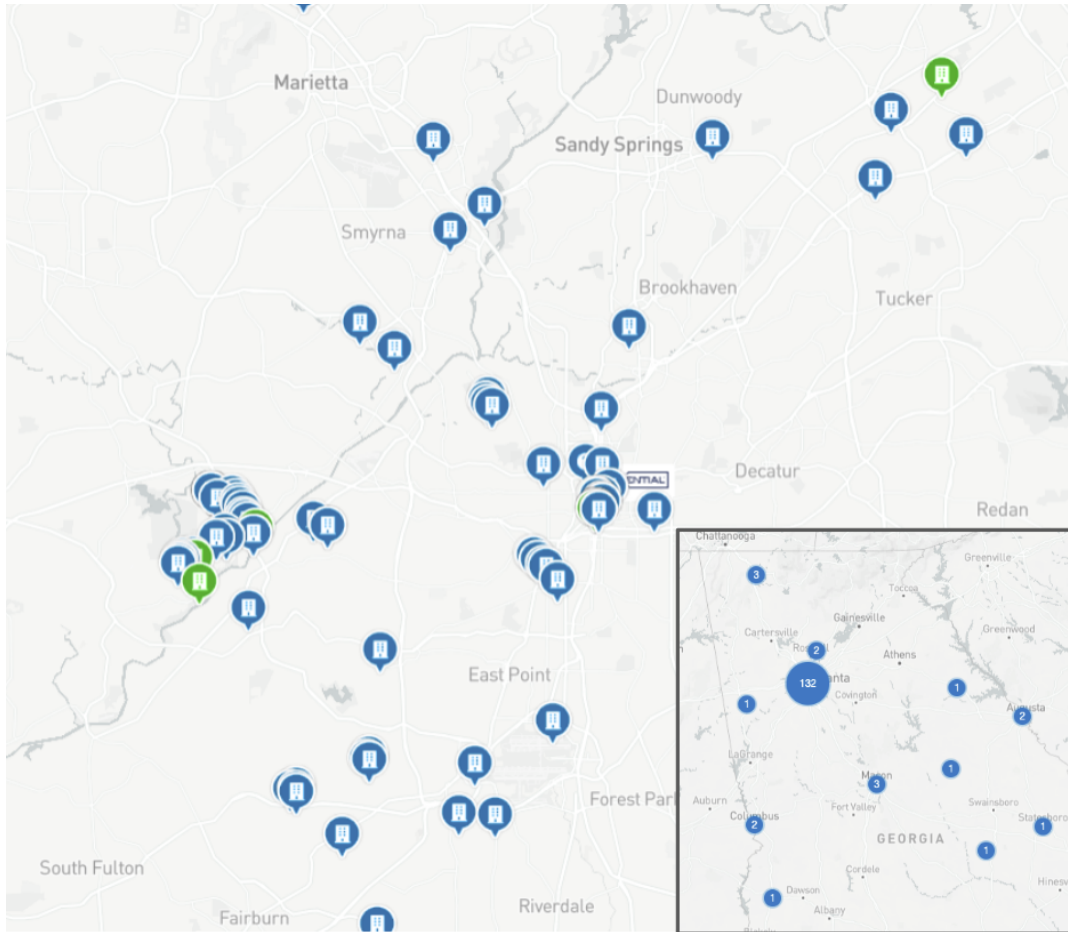
¹¹ Virginia DEQ Guidelines at 3.

¹² Ga. Env’tl. Prot. Div., Narrative to Air Quality Permit, Permit No. 7374-097-0101-S-01-0 (Apr. 7, 2025) at 19.

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 should take a hard look at the number of data centers in Georgia, which is growing rapidly. As mentioned above and as Figure 1 below demonstrates, Georgia currently has 150 data centers, 132 of which are in the Atlanta area.¹³ Georgia Power alone currently serves more than 73 data centers.¹⁴

Figure 1: Data Centers in Atlanta. Source: Georgia Data Centers, DATA CENTER MAP (2026).



If just 250 data centers in the metro Atlanta area were allowed 99.9 tons per year NOx emissions limits per year for their facilities, they would be allowed to emit 24,975 tons of NOx each year, close to double the annual NOx emissions of Georgia's coal plants, Plant Scherer and Plant Bowen.¹⁵ EPD should at least do a cumulative impact analysis of the permitted emissions from

¹³ Data Ctr. Map, Georgia Data Centers (2025), <https://www.datacentermap.com/usa/georgia/>.

¹⁴ Rebuttal Testimony of Kristin W. Curylo, Jeffrey R. Grubb, M. Brandon Looney, and Francisco Valle on behalf of Georgia Power Company, Docket Nos. 56298 and 56310 at 18.
<https://psc.ga.gov/search/facts-document/?documentId=224672>.

¹⁵ In 2024, Plant Scherer emitted 7,216.987 short tons of NOx and Plant Bowen emitted 5,783.562 short tons of NOx, according to the EPA's Clean Air Markets Database.

all backup generators at all data centers in the greater Atlanta area so the public can be better informed of the effects of the emissions from such facilities if they ran their generators at the maximum permitted levels during a power outage.

The data centers are also driving load growth, bringing more polluting generation online that degrades air quality. Georgia Power's 2023 IRP Update indicated that "large load projects correspond to the...influx of new businesses coming to Georgia [including] data centers... These projects' sizes far exceed historical annual norms, with some surpassing 1,000 MW."¹⁶ To meet this growing demand, Georgia Power plans to build three combustion turbine plants (also called "gas peaker plants"), which will run on oil during peak times when gas is not available. In response to discovery during the 2023 IRP Update before the Georgia Public Service Commission, Georgia Power explained that the new gas peaker plants "will primarily run on fuel oil during peak winter and summer periods when the pipeline is constrained. No [firm transportation] or additional gas capacity is being proposed to support these units since these units can burn oil year around."¹⁷

Georgia Power submitted a load forecast update with the Georgia Public Service Commission showing that these numbers have increased yet again:

As of September 30, 2024, the total pipeline of economic development projects through the mid-2030s has increased by 12,200 MW to 36,500 MW. Of this, 34,600 MW represent large load economic development projects (...) Looking towards the near-term winter of 2028/2029, just as the longer-term total economic development pipeline has grown, the large load pipeline has increased by 6,000 MW now totaling 19,900 MW.¹⁸

More recently, Georgia Power's 2025 IRP, filed in January and approved in July of this year, projects an additional 2,200 MW of load growth from just over a year ago, driven in large part by data centers.¹⁹ Due to this load growth, Georgia Power plans to continue operating the coal-burning Plants Scherer and Bowen, heavy producers of NOx emissions.²⁰

EPD must take into consideration not only the diesel generators proliferating around Atlanta, but also air pollution from the three new gas peakers plants, five new combined cycle gas plants (two

¹⁶ Ga. Power Co., 2023 IRP Update (Oct. 2023), <https://www.georgiapower.com/content/dam/georgia-power/pdfs/company-pdfs/2023-irp-update-main-document.pdf> at 9, PDF 13.

¹⁷ Ga. Power Co., Response to Public Disclosure Data Request # STF-JKA-2-22 (d).

¹⁸ Ga. Pub. Serv. Comm'n Docket No. 55378: Georgia Power Company's 2023 Integrated Resource Plan, Update Large Load Economic Development Report Q3 2024 at 1.

¹⁹ Ga. Pub. Serv. Comm'n Docket No. 56002: Georgia Power Company's 2025 Integrated Resource Plan, 2025 Integrated Resource Plan PD at 1.

²⁰ *Id.* at 2.

at the Bowen site, two at the Wansley site, and one at the McIntosh site)²¹, and the coal plants staying online. The peaker plants are less than 40 miles outside of Atlanta and run on oil during peak times, driving emission from NOx and other pollutants twice as high as if they were run on gas. As mentioned above, coal plants are also extreme NOx polluters. Plant Scherer emitted 7,217 tons of NOx in 2024 alone,²² while Plant Bowen, located just 45 miles north of Atlanta, emitted 1,809 tons of NOx in 2024.²³ With all the polluting generation coming and staying online in the state, EPD must consider whether issuing permits for backup diesel generation in the Atlanta area is at all advisable for public health.

Sierra Club appreciates the opportunity to comment on this Draft Permit.

Sincerely,

/s/ Isabella Ariza

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²¹ Ga. Pub. Serv. Comm'n, Order Adopting Stipulation and Granting Certification of Capacity from the 2029-2031 All-Source RFP and Supplemental Resources for 2028-2031 Capacity (Dec. 30, 2025), <https://psc.ga.gov/search/facts-document/?documentId=224953>.

²² Env't Prot. Agency, Clean Air Markets Program Data, <https://campd.epa.gov>.

²³ *Id.*