

NARRATIVE

TO: Cynthia Dorrough

FROM: Renee Browne

DATE: March 5, 2026

Facility Name: **Rosewall Pines Holdings LLC**
AIRS No.: 04-13-285-00109
Location: LaGrange, GA (Troup County)
Application #: 29849
Date of Application: August 27, 2025

Background Information

The Division received the Rosewall Pines Holdings LLC Georgia State Implementation Plan (SIP) Construction & Operating Permit Application on September 3, 2025, that requested authorization for the construction and operation of a proposed data center in Troup County, Georgia. The proposed facility will include diesel-fired emergency generators that will provide electricity to the data center during an emergency (i.e., when power from the electric grid to the data center is interrupted).

The proposed facility will be classified as a synthetic minor source of air emissions with respect to the Title V and New Source Review (NSR) permitting programs. As such, Rosewall Pines Holdings LLC requested a SIP permit for the proposed facility in accordance with the Georgia Rules for Air Quality Control (GRAQC) 391-3-1-.03(1) & (2).

The Division received the Rosewall Pines Holdings LLC Georgia State Implementation Plan (SIP) Construction & Operating Permit Application Update on March 4, 2026, that updated the Potential Emissions (PTE) and Toxic Air Pollutant (TAP) Impact Assessment (TIA) which reevaluates the TIA at the facility-wide potential emissions levels (based on synthetic minor limitations) for the listed TAP.

Purpose of Application

In Application No. 29849, Rosewall Pines Holdings LLC proposes to construct and operate U.S. EPA Tier 2 and Tier 3 certified diesel fuel-fired engine generators and diesel fuel-fired fire pumps at a computer processing, data preparation and processing facility in Troup County Georgia. The facility's diesel-fired emergency generators will provide electricity to the data center during an emergency (i.e., when power from the electric grid to the data center is interrupted).

Other sources of emissions at the proposed facility will consist of diesel belly storage tanks for each generator/fire pump.¹ There will be no stationary combustion sources present at the facility aside from the emergency standby generators and emergency fire pumps. The diesel fuel-fired engines may also use renewable diesel fuel (i.e. hydrotreated vegetable oil [HVO]) in addition to standard diesel fuel.

The Public Advisory period for this application expired on October 17, 2025, and comments were received from the Sierra Club and the Southern Environmental Law Center by the Division. Comments address concerns about data centers and their effect on air quality and recommends alternatives to the emergency generators proposed in the application. These comments were taken into consideration during the drafting of the permit and associated narrative.

Equipment List

Source Code		Capacity	Description	Installation Date	Construction Date
Group 1	Emergency Generators	-	Tier 2 Diesel Engine	2025+	2025+
Group 2	Emergency Generators	-	Tier 2 Diesel Engine	2025+	2025+
Group 3	Emergency Generators	-	Tier 3 Diesel Engine	2025+	2025+
Group 4	Emergency Generators	-	Tier 3 Diesel Engine	2025+	2025+
Group 5	Emergency Fire Pumps	-	Tier 3 Diesel Engine	2025+	2025+

Emissions Summary

Group 1 and Group 2 Emergency Generators

NO_x, CO, PM and VOC emissions for the proposed Group 1 and 2 emergency generators are calculated using emission factors provided by the manufacturer's expected operational loads and corresponding post-commissioning testing, maintenance, similar other non-emergency use, and anticipated emergency hours of operation. A worst-case approach of using the maximum emission factor for each pollutant was used for the emission factors provided by the manufacturers as several different engine models are being considered for the facility. SO₂ emissions are based on a fuel sulfur content of 15 parts per million (ppm) for ultra-low sulfur diesel (ULSD) fuel, as defined under 40 CFR 1090, Part D, Section 1090.305. The SO₂ emission factor from AP-42 Section 3.4, Table 3.4-1 (4/25) is used to account for the fuel sulfur content. PM₁₀ and PM_{2.5} emissions are conservatively assumed to be equal to PM emissions, as calculated using the manufacturer-provided emission factor. Total PM is conservatively set equal to filterable PM plus VOC from the manufacturer. Also, it is conservatively assumed that the emission factor for VOC is equivalent to the emission factor for hydrocarbons (HC). Total HAP emissions are calculated using the emission factors (lb/MMBtu) obtained from AP-42, Section 3.4, Table 3.4-3, and Table 3.4-4 (4/25).

¹ The diesel belly tanks are exempt from state air permitting requirements pursuant to GRAQC 391-3-1-.03(6)(c)3.

Group 3 and Group 4 Emergency Generators

NO_x, CO, PM and VOC emissions for the proposed Group 3 and 4 emergency generators are calculated using Tier 3 emission standards from Appendix I of 40 CFR Part 1039 with 25% safety factor using a maximum engine power of 560 mechanical kW (751 m-hp), VOC is conservatively set equal to the emission factor for TOC from AP-42 Section 3.4, Table 3.4-1 (4/25), with a 25% safety factor. SO₂ emissions are based on a fuel sulfur content of 15 parts per million (ppm) for ultra-low sulfur diesel (ULSD) fuel, as defined under 40 CFR 1090, Part D, Section 1090.305. The SO₂ emission factor from AP-42 Section 3.4, Table 3.4-1 (4/25) is used to account for the fuel sulfur content. NO_x emission factor is conservatively set equal to the emission factor for NO_x plus NMHC, PM₁₀ and PM_{2.5} emissions are conservatively assumed to be equal to PM emissions, as calculated using the manufacturer-provided emission factor. Total PM is conservatively set equal to filterable PM plus VOC. Total HAP emissions are calculated using the emission factors (lb/MMBtu) obtained from AP-42, Section 3.4, Table 3.4-3, and Table 3.4-4 (4/25).

Group 5 Fire Pump Engines

NO_x, CO, PM and VOC emissions for the proposed Group 5 fire pump engines are calculated using fire pump emission standards from Table 4 of NSPS Subpart IIII with 25% safety factor using a maximum engine power of 400 m-hp. VOC is conservatively set equal to the emission factor for exhaust TOC from AP-42 Section 3.3, Table 3.3-1, with a 25% safety factor. SO₂ emissions are based on a fuel sulfur content of 15 parts per million (ppm) for ultra-low sulfur diesel (ULSD) fuel, as defined under 40 CFR 1090, Part D, Section 1090.305. The SO₂ emission factor from AP-42 Section 3.4, Table 3.4-1 (4/25) is used to account for the fuel sulfur content. NO_x emission factor is conservatively set equal to the emission factor for NO_x plus NMHC, PM₁₀ and PM_{2.5} emissions are conservatively assumed to be equal to PM emissions, as calculated using the manufacturer-provided emission factor. Total PM is conservatively set equal to filterable PM plus VOC. Total HAP emissions are calculated using the emission factors (lb/MMBtu) obtained from AP-42, Section 3.3, Table 3.3-2 (4/25).

Facility-Wide Emissions in tons per year)

Pollutant	Potential Emissions
PM _{2.5} / PM ₁₀	5.46
PM	5.46
NO _x	99.0
SO ₂	6.5E-02
CO	24.2
VOC	3.04
Maximum Individual HAP (Benzene)	2.9E-02
Total HAPs	6.0E-02

Regulatory Applicability**Federal Regulations****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**

The following sources are subject to NSPS in 40 CFR 60 Subpart IIII:

(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are:

- Manufactured after April 1, 2006, and are not fire pump engines, or
- Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

The facility wishes to construct emergency generators and emergency fire pumps. Based on the date of construction and operation, the new emergency generators and emergency fire pumps are subject to the emission limits stated in §§60.4202(b).

40 CFR Part 60, Subpart IIII establishes NO_x, PM, CO, SO₂, and VOC emissions standards, fuel, testing, monitoring, recordkeeping, and reporting requirements for compression ignition engine units constructed (i.e., ordered) after July 11, 2005, non-fire pump engines manufactured after April 1, 2006, and fire pump engines manufactured after July 1, 2006. 40 CFR §60.4202(a) and §60.4202(b) establish exhaust emissions standards for NO_x, PM, CO, and VOC. All proposed engines will meet the U.S. EPA Tier 2 and Tier 3 emissions standards and will therefore meet or exceed the requirements found in 40 CFR §60.4202(a) or §60.4202(b).

The proposed engines will be subject to 40 CFR Part 60, Subpart IIII and will conform with the fuel requirements in 40 CFR §60.4207 by using ultra-low sulfur diesel (ULSD) with a maximum sulfur content of 15 parts per million (ppm). Requirements for the proposed engines also include the use of the non-resettable hour meters, maintaining operational records including date, hour meter readings, and reason for operation, and operating in accordance with the definition of an emergency stationary internal combustion engine at 40 CFR §60.4219.

Part 63, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 63) National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines-Subpart ZZZZ

The following sources are subject to the NESHAP in 40 CFR 63 Subpart ZZZZ

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 any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ 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.

- A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.
- An area source of HAP emissions is a source that is not a major source.

The facility proposes to operate internal combustion engines as emergency generators and emergency fire pumps at a facility that has HAP emissions under the major source threshold, classifying it as an area source, therefore all of the emergency generators and emergency fire pumps within the facility are subject to 40 CFR 63 Subpart ZZZZ.

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 this part by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines or 40 CFR 60 Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

The emergency generators and emergency fire pumps within the facility meet the criteria established by 40 CFR 63.6590(c)(1) because the generators are classified as new or reconstructed stationary RICE located at an area source. The generators and fire pumps will demonstrate compliance with 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII for compression ignition engines, therefore no further requirements apply for the emergency generators and emergency fire pumps in the facility.

Part 70, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 70) – State Operating Permits Programs

This regulation contains the provisions for establishing a federal permitting program for “major sources” (Title V) of emissions. Troup County is an attainment county in which the major source threshold for NO_x emissions is 100 tons per year. Potential NO_x emissions result in a major source status for the facility. However, the facility wishes to take a self-imposed limit guaranteeing NO_x emissions levels will remain under 100 tons per year. Therefore, the facility will not be subject to 40 CFR Part 70

State Rules

Georgia Rule 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 of the permitted sources are subject to this regulation.

The facility will comply with this limitation through the exclusive use of ultra-low sulfur diesel fuel in its generator and fire pump engines, which will result in negligible visible emissions.

Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide

This regulation 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 of the engines have the capability to burn fossil fuel, thus making the equipment subject to this regulation, however this limit will be subsumed by the NSPS Subpart IIII sulfur limit of 15 ppm.

Georgia Rule 391-3-1-.02(2)(yy)- Emission of Nitrogen Oxides from Major Sources

This rule prohibits the emission of nitrogen oxides from any source to exceed 25 tons per year to all sources located in Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding and Rockdale counties unless such source has been approved by the Director as meeting the appropriate requirement for all reasonably available control technology (RACT) in controlling the emissions of nitrogen dioxides. Potential NOx emissions result in a minor source status for the Facility with the request for a Title V avoidance limit of less than 100 tpy facility wide on a twelve-month consecutive basis. Though the potential NOx emissions from the facility will exceed 25 tons per year, per GRAQC 391-3-1-02(2)(yy), the requirements of this rule do not apply to individual equipment at the source which are subject to (jjjj), (iiii), (mmm), or (nnn). The proposed emergency generators will be subject to Rule (mmm); therefore, as the proposed emergency generators and emergency fire pumps will be the only sources of NOx at the facility, the provisions of Rule (yy) will not apply.

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

Each generator that operates less than 200 hours per twelve consecutive months will meet the definition of Rule (mmm)7 for emergency engines.

Georgia Rule 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 for the construction of emergency generators and emergency fire pumps.

Georgia Rule 391-3-1-.03(6)(c)1 – Storage Tanks Exemptions

The regulation exempts all petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 pounds per square inch atmosphere (psia). The diesel belly storage tanks are used to store diesel fuel with a true vapor pressure of 0.01 psia, thus rendering an exemption from permitting.

Permit Conditions

Permit Condition 2.1 limits facility-wide NOx emissions to 99 tons during any consecutive twelve-month period.

Permit Condition 2.2 limits the operation of emergency generators to meet the criteria of Georgia Rule 391-3-1-.02(2)(mmm)7 for emergency generators.

Permit Condition 2.3 limits opacity to 40 percent from the emergency generators and emergency fire pumps (6-minute average).

Permit Condition 2.4 requires the Permittee to comply with NSPS Subpart A and Subpart IIII for the operation of the emergency generators and emergency fire pumps.

Permit Condition 2.5 limits the accumulated non-emergency service time for the emergency generators and emergency fire pumps to less than 100 hours per year and prohibits any operation other than emergency operation, maintenance checks and readiness testing.

Permit Condition 2.6 requires the facility to fuel the emergency generators and emergency fire pumps 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 2.7 requires the Permittee to comply with NESHAP Subpart A and Subpart ZZZZ for the operation of the emergency generators and emergency fire pumps.

Permit Conditions 2.8 through 2.10 supply further requirements for the Permittee to comply with NSPS Subpart A and Subpart IIII for the operation of the emergency generators and emergency fire pumps.

Permit Condition 2.11 requires that the fuel oil fired in the emergency generators and the emergency fire pumps be diesel fuel oil and the definition of such.

Permit Condition 2.12 limits the hours of operation for the engines in Groups 1 through 5 to the 12 consecutive month limits listed in Table 2.12-1 of the permit.

Permit Condition 3.1 requires the Permittee to take all reasonable precautions with any operation, process, handling, transportation or storage facilities to prevent fugitive emissions or air contaminants.

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

Permit Condition 5.1 requires the continuous operation of any continuous monitoring system required by the Division and 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 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 and to install a system to monitor generator output load.

Permit Condition 5.3 requires the Permittee to verify that each shipment of diesel fuel oil received for combustion in each emergency generator and emergency fire pump 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 2.11.

Permit Conditions 6.1 and 6.2 provide guidelines for performance, compliance testing and maintenance of the engines.

Permit Condition 7.1 requires the Permittee to notify the Division of initial startup.

Permit Condition 7.2 requires the Permittee to maintain monthly operating records for each emergency generator and emergency fire pump and maintain them in a format suitable for inspection for a period of five years.

Permit Condition 7.3 requires the Permittee to use the monthly emergency service operating data to calculate monthly, the twelve-month rolling total of the emergency service operating time for each generator during each twelve consecutive month period and notify the Division in writing within 15 days if any of the twelve-month rolling total emergency service operating time exceeds 200 hours.

Permit Condition 7.4 requires the Permittee to use the monthly non-emergency service operating data to calculate monthly, the twelve-month rolling total of the non-emergency service operating time for each generator and emergency fire pump during each twelve consecutive month period and notify the Division in writing within 15 days if any of the twelve-month rolling total non-emergency service operating time exceeds 100 hours.

Permit Condition 7.5 requires the Permittee to demonstrate compliance with emission standards specified in 40 CFR 60, Subpart IIII for the emergency generators and emergency fire pumps 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 according to the manufacturer's specifications and records of this action shall be maintained in a format suitable for inspection.

Permit Condition 7.6 requires the Permittee to submit an annual report with the requirements specified in 40 CFR 60.4214(d) if the emergency generators are operated for the purpose specified in 40 CFR 60.4211(f)(3)(i).

Permit Condition 7.7 requires the Permittee to keep records of each shipment of distillate fuel received for firing the emergency generators and emergency fire pumps to show compliance with the applicable requirements in Condition 2.6.

Permit Condition 7.8 provides the equation for calculating monthly NO_x emissions from the emergency generators and emergency fire pumps.

Permit Condition 7.9 requires the Permittee to calculate total NO_x emissions (in tons) from the emergency generators during the last twelve consecutive calendar months, using the equation in Condition 7.8.

Permit Condition 7.10 requires the Permittee to use the monthly emergency and non-emergency operating times and generator output load to calculate the 12-month rolling total of the operating hours for the engines to comply with the limit in Permit Condition 2.12.

Permit Condition 8.1 gives the Division the right to amend the provisions of this permit in the event determination is made requiring additional control of emissions from the facility to provide for the continued protection of public health, safety and welfare.

Toxic Impact Assessment

The Facility has prepared and included as a part of this application a Toxic Ambient Impact Assessment (TIA) pursuant to GEPA's *Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions*, revised May 2017 (GEPA Guideline for TIA). G.A.C. 391-3-1-.02(2)(a)3(ii) requires emissions limitations or other requirements to safeguard the public health, safety, and welfare of the people of Georgia. This safeguarding is demonstrated in air quality permit applications with the completion of a TIA for sources of air emissions proposed for construction/modification.

The Division regulates the emissions of toxic air pollutants (TAP) through the Guideline described above. 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.

According to the Guideline, dispersion modeling at a new facility should be completed for each TAP having potential emissions above the specific Minimum Emission Rate (MER) provided. The Facility prepared a project-related toxic air pollutant (TAP) emissions inventory on a PTE basis, based on the proposed 99 tpy NO_x limit.

Table 1 below compares the selected significant TAPs to the MER. Note that there was a Minimum Emissions Rate (MER) exceedance for benzene and formaldehyde.

Table 1. TAP Emissions Compared to MER

Pollutant	Minimum Emission Rate ¹ (lb/yr)	20% Minimum Emission Rate ² (lb/yr)	Facility-Wide Potential Emissions (lb/yr)	Is PTE > 20% MER?
Benzene	3.16E+01	6.32E+00	5.82E+01	Yes
Toluene	1.22E+06	2.44E+05	2.11E+01	No
Xylene	2.43E+06	4.86E+05	1.45E+01	No
Formaldehyde	2.21E+01	4.42E+00	6.52E+00	Yes
Acetaldehyde	1.11E+03	2.22E+02	2.30E+00	No
Acrolein	4.87E+00	9.74E-01	6.37E-01	No
Napthalene	7.30E+02	1.46E+02	9.70E+00	No
1,3 Butadiene	7.30E+00	1.46E+00	2.19E-02	No

1. From Appendix A of EPA's Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions. Using updated MER for formaldehyde.

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

The only TAP emission sources at the site are point sources with vertical stacks equipped with a flapper lid to prevent rain from entering. The flapper lid is open when the engine is operating and is thus effectively an unobstructed vertical stack when operating. However, for the purpose of this analysis, Rosewall Pines

Holdings LLC has conservatively presumed these release points to be obstructed vertical stacks. Therefore, the air toxics emissions which are part of this permit application will have facility wide emissions evaluated and compared to 20% of the MER threshold values to determine which toxic pollutants will require an evaluation.²

As there was a Minimum Emissions Rate (MER) exceedance for benzene and formaldehyde, further analysis of ambient air concentration due to engine emissions of benzene and formaldehyde was conducted using the SCREEN3 (version 13043) air dispersion model.

Modeling Results and Compliance

The SCREEN3 dispersion modeling results for benzene and formaldehyde 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 20.0 ($\mu\text{g}/\text{m}^3$), which is well under the short-term AAC of 1,600 $\mu\text{g}/\text{m}^3$. Likewise, the maximum annual average benzene concentration was on the order of 6.89E-03 $\mu\text{g}/\text{m}^3$, which is below the annual AAC of 0.13 $\mu\text{g}/\text{m}^3$. Specifically, the maximum 15-minute formaldehyde concentration at or beyond the property boundary was roughly 3.22 ($\mu\text{g}/\text{m}^3$), which is well under the short-term AAC of 245 $\mu\text{g}/\text{m}^3$. Likewise, the maximum annual average formaldehyde concentration was on the order of 1.52E-03 $\mu\text{g}/\text{m}^3$, which is below the annual AAC of 0.09 $\mu\text{g}/\text{m}^3$. In other words, the worst-case modeled benzene and formaldehyde impacts were within acceptable concentrations set by Georgia's guidelines, for both acute and chronic exposure periods. The 15-minute and annual benzene and formaldehyde concentrations for each group are shown in Table 2 below.

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

Stack #	15-minute ($\mu\text{g}/\text{m}^3$)	15-minute AAC	Impact?	Annual ($\mu\text{g}/\text{m}^3$)	Annual AAC	Impact?
Benzene						
Group 1	1.61E+01			4.30E-03		
Group 2	2.30E-01			6.15E-05		
Group 3	1.24E+00			8.60E-04		
Group 4	1.39E+00			9.58E-04		
Group 5	1.02E+00			7.04E-04		
Total	2.00E+01	1600 $\mu\text{g}/\text{m}^3$	Acceptable	6.89E-03	0.13 $\mu\text{g}/\text{m}^3$	Acceptable
Formaldehyde						
Group 1	1.64E+00			4.38E-04		
Group 2	2.34E-02			6.25E-06		
Group 3	1.26E-01			8.74E-05		
Group 4	1.41E-01			9.74E-05		
Group 5	1.29E+00			8.91E-04		
Total	3.22E+00	245 $\mu\text{g}/\text{m}^3$	Acceptable	1.52E-03	0.09 $\mu\text{g}/\text{m}^3$	Acceptable

² Email from Ms. Susan Jenkins (Georgia EPD) to Mr. Chris Pool (Trinity) on March 3, 2023. If 80% or more of emissions of the TAP under review are from vertical/unobstructed stacks, then facility-wide emissions of that TAP can be compared directly to the MER. However, if less than 80% of emissions are from vertical unobstructed stacks and are from other types of releases (e.g., capped stack, fugitive, etc.) then facility wide emissions should be compared to 20% of the MER value.

Because the screening-level analysis showed compliance with all AAC criteria, no further refined modeling was required. The benzene and formaldehyde impact assessments 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 and formaldehyde 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 or formaldehyde. 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

Based upon the above considerations, it is recommended that Permit Number 7374-285-0109-S-01-0 be issued to Rosewall Pines Holdings LLC for their facility located at 411 Pegasus Parkway in Troup County. It has been determined that Rosewall Pines Holdings LLC is classified as a synthetic minor facility.

The facility must comply with NO_x emissions limitations, limitations on the combined generator capacity and limitations on the hours of operation to constitute emergency generator usage and remain below major source thresholds.

A Public Advisory was issued on September 17, 2025, and expired on October 17, 2025, with comments received from the Sierra Club and the Southern Environmental Law Center.

Addendum to Narrative

The 30-day public review started on April 23, 2026 and ended on May 22, 2026. EPD held a public hearing and public meeting on May 22, 2026. Comments were received for the record, and additional comments were received on April 22, 2008, April 23, 2026, May 1, 2026, May 8, 2026, May 14, 2026, and May 22, 2026.

Roswell Pines Holding, LLC Comments

Comments were received from Trinity Consultants on behalf of Roswell Pines Holding, LLC letters dated May 8, 2026 and May 22, 2026;

Comment 1**Condition 2.1 – NOx Limit Language**

Editorial deletion of “equal to or” so the limitation reads “greater than 99 tons during any twelve consecutive month period.”

Reply 1

The Division agrees and will make the change as requested.

- 2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the entire facility nitrogen oxides (NOx) emissions ~~equal to or~~ greater than 99 tons during any twelve consecutive month period.
[Avoidance of 40 CFR Part 70]

Comment 2**Condition 2.2 – Georgia Rule (mmm) Exemption Criteria Applicability**

Revision of Condition 2.2 to apply Georgia Rule 391-3-1-.02(2)(mmm)7 and add Rule 391-3-1-.02(2)(mmm)8 as equivalent compliance pathways at Conditions 2.2.a and 2.2.b, respectively.

Rule (mmm)7 exempts emergency engines that operate less than 200 hours per twelve consecutive months under specified operating conditions. Rule (mmm)8 exempts emergency standby engines at data centers that operate less than 500 hours per twelve consecutive months, subject to operating purpose, overnight testing, and recordkeeping constraints.

By their text, Paragraphs (mmm)7 and (mmm)8 are independent exemption criteria. Nothing in the rule states that they are mutually exclusive, or that a permittee must select one over the other. The rule simply lists separate circumstances under which the exemption to the NOx emission limit applies. Each emergency engine at the Facility satisfies both: it is an emergency stationary engine under (mmm)4(i), and an emergency standby stationary engine at a data center under (mmm)4(v).

While Rosewall Pines Holdings, LLC expects that emergency generators will operate less than 200 hours per twelve-month period, and while Rule (mmm)7 is the preferred exemption pathway, Rule (mmm)8

provides additional flexibility if a unit reaches the level of 200 to 500 hours per twelve-month period, where the Facility will ensure the additional provisions under Rule (mmm)8 are met.

Reply 2

The Division disagrees with this as the rule is intended as an option for a designated set of engines at a site and both sets of criteria under (mmm)7 and (mmm)8 cannot apply to the same set of engines. The Condition will remain unchanged.

Comment 3

Condition 2.7 – NESHAP Subpart ZZZZ Title

Editorial correction to update title of 40 CFR 63 Subpart ZZZZ.

Reply 3

The Division agrees and will make the change as requested.

- 2.7 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as found in 40 CFR 63 Subpart A- General Provisions. and 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines ~~Stationary Combustion Engines~~. for the operation of the emergency generators and emergency fire pumps.
[40 CFR 63, Subparts A and ZZZZ]

Comment 4

Condition 2.12 - Removal

Removal of Condition 2.12 and Table 2.12-1.

On behalf of Rosewall Pines Holdings LLC, Trinity submitted the Toxic Impact Assessment (TIA) addendum to this application on March 4, 2026, specifically to address sitewide criteria pollutant and toxic air pollutant (TAP) emissions at the requested synthetic minor limit of 99 tons per year (tpy) of NOX so that the Permit would not need to impose a limitation on hours of operation per engine group to prove synthetic minor source status. A per-group hours cap is incompatible with normal data center operations: any single engine may operate more hours than others in a given period because of staggered maintenance, load-bank testing, commissioning, and emergency rotation across the fleet, all while the facility remains in compliance with the operational requirements of federal engine regulations and below the 99 tpy NOX limit in Condition 2.1. Condition 2.12 also caps certain groups in a manner that would prohibit normal part-load operation, even though those operating modes are routine elements of engine operation.

The TIA addendum also modeled toxic air pollutant impacts assuming all emissions from an engine group from the worst-case (closest to the property boundary) stack, and the SCREEN3 dispersion modeling demonstrated that benzene and formaldehyde concentrations remain well within the Acceptable Ambient Concentrations (AACs) under the Georgia Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions. Title V avoidance and air toxics avoidance are therefore both demonstrated

independently of any per-group hours cap, which makes Condition 2.12 duplicative and operationally unworkable.

Condition 2.12 and Table 2.12-1 reference compliance with Title V Avoidance and Air Toxics Avoidance. As described herein, this condition should be removed from the Draft Permit. Such hours of operation limitations (particularly on Engine Groups 1 and 2) are not needed to demonstrate compliance with either program listed and would unnecessarily prevent the facility from operating as designed and intended. These comments provide supporting documentation for the removal of these requirements.

Compliance with the synthetic minor framework is already secured by other conditions in the Draft Permit. Condition 2.1 imposes a 99 tons per year (tpy) NO_x limit on the facility, which serves as the Title V Avoidance compliance requirement. Condition 7.8 demonstrates compliance with this limit by requiring monthly calculation of NO_x emissions from each emergency engine, with a 15-day written notification to the Division if the monthly total site-wide NO_x emissions for the emergency generators and fire pumps equal or exceed 8.25 tons during any calendar month. Condition 7.9 requires monthly calculation of the site-wide twelve-month rolling total of NO_x emissions, with a separate 15-day written notification if this rolling total exceeds 99 tons.

The inclusion of Condition 2.12 and Table 2.12-1 is not supported by the Georgia Rules for Air Quality Control or the Georgia Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions (May 2017) (Air Toxic Guideline). Rule 391-3-1-.03(1)(c) states that the permit “shall be issued upon a determination by the Director that the facility can reasonably be expected to comply with all the provisions of the Act and the rules and regulations promulgated thereunder.” Condition 2.12 and Table 2.12-1 are not needed to comply with the Act or the rules because, as demonstrated in this letter, the Facility could not “reasonably” operate emergency engines in a manner that would cause an exceedance of the maximum ground-level concentration (MGLC) as compared to the acceptable ambient concentration (AAC, Appendix A) for the pollutant.

With specific regard to Engine Groups 1 and 2, compliance with the Georgia Air Toxics program is inherently guaranteed by the facility-wide Title V avoidance limit of 99 tpy NO_x in Condition 2.1. To support this, two exaggerated scenarios of operation (at 100% load and with passing toxics modeling results) are included as Attachment A and Attachment B to show that the facility-wide Title V avoidance limit of 99 tpy of NO_x establishes compliance with the Division’s Air Toxics program (i.e., Air Toxics Avoidance). A limitation on hours of operation for Engine Groups 1 and 2 is therefore not needed to demonstrate compliance with the Air Toxics program. A limitation on operation at particular loads is not needed for any engine group to demonstrate compliance with the Air Toxics program as 100% load is the worst-case emission rate.

Table 1. Hours of Operation Summary for Additional Scenarios

Group	Scenario 1	Scenario 2
	Hours of Operation Per Engine	
	(hr/yr)	
1	500	924
2	500	8760
3	500	500
4	500	500
5	500	500

Scenario 1 in Attachment A quantifies benzene and formaldehyde emissions at 500 hours of annual operation per emergency engine at 100% load for all engine groups. Georgia EPD's *Procedure to Calculate a Facility's "Potential to Emit" and to determine its Classification (August 26, 2008 - revised Nov 16, 2018)* includes information on quantifying emissions from emergency generators. Pursuant to this Procedure,

"The U.S. EPA stated that 500 hours would be an appropriate default assumption for estimating the number of hours that an emergency generator could be expected to operate under worst-case condition." Toxic air pollutant impacts were modeled assuming all emissions from an engine group are emitted from the worst-case (closest to the property boundary) stack, and the results of the SCREEN3 dispersion modeling demonstrated that benzene and formaldehyde concentrations under this scenario remain well within the AACs under the Georgia Air Toxics Guideline. Under this scenario, the resulting facility-wide emissions of NO_x are 1,243 tpy, which is not allowable under the synthetic minor limitation in Condition 2.1. Therefore, Title V Avoidance and Air Toxics Avoidance are both demonstrated under the requested synthetic minor limit of 99 tpy of NO_x.

Scenario 2 in Attachment B quantifies benzene and formaldehyde emissions at 8,760 hours of annual operation per engine at 100% load for engine Group 2 and 500 hours of annual operation per engine at 100% load for engine Groups 3, 4, and 5. The hours of annual operation per engine for Group 1 engines were set to 924 hours using SCREEN3 dispersion modeling to demonstrate that the benzene concentration remains just under the annual AAC under the Georgia Air Toxics Guideline. Please note that the benzene annual AAC is the limiting pollutant and averaging period for the Air Toxics Assessment. Toxic air pollutant impacts were modeled assuming all emissions from an engine group are emitted from the worst-case (closest to the property boundary) stack. Under this scenario, the resulting emissions of NO_x are 2,584 tpy, which is not allowable under the synthetic minor limitation in Condition 2.1. Therefore, Title V avoidance and air toxics avoidance are both demonstrated under the requested synthetic minor limit of 99 tons per year (tpy) of NO_x independently of any per-group hours cap on Groups 1 and 2, which makes Condition 2.12 duplicative.

The Division's precedent confirms that a per-engine or per-group hours cap is not required at synthetic minor source data centers with comparable operating profiles. Multiple Georgia data centers track NO_x emissions on a monthly basis to demonstrate compliance with their facility-wide synthetic minor limits, without any limitation on hours of operation per engine or engine type for Title V Avoidance or Air Toxics Avoidance.

Examples include AIRS Nos. 04-13-097-00101, 04-13-015-00156, and 04-13-097-00061. The Division's change of its established permit issuing practice regarding this issue is not justified. Issuing this Permit without Condition 2.12 is consistent with that established practice and preserves all protective elements of the synthetic minor framework with regard to Title V and Air Toxics.

ATTACHMENT A

Additional Scenario 1

Table 1. Short-Term Emissions Summary

Group	Benzene Short-Term Emissions ¹ (lb/hr)	Formaldehyde Short-Term Emissions ¹ (lb/hr)	NO _x Short-Term Emissions ¹ (lb/hr)
1	1.41E+00	1.43E-01 2.83E-	4.88E+03
2	2.78E-02 4.08E-	03 4.15E-04	7.46E+01
3	03 4.08E-03	4.15E-04	6.17E+00
4	5.22E-03	6.61E-03	6.17E+00
5			6.61E+00

1. Emissions (lb/hr) = Hourly Emissions (lb/hr) per engine at 100% load * # of Engines in Group

Table 2. Annualized Emissions Summary¹

Group	Hours of Operation Per Engine (hr/yr)	Benzene Emissions ¹ (lb/hr)	Formaldehyde Emissions ¹ (lb/hr)
1	500	8.02E-02 1.59E-	8.15E-03 1.61E-
2	500	03 2.33E-04	04 2.37E-05
3	500	2.33E-04	2.37E-05
4	500	2.98E-04	3.77E-04
5	500		

NO _x Resulting Annual Emissions (tpy)
1219.56
18.65
1.54 1.54
1.65
1242.95 Total

This is not allowable as
the facility is limited to
99 tpy NO_x

1. Annualized emission rate is calculated pursuant to Section 3.3.B(ii) of the Guideline, where the maximum emission rate is the total emissions from the worst case batch times the maximum number of batches per year divided by 8760 hr/yr.

Table 3. Short-Term and Annualized Emission Rates

Stack Type Number	Benzene		Formaldehyde	
	Short-Term Emission Rate (g/s)	Annualized Emission Rate (g/s)	Short-Term Emission Rate (g/s)	Annualized Emission Rate (g/s)
1	1.77E-01	1.01E-02	1.80E-02	1.03E-03
2	3.51E-03	2.00E-04	3.56E-04	2.03E-05
3	5.14E-04	2.93E-05	5.23E-05	2.98E-06
4	5.14E-04	2.93E-05	5.23E-05	2.98E-06
5	6.58E-04	3.76E-05	8.33E-04	4.75E-05

	Maximum 1-Hour Concentration Distance	Modeled Maximum 1- Hour Impact at 1 g/s	Maximum 1- Hour Impact Using Short-Term Emission Rates ¹	Maximum 1- Hour Impact Using Annualized Emission Rates ¹	Calculated 15-Minute Impact ²	15-Minute AAC ³	Impact > AAC?	Calculated Annual Impact ⁴	Annual AAC ³	Impact > AAC?
Source	(m)	(µg/m3)	(µg/m3)	(µg/m3)	(µg/m3)	(µg/m3)	(Yes/No)	(µg/m3)	(µg/m3)	(Yes/No)
Benzene										
1	149	6.89E+01	1.22E+01	6.96E-01	1.61E+01	--	--	5.57E-02	--	--
2	370	4.97E+01	1.74E-01	9.94E-03	2.30E-01	--	--	7.95E-04	--	--
3	90	1.83E+03	9.39E-01	5.36E-02	1.24E+00	--	--	4.29E-03	--	--
4	80	2.04E+03	1.05E+00	6.00E-02	1.39E+00	--	--	4.80E-03	--	--
5	130	1.17E+03	7.68E-01	4.38E-02	1.01E+00	--	--	3.50E-03	--	--
Total	--	5.16E+03	1.51E+01	8.64E-01	2.00E+01	1600	No	0.069	0.13	No
Formaldehyde										
1	149	6.89E+01	1.24E+00	7.08E-02	1.64E+00	--	--	5.66E-03	--	--

2	370	4.97E+01	1.77E-02	1.01E-03	2.34E-02	--	--	8.09E-05	--	--
3	90	1.83E+03	9.55E-02	5.45E-03	1.26E-01	--	--	4.36E-04	--	--
4	80	2.04E+03	1.07E-01	6.10E-03	1.41E-01	--	--	4.88E-04	--	--
5	130	1.17E+03	9.71E-01	5.54E-02	1.28E+00	--	--	4.43E-03	--	--
Total	--	5.16E+03	2.43E+00	1.39E-01	3.21E+00	245	No	0.011	0.09	No

Table 4. SCREEN3 Model Results

1. Maximum 1-Hour Concentration equals the modeled impacts at 1.00 g/s multiplied by the actual emission rate.
2. The 15-minute impact equals the 1-hour impact times 1.32 per the EPD Guideline.
3. From Appendix A of the EPD Guideline. Using updated annual AAC for formaldehyde.
4. The annual impact equals the 1-hour impact times 0.08 per the EPD Guideline.

ATTACHMENT B

Additional Scenario 2

Table 5. Short-Term Emissions Summary

Group	Benzene	Formaldehyde	NO _x
	Short-Term Emissions ¹ (lb/hr)	Short-Term Emissions ¹ (lb/hr)	Short-Term Emissions ¹ (lb/hr)
1	1.41E+00	1.43E-01	4.88E+03
2	2.78E-02 4.08E-	2.83E-03	7.46E+01
3	03 4.08E-03	4.15E-04	6.17E+00
4	5.22E-03	4.15E-04	6.17E+00
5		6.61E-03	6.61E+00

1. Emissions (lb/hr) = Hourly Emissions (lb/hr) per engine at 100% load * # of Engines in Group

Table 6. Annualized Emissions Summary¹

Group	Hours of Operation Per Engine	Benzene	Formaldehyde
	(hr/yr)	Emissions ¹ (lb/hr)	Emissions ¹ (lb/hr)
1	924	1.48E-01	1.51E-02
2	8760	2.78E-02	2.83E-03
3	500	2.33E-04	2.37E-05
4	500	2.33E-04	2.37E-05
5	500	2.98E-04	3.77E-04

NO _x Resulting Annual Emissions (tpy)
2252.62
326.72
1.54 1.54
1.65
2584.08 Total

This is not allowable as
the facility is limited to
99 tpy NO_x

1. Annualized emission rate is calculated pursuant to Section 3.3.B(ii) of the Guideline, where the maximum **emission** rate is the total emissions from the worst case batch times the maximum number of batches per year divided by 8760 hr/yr.

Table 7. Short-Term and Annualized Emission Rates

Stack Type Number	Benzene		Formaldehyde	
	Short-Term Emission Rate (g/s)	Annualized Emission Rate (g/s)	Short-Term Emission Rate (g/s)	Annualized Emission Rate (g/s)
1	1.77E-01	1.87E-02	1.80E-02	1.90E-03
2	3.51E-03	3.51E-03	3.56E-04	3.56E-04
3	5.14E-04	2.93E-05	5.23E-05	2.98E-06
4	5.14E-04	2.93E-05	5.23E-05	2.98E-06
5	6.58E-04	3.76E-05	8.33E-04	4.75E-05

Table 8. SCREEN3 Model Results

Source	Maximum 1-Hour Concentration Distance (m)	Modeled Maximum 1-Hour Impact at 1 g/s (µg/m3)	Maximum 1-Hour Impact Using Short-Term Emission Rates ¹ (µg/m3)	Maximum 1-Hour Impact Using Annualized Emission Rates ¹ (µg/m3)	Calculated 15-Minute Impact ² (µg/m3)	15-Minute AAC ³ (µg/m3)	Impact > AAC? (Yes/No)	Calculated Annual Impact ⁴ (µg/m3)	Annual AAC ³ (µg/m3)	Impact AAC? (Yes/No)
Benzene										
1	149	6.89E+01	1.22E+01	1.29E+00	1.61E+01	--	--	1.03E-01	--	--
2	370	4.97E+01	1.74E-01	1.74E-01	2.30E-01	--	--	1.39E-02	--	--
3	90	1.83E+03	9.39E-01	5.36E-02	1.24E+00	--	--	4.29E-03	--	--
4	80	2.04E+03	1.05E+00	6.00E-02	1.39E+00	--	--	4.80E-03	--	--
5	130	1.17E+03	7.68E-01	4.38E-02	1.01E+00	--	--	3.50E-03	--	--
Total	--	5.16E+03	1.51E+01	1.62E+00	2.00E+01	1600	No	0.129	0.13	No
Formaldehyde										
1	149	6.89E+01	1.24E+00	1.31E-01	1.64E+00	--	--	1.05E-02	--	--
2	370	4.97E+01	1.77E-02	1.77E-02	2.34E-02	--	--	1.42E-03	--	--
3	90	1.83E+03	9.55E-02	5.45E-03	1.26E-01	--	--	4.36E-04	--	--
4	80	2.04E+03	1.07E-01	6.10E-03	1.41E-01	--	--	4.88E-04	--	--
5	130	1.17E+03	9.71E-01	5.54E-02	1.28E+00	--	--	4.43E-03	--	--
Total	--	5.16E+03	2.43E+00	2.15E-01	3.21E+00	245	No	0.017	0.09	No

1. Maximum 1-Hour Concentration equals the modeled impacts at 1.00 g/s multiplied by the actual emission rate.

2. The 15-minute impact equals the 1-hour impact times 1.32 per the EPD Guideline.

3. From Appendix A of the EPD Guideline. Using updated annual AAC for formaldehyde.

4. The annual impact equals the 1-hour impact times 0.08 per the EPD Guideline.

Response 4

The Division has reviewed the alternate modeling scenarios and agrees that Condition 2.1 containing the 99 tons NOx Emission Limit during any twelve consecutive month period is in itself limiting compared to the alternate scenarios and Condition 2.1 is sufficient to protect the environment per the Georgia Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions (May 2017) (Air Toxic Guideline). Therefore, Conditions 2.12 and 7.10 will be removed from the permit.

~~2.12 The Permittee shall not operate each emergency generators in excess of the hours listed in Table 2.12-1 during any period of twelve (12) consecutive months.
[Title V Avoidance and Air Toxics Avoidance]~~

~~Table 2.12-1: Hours of Operation at Synthetic Minor Limit in terms of hours per 12 consecutive months Source Code~~

Source Code	Percent Load				
	100% Load (hr)	75% Load (hr)	50% Load (hr)	25% Load (hr)	10% Load (hr)
Group 1	38.6	0	0	0	6
Group 2	38.6	0	0	0	6
Group 3	100	-	-	-	-
Group 4	100	-	-	-	-
Group 5	100	-	-	-	-

Comment 5**Condition 5.3 – Update to Cross Reference**

Correction of the cross-reference in Condition 5.3 from “Condition 2.12” to “Condition 2.11.”

Reply 5

The Division agrees and will make the change as requested.

5.3 The Permittee shall verify that each shipment of diesel fuel oil received for combustion in each emergency engine 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 2.12~~1~~1. Verification shall consist of either of the following:

- 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.

Comment 6**Condition 7.3 – Update Corresponding to Condition 2.2**

Update to require written notification at both the 200-hour and 500-hour rolling-total thresholds, consistent with the proposed edits to Condition 2.2.

Reply 6

See response to Comment 2.

Comment 7**Condition 7.8 – Table 7.8-1 Correction**

Correction of the Group 1 NOx emission factor at 50% Load in Table 7.8-1 from 27.06 lb/hr to 22.06 lb/hr, to conform to the manufacturer-provided emission factors used in Appendix C of the application.

Reply 7

The Division agrees and will make the change as requested.

Table 7.8-1. NOx Mass Emission Rate Source Code

Source	NOx Emission Factor (lb/hr)				
Code	10% Load	25% Load	50% Load	75% Load	100% Load
Group 1	12.57	12.57	22.06	39.01	76.22
Group 2	6.58	5.76	13.85	23.14	37.30
Group 3	-	-	-	-	6.17
Group 4	-	-	-	-	6.17
Group 5	-	-	-	-	3.31

Comment 8**Condition 7.10 – Conforming Removal**

Removal of Condition 7.10 corresponding to the removal of Condition 2.12.

Reply 8

The Division agrees and will make the change as requested.

~~7.10 The Permittee shall use monthly emergency and non-emergency service operating time and generator output load data required by Condition 5.2 to calculate monthly the twelve-month rolling total of the operating hours for each engine during the consecutive twelve-month period. All 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 emergency service operating time equals or exceeds the limits for engines in each emissions group in Condition 2.12. This notification shall include an explanation of how the Permittee intends to attain future compliance with Condition 2.12.~~

~~[391-3-1-.02(6)(b)1, Title V Avoidance, and Air Toxics Avoidance]~~

Comment 9**Condition 8.2 – Annual Fees**

Addition of administrative Condition 8.2 requiring payment of annual fees to the Division.

Reply 9

The Division agrees and will make the change as requested.

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.”

Comment 10**Permit Narrative – Conforming Edits**

Conforming edits and typographical edits to the Permit Narrative as proposed in the Redline Permit Narrative Document.

Reply 10

The original narrative section of the document does not change for minor, non-substantive edits. Any substantive changes to the narrative will be addressed in the narrative addendum.

Sierra Club Comments

Comments were received from the Sierra Club on behalf of itself, and its 9,000 Georgia members. The letter was received on May 22, 2026 and was signed by Isabell Ariza, Managing Attorney, and Caden Koontz, Legal Assistant. Please refer to Appendix C to view the entire comments. EPD will only address the comments relevant to the draft permit and application below.

Comment 1

EPD must consider the cumulative impacts that data centers have on Georgia's air quality and grid planning.

Response 1

The Division is aware of and monitoring the new developments in the MSA area. The Division required the performance of a TIA assessment of the project TAP emissions from the source. The applicant performed the TIA assessment, and the results were well below the AACs. The TIA analysis does not require a cumulative impact analysis. The Division issues enforceable air permits that adhere 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 2

EPD must require data centers to install more protective emissions control technology on their backup generators.

Response 2

The Division is responsible for protecting Georgia's air quality through the regulation of emissions from industrial and mobile sources according to state and federal regulations. The Division cannot dictate to the facility how to design or build the facility.

The Division required the performance of a toxic impact assessment (TIA) of the project's facility-wide toxic air pollutant (TAP) emissions from the source. The applicant performed the TIA assessment, and the results were below the AACs with the proposed Tier II and Tier III (not all of the proposed engines are the Tier II standard) standard engines. The state is allowed to be more stricter than federal regulations, yet it is not in the Division's procedures to require the type of control technology for the engines as the federal and state regulations are being met.

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

Comment 3**EPD must be transparent about the data center permitting process.****Response 3**

The facility checked Box 11 of the Application indicating that confidential information was being submitted in the application, and the guidelines were followed in the Division's "*Procedures for Requesting that*

Submitted Information be treated as Confidential". As such, the number, make and model number were treated as confidential and were not made available to the public.

Substantiated "trade secrets" will be treated as confidential, but the reports on the nature and amounts of stationary source emissions obtained by the Division will not. Information that constitutes "nature and amount" is listed in the Division's. "*Procedures for Submitting Information Pursuant to a Claim that Information in the Submittal is Protected Under Georgia Law from Disclosure to the Public*" (June 2015). This document includes information necessary to determine the identity, amount, frequency, concentration, stack parameters, or other characteristics (to the extent related to air quality) of any emissions which has been emitted by the source; or other characteristics (to the extent related to air quality) of the emissions that, under an applicable standard or limitation, the source is, was, or will be authorized to emit, or a general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources.

The applicant must submit substantiation of the confidentiality claim and both a public and confidential version of the application according to the procedures above. The Division is required to review the confidentiality claim and the applications submitted, and if approved, send a letter saying the confidentiality status is accepted. The redaction of the confidential information from the permit application did not hinder EPD's or the public's review because the make and model of a unit is not necessary to evaluate the nature and extent of emissions, and all emissions related information was readily available in the public version of the permit application filed on September 3, 2025.

General Public and Public Hearing Comments

Comments were received prior to and during the Public Hearing held on May 22, 2026. Please refer to Appendix C for all the comments received during the comment period.

Comment 1

In an e-mail dated Thursday April 23, 2026, Citizen Amanda Buchens states her concerns about the catastrophic health effects and the diesel generators being so close to people and schools and water parks, recreation area, ball fields, etc.

Response 1

The Division required the performance of a TIA assessment of the project TAP emissions from the source. The applicant performed the TIA assessment, and the results were well below the AACs. The Division issues enforceable air permits that adhere 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 2

In an e-mail dated Thursday April 23, 2026, Citizen Jordan Coburn opposes this permit being issued with concerns that the generators will be detrimental to the environment.

Response 2

This comment is duly noted. See response to Comment 1.

Comment 3

In e-mails dated Friday May 1, 2026, and Friday, May 22, 2026, Citizens Laura and Sam Breyfogle state their concerns about possible air quality degradation from an unnamed number of backup generators burning unnamed fuel during testing and use during a power outage. They require transparency of the generator information. They strongly encourage that Tier 4 generators be installed rather than Tier 2 generators since they are less polluting. They state that the Division should require the strictest air quality standards and the facility should use the least amount of generators.

Response 3

The Division is responsible for protecting Georgia's air quality through the regulation of emissions from industrial and mobile sources according to state and federal regulations. The Division cannot dictate to the facility how to design or build the facility.

The Division required the performance of a TIA assessment of the project TAP emissions from the source. The applicant performed the TIA assessment, and the results were well below the AACs with the proposed Tier II and Tier III (not all of the proposed engines are the Tier II standard) standard engines that fire diesel

fuel as stated in the application. The state is allowed to be stricter than federal regulations, yet it is not in the Division's procedures to require the type of control technology for the engines as the federal and state regulations are being met.

Concerning transparency requirements see Response 3 in the Sierra Club Comments.

Comment 4

In an e-mail dated Friday May 22, 2026, Citizens George M. Henry, MD on behalf of Gage Bailey and Cindie Hutchins, Dana Austen, Travis Towns, Charlene Baxter, and Jennifer Sampson state the following;

- Google should be required to have Tier 4 or higher diesel generators. They emit less pollutants and are not as loud.
- Testing should be done no more often than once a month.
- Google should report on emissions regularly with information being available to the public.
- No information should be redacted or hidden from the public.

Without carefully planned and enforced requirements, the many well- conceived and now well-reviewed by our local officials are at risk to be overturned, unless careful oversight is guaranteed.

Response 4

See Response 3 as noted above in the public comments. See Response 3 as noted in Sierra Club comment concerning the confidential submittal process. Regarding reporting, the permittee is required to submit reporting pursuant to Section 7 of the permit. All reporting submitted to EPD is available to the public.

Comment 5

In an e-mail dated Friday May 22, 2026, Citizen Kaitlyn Nicole Williams states her concern about possible air quality degradation from generators. She strongly encourages that Tier 4 generators be installed since they are more protective of the environment.

Response 5

See Response 3 in the public comments.