

April 15, 2022

Washington State Department of Ecology
Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205

Attn: Karin Baldwin and Jenny Filipy

Transmitted via email to: kbal461@ecy.wa.gov and jfil461@ecy.wa.gov

**Re: Approval Order Amendment Request
Microsoft MWH Data Center
Quincy, Washington
Landau Project No. 1409014.010**

Dear Ms. Baldwin and Ms. Filipy:

Microsoft Corporation (Microsoft) operates a data center campus at 1515 NW Port Industrial Parkway in Quincy, Washington (MWH Data Center) under an Approval Order from the Washington State Department of Ecology (Ecology). This letter and its attachments comprise an Approval Order amendment request prepared by Landau Associates, Inc. on behalf of Microsoft. The MWH Data Center currently operates under Ecology Approval Order No. 20AQ-E005 (MWH Approval Order).

Operating limitation 3.a of the MWH Approval Order requires that all generators consume diesel fuel equivalent to on-road specification No. 2 distillate fuel oil (less than 0.00150 weight percent [15 parts per million] sulfur). Microsoft requests permission from Ecology to use renewable diesel fuel to power the generators at the MWH Data Center in place of petroleum-based diesel fuel. A certificate of analysis for REG-9000 renewable hydrocarbon diesel (RHD) fuel is provided as Attachment 1. The terms RHD and hydro-treated vegetable oil (HVO) fuel are used in this application interchangeably.

All permitted generators at the MWH Data Center are Caterpillar (CAT) models. CAT has indicated that HVO fuel is considered a “drop in” replacement for petroleum-based diesel fuel and is approved for use in CAT engines. CAT provided a letter (Attachment 2) indicating that HVO renewable fuel can be used to fuel CAT engines with comparable or lower emissions than that of the same engine model running on petroleum-based diesel fuel. CAT has stated that no change is required to potential site variation (PSV) emissions data based on the use of HVO.

Microsoft has tested RHD fuel at a data center facility outside of Washington state. Emissions were tested in a side-by-side comparison of petroleum-based ultra-low sulfur diesel (ULSD) and RHD. The results of that test show that emissions associated with RHD are similar and in some cases lower than emissions associated with ULSD. Due to the use of test methods that are not comparable to methods used by CAT to develop PSV data in a factory setting, the results of this study are not directly

applicable to emission rates associated with the MWH facility. The study is provided for informational purposes only in Attachment 3.

Microsoft plans to begin using RHD fuel at the MWH facility as soon as approval is granted, or as early as June 2022. A Notice of Construction Application Form is provided in Attachment 4.

Please contact me if you have any comments or questions about this request. Thank you for your time and consideration of this request.

Respectfully submitted,

LANDAU ASSOCIATES, INC.



Mark Brunner
Senior Associate

AEM/MWB/ccy

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cc: Sid Janga, Microsoft

Attachments:

- 1: Caterpillar Certificate of Analysis for REG-9000 Renewable Hydrocarbon Diesel Fuel
- 2: Caterpillar Letter re: Engine Emissions from Renewable/Alternative Fuels
- 3: Results of Microsoft Renewable Hydrocarbon Diesel Study
- 4: Notice of Construction Application Form

**Caterpillar Certificate of Analysis for REG-9000
Renewable Hydrocarbon Diesel Fuel**



Renewable Hydrocarbon Diesel Certificate of Analysis



202009256022 COA

Lot Number:	750-200925-T6022	Product Type:	Renewable Hydrocarbon Diesel
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Analysis of REG-9000/RHD

Property	Value	ASTM D975 No. 2-D Limit	REG-9000® Limit*	Units	Test Method (current revision)
Cloud point:	-11	Report	Report	°C	D5771
Water & Sediment:	<0.05	0.05, max	0.05, max	% volume	D2709
Conductivity:	60	25, min	25, min	pS/m	D2624
Appearance:	Clear & Bright	Clear & Bright	Clear & Bright	N/A	D4176, Procedure 1
API Gravity @ 60°F:	49.3	N/A	Report	N/A	D4052
Specific gravity @ 60°F:	0.7827	N/A	Report	N/A	D4052
Flash point:	65.1	52, min	52, min	°C	D93A
Total Sulfur:	<1	15, max	2, max	ppm (mg/kg)	D5453
Ramsbottom Carbon:	0.05	0.35, max	0.35, max	% mass	D524
Ash:	<0.001	0.01	0.01	% mass	D482
Kinematic Viscosity at 40 °C:	3.2	1.9 – 4.1	1.9 – 4.1	mm ² /sec	D445
Copper Corrosion (3 hrs at 50 °C):	1a	No. 3	No. 1b	N/A	D130
Distillation Temperature, at 90%:	301	282 – 338	282 – 338	°C	D86
Cetane Index:	94	40, min	65, min	N/A	D4737, Procedure A

- Notes:
1. ASTM D1319 test detection limits for Aromatics is 5-99 % volume, since REG Geismar's renewable diesel is lower than 5 % volume, this testing was discontinued in the REG Geismar lab
 2. Based on a customer's purchase requirements, an optional lubricity additive may be injected into the RHD at the time of shipment to bring the lubricity to < 520 microns
 3. This product conforms to the most recent version of ASTM D975

Prepared by: Keith Gill Lab Supervisor Geismar, LA 09/25/2020
Name Title Location Date

Caterpillar Letter re: Engine Emissions from Renewable/Alternative Fuels



Electric Power Division
P.O. Box 610- AC6109
Mossville, IL 61552

6/28/2021

Mycah Gambrell-Ermak
Energy & Sustainability Division,

RE: **Regarding Caterpillar engine emissions from renewable/alternative fuels**

Ms. Gambrell-Ermak,

This letter conveys our emissions experience with Hydrotreated Vegetable Oil (HVO) renewable fuel. Based on our scientific judgment, the chemical attributes of HVO as a fuel, general experience, and available test data, emissions from Caterpillar engines running on a HVO fuel should be comparable, if not lower, to that of the same engine model running on a petroleum diesel. Any given HVO fuel would be expected to meet the fuel specifications prescribed in Caterpillar Commercial Engine Fluid Recommendations (SEBU6251).

Based on the above, HVO fuel-fired Caterpillar engine emissions are expected to be the same or lower than diesel fuel-fired Caterpillar engine emissions provided in Caterpillar's "rated speed potential site variation emissions data (PSV)." PSV data should be used for onsite performance testing validation.

Sincerely,

A handwritten signature in black ink that reads "Evan Hodgen". The signature is written in a cursive, flowing style.

Evan Hodgen
Electric Power Technical Sales Support Manager
Caterpillar Inc.
(765)448-2645
Hodgen_Evan@cat.com

Results of Microsoft Renewable Hydrocarbon Diesel Study



HVO RD99 Testing on Caterpillar C175-16

HVO (RD99) fuel testing on Caterpillar C175-16 Operational and Performance Test
Engine Emissions and Load Comparisons

Test Date: November 5 & 6, 2020

Type of Test: Transient Response Test / Load Test / Emissions Testing

Project Number: EP03524

Engine Serial Number: TB800180

Generator Serial Number: G7J06324

Engine Model: C175-16

Max Power: 3140 KW

Voltage: 480 Volts

Current: 3975 Amps





Summary of Test Results for Diesel vs. RD99 Fuel

The following report encompasses results from a series of tests used for evaluation of exhaust emissions and performance of HVO C175-16 Generator Set using #2 Diesel and Alternative RD99 Fuel. The transient response test results demonstrate that the Genset is able to pick up the 0 to 100% block load and stabilize voltage and frequency in 6.54 seconds on #2 ULSD Fuel and 7.67 Seconds on RD99 Fuel.

Transient response and Emissions load test were conducted on a C175-16 genset rated at 480V 60Hz 0.95pf 3100kW without fan, 3000kW with engine mounted fan. The testing was conducted in a test cell in Griffin, GA at the YES facility, overseen by Caterpillar, with the purpose of comparing genset performance during transient load application and emissions on both diesel and RD99 fuel. The full set of test data was provided to the client for their records. Below is a high-level summary of the results including a reduced data set. The requirements for the RD99 fuel specification were determined during meetings between Caterpillar, client, and the fuel vendor and is documented outside of this summary of results.

Transient Response

Testing indicated that there was not a significant difference in genset transient response performance between the two fuels. Despite RD99 having a lower energy content, the engine fuel system was capable of dynamically adjusting flow rates to provide a similar transient performance. Operation on RD99 should not negatively impact operation during load acceptance. A table with the comparison at each load step is provided in Appendix A.

Emissions Data

Testing was conducted on both fuels for one hour at each 25%, 50% and 75% load and for 3 hours at 100% load. RD99 did show a reduction in PM and CO across all load steps. A reduction of NOx was experienced at part load steps, but the 100% load point was essentially the same between both fuels. A table with the comparison at each load point is provided in Appendix B.

Engine Oil Sample Analysis

Engine oil sample analysis were performed before and after testing on both fuels. The results of wear metals were consistent with a new engine moving through its break in cycle and did not indicate any areas for concern.

Fuel Sample Analysis

Fuel samples were taken for both fuels and have been provided outside of this summary to document the fuel characteristics.





Appendix C – Test Procedure

Test Details

November 4, 2020 – Yancy CAT test facility

4 hour load run on Diesel
20 hour load run on R99
Transient on both fuels

Emissions data

Analytes	EPA Method	Run Duration	Number of runs per test
Oxygen (O ₂)	3A	60 Min	1
Nitrogen oxides (NO _x)	7E	60 Min	1
Carbon monoxide (CO)	10	60 Min	1
Visual emissions (opacity)	9	60 Min	1

Test Procedure:

The tests, as specified in test procedure provided to the customer, are conducted at Yancey Engineered Solutions Test Laboratory. The Genset is set up in Test Cell 2 with the following temporary connections; 24v Battery, 240 VAC Shore Power, Fuel supply and return.

1. Perform Pretest activities for Testing with #2 Diesel Fuel. Obtain Engine Oil and #2 Diesel Fuel Samples for Analysis.
2. Perform Transient Tests with #2 Diesel Fuel as per Test procedure. Load Percentages 0-75-0-50-100-50-75-100-75-50-0-100-0.
3. Operate the Genset on #2 Diesel Fuel at load percentages 25-50-75-100 for Emissions sampling and data collection.
4. Perform Pretest activities for Testing with RD99 Fuel. Obtain Engine Oil Sample for Analysis. Top off Oil Level and Record quantity as necessary.
5. Operate the Genset on RD99 Fuel for 14 Hours Continuously at 100 percent load and collect operating data.
6. Operate the Genset on RD99 Fuel at load percentages 25-50-75-100 for Emissions sampling and data collection.
7. Perform Transient Tests with RD99 Fuel as per Test procedure. Load Percentages 0-75-0-50-100-50-75-100-75-50-0-100-0.
8. Operate the Genset on RD99 Fuel for 3 Hours Continuously at 100 percent load and collect operating data.
9. Obtain Oil Sample for analysis.





Test Instrumentation:

Load bank	Creschic 6.25 Mva Resistive/Reactive.
Computer Software	Caterpillar- Electronic Technician Dran View 6 Enterprise
Data Recorder	Dranetz PX5, calibration date: 1/20/2020

Test Fuel:

#2 ULSD Fuel- Test Lab Analysis
RD99 Fuel- Test Lab Analysis



Advanced Industrial Resources, Inc.

Test Results

Yancy

Griffin, GA

Generator #2 Diesel

		Units	Run 1	Run 2	Run 3	Run 4	Run 5	Run 6	Averages
Genset Load		% of full load	25	50	75	100	100	100	100
Test Date			05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20
Start Time			9:10	10:48	12:10	13:35	14:50	16:10	Runs
End Time			10:16	11:52	13:14	14:40	15:54	17:15	4, 5, 6
P_m	Pressure of meter gases	inches Hg	30.27	30.30	30.27	30.24	30.21	30.20	30.22
P_s	Pressure of stack gases	inches Hg	30.18	30.20	30.18	30.14	30.11	30.10	30.12
V_{m(std)}	Volume of gas sample	dscf	37.35	39.54	36.09	37.10	36.31	39.26	37.56
V_{w(std),meas}	Meas. volume of water vapor	scf	2.26	2.40	2.17	2.54	2.64	2.59	2.59
B_{ws,meas}	Measured moisture	dimensionless	0.057	0.057	0.057	0.064	0.068	0.062	0.065
B_{ws,theo}	Theoretical max. moisture		1.000	1.000	1.000	1.000	1.000	1.000	1.000
B_{ws,act}	Actual moisture		0.057	0.057	0.057	0.064	0.068	0.062	0.065
M_d	Mol. Wt. Of gas at DGM	lb./lb.-mole	29.48	29.50	29.59	29.66	29.66	29.65	29.66
M_s	Mol. Wt. Of gas at stack	lb./lb.-mole	28.83	28.85	28.93	28.92	28.87	28.93	28.91
V_s	Velocity of stack gas	ft./sec	42.42	85.13	96.59	119.90	120.96	121.60	120.82
A_n	Area of nozzle	ft ²	0.000491	0.000289	0.000241	0.000218	0.000218	0.000218	0.000218
A_s	Area of stack	ft ²	3.14	3.14	3.14	3.14	3.14	3.14	3.14
Gas Stream Flow Rates									
Q_a	Vol. Flow rate of actual gas	cfm	7,996	16,046	18,207	22,601	22,800	22,921	22,774
Q_w	Vol. Flow rate of wet gas	scfm	4,124	7,502	8,328	9,908	9,878	9,989	9,925
Q_w	Vol. Flow rate of wet gas	scfh	247,424	450,104	499,686	594,472	592,702	599,366	595,513
Q_{sd}	Vol. Flow rate of dry gas	dscfm	3,889	7,072	7,857	9,273	9,210	9,371	9,285
I	Isokinetic sampling ratio	percent	102.5	101.5	100.0	96.1	94.7	100.6	97.1
Process Data									
P_(product input)	Process	HP	1,126	2,148	3,151	4,159	4,160	4,166	4,162
P_(heat input)	Fuel firing rate	MMBtu/hr	9.8	18.0	23.8	31.3	31.1	31.0	31.1
Gas Stream Particulate Concentrations Method 5									
C_{PM}	Conc. Of PM in dry stack gas	mg/dscm	54.99	5.16	7.02	8.93	12.91	2.66	8.17
C_{PM}	Conc. Of PM in dry stack gas	gr/dscf	0.02402	0.00225	0.00307	0.00390	0.00564	0.00116	0.00357
Particulate Matter Mass Rates Method 5									
E_{PM}	Emission rate of PM	lb/hour	0.801	0.137	0.207	0.310	0.445	0.093	0.283
E_{PM}	Emission rate of PM	g/HP-hr	0.323	0.029	0.030	0.034	0.049	0.010	0.031
E_{PM}	Emission rate of PM	lb / MMBtu	0.0820	0.0076	0.0087	0.0099	0.0143	0.0030	0.0091
Gas Stream Particulate Concentrations Method 202									
C_{PM}	Conc. Of PM in dry stack gas	mg/dscm	17.06	21.35	18.15	24.04	18.67	9.04	17.25
C_{PM}	Conc. Of PM in dry stack gas	gr/dscf	0.00745	0.00932	0.00793	0.01050	0.00816	0.00395	0.00753
Particulate Matter Mass Rates Method 202									
E_{PM}	Emission rate of PM	lb/hour	0.249	0.565	0.534	0.835	0.644	0.317	0.599
E_{PM}	Emission rate of PM	g/HP-hr	0.100	0.119	0.077	0.091	0.070	0.035	0.065
E_{PM}	Emission rate of PM	lb / MMBtu	0.025	0.031	0.022	0.027	0.021	0.010	0.0192
Gas Stream Particulate Concentrations Methods 5 & 202									
C_{PM}	Conc. Of PM in dry stack gas	mg/dscm	72.06	26.50	25.17	32.96	31.59	11.70	25.42
C_{PM}	Conc. Of PM in dry stack gas	gr/dscf	0.0315	0.0116	0.0110	0.0144	0.0138	0.0051	0.0111
Particulate Matter Mass Rates Methods 5 & 202									
E_{PM}	Emission rate of PM	lb/hour	1.05	0.70	0.74	1.14	1.09	0.41	0.88
E_{PM}	Emission rate of PM	g/HP-hr	0.423	0.148	0.107	0.125	0.119	0.045	0.096
E_{PM}	Emission rate of PM	lb / MMBtu	0.1075	0.0389	0.0311	0.0366	0.0350	0.0132	0.0283
Sulfur Dioxide Concentrations Method 6C									
C_{SO2}	Conc. of SO ₂ in dry stack gas	ppm	9.48	3.4	3.78	5.31	5.38	5.07	5.25
C_{SO2}	Conc. of SO ₂ in dry stack gas	ppm @ 15% O ₂	6.96	2.43	2.30	2.90	2.94	2.82	2.89
C_{SO2}	Conc. of SO ₂ in dry stack gas	mg/dscm	25.23	8.96	10.07	14.13	14.31	13.48	13.98
C_{SO2}	Conc. of SO ₂ in dry stack gas	gr/dscf	0.01102	0.00391	0.00440	0.00617	0.00625	0.00589	0.00610
Sulfur Dioxide Mass Rates Method 6C									
E_{SO2}	Emission rate of SO ₂	lb/hour	0.37	0.24	0.30	0.49	0.49	0.47	0.49
E_{SO2}	Emission rate of SO ₂	g/HP-hr	0.148	0.050	0.043	0.054	0.054	0.052	0.053
E_{SO2}	Emission rate of SO ₂	lb / MMBtu	0.0376	0.0132	0.0124	0.0157	0.0159	0.0153	0.0156

Advanced Industrial Resources, Inc.

Test Results

Yancy

Griffin, GA

Generator #2 Diesel

		Units	Run 1	Run 2	Run 3	Run 4	Run 5	Run 6	Averages
Genset Load	% of full load		25	50	75	100	100	100	100
Test Date			05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20	05-Nov-20
Start Time			9:10	10:48	12:10	13:35	14:50	16:10	Runs
End Time			10:16	11:52	13:14	14:40	15:54	17:15	4, 5, 6
Nitrogen Oxides Concentrations Method 7E									
C_{NOx}	Conc. of NO _x in dry stack gas	ppm	510.5	270.6	620.9	890.0	874.2	855.4	873.2
C_{NOx}	Conc. of NO _x in dry stack gas	ppm @ 15% O ₂	374.6	195.4	377.7	486.6	477.1	476.1	480.0
C_{NOx}	Conc. of NO _x in dry stack gas	mg/dscm	976.4	517.6	1187.6	1702.3	1672.0	1636.0	1670.1
C_{NOx}	Conc. of NO _x in dry stack gas	gr/dscf	0.426	0.226	0.519	0.743	0.730	0.715	0.729
Nitrogen Oxides Mass Rates Method 7E									
E_{NOx}	Emission rate of NO _x	lb/hour	14.2	13.7	35.0	59.1	57.7	57.4	58.1
E_{NOx}	Emission rate of NO _x	g/HP-hr	5.73	2.90	5.03	6.33	6.29	6.25	6.29
E_{NOx}	Emission rate of NO _x	lb / MMBtu	1.46	0.76	1.47	1.89	1.85	1.85	1.87
Carbon Monoxide Concentrations Method 10									
C_{CO}	Conc. of CO in dry stack gas	ppm	360.4	89.2	116.1	78.6	74.6	65.3	72.8
C_{CO}	Conc. of CO in dry stack gas	ppm @ 15% O ₂	264.5	64.4	70.6	43.0	40.7	36.3	40.0
C_{CO}	Conc. of CO in dry stack gas	mg/dscm	419.6	103.8	135.2	91.5	86.8	76.0	84.8
C_{CO}	Conc. of CO in dry stack gas	gr/dscf	0.1833	0.0454	0.0590	0.0399	0.0379	0.0332	0.0370
Carbon Monoxide Mass Rates Method 10									
E_{CO}	Emission rate of CO	lb/hour	6.11	2.75	3.98	3.18	3.00	2.67	2.95
E_{CO}	Emission rate of CO	g/HP-hr	2.46	0.58	0.57	0.35	0.33	0.29	0.32
E_{CO}	Emission rate of CO	lb / MMBtu	0.626	0.152	0.167	0.102	0.096	0.086	0.095
Total Hydrocarbon Concentrations (including methane) Method 25A									
C_{THC}	THC concentration (as methane)	ppm	12.20	5.63	2.04	2.48	2.15	3.15	2.59
C_{THC}	THC concentration (as methane)	ppm @ 15% O ₂	8.95	4.06	1.24	1.35	1.17	1.75	1.43
C_{THC}	THC concentration (as methane)	mg/dscm	8.11	3.74	1.36	1.65	1.43	2.09	1.72
C_{THC}	THC concentration (as methane)	gr/dscf	0.00354	0.00164	0.00059	0.00072	0.00062	0.00091	0.00075
Total Hydrocarbon Mass Rates (including methane) Method 25A									
E_{THC}	THC emission rate (as methane)	lb/hour	0.1182	0.0992	0.0400	0.0572	0.0493	0.0735	0.0600
E_{THC}	THC emission rate (as carbon)	lb/hour	0.0886	0.0744	0.0300	0.0429	0.0370	0.0551	0.0450
E_{THC}	THC emission rate (as carbon)	lb / MMBtu	0.0121	0.0055	0.0017	0.0018	0.0016	0.0024	0.0019
Methane Concentrations Method 25A									
C_{Methane}	CH ₄ concentration (as methane)	ppm	1.57	0.87	1.02	0.77	0.71	0.72	0.73
C_{Methane}	CH ₄ concentration (as methane)	ppm @ 15% O ₂	1.15	0.63	0.62	0.42	0.39	0.40	0.40
C_{Methane}	CH ₄ concentration (as methane)	mg/dscm	1.04	0.58	0.68	0.51	0.47	0.48	0.49
C_{Methane}	CH ₄ concentration (as methane)	gr/dscf	0.00046	0.00025	0.00030	0.00022	0.00021	0.00021	0.00021
Methane Mass Rates Method 25A									
E_{Methane}	CH ₄ emission rate (as methane)	lb/hour	0.0152	0.0153	0.0199	0.0178	0.0163	0.0167	0.0169
E_{Methane}	CH ₄ emission rate (as carbon)	lb/hour	0.0114	0.0115	0.0149	0.0134	0.0122	0.0125	0.0127
E_{Methane}	CH ₄ emission rate (as carbon)	lb / MMBtu	0.001168	0.000848	0.000836	0.000570	0.000525	0.000538	0.000544
Ethane Concentrations Method 25A									
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	ppm	< 0.0502	< 0.0502	< 0.0501	< 0.0505	< 0.0507	< 0.0504	< 0.0506
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	ppm @ 15% O ₂	< 0.0368	< 0.0362	< 0.0305	< 0.0276	< 0.0277	< 0.0281	< 0.0278
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	mg/dscm	< 0.0627	< 0.0627	< 0.0627	< 0.0632	< 0.0634	< 0.0630	< 0.0632
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	gr/dscf	< 0.000027	< 0.000027	< 0.000027	< 0.000028	< 0.000028	< 0.000028	< 0.000028
Ethane Mass Rates Method 25A									
C_{Ethane}	C ₂ H ₆ emission rate (as Ethane)	lb/hour	< 0.00091	< 0.00166	< 0.00184	< 0.00219	< 0.00219	< 0.00221	< 0.00220
C_{Ethane}	C ₂ H ₆ emission rate (as carbon)	lb/hour	< 0.00073	< 0.00133	< 0.00147	< 0.00175	< 0.00175	< 0.00177	< 0.00175
C_{Ethane}	C ₂ H ₆ emission rate (as carbon)	lb / MMBtu	< 0.00007	< 0.00009	< 0.00008	< 0.00007	< 0.00007	< 0.00007	< 0.00007
Total Hydrocarbon Mass Rates (excluding methane and ethane) Method 25A									
E_{THC}	THC emission rate (as carbon)	lb/hour	0.0765	0.0616	0.0136	0.0278	0.0230	0.0408	0.0306
E_{THC}	THC emission rate (as carbon)	g/HP-hr	0.0308	0.0130	0.0020	0.0030	0.0025	0.0044	0.0033

Notes:

- 1) lb/MMBtu results based on Method 19 Fd factor of 9190 for diesel oil combustion.
- 2) (<) indicates the result were below the detection limit and value used is the minimally detected value.

Advanced Industrial Resources, Inc.

Test Results

Yancy

Griffin, GA

Generator RD99 Diesel

		Units	Run 1	Run 2	Run 3	Run 4	Run 5	Run 6	Averages
Genset Load		% of full load	25	50	75	100	100	100	100
Test Date			06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20
Start Time			7:55	9:28	10:43	11:58	13:12	14:25	Runs
End Time			9:00	10:31	11:47	13:04	14:17	15:30	4, 5, 6
P_m	Pressure of meter gases	inches Hg	30.26	30.20	30.18	30.17	30.15	30.11	30.14
P_s	Pressure of stack gases	inches Hg	30.16	30.09	30.09	30.07	30.05	30.01	30.04
V_{m(std)}	Volume of gas sample	dscf	38.26	39.85	36.47	40.85	40.46	38.16	39.82
V_{w(std),meas}	Meas. volume of water vapor	scf	2.21	2.54	2.73	2.68	2.92	2.45	2.68
B_{ws,meas}	Measured moisture	dimensionless	0.055	0.060	0.070	0.062	0.067	0.060	0.063
B_{ws,theo}	Theoretical max. moisture		1.000	1.000	1.000	1.000	1.000	1.000	1.000
B_{ws,act}	Actual moisture		0.055	0.060	0.070	0.062	0.067	0.060	0.063
M_d	Mol. Wt. Of gas at DGM	lb./lb.-mole	29.44	29.36	29.46	29.54	29.58	29.64	29.59
M_s	Mol. Wt. Of gas at stack	lb./lb.-mole	28.82	28.68	28.66	28.83	28.80	28.94	28.86
V_s	Velocity of stack gas	ft./sec	45.33	85.70	95.71	121.65	121.50	121.94	121.70
A_n	Area of nozzle	ft ²	0.000491	0.000289	0.000241	0.000218	0.000218	0.000218	0.000218
A_s	Area of stack	ft ²	3.14	3.14	3.14	3.14	3.14	3.14	3.14
Gas Stream Flow Rates									
Q_a	Vol. Flow rate of actual gas	cfm	8,544	16,154	18,041	22,931	22,902	22,986	22,939
Q_w	Vol. Flow rate of wet gas	scfm	4,386	7,597	8,294	10,167	10,086	10,041	10,098
Q_w	Vol. Flow rate of wet gas	scfh	263,182	455,846	497,638	610,029	605,151	602,478	605,886
Q_{sd}	Vol. Flow rate of dry gas	dscfm	4,147	7,142	7,716	9,541	9,407	9,436	9,461
I	Isokinetic sampling ratio	percent	98.5	101.3	102.9	102.8	103.3	97.1	101.1
Process Data									
P_(product input)	Process	HP	1,126	2,148	3,133	4,166	4,165	4,166	4,166
P_(heat input)	Fuel firing rate	MMBtu/hr	10.9	20.9	25.0	33.2	32.7	31.7	32.5
Gas Stream Particulate Concentrations Method 5									
C_{PM}	Conc. Of PM in dry stack gas	mg/dscm	43.01	2.85	4.77	3.42	3.48	2.51	3.14
C_{PM}	Conc. Of PM in dry stack gas	gr/dscf	0.01879	0.00125	0.00208	0.00150	0.00152	0.00110	0.00137
Particulate Matter Mass Rates Method 5									
E_{PM}	Emission rate of PM	lb/hour	0.668	0.076	0.138	0.122	0.122	0.089	0.111
E_{PM}	Emission rate of PM	g/HP-hr	0.269	0.016	0.020	0.013	0.013	0.010	0.012
E_{PM}	Emission rate of PM	lb / MMBtu	0.0615	0.0036	0.0055	0.0037	0.0037	0.0028	0.0034
Gas Stream Particulate Concentrations Method 202									
C_{PM}	Conc. Of PM in dry stack gas	mg/dscm	9.88	10.68	15.15	8.34	11.00	12.96	10.77
C_{PM}	Conc. Of PM in dry stack gas	gr/dscf	0.00431	0.00466	0.00662	0.00364	0.00480	0.00566	0.00470
Particulate Matter Mass Rates Method 202									
E_{PM}	Emission rate of PM	lb/hour	0.153	0.286	0.438	0.298	0.388	0.458	0.381
E_{PM}	Emission rate of PM	g/HP-hr	0.062	0.060	0.063	0.032	0.042	0.050	0.042
E_{PM}	Emission rate of PM	lb / MMBtu	0.014	0.014	0.018	0.009	0.012	0.014	0.0118
Gas Stream Particulate Concentrations Methods 5 & 202									
C_{PM}	Conc. Of PM in dry stack gas	mg/dscm	52.89	13.53	19.92	11.77	14.47	15.46	13.90
C_{PM}	Conc. Of PM in dry stack gas	gr/dscf	0.0231	0.0059	0.0087	0.0051	0.0063	0.0068	0.0061
Particulate Matter Mass Rates Methods 5 & 202									
E_{PM}	Emission rate of PM	lb/hour	0.82	0.36	0.58	0.42	0.51	0.55	0.49
E_{PM}	Emission rate of PM	g/HP-hr	0.331	0.076	0.083	0.046	0.056	0.060	0.054
E_{PM}	Emission rate of PM	lb / MMBtu	0.0757	0.0173	0.0230	0.0127	0.0156	0.0172	0.0152
Sulfur Dioxide Concentrations Method 6C									
C_{SO2}	Conc. of SO ₂ in dry stack gas	ppm	3.38	2.3	4.40	5.67	6.44	6.20	6.10
C_{SO2}	Conc. of SO ₂ in dry stack gas	ppm @ 15% O ₂	2.38	1.46	2.50	3.00	3.42	3.40	3.27
C_{SO2}	Conc. of SO ₂ in dry stack gas	mg/dscm	8.99	6.19	11.71	15.08	17.15	16.50	16.24
C_{SO2}	Conc. of SO ₂ in dry stack gas	gr/dscf	0.00393	0.00270	0.00511	0.00658	0.00749	0.00721	0.00709
Sulfur Dioxide Mass Rates Method 6C									
E_{SO2}	Emission rate of SO ₂	lb/hour	0.14	0.17	0.34	0.54	0.60	0.58	0.58
E_{SO2}	Emission rate of SO ₂	g/HP-hr	0.056	0.035	0.049	0.059	0.066	0.064	0.063
E_{SO2}	Emission rate of SO ₂	lb / MMBtu	0.0129	0.0079	0.0135	0.0162	0.0185	0.0184	0.0177

Advanced Industrial Resources, Inc.

Test Results

Yancy

Griffin, GA

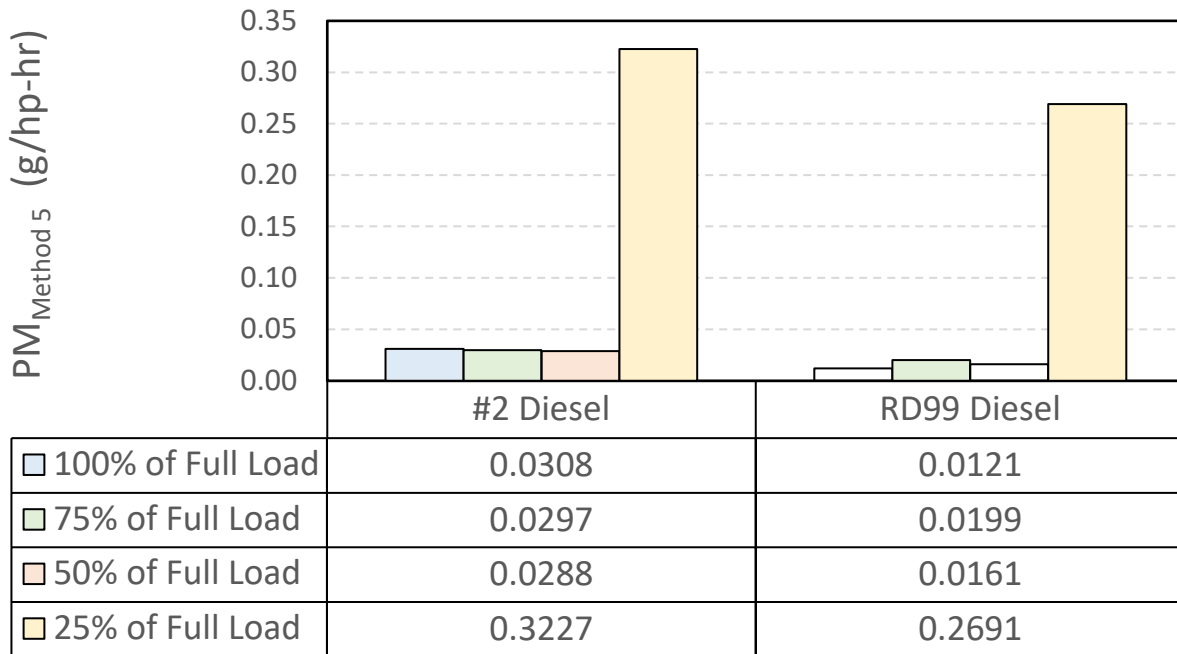
Generator RD99 Diesel

		Units	Run 1	Run 2	Run 3	Run 4	Run 5	Run 6	Averages
Genset Load	% of full load		25	50	75	100	100	100	100
Test Date			06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20	06-Nov-20
Start Time			7:55	9:28	10:43	11:58	13:12	14:25	Runs
End Time			9:00	10:31	11:47	13:04	14:17	15:30	4, 5, 6
Nitrogen Oxides Concentrations Method 7E									
C_{NOx}	Conc. of NO _x in dry stack gas	ppm	516.4	236.9	555.0	812.5	823.6	859.7	831.9
C_{NOx}	Conc. of NO _x in dry stack gas	ppm @ 15% O ₂	363.6	148.9	315.4	430.7	437.0	470.9	446.2
C_{NOx}	Conc. of NO _x in dry stack gas	mg/dscm	987.7	453.1	1061.5	1554.0	1575.3	1644.3	1591.2
C_{NOx}	Conc. of NO _x in dry stack gas	gr/dscf	0.431	0.198	0.464	0.679	0.688	0.718	0.695
Nitrogen Oxides Mass Rates Method 7E									
E_{NOx}	Emission rate of NO _x	lb/hour	15.3	12.1	30.7	55.5	55.5	58.1	56.4
E_{NOx}	Emission rate of NO _x	g/HP-hr	6.18	2.56	4.44	6.05	6.05	6.33	6.14
E_{NOx}	Emission rate of NO _x	lb / MMBtu	1.41	0.58	1.23	1.67	1.70	1.83	1.73
Carbon Monoxide Concentrations Method 10									
C_{CO}	Conc. of CO in dry stack gas	ppm	294.0	52.5	90.5	57.1	61.2	63.3	60.6
C_{CO}	Conc. of CO in dry stack gas	ppm @ 15% O ₂	207.0	33.0	51.4	30.3	32.5	34.7	32.5
C_{CO}	Conc. of CO in dry stack gas	mg/dscm	342.3	61.1	105.3	66.5	71.3	73.8	70.5
C_{CO}	Conc. of CO in dry stack gas	gr/dscf	0.1495	0.0267	0.0460	0.0290	0.0311	0.0322	0.0308
Carbon Monoxide Mass Rates Method 10									
E_{CO}	Emission rate of CO	lb/hour	5.32	1.63	3.04	2.38	2.51	2.61	2.50
E_{CO}	Emission rate of CO	g/HP-hr	2.14	0.35	0.44	0.26	0.27	0.28	0.27
E_{CO}	Emission rate of CO	lb / MMBtu	0.490	0.078	0.122	0.072	0.077	0.082	0.077
Total Hydrocarbon Concentrations (including methane) Method 25A									
C_{THC}	THC concentration (as methane)	ppm	5.56	2.98	1.87	2.03	2.10	2.18	2.10
C_{THC}	THC concentration (as methane)	ppm @ 15% O ₂	3.91	1.88	1.06	1.08	1.12	1.19	1.13
C_{THC}	THC concentration (as methane)	mg/dscm	3.70	1.99	1.24	1.35	1.40	1.45	1.40
C_{THC}	THC concentration (as methane)	gr/dscf	0.00162	0.00087	0.00054	0.00059	0.00061	0.00063	0.00061
Total Hydrocarbon Mass Rates (including methane) Method 25A									
E_{THC}	THC emission rate (as methane)	lb/hour	0.0575	0.0531	0.0359	0.0484	0.0493	0.0511	0.0496
E_{THC}	THC emission rate (as carbon)	lb/hour	0.0431	0.0398	0.0270	0.0363	0.0370	0.0384	0.0372
E_{THC}	THC emission rate (as carbon)	lb / MMBtu	0.0053	0.0025	0.0014	0.0015	0.0015	0.0016	0.0015
Methane Concentrations Method 25A									
C_{Methane}	CH ₄ concentration (as methane)	ppm	1.62	0.79	< 0.49	< 0.48	< 0.45	< 0.45	0.46
C_{Methane}	CH ₄ concentration (as methane)	ppm @ 15% O ₂	1.14	0.50	< 0.28	< 0.26	< 0.24	< 0.25	0.25
C_{Methane}	CH ₄ concentration (as methane)	mg/dscm	1.08	0.53	< 0.32	< 0.32	< 0.30	< 0.30	0.31
C_{Methane}	CH ₄ concentration (as methane)	gr/dscf	0.00047	0.00023	< 0.00014	< 0.00014	< 0.00013	< 0.00013	0.00013
Methane Mass Rates Method 25A									
E_{Methane}	CH ₄ emission rate (as methane)	lb/hour	0.0167	0.0141	< 0.0094	< 0.0115	< 0.0106	< 0.0107	0.0109
E_{Methane}	CH ₄ emission rate (as carbon)	lb/hour	0.0125	0.0106	< 0.0070	< 0.0086	< 0.0080	< 0.0080	0.0082
E_{Methane}	CH ₄ emission rate (as carbon)	lb / MMBtu	0.001156	0.000675	< 0.000374	< 0.000346	< 0.000325	< 0.000336	0.000335
Ethane Concentrations Method 25A									
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	ppm	< 0.0514	< 0.0491	< 0.0497	< 0.0492	< 0.0495	< 0.0492	< 0.0493
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	ppm @ 15% O ₂	< 0.0362	< 0.0309	< 0.0282	< 0.0261	< 0.0263	< 0.0269	< 0.0264
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	mg/dscm	< 0.0643	< 0.0614	< 0.0621	< 0.0616	< 0.0619	< 0.0615	< 0.0617
C_{Ethane}	C ₂ H ₆ concentration (as Ethane)	gr/dscf	< 0.000028	< 0.000027	< 0.000027	< 0.000027	< 0.000027	< 0.000027	< 0.000027
Ethane Mass Rates Method 25A									
C_{Ethane}	C ₂ H ₆ emission rate (as Ethane)	lb/hour	< 0.00100	< 0.00164	< 0.00179	< 0.00220	< 0.00218	< 0.00217	< 0.00218
C_{Ethane}	C ₂ H ₆ emission rate (as carbon)	lb/hour	< 0.00080	< 0.00131	< 0.00143	< 0.00176	< 0.00174	< 0.00173	< 0.00174
C_{Ethane}	C ₂ H ₆ emission rate (as carbon)	lb / MMBtu	< 0.00007	< 0.00008	< 0.00007	< 0.00007	< 0.00007	< 0.00007	< 0.00007
Total Hydrocarbon Mass Rates (excluding methane and ethane) Method 25A									
E_{THC}	THC emission rate (as carbon)	lb/hour	0.0297	0.0279	0.0185	0.0259	0.0273	0.0286	0.0273
E_{THC}	THC emission rate (as carbon)	g/HP-hr	0.0120	0.0059	0.0027	0.0028	0.0030	0.0031	0.0030

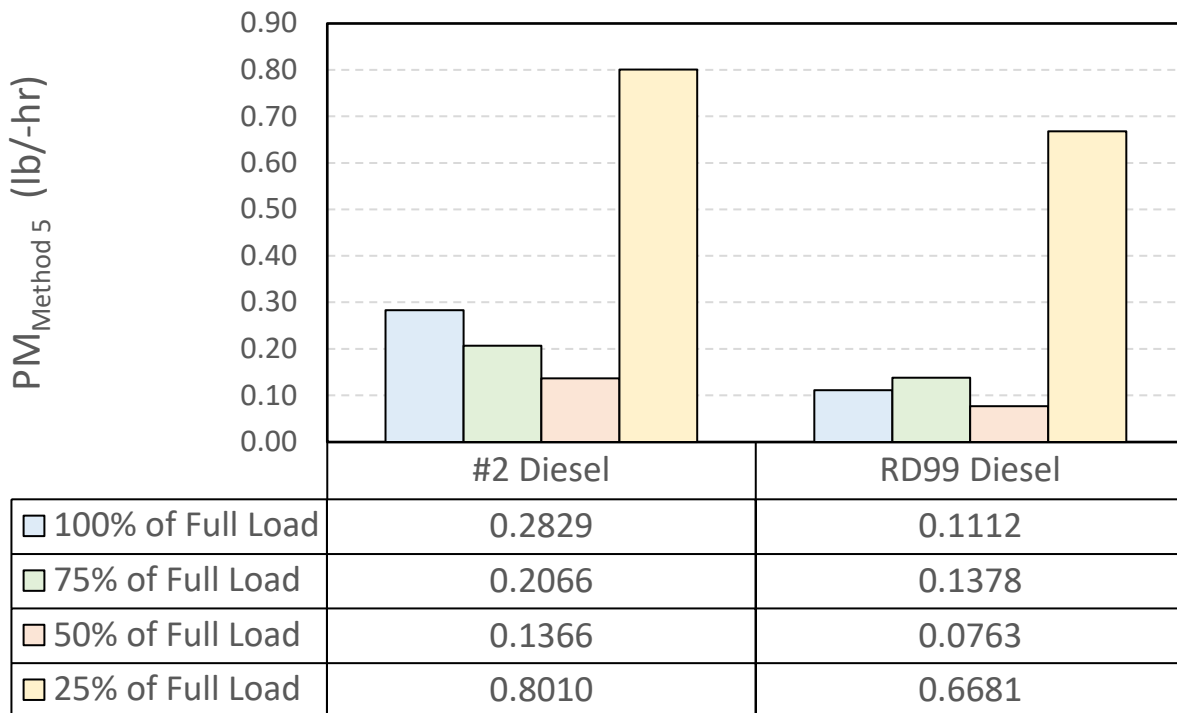
Notes:

- 1) lb/MMBtu results based on Method 19 Fd factor of 9190 for diesel oil combustion.
- 2) (<) indicates the result were below the detection limit and value used is the minimally detected value.

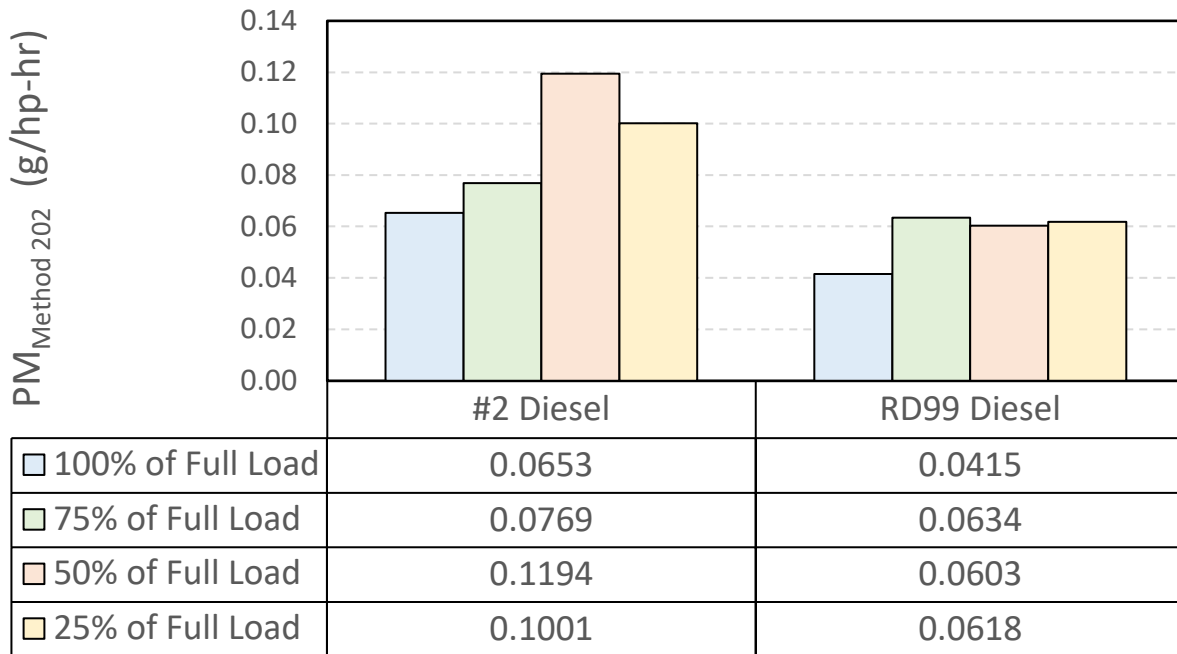
Emissions Test Comparisons - $PM_{\text{Method 5}}$ (g/hp-hr)



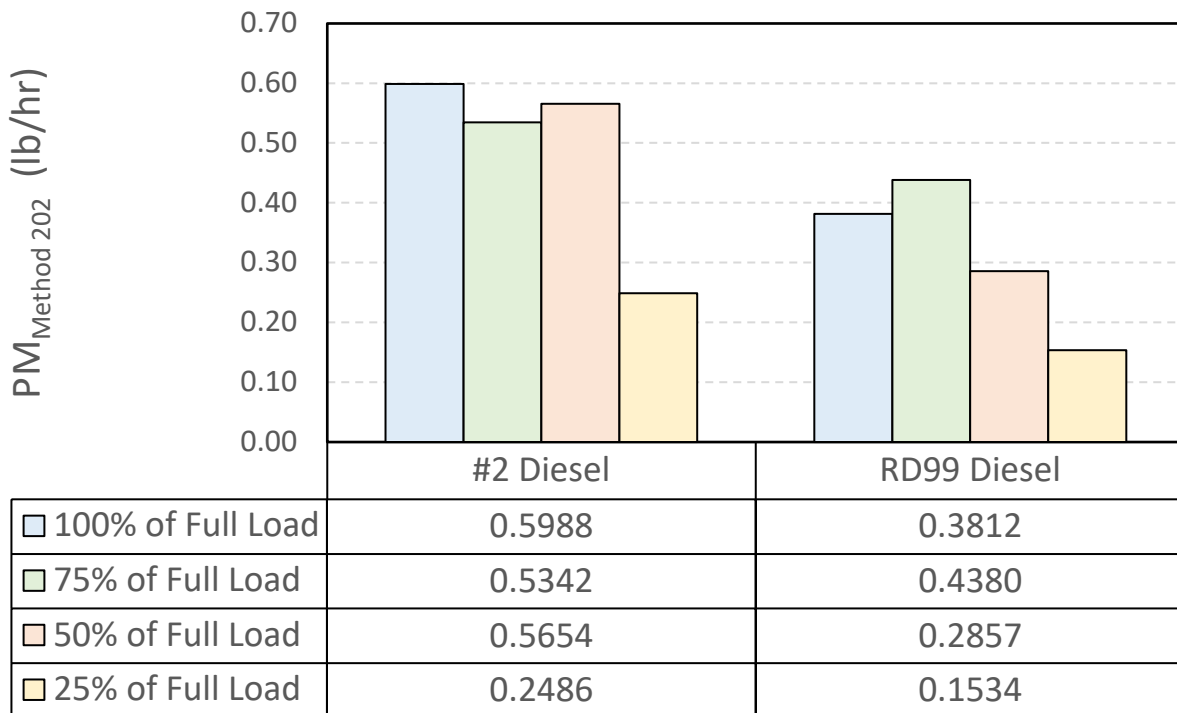
Emissions Test Comparisons - $PM_{\text{Method 5}}$ (lb/hr)



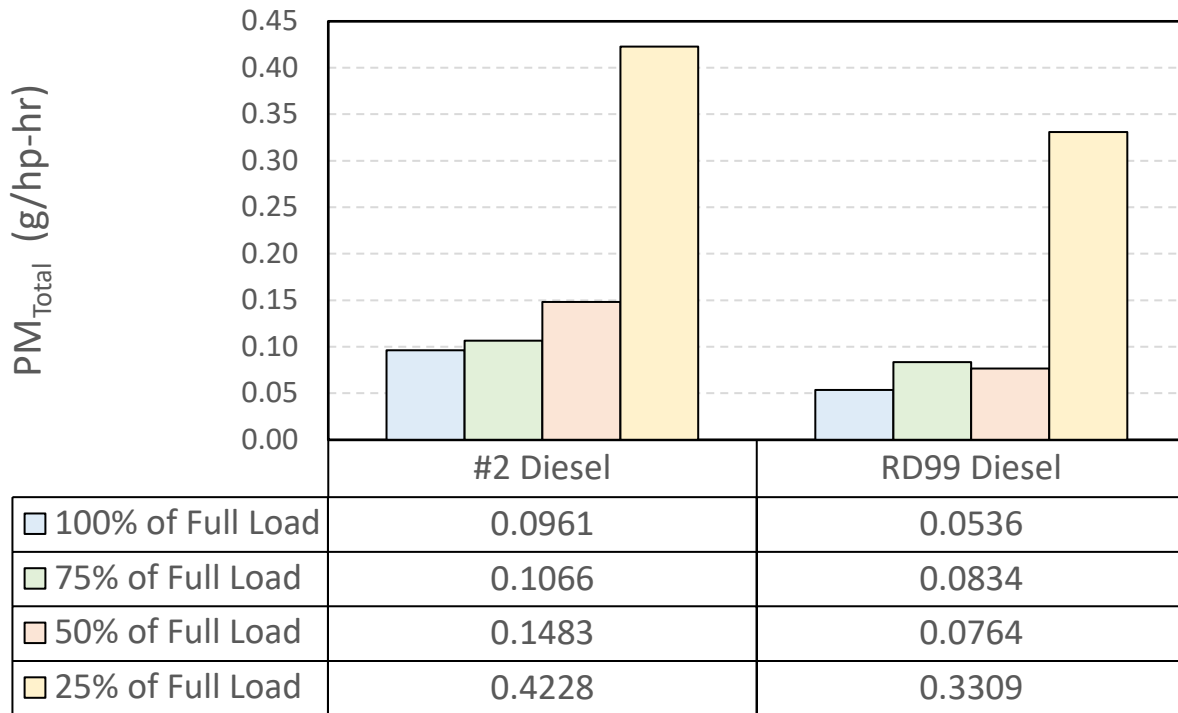
Emissions Test Comparisons - $PM_{\text{Method 202}}$ (g/hp-hr)



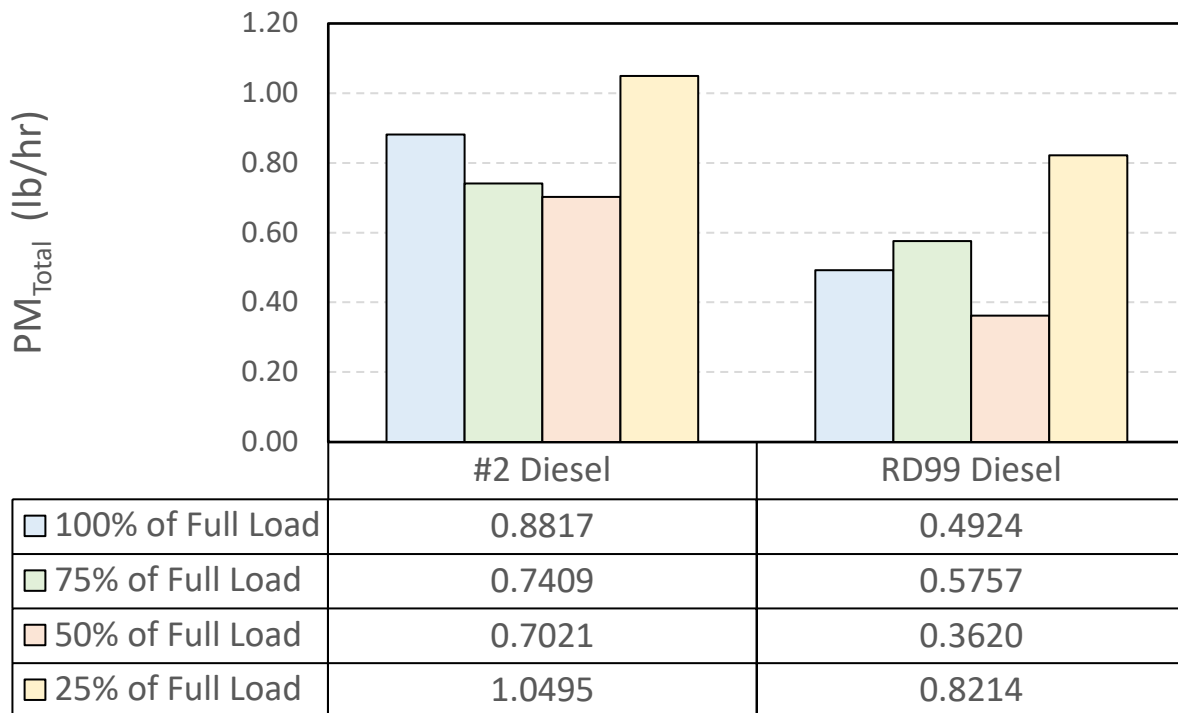
Emissions Test Comparisons - $PM_{\text{Method 202}}$ (lb/hr)



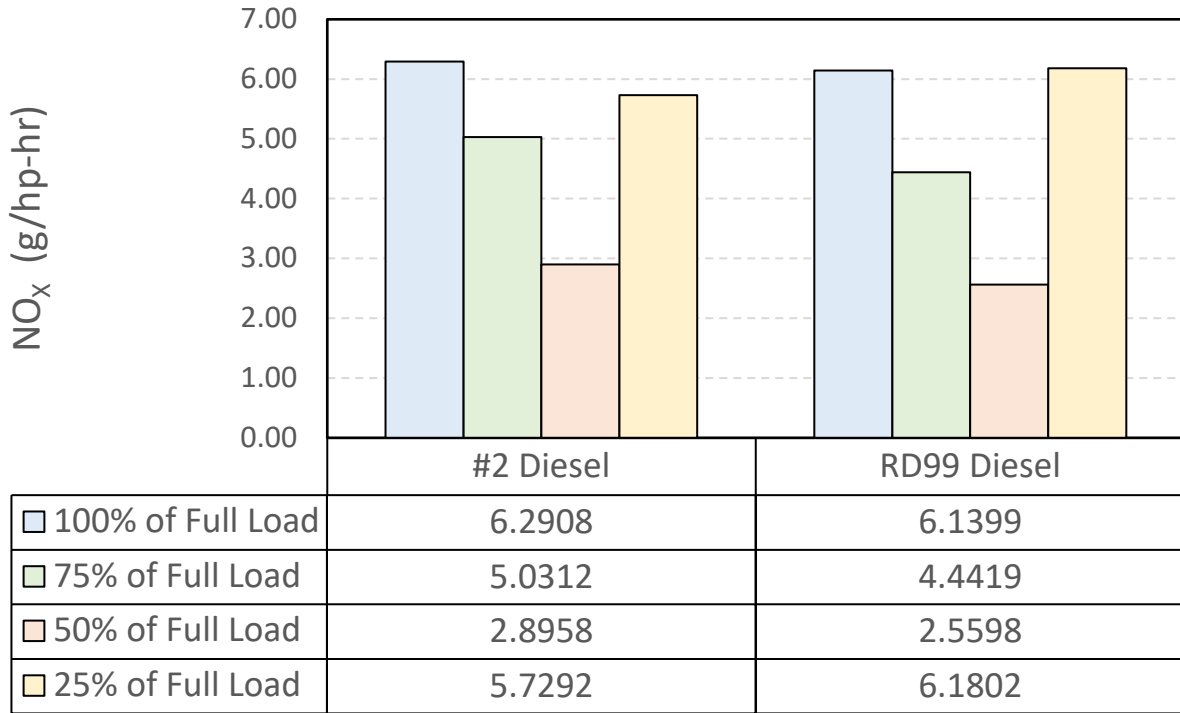
Emissions Test Comparisons - PM_{Total} (g/hp-hr)



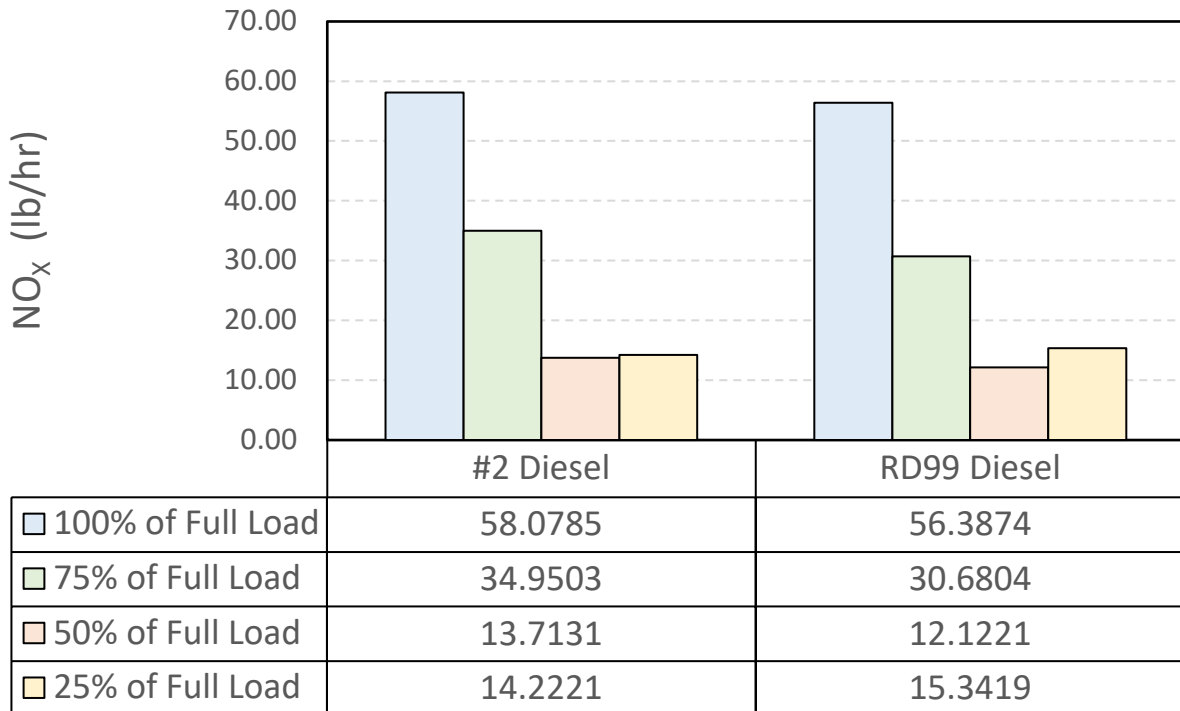
Emissions Test Comparisons - PM_{Total} (lb/hr)



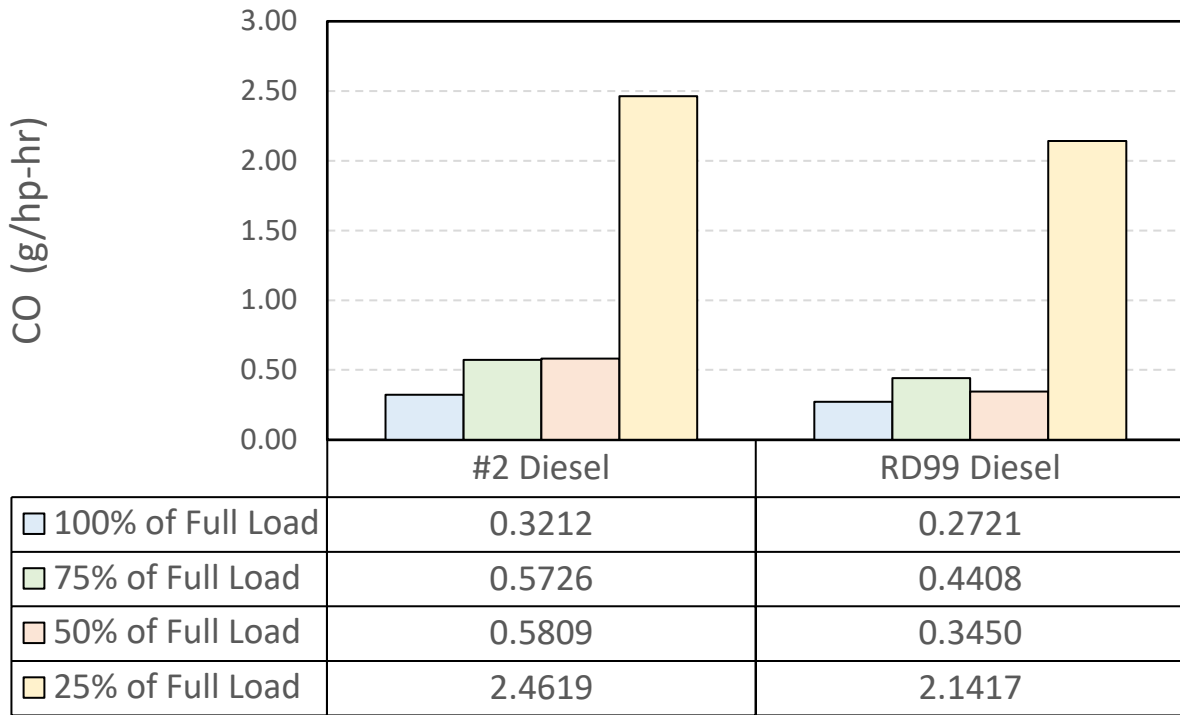
Emissions Test Comparisons - NO_x (g/hp-hr)



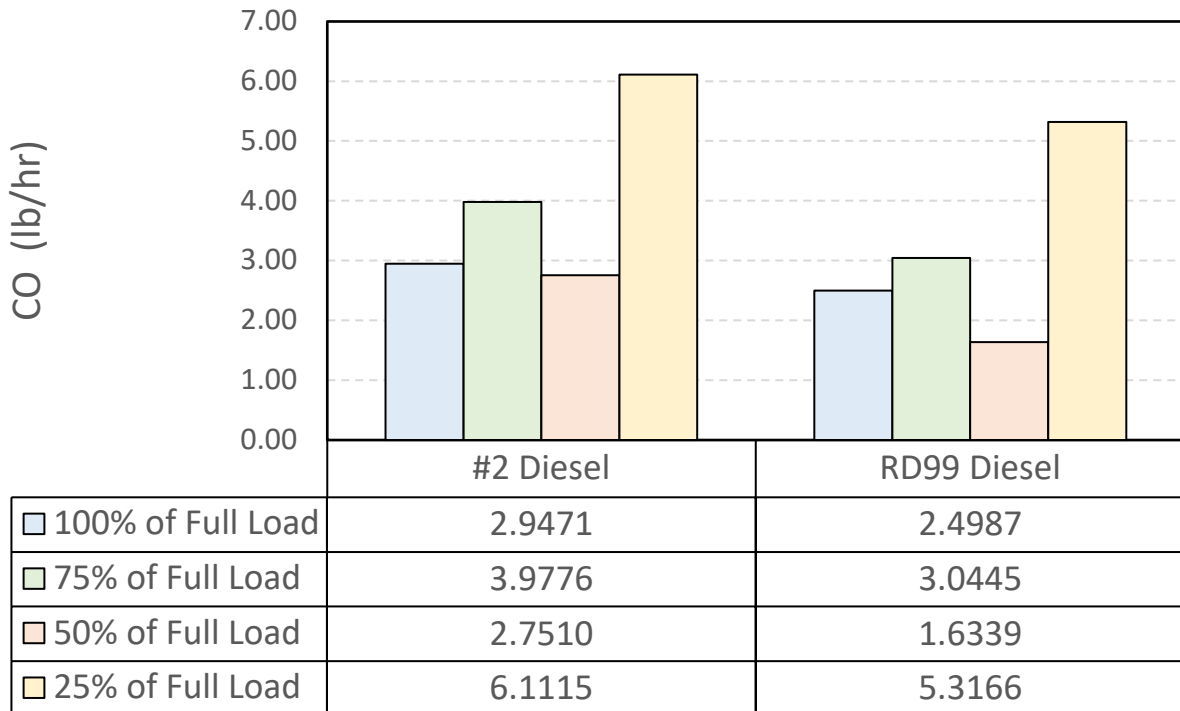
Emissions Test Comparisons - NO_x (lb/hr)



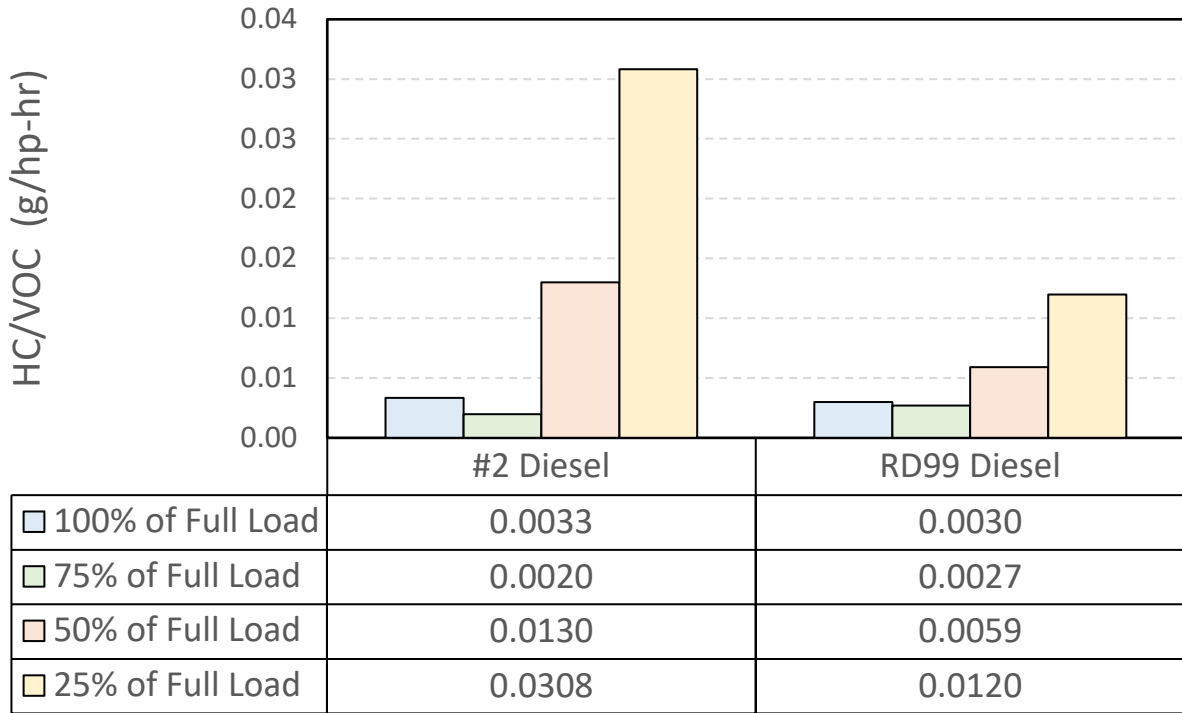
Emissions Test Comparisons - CO (g/hp-hr)



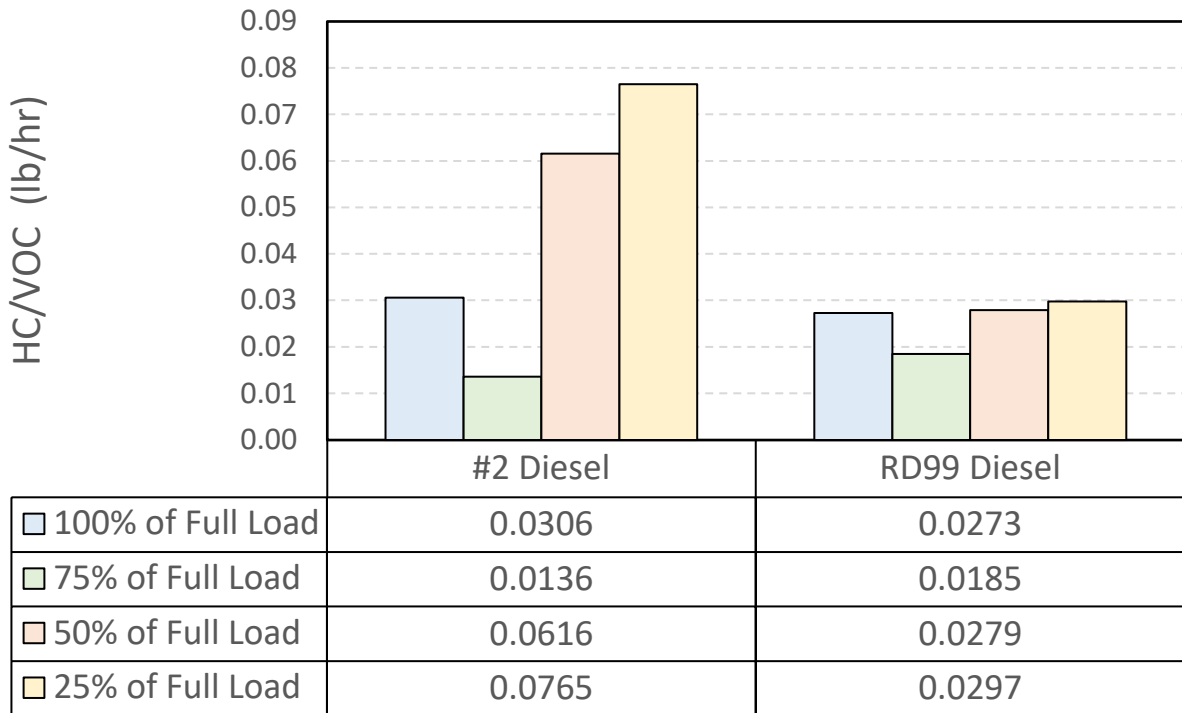
Emissions Test Comparisons - CO (lb/hr)



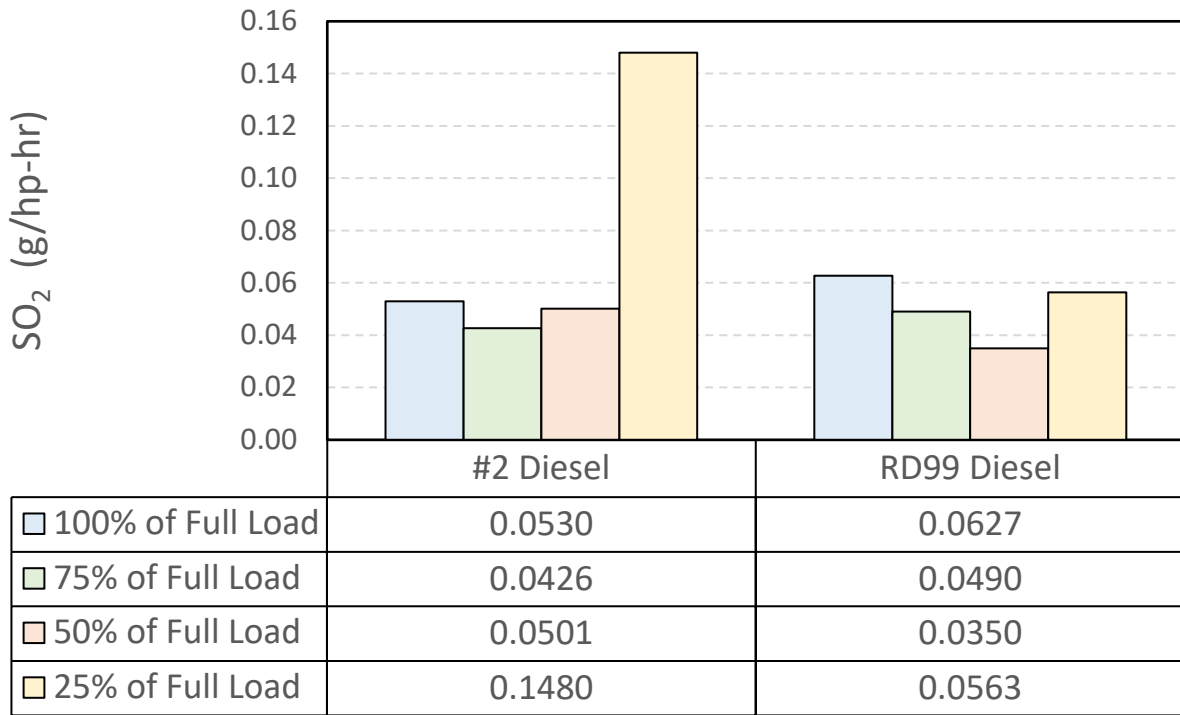
Emissions Test Comparisons - HC/VOC (g/hp-hr)



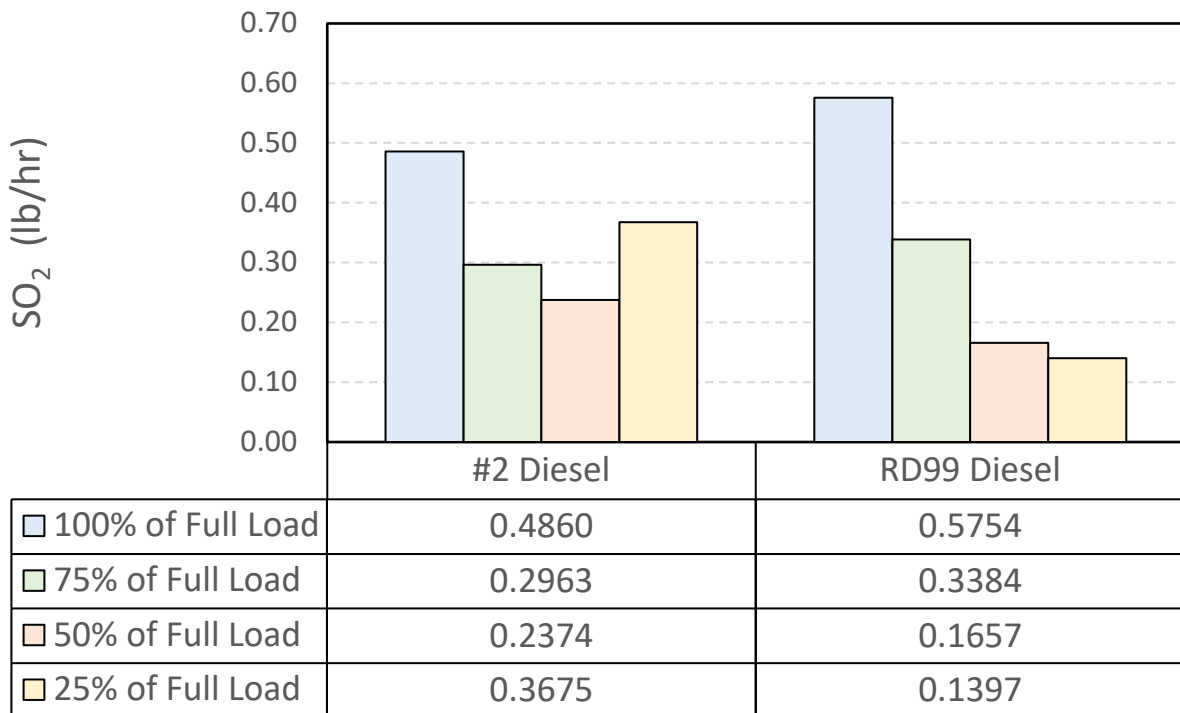
Emissions Test Comparisons - HC/VOC (lb/hr)



Emissions Test Comparisons - SO₂ (g/hp-hr)



Emissions Test Comparisons - SO₂ (lb/hr)



Notice of Construction Application Form



Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology’s jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, “Instructions for Ecology’s Notice of Construction Application.”

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

**Department of Ecology
Cashiering Unit
P.O. Box 47611
Olympia, WA 98504-7611**

For Fiscal Office Use Only:
001-NSR-216-0299-000404

Check the box for the location of your proposal. For assistance, call the contact listed below:		
	Ecology Permitting Office	Contact
<input type="checkbox"/>	Chelan, Douglas, Kittitas, Klickitat, or Okanogan County Ecology Central Regional Office – Air Quality Program	Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
<input checked="" type="checkbox"/>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla or Whitman County Ecology Eastern Regional Office – Air Quality Program	Karin Baldwin (509) 329-3452 karin.baldwin@ecy.wa.gov
<input type="checkbox"/>	San Juan County Ecology Northwest Regional Office – Air Quality Program	David Adler (425) 649-7267 david.adler@ecy.wa.gov
<input type="checkbox"/>	For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Ecology Industrial Section – Waste 2 Resources Program Permit manager: _____	James DeMay (360) 407-6868 james.demay@ecy.wa.gov
<input type="checkbox"/>	For actions taken on the US Department of Energy Hanford Reservation Ecology Nuclear Waste Program	Lilyann Murphy (509) 372-7951 lilyann.murphy@ecy.wa.gov

Check the box below for the fee that applies to your application.



Notice of Construction Application

New project or equipment:

- | | |
|--------------------------|--|
| <input type="checkbox"/> | \$1,500: Basic project initial fee covers up to 16 hours of review. |
| <input type="checkbox"/> | \$10,000: Complex project initial fee covers up to 106 hours of review. |

Change to an existing permit or equipment:

- | | |
|-------------------------------------|---|
| <input type="checkbox"/> | \$200: Administrative or simple change initial fee covers up to 3 hours of review
Ecology may determine your change is complex during completeness review of your application. If your project is complex, you must pay the additional \$675 before we will continue working on your application. |
| <input checked="" type="checkbox"/> | \$875: Complex change initial fee covers up to 10 hours of review |
| <input type="checkbox"/> | \$350 flat fee: Replace or alter control technology equipment under WAC 173-400-114
Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application. |

- | | |
|---|--|
| Read each statement, then check the box next to it to acknowledge that you agree. | |
| <input checked="" type="checkbox"/> | The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you \$95 per hour for the extra time. |
| <input checked="" type="checkbox"/> | You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested. |
| <input checked="" type="checkbox"/> | Submittal of this application allows Ecology staff to visit and inspect your facility. |



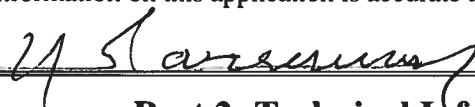
Notice of Construction Application

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name MWH Data Center Approval Order Amendment Request	
2. Facility Name MWH Data Center	
3. Facility Street Address 1515 Port Industrial Parkway, Quincy, WA, 98848	
4. Facility Legal Description PARCEL 'C' OXFORD SP 28-8	
5. Company Legal Name (if different from Facility Name) Microsoft Corporation	
6. Company Mailing Address (street, city, state, zip) 1515 Port Industrial Parkway, Quincy, WA, 98848	

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite) Shirazeh Entezari	
2. Facility Contact Mailing Address (if different than Company Mailing Address) 1515 Port Industrial Parkway, Quincy, WA, 98848	
3. Facility Contact Phone Number 509-669-0884	4. Facility Contact E-mail shirazeh.entezari@microsoft.com
5. Billing Contact Name (who should receive billing information) Mark Brunner, Landau Associates, Inc.	
6. Billing Contact Mailing Address (if different than Company Mailing Address) 155 NE 100 th Ste 302, Seattle, WA 98125	
7. Billing Contact Phone Number (206) 631-8695	8. Billing Contact E-mail mbrunner@landauinc.com
9. Consultant Name (optional – if 3 rd party hired to complete application elements) Mark Brunner	
10. Consultant Organization/Company Landau Associates, Inc.	
11. Consultant Mailing Address (street, city, state, zip) 155 NE 100 th Ste 302, Seattle, WA 98125	
12. Consultant Phone Number (206) 631-8695	13. Consultant E-mail mbrunner@landauinc.com
14. Responsible Official Name and Title (who is responsible for project policy or decision-making) Hichem Garnaoui	
16. Responsible Official Phone 206-330-7508	17. Responsible Official E-mail hgarnao@microsoft.com
18. Responsible Official Certification and Signature I certify that the information on this application is accurate and complete.	
Signature <u></u> Date 04/14/2022	

Part 2: Technical Information



Notice of Construction Application

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

Please attach the following to your application.

- Written narrative describing your proposed project.
- Projected construction start and completion dates.
- Operating schedule and production rates.
- List of all major process equipment with manufacturer and maximum rated capacity.
- Process flow diagram with all emission points identified.
- Plan view site map.

- Manufacturer specification sheets for major process equipment components.
- Manufacturer specification sheets for pollution control equipment.
- Fuel specifications, including type, consumption (per hour & per year) and percent sulfur.

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

SEPA review is complete:
Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, EIS) with your application.

SEPA review has not been conducted:

If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.

Agency Reviewing SEPA:

If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at

<https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates>



Notice of Construction Application

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

If yes, please provide the following information regarding your criteria emissions in your application.

The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, TSP, VOC, and Pb)

Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)

If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? Yes No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

The names of the toxic air pollutants emitted (specified in [WAC 173-460-150¹](#))

Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)

If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70.94 RCW.

Does your project comply with all applicable standards identified? Yes No

VIII. Best Available Control Technology

Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>



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IX. Ambient Air Impacts Analyses

Please provide the following:

- Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
- Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)

- Discharge point data for each point included in air impacts analyses (include only if modeling is required)
 - Exhaust height
 - Exhaust inside dimensions (ex. diameter or length and width)
 - Exhaust gas velocity or volumetric flow rate
 - Exhaust gas exit temperature
 - The volumetric flow rate
 - Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
 - Identification of the emission unit(s) discharging from the point
 - The distance from the stack to the nearest property line
 - Emission unit building height, width, and length
 - Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
 - Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? Yes No