



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

September 27, 2022

Shirazeh Entezari
Microsoft Corporation
1515 Port Industrial Parkway
Quincy, WA 98848

Re: Approval Order No. 22AQ-E035
AQPID No. A0250310

Dear Shirazeh Entezari,

The Department of Ecology's Air Quality Program (Ecology) has approved the use of renewable diesel fuel for emergency engines at Microsoft Corporation MWH Data Center located at 1515 Port Industrial Parkway, Quincy, Washington in Grant County.

Ecology's approval is based on the Notice of Construction application and supplemental information submitted on April 22, 2022. The 30-day public comment period required per Washington Administrative Code (WAC) 173-400-171, has been completed. Response to comments received is included in the Technical Support Document.

Enclosed is Approval Order No. 22AQ-E035 for Microsoft Corporation MWH Data Center.

If you have any questions, please contact me at david.finley@ecy.wa.gov or 509-342-5917.

Sincerely,

David Finley, P.E.
Commercial/Industrial Unit
Regional Air Quality Program

DF:sg

Enclosures: Approval Order No. 22AQ-E035

Certified Mail: 7019 0140 0000 6495 6323



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State of Washington Department of Ecology
Notice of Construction Approval Order

In the matter of approving a)	Approval Order No. 22AQ-E035
modified air contaminant source)	AQPID No. A0250310
for Microsoft Corporation MWH)	
Data Center)	

Project Summary

MWH Data Center, herein referred to as the Permittee, is an existing data center located at 1515 Port Industrial Parkway, Quincy, Washington, in Grant County.

The Permittee is classified as a synthetic minor source.

The project consists of the addition of renewable diesel fuel as a fueling option for the facility’s emergency generators.

Equipment

A list of equipment for this project is provided in Tables 1.a–1.e below. Engine sizes listed in Tables 1.a–1.d and 2.a -2.b are in megawatt (MWe) units with the “e” indicating “electrical” based on generator power ratings listed on the engine specifications provided with the application. MWe is the assumed engine power rating unit for all Approval Conditions related to this Order.

**Table 1.a. 2.5 MWe Engine & Generator Serial Numbers for
MWH 01 & 02 Primary Emergency Generators**

Phase/Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
Ph 1/AZA, Cell 1	MWH01.AS1.AZA.CE1.XXX.GEN1	DD500650	G7J00455	11/13/2015
“Cell 2	MWH01.AS1.AZA.CE2.XXX.GEN1	DD500647	G7J00451	11/13/2015
“Cell 3	MWH01.AS1.AZA.CE3.XXX.GEN1	DD500655	G7J00458	11/13/2015
“Cell 4	MWH01.AS1.AZA.CE4.XXX.GEN1	DD500642	G7J00446	11/13/2015
Ph 1/AZB, Cell 1	MWH01.AS1.AZB.CE1.XXX.GEN1	DD500625	G7J00440	9/21/2015
“Cell 2	MWH01.AS1.AZB.CE2.XXX.GEN1	DD500641	G7J00442	9/21/2015
“Cell 3	MWH01.AS1.AZB.CE3.XXX.GEN1	DD500626	G7J00439	11/13/2015
“Cell 4	MWH01.AS1.AZB.CE4.XXX.GEN1	DD500637	G7J00441	11/13/2015
Ph 1/AZC, Cell 1	MWH01.AS1.AZC.CE1.XXX.GEN1	DD500651	G7J00456	11/13/2015
“Cell 2	MWH01.AS1.AZC.CE2.XXX.GEN1	DD500657	G7J00457	11/13/2015
“Cell 3	MWH01.AS1.AZC.CE3.XXX.GEN1	DD500663	G7J00459	11/13/2015
“Cell 4	MWH01.AS1.AZC.CE4.XXX.GEN1	DD500644	G7J00447	11/13/2015
Ph 1/AZD, Cell 1	MWH01.AS1.AZD.CE1.XXX.GEN1	DD500643	G7J00445	9/21/2015
“Cell 2	MWH01.AS1.AZD.CE2.XXX.GEN1	DD500645	G7J00448	9/21/2015
“Cell 3	MWH01.AS1.AZD.CE3.XXX.GEN1	DD500664	G7J00460	11/13/2015

Phase/Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
"Cell 4	MWH01.AS1.AZD.CE4.XXX.GEN1	DD500648	G7J00450	11/13/2015
Ph 2/AZA, Cell 1	MWH02.AZA.CE1.GEN01	SBK02066-O	G7J00739	12/6/2017
"Cell 2	MWH02.AZA.CE2.GEN01	SBK02088-H	G7J00754	12/6/2017
"Cell 3	MWH02.AZA.CE3.GEN01	SBK02107-N	G7J00759	12/6/2017
"Cell 4	MWH02.AZA.CE4.GEN01	SBK02068-F	G7J00738	12/6/2017
Ph 2/AZB, Cell 1	MWH02.AZB.CE1.GEN01	SBK02056-C	G7J00732	4/9/2018
"Cell 2	MWH02.AZB.CE2.GEN01	SBK02070-G	G7J00741	4/9/2018
"Cell 3	MWH02.AZB.CE3.GEN01	SBK02069-P	G7J00740	7/13/2018
"Cell 4	MWH02.AZB.CE4.GEN01	SBK02081-J	G7J00748	4/9/2018
Ph 2/AZC, Cell 1	MWH02.AZC.CE1.GEN01	SBK02082-L	G7J00749	8/22/2017
"Cell 2	MWH02.AZC.CE2.GEN01	SBK02098-K	G7J00758	8/22/2017
"Cell 3	MWH02.AZC.CE3.GEN01	SBK02048-B	G7J00731	8/22/2017
"Cell 4	MWH02.AZC.CE4.GEN01	SBK02094-I	G7J00755	8/22/2017
Ph 2/AZD, Cell 1	MWH02.AZD.CE1.GEN01	SBK02058-D	G7J00735	6/7/2018
"Cell 2	MWH02.AZD.CE2.GEN01	SBK02064-E	G7J00736	6/7/2018
"Cell 3	MWH02.AZD.CE3.GEN01	SBK02085-M	G7J00752	6/7/2018
"Cell 4	MWH02.AZD.CE4.GEN01	SBK02046-A	G7J00730	6/7/2018

Table 1.b. 2.5 MWe Engine & Generator Serial Numbers for MWH 01 & 02 Reserve Emergency Generators

Phase/Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
Ph 1/AZA	MWH01.AS1.AZA.ELECR1.GEN1	SBK02010-B	G7J00710	11/9/2018
Ph 1/AZB	MWH01.AS1.AZB.ELECR1.GEN1	SBK02009-A	G7J00709	9/7/2018
Ph 1/AZC	MWH01.AS1.AZC.ELECR1.GEN1	SBK02012-C	G7J00711	1/1/2018
Ph 1/AZD	MWH01.AS1.AZD.ELECR1.GEN1	SBK02011-D	G7J00712	1/1/2018
Ph 2/AZA	MWH02.AZA.ELECR1.GEN01	SBK02113-Q	G7J00762	12/6/2017
Ph 2/AZB	MWH02.AZB.ELECR1.GEN01	SBK02117-R	G7J00764	4/9/2018
Ph 2/AZC	MWH02.AZC.ELECR1.GEN01	SBK02119-S	G7J00768	8/22/2017
Ph 2/AZD	MWH02.AZD.ELECR1.GEN01	SBK02120-T	G7J00769	6/7/2018

Table 1.c. 2.0 MWe Engine & Generator Serial Numbers for MWH 01 & 02

Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
CNR-A	MWH01.XXX.CNA.XXX.XXX.GEN1	DD600483	G7F00184	7/27/2015
CNR-B	MWH01.XXX.CNB.XXX.XXX.GEN1	DD600485	G7F00185	7/27/2015
CNR-C	MWH01.XXX.CNC.XXX.XXX.GEN1	DD600480	G7F00186	8/31/2015
CNR-D	MWH01.XXX.CND.XXX.XXX.GEN1	DD600481	G7F00183	8/31/2015

Table 1.d. 0.750 MWe Engine & Generator Serial Numbers for MWH 01 & 02

Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
Admin	MWH01.XXX.AB1.XXX.XXX.GEN1	MJE03975	GDG00160	8/31/2015

Table 1.e. Cooling Towers for MWH 01 & 02

Phase/Building	# Cooling Towers	# Cells per Tower	Total # Cooling Tower Cells
Ph 1/AZA	4	4	16
Ph 1/AZB	4	4	16
Ph 1/AZC	4	4	16
Ph 1/AZD	4	4	16
Ph 2/AZA	4	4	16
Ph 2/AZB	4	4	16
Ph 2/AZC	4	4	16
Ph 2/AZD	4	4	16
Total	32	4	128

Table 2.a. 3.0 MWe Engine & Generator Serial Numbers for MWH 03/04/05/06

Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
MWH03/Colo 1 Cell A	MWH03.COLO1.CELLA.GEN01	WYB02212-D	MF 15627	10/7/2019
"Cell B	MWH03.COLO1.CELLB.GEN01	WYB02224-I	MF 15639	10/7/2019
"Cell C	MWH03.COLO1.CELLC.GEN01	WYB02220-G	MF 15607	10/7/2019
"Cell D	MWH03.COLO1.CELLD.GEN01	WYB02210-B FWT	MF 15614	10/7/2019
MWH03/Colo 2 Cell A	MWH03.COLO2.CELLA.GEN01	WYB02223-H	MF15628	3/17/2020
"Cell B	MWH03.COLO2.CELLB.GEN01	WYB02217-F	MF15647	3/17/2020
"Cell C	MWH03.COLO2.CELLC.GEN01	WYB02226-E	MF15662	3/17/2020
"Cell D	MWH03.COLO2.CELLD.GEN01	WYB02211-C	MF15476	3/17/2020
MWH04/Colo 1 Cell A	MWH04.COLO1.CELLA.GEN01	WYB02281-B	1000214	1/8/2020
"Cell B	MWH04.COLO1.CELLB.GEN01	WYB02283-D	1000216	1/8/2020
"Cell C	MWH04.COLO1.CELLC.GEN01	WYB02287-E	1000218	1/8/2020
"Cell D	MWH04.COLO1.CELLD.GEN01	WYB02282-C	1000215	1/8/2020
MWH04/Colo 2 Cell A	MWH04.COLO2.CELLA.GEN01	WYB02319-T	1001298	5/13/2020
"Cell B	MWH04.COLO2.CELLB.GEN01	WYB02303-N	1001294	5/13/2020
"Cell C	MWH04.COLO2.CELLC.GEN01	WYB02335-Q	1001297	5/13/2020
"Cell D	MWH04.COLO2.CELLD.GEN01	WYB02322-O	1001296	5/13/2020

Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
MWH04/Colo 3 Cell A	MWH04.COLO3.CELLA.GEN01	WYB02384-X	1003091	9/23/2020
"Cell B	MWH04.COLO3.CELLB.GEN01	WYB02385-Z	1004480	9/23/2020
"Cell C	MWH04.COLO3.CELLC.GEN01	WYB02391-AC	1003093	9/23/2020
"Cell D	MWH04.COLO3.CELLD.GEN01	WYB02388-V	1003092	9/23/2020
MWH04/Colo 4 Cell A	MWH04.COLO4.CELLA.GEN01	WYBO2464-AH	1006084	10/21/2020
"Cell B	MWH04.COLO4.CELLB.GEN01	WYB02392-AD	1005827	10/21/2020
"Cell C	MWH04.COLO4.CELLC.GEN01	WYBO2463-AG	1006216	10/21/2020
"Cell D	MWH04.COLO4.CELLD.GEN01	WYB02386-Y	1001998	10/21/2020
MWH04/Colo 5 Cell A	MWH04.COLO5.CELLA.GEN01	WYBO2461-AE	1006213	11/19/2020
"Cell B	MWH04.COLO5.CELLB.GEN01	WYB02380-W	1001997	11/19/2020
"Cell C	MWH04.COLO5.CELLC.GEN01	WYBO2462-AF	1006470	11/19/2020
"Cell D	MWH04.COLO5.CELLD.GEN01	WYB02390-AB	1004481	11/19/2020
MWH05/Colo 1 Cell A	MWH05.COLO1.CELLA.GEN01	WYB02289-G	1000675	5/27/2020
"Cell B	MWH05.COLO1.CELLB.GEN01	WYB02290-H	1000716	5/27/2020
"Cell C	MWH05.COLO1.CELLC.GEN01	WYB02288-H	1000624	5/27/2020
"Cell D	MWH05.COLO1.CELLD.GEN01	WYB02291-J	1000717	5/27/2020
MWH05/Colo 2 Cell A	MWH05.COLO2.CELLA.GEN01	WYB02318	1001299	7/22/2020
"Cell B	MWH05.COLO2.CELLB.GEN01	WYB02296-K	1000440	7/22/2020
"Cell C	MWH05.COLO2.CELLC.GEN01	WYB02328	1001295	7/22/2020
"Cell D	MWH05.COLO2.CELLD.GEN01	WYB02292-I	1000543	7/22/2020
MWH05/Colo 3 Cell A	MWH05.COLO3.CELLA.GEN01	WYB02330	1001293	8/12/2020
"Cell B	MWH05.COLO3.CELLB.GEN01	WYB02299-M	1000544	8/12/2020
"Cell C	MWH05.COLO3.CELLC.GEN01	WYB02320	1001300	8/12/2020
"Cell D	MWH05.COLO3.CELLD.GEN01	WYB02297-L	1000545	8/12/2020
MWH06/Colo 1 Cell 1	MWH06.COLO1.CE1.GPC01	WYB02492	1006987	4/15/2022
"Cell 2	MWH06.COLO1.CE2.GPC01	WYB02485	1007059	4/15/2022
"Cell 3	MWH06.COLO1.CE3.GPC01	WYB02496	1006214	4/15/2022
"Cell 4	MWH06.COLO1.CE4.GPC01	WYB02488	1006986	4/15/2022
MWH06/Colo 2 Cell 1	MWH06.COLO2.CE1.GPC01	TB800160	G7J06299	4/27/2022
"Cell 2	MWH06.COLO2.CE2.GPC01	TB800164	G7J06294	4/27/2022
"Cell 3	MWH06.COLO2.CE3.GPC01	TB800161	G7J06300	4/27/2022
"Cell 4	MWH06.COLO2.CE4.GPC01	TB800165	G7J06295	4/27/2022
MWH06/Colo 3 Cell 1	MWH06.COLO3.CE1.GPC01	TB800298	G7J06446	5/13/2022

Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
"Cell 2	MWH06.COLO3.CE2.GPC01	TB800256	G7J06397	5/13/2022
"Cell 3	MWH06.COLO3.CE3.GPC01	TB800254	G7J06400	5/13/2022
"Cell 4	MWH06.COLO3.CE4.GPC01	TB800250	G7J06395	5/13/2022
MWH06/Colo 4 Cell 1	MWH06.COLO4.CE1.GPC01	TB800295	G7J06426	6/8/2022
"Cell 2	MWH06.COLO4.CE2.GPC01	TB800261	G7J06396	6/8/2022
"Cell 3	MWH06.COLO4.CE3.GPC01	TB800258	G7J06398	6/8/2022
"Cell 4	MWH06.COLO4.CE4.GPC01	TB800302	G7J06447	6/8/2022

Table 2.b. 0.5 MWe/1.0 MWe/1.5 MWe Engine & Generator Serial Numbers for MWH 03/04/05/06

Building	Unit ID	Engine SN	Generator SN	Date of Commission Completion
MWH03 Admin	MWH03.ADMIN.GEN01	JSJ03649-J FWT	G1F01843	10/7/2019
MWH04 Admin	MWH04.ADMIN.GEN01	LYH00302-A	GAH00176	1/8/2020
MWH05 Admin	MWH05.ADMIN.GEN01	LYH00303-AA	GAH00177	5/27/2020
MWH06 Admin	MWH06.ADMIN.GPC01	T3500246	G6B26159	4/15/2022

Table 2.c. Fluid Coolers for MWH 03/04/05/06

Phase/Building	Total # Fluid Coolers
MWH 03	14
MWH 04	34
MWH 05	20
MWH 06	32
Total	100

Legal Authority

The emissions from the proposed modification have been reviewed under the legal authority of RCW 70A.15.2210 and the applicable rules and regulations adopted thereunder. The proposed modification, if operated as specified, will be in accordance with applicable rules and regulations, as set forth in Chapters 173-400 WAC and 173-460 WAC and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.

This Notice of Construction (NOC) Approval Order rescinds and replaces NOC Approval Order No. 20AQ-E005; NOC Approval Order No. 20AQ-E005 is no longer in effect.

Therefore, it is ordered that the project, as described in the Notice of Construction (NOC) application and/or in the plans, specifications, and other information submitted to the

Washington State Department of Ecology (Ecology), is approved for construction and operation provided the following conditions are satisfied:

Approval Conditions

1. Administrative Conditions

- a. The emergency engine generators approved for operation by this Order are to be used solely for those purposes authorized for emergency generators under 40 CFR 60, Subpart III. This includes the hourly operation requirements described in 40 CFR 60.4211(f), except that there must be no operation of this equipment to produce power for demand-response arrangements, peak shaving arrangements, nor to provide power as part of a financial arrangement with another entity, nor to supply power to the grid.
- b. The MWH Data Center must coordinate engine maintenance and testing schedules with NTT and the Microsoft Columbia Data Center in Quincy to minimize overlap between data center scheduled testing. Microsoft must maintain records of the coordination communications with the other data centers, and those communications must be available for review by Ecology.

2. Equipment Restrictions

- a. All engines identified in Table 5 must be operated in accordance with applicable 40 CFR 60, Subpart III requirements including but not limited to: certification by the manufacturer to meet the 40 CFR 89 EPA Tier 2 emissions levels as required by 40 CFR 60.4202; and installed and operated as emergency engines, as defined in 40 CFR 60.4219.
 - i. At the time of the effective date of this permit, Tier 4 interim and Tier 4 final certified engines (as specified in 40 CFR 1039.102 Table 7 and 40 CFR 1039.101 Table 1, respectively), are not required for 0.50 MWe, 0.750 MWe, 1.0 MWe, 1.5 MWe, 2.0 MWe, 2.5 MWe and 3.0 MWe electrical generators used for emergency purposes as defined in 40 CFR 60.4219 in attainment areas in Washington State. Any engines installed at the MWH Data Center after Tier 4 or other limits are implemented by EPA for emergency generators, must meet the applicable specifications as required by EPA at the time the emergency engines are installed.
- b. Each engine must be equipped with Selective Catalytic Reduction (SCR) and catalyzed Diesel Particulate Filter (DPF) controls to meet with emission requirements of EPA Tier 4 engines. The only engines and electrical generating units approved for operation at the MWH Data Center are those listed in Tables 1.a - 1.d and 2.a - 2.b on pages 1 - 5.

- c. The installation of any new or replacement engines 18 months after issuance of this Approval Order, will require notification to Ecology that includes engine manufacturer’s specification sheets. Ecology will decide whether new source review is required based on various factors including whether the new engines will have either an increased emission rate, or result in an emission concentration that may increase community impacts over those evaluated for this Approval Order, or if an update to Best Available Control Technology analysis is necessary.

Table 5. Engine Exhaust Stack Dimension Requirements

Quantity	Engine Size	Minimum Stack Height (feet)	Maximum Stack Diameter (inches)	Height above building roof (feet)
56	3.0 MWe	72’	24”	26’+
40	2.5 MWe	40’	22”	12’
4	2.0 MWe	40’	22”	19’
2	1.5 MWe	72’	20”	26’+
1	1.0 MWe	72’	20”	26’+
1	0.75 MWe	35’	14”	12’
1	0.50 MWe	30’	8”	3+’

- d. In addition to meeting EPA Tier 2 certification requirements, the source must have written verification from the engine manufacturer that each engine of the same make, model, and rated capacity installed at the facility uses the same electronic Programmable System Parameters, i.e., configuration parameters, in the electronic engine control unit.

3. Operating Limitations

- a. Fuel consumption at the MWH Data Center facility will be limited to a total of 1,657,088 gallons per year and 438,815 gallons per day of diesel fuel equivalent to on-road specification No. 2 distillate fuel oil or renewable diesel fuel (including renewable hydrocarbon diesel and hydro-treated vegetable oil). All fuels used must contain less than 0.00150 weight percent sulfur. Total facility annual fuel consumption must be averaged over a 12-month period using monthly rolling totals.
- b. The 97 MWH Data Center primary engines and eight reserve engines must not exceed the following load specific engine hour limits:
 - i. Each engine must not exceed 86 hours per year of operation averaged across all generators in service over a 12-month rolling average. If a reserve engine is used to temporarily replace a primary engine during a power outage, then the actual runtime for the reserve engine must be deducted from the primary engine’s

allowable runtime.

- ii. Each reserve engine must not exceed 40 hours per year for purposes other than stack testing or power outages, averaged across all reserve generators in service over a 12-month rolling period.
- iii. For commissioning events, each engine must not exceed a one-time total of 50 hours of operation over a full range of loads, averaged over all facility engines commissioned in that year.
- iv. Stack testing must be conducted according to the testing requirements and the schedule in Approval Condition 4. Each engine must operate no more than 45 hours per stack testing event. If more than 45 hours are needed for re-testing to satisfy Approval Condition 4.d, those hours should be deducted from other preapproved hours in Approval Condition 3.b. Additional operation of the engines for the purpose of emissions testing beyond the operating time and fuel consumption limits authorized by this Order will be considered by Ecology upon request in writing.
- v. Daily generator usage of all MWH 01 and 02 generators combined (including reserve engines), must not exceed a maximum limit of 160 generator hours per calendar day, except during up to four days per year of emergency power outage.
- vi. Operation of more than five MWH 03/04/05/06 generators for more than 18 hours per generator in any 24 hour period must not occur more than three times in any three calendar year period.
- vii. The operation of more than five MWH 03/04/05/06 generators, operating concurrently at any one time, must not occur on more than 18 calendar days in any three calendar year period.
- viii. The operation of between three and five MWH 03/04/05/06 generators operating concurrently at any one time must not occur on more than 33 calendar days in any three calendar year period. Operation during this scenario is limited to daytime hours only (7:00 a.m. to 7:00 p.m.).
- ix. The operation of two MWH 03/04/05/06 generators operating concurrently at any one time must not occur on more than 144 calendar days in any three calendar year period. Operation during this scenario is limited to daytime hours only (7:00 a.m. to 7:00 p.m.).
- x. There is no limit on the number of days that operation of one MWH 03/04/05/06 generator at a time can occur, but operation under this scenario is limited to

daytime hours (7:00 a.m. to 7:00 p.m.).

- xi. Concurrent operation of generators occurs when two or more generators operate at exactly the same moment. Generators are considered to operate concurrently even on occasions when the operational overlap occurs for just a short period of time (e.g., 1 minute or less). Sequential operation of generators is not considered concurrent operation even if multiple generators operate in the same minute, hour, or day.
- c. All of the 32 MWH 01 and 02 cooling towers and the 100 MWH 03/04/05/06 fluid coolers must comply with the following conditions:
 - i. Each individual cooling tower unit or fluid cooler unit must use a mist eliminator that achieves a liquid droplet drift rate of no more than 0.0005 percent of the recirculation flow rate within each cooling tower.
 - ii. Chemicals containing hexavalent chromium cannot be used to pre-treat the cooling tower or fluid cooler makeup water.

4. General Testing and Maintenance Requirements

- a. The MWH Data Center will follow engine-manufacturer's recommended diagnostic testing and maintenance procedures to ensure that each of the 56 3.0 MWe engines, 32 2.5 MWe primary engines, eight reserve engines, four 2.0 MWe engines, two 1.5 MWe engines, one 1.0 MWe engine, one 0.750 MWe engine, and one 0.50 MWe engine will conform to applicable engine specifications in Approval Condition 2.a, 2.b, and applicable emission specifications in Approval Condition 5 throughout the life of each engine.
- b. Any emission testing performed to verify conditions of this Approval Order or for submittal to Ecology in support of this facility's operations, requires that Microsoft comply with all requirements in 40 CFR 60.8 except subsection (g). 40 CFR 60.8(g) may be required by Ecology at their discretion. A test plan will be submitted to Ecology at least 30 days prior to testing that will include a testing protocol for Ecology approval that includes the following information:
 - i. The location and Unit ID of the equipment proposed to be tested.
 - ii. The operating parameters to be monitored during the test.
 - iii. A description of the source including manufacturer, model number, design capacity of the equipment and the location of the sample ports or test locations.
 - iv. Time and date of the test and identification and qualifications of the personnel

involved.

- v. A description of the test methods or procedures to be used.
- c. The MWH Data Center must source test engines as described in Approval Condition 4.d to show compliance with emission limits in Table 6.
- d. The following testing requirements are for ammonia, PM, NO_x, CO, and non-methane hydro-carbons (NMHC). The test methods in Table 6 must be used for each test event unless an alternate method is proposed by Microsoft, and approved in writing by Ecology prior to the test. Test reports must be submitted to Ecology as provided in Condition 9.e of this Order.

Table 6. Emission Limits and Testing Requirements

Pollutant	Load Test	Test Method^(a)	Emission Limits	Compliance Test Frequency
PM	Five-load weighted avg.	EPA Method 5 or alternative method from 40 CFR 1065	0.03 g/kW-hr	See Approval Conditions 4.d.iv, 4.d.v, 4.d.vi.
NO _x	Five-load weighted avg.	EPA Method 7E, or alternative method from 40 CFR 1065	0.67 g/kW-hr	See Approval Conditions 4.d.iv, 4.d.v, 4.d.vi.
CO	Five-load weighted avg.	EPA Method 10, or alternative method from 40 CFR 1065	3.5 g/kW-hr	See Approval Conditions 4.d.iv, 4.d.v, 4.d.vi.
NMHC/VOC	Five-load weighted avg.	EPA Method 25A and EPA Method 18; or alternative method from 40 CFR 1065	0.19 g/kW-hr	See Approval Conditions 4.d.iv, 4.d.v, 4.d.vi.
Ammonia	100%-load (±2%)	BAAQMD Method ST-1B or EPA Method 320 or EPA CTM-027; or alternative method suitable for use with 40 CFR 1065	0.19 lb/hr (0.75 MWe) 0.50 lb/hr (1.5 MWe) 0.48 lb/hr (2.0 MWe) 0.61 lb/hr (2.5 MWe) 0.95 lb/hr (3.0 MWe)	See Approval Conditions 4.d.iv, 4.d.v, 4.d.vi.

In lieu of these requirements, Microsoft may propose an alternative test protocol to Ecology in writing for approval.

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- i. For the five load tests, testing must be performed at each of the five engine torque load levels described in Table 2 of Appendix B to Subpart E of 40 CFR Part 89, and data must be reduced to a single-weighted average value using the weighting factors specified in Table 2. Microsoft may replace the dynamometer requirement in Subpart E of 40 CFR Part 89 with corresponding measurement of gen-set electrical output to derive torque output.
 - ii. For all tests, the F-factor described in Method 19 must be used to calculate exhaust flow rate through the exhaust stack, except that EPA Method 2 must be used to calculate the flow rate for purposes of particulate testing (Method 2 is not required if 40 CFR 1065 is used). Fuel meter data measured according to Approval Condition 4.f must be included in the test report, along with the emissions calculations.
 - iii. Three test runs must be conducted for each engine, except as allowed by the sampling protocol from 40 CFR 1065. Each run must last at least 60 minutes except as allowed by the sampling protocol from 40 CFR 1065. Source test analyzers and engine control unit data must be recorded at least once every minute during the test. Engine run time and torque output (measured kW to convert to torque) and fuel usage must be recorded during each test run for each load and must be included in the test report.
 - iv. For the 3.0 MWe and 1.5 MWe engines or new engine models or manufacturers or control generation other than those in Tables 1.a-1.d, and 2.a-2.b, at least one representative engine from each manufacturer and each size engine from each manufacturer must be tested initially with the five-load test as soon as possible after commissioning.
 - v. Every 60 months after initial source testing, Microsoft must test at least one 2.5 MWe engine and one 3.0 MWe engine, including the engine with the most operating hours as long as it is a different engine from that which was tested during the previous 60 month interval testing.
 - vi. In the event that any source test of a 1.5 MWe, 2.0 MWe, 2.5 MWe or a 3.0 MWe engine shows non-compliance with any applicable Table 6 Emission Standards for the engines specified in Approval Condition 2.a, Microsoft will repair or replace the engine and repeat the test on the same engine plus two additional equivalent engines. If the 0.50 MWe, 1.0 MWe, or 0.750 MWe engine fails a test, it must be repaired or replaced and retested.
- e. Each engine must be equipped with a properly installed and maintained non-resettable meter that records total operating hours.

- f. Each engine must be connected to a properly installed and maintained fuel flow monitoring system (either certified physical or generator manufacturer provided software) that records the amount of fuel consumed by the engine.

5. Emission Limits

- a. The 56 3.0 MWe engines, 32 primary 2.5 MWe engines, eight reserve engines, four 2.0 MWe engines, two 1.5 MWe, one 1.0 MWe engine, one 0.750 MWe engine, and one 0.50 MWe must meet the follow emission rate limitations:
 - i. Each emergency engine must not exceed the applicable emission limits in Table 6.
 - ii. Total annual facility-wide emissions must not exceed the 12-month rolling average emissions for PM₁₀, PM_{2.5}, CO, NO_x, VOC, SO₂, DEEP, NO₂, and ammonia as listed in Table 7.

Table 7. Criteria Pollutant and Toxic Air Pollutant Emission Limits for Total Facility MWH 01/02/03/04/05/06 (Tons/Year)

Pollutant	Annual Emissions	Annual with Commissioning Emissions
PM smaller than 10 microns in diameter (PM ₁₀)	24	25
PM smaller than 2.5 microns in diameter (PM _{2.5})*	10.0	10.5
PM2.5/PM10 (Gens Only)	1.7	2.2
Carbon monoxide (CO)	11	13
Nitrogen oxides (NO _x)	53	64
Volatile organic compound (VOC)	1.5	1.7
Sulfur dioxide (SO ₂)	0.18	0.24
Ammonia (NH ₃)	3.5	4.8
Diesel Engine Exhaust Particulate (DEEP)*	0.97	1.1
Nitrogen Dioxide (NO ₂)**	5.3	6.4

* All PM emissions from the generator engines are PM_{2.5}, and all filterable PM_{2.5} from the generator engines is considered Diesel Engine Exhaust Particulate (DEEP).

** NO₂ is assumed to be equal to 10 percent of the total NO_x emitted.

- iii. Visual emissions from each diesel engine exhaust stack must be no more than five percent, with the exception of a two-minute period after unit start-up. Visual emissions must be measured by using the procedures contained in 40 CFR 60, Appendix A, Method 9.
- iv. The actual one-hour aggregate NO_x emissions from all engines operating in any

hour must not exceed 1,034 lb. Actual NOx emissions must be based on algebraic equations of the most accurate load-specific NOx emission factors available. NOx emission records must be maintained as provided in Condition 8(f)(v).

6. Operation and Maintenance Manuals (O&M)

- a. A site-specific O&M manual for the MWH Data Center facility equipment must be developed and followed. Manufacturer's operating instructions and design specifications for the engines, generators, cooling towers, fluid coolers and associated equipment must be included in the manual. The manual must include the manufacturer's recommended procedures for low-load generator operation. The O&M manual must be updated to reflect any modifications of the equipment or its operating procedures. Emissions that result from failure to follow the operating procedures contained in the O&M manual or manufacturer's operating instructions may be considered proof that the equipment was not properly installed, operated, and/or maintained.
 - i. The O&M manual for the diesel engines, engine exhaust control equipment, cooling towers, fluid coolers and associated equipment must at a minimum include:
 - A. Manufacturer's testing and maintenance procedures that will ensure that each individual engine (and engine exhaust control equipment) will conform to the EPA Emission Standards appropriate for that engine (and engine exhaust control equipment) throughout the life of the engine (and engine exhaust control equipment).
 - B. Normal operating parameters and design specifications.
 - C. Operating maintenance schedule.
 - D. Specification sheet for cooling towers and fluid coolers verifying 0.0005 percent drift rating, water flow, airflow, makeup water rate, and a list of chemicals used to pre-treat cooling tower and fluid cooler makeup water.

7. Submittals

- a. All notifications, reports, and other submittals must be sent to:

Washington State Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

Or email: emissions.inventory@ecy.wa.gov

OR AS DIRECTED.

8. Recordkeeping

- a. All records, O&M manual, and procedures developed under this Order must be organized in a readily accessible manner and cover a minimum of the most recent 60-month period except as required for stack testing in Condition 8.c. Any records required to be kept under the provisions of this Order must be provided within 30 days to Ecology upon request. The following records are required to be collected and maintained.
- i. Fuel receipts with amount of diesel and sulfur content for each delivery to the facility.
 - ii. Monthly and 12-month rolling fuel usage.
 - iii. Monthly and 12-month rolling hours of operation for each diesel engine. The cumulative hours of operation for each engine must be maintained for the life of the engine while at Microsoft, and must include which engines have been stack tested, and the report information from Condition 9.e.
 - iv. Annual number of start-ups for each diesel engine.
 - v. Annual gross electrical power in MWe generated by facility-wide operation of the emergency backup electrical generators.
 - vi. Record of each operational period for each engine with the following information:
 - A. Date of engine operation.
 - B. Engine unit ID.
 - C. Reason for operating: an operational period for an engine will be identified as one of the following reasons for operating: EMERGENCY

SITUATIONS, STACK TESTING, COMMISSIONING, MAINTENANCE CHECKS, READINESS TESTING, DEVIATION OF VOLTAGE OR FREQUENCY, or UNSPECIFIED NON-EMERGENCY SITUATIONS.

- D. Duration of operation, and percent of generator electrical load, for each category of generator load.
 - E. For each unplanned power outage, that activates 30 or more engines in an hour, record the actual one-hour NOX emission rate from all operating engines, as provided in Conditions 5.d and 9.b.vi.
- vii. Upset condition log for each emission unit (the 97 engines, eight reserve engines, 32 cooling towers, and 100 fluid coolers) and their respective control units that include unit ID, date, time, duration of upset, cause, and corrective action.
 - viii. Applicable recordkeeping for emergency engines required by 40 CFR Part 60, Subpart III Section 60.4214 (b), (c), and (d).
 - ix. Air quality complaints received from the public or other entity, the affected emissions units and any actions taken by Microsoft in response to those complaints.

9. Reporting

- a. The serial number, manufacturer make and model, and standby capacity for each engine and generator, and the engine build date will be submitted prior to installation of each engine.
- b. The following information will be submitted to the AQP at the address in Condition 7 above by January 31 of each calendar year to report operating conditions for the previous calendar year. This information may be submitted with annual emissions information requested by the AQP.
 - i. Monthly and 12-month rolling total summary of all air contaminant emissions for criteria and toxic air pollutants.
 - ii. Monthly and 12-month rolling facility-wide generator hours of operation.
 - iii. Gross power generation with annual total as specified in Approval Condition 8.e.
 - iv. Monthly and 12-month rolling total summary of fuel usage (in gallons) compared to Approval Condition 3.a.
 - v. Calendar year annual total runtime hours.

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- vi. For each power outage operating scenario described in Condition 8.f.v, the aggregate NO_x emission rate for all operating engines during each hour in which the NO_x emission rate exceeds 1,034 lb/hour.
 - c. Written notification that the O&M manual described in Approval Condition 6 has been developed and updated within 60 days after the issuance of this Order. A copy of the most current O&M manual will be provided to Ecology if requested.
 - d. Any air quality complaints resulting from operation of the emissions units or activities must be promptly assessed and addressed. A record must be maintained of Microsoft Corporation's action to investigate the validity of the complaint and what, if any, corrective action was taken in response to the complaint. Ecology must be notified within three days of receipt of any such complaint.
 - e. Stack test reports of any engine must be submitted to Ecology within 60 days of completion of the test and must include, at a minimum, the following information:
 - i. The information from Conditions 4.b.iii, 4.b.iv, and 4.b.v including field and analytical laboratory data, quality assurance/quality control procedures and documentation.
 - ii. A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit.
 - iii. A summary of control system or equipment operating conditions.
 - iv. A summary of operating parameters for the diesel engines being tested.
 - v. Copies of field data and example calculations.
 - vi. Chain of custody information.
 - vii. Calibration documentation.
 - viii. Discussion of any abnormalities associated with the results.
 - ix. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.
 - f. Microsoft must notify Ecology by e-mail or in writing within 24 hours of any engine operation of greater than 60 minutes if such engine operation occurs as the result of a power outage or other unscheduled operation.

10. General Conditions

- a. **Activities Inconsistent with this Order** - Any activity undertaken by the Permittee, or others, in a manner that is inconsistent with the data and specifications submitted as part of the NOC application or this NOC Approval Order, will be subject to Ecology enforcement under applicable regulations.
- b. **Availability of Order** - Legible copies of this NOC Approval Order and any O&M manual(s) must be available to employees in direct operation of the equipment described in the NOC application and must be available for review upon request by Ecology.
- c. **Compliance Assurance Access** - Access to the source by representatives of Ecology or the United States Environmental Protection Agency (EPA) must be permitted upon request. Failure to allow access is grounds for enforcement action under the federal Clean Air Act or the Washington State Clean Air Act, and may result in revocation of this NOC Approval Order.
- d. **Discontinuing Construction or Operation** – This NOC Approval Order will become invalid if construction of the equipment described in the NOC application and this NOC Approval Order does not commence within 18 months after receipt of this NOC Approval Order.

If construction or operation is discontinued for 18 months or longer on a portion or all of the equipment described in the NOC application and this NOC Approval Order, the portion of the NOC Approval Order regulating the inactive equipment will become invalid. Ecology may extend the 18-month period upon request by the Permittee and a satisfactory showing that an extension is justified.

- e. **Equipment Operation** - Operation of the facility must be conducted in compliance with all data and specifications submitted as part of the NOC application and in accordance with O&M manuals, unless otherwise approved in writing by Ecology.
- f. **Registration** - Periodic emissions inventory and other information may be requested by Ecology. The requested information must be submitted within 30 days of receiving the request, unless otherwise specified. All fees must be paid by the date specified.
- g. **Violation Duration** - If the Permittee violates an approval condition in this NOC Approval Order, the violation is presumed to commence at the time of the testing, recordkeeping, or monitoring which indicates noncompliance. The violation is presumed to continue until the time of retesting, recordkeeping, or monitoring which indicates compliance. A violation of an approval condition includes, but is not limited to, failure of air pollution control equipment, failure of other equipment resulting in increased emissions, or a failed source test indicating an exceedance of an emission limit. The duration of a

violation may also be determined based on credible evidence which shows that the violation was of longer duration, that there was intervening days during which no violation occurred, or that the violation was not continuous in nature.

- h. **Obligations Under Other Laws or Regulations** - Nothing in this NOC Approval Order excuses the Permittee from compliance with any applicable federal, state, or local statutes, ordinances, or regulations.
- i. **Maintaining Compliance** - It will not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the operations in order to maintain compliance with the conditions of this NOC Approval Order.
- j. **Visible Emissions** - No visible emissions from the source are allowed beyond the property line, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 22.
- k. **Changes in Operations** - Any changes in operation contrary to information submitted in the NOC application must be reported to Ecology at least 60 days before the changes are implemented. Such changes in operation may require a new or amended NOC Approval Order.

Authorization may be modified, suspended, or revoked in whole or part for cause, including, but not limited to, the following:

- Violation of any terms or conditions of this authorization.
- Obtaining this authorization by misrepresentation or failure to disclose full all relevant facts.

The provisions of this authorization are severable and, if any provision of this authorization or application of any provision to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, will not be affected thereby.

Your Right to Appeal

You have a right to appeal this NOC Approval Order to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt of this NOC Approval Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this NOC Approval Order:

- File your appeal and a copy of this NOC Approval Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.

- Serve a copy of your appeal and this NOC Approval Order on Ecology in paper form - by mail or in person (see addresses below). E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Address and Location Information

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Rd SW. STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Americans with Disabilities Act Information

Accommodation Requests

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-7668 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Dated on this 27th Day of September, 2022.

Prepared By:

Reviewed By:

David Finley, PE
Commercial Industrial Unit
Air Quality Program
Eastern Regional Office

Jenny Filipy, PE
Commercial Industrial Unit
Air Quality Program
Eastern Regional Office

Approved By:

David T. Knight
Section Manager
Air Quality Program
Eastern Regional Office

- Serve a copy of your appeal and this NOC Approval Order on Ecology in paper form - by mail or in person (see addresses below). E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Address and Location Information

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Rd SW. STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

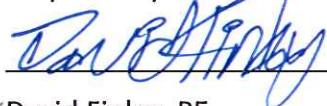
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Approved By:



David T. Knight
Section Manager
Air Quality Program
Eastern Regional Office

State of Washington
Department of Ecology

Technical Support Document (TSD)

Source Name: Microsoft Corporation – MWH Data Center
Source Location: 1515 Port Industrial Parkway, Quincy, WA 98848
County: Grant
Approval Order No.: 22AQ-E035
Source Classification: Synthetic Minor
Permit Reviewer: David Finley

Background and Description for Order 22AQ-E035

On April 22, 2022, Microsoft Corporation – MWH Data Center submitted a Notice of Construction (NOC) application, requesting permission to use renewable diesel fuel as a fueling option for the emergency generators at its facility. Renewable diesel fuel would be an alternative to the diesel fuel equivalent to on-road specification No. 2 distillate fuel oil (less than 15 parts per million sulfur) that MWH Data Center was already approved to use. After review, Ecology determined that renewable diesel fuel can be used to fuel Caterpillar engines with comparable or lower emissions than that of the same engine model running on petroleum-based diesel fuel. The application was determined complete on May 16, 2022.

Comments and Responses

Washington State Department of Ecology (Ecology) used the following topics to group comments received on Microsoft MWH Data Center (MWH) draft approval order:

- In Scope Comments. Ecology held the public comment period so the public could provide feedback on the addition of renewable diesel to fuel the emergency engines. The addition of the fuel type was the only change Ecology made to the existing approval order for MWH.
- Out of Scope Comments. All other comments unrelated to renewable diesel fuel.

Commenter: Patricia Martin – Comments 1 through 14.

In Scope Comments:

1. Question: First, what is the source of the renewable fuels. Are they sourced from animals, and if so, is it possible to transmit diseases or emit toxic chemicals not currently regulated through the state or federal clean air acts? Since many organic toxics are bioaccumulated in fats, which will be source of the alternate fuel, are these toxics accounted for in calculating risk to the community?

Response: The renewable diesel fuels are sourced from vegetable oils, cooking oils, and animal fats.

Renewable diesel fuel is refined and produced in a different manner than biodiesel. Based on information provided by the planned primary fuel supplier, the refining process for renewable diesel fuel is at high heat and pressure, similar to petroleum diesel. According to information available online, refining renewable diesel fuels occurs at temperatures between 450 and 650 degrees Fahrenheit. According to the fuel supplier, there is not a concern for communicable diseases in the refined renewable diesel fuel.

The Environmental Protection Agency regulates the contents of renewable fuels through the Renewable Fuel Standard Program. Ecology does not play a role in the contents of renewable diesel nor can we forecast what chemicals will be regulated in the future.

Some chemicals regulated under Chapter 173-460 WAC, such as 2,3,7,8-Tetrachlorodibenzo-p-dioxin and related compounds, may accumulate in animal fats. While the applicant did not specifically address this possibility as part of their analysis, Ecology estimates that the content of dioxin-like chemicals in renewable diesel fuel from animal fats is unlikely to be sufficient to result in an ambient impact at levels that exceed the acceptable source impact level (ASIL). MWH would need to consume 2.1 million gallons of renewable diesel fuel to have sufficient mass of 2,3,7,8-tetrachlorodibenzo-p-dioxin and related compounds to achieve the small quantity emission rate (SQER). This is more fuel than allowed in the permit. Because SQERs are derived in a conservative manner, it further lends support that ambient impacts would likely be much lower than an ASIL.

The above estimate is based on the following assumptions:

- MWH will solely use renewable diesel fuel.
 - Beef fat (tallow) makes up 1/3 of the total feedstock for renewable diesel fuel (see the report from Cerulogy: <https://theicct.org/wp-content/uploads/2022/01/impact-renewable-diesel-us-jan22.pdf>).
 - Tallow contains an average of 0.93 ng/kg 2,3,7,8-Tetrachlorodibenzo-p-dioxin toxic equivalent based on Food and Drug Administration data on Dioxins and Dioxin-Like Compounds In the U.S. Domestic Meat and Poultry Supply.
 - Specific gravity of renewable diesel = 0.7827
 - No dioxin-like chemicals are destroyed during processing or combustion of renewable diesel fuel.
2. Question: Second, is the storage for these alternate fuels different from the current method, and if so, how will these be stored prior to use? Is there a decay factor that needs to be considered, e.g., fats oxidize and become rancid? Are there issues of undesirable or putrid odors from the burning of these fuels? Are the current controls effective for the removal of particulate matter -- both PM2.5 and PM10 -- NOx, etc.?

Response: The storage requirements for renewable diesel fuels are no different than those of the ultra-low sulfur diesel already stored on site. A decay factor does not need to be considered for the renewable diesel fuels. The refining process removes contaminants and eliminates odors associated with the fuel's sources. The current controls for the facility's generators are effective for the control of PM2.5, PM10, and NOx.

3. Question: I notice in my quick review that the permit is issued on the assumption of the use of No. 2 diesel or two different alternate fuels. What are the permit emission assumptions based upon? With an allowable consumption of 1,165,088 gallons per year and 86 hours of run time for each of 97 engines, the assumption is 139 gallons/hr of fuel burned. Are emission assumptions based on the fuel that would emit the most toxics? This permit allows a lot of engine operational hours.

Response: The permit emission assumptions are based on the use of petroleum-based diesel fuel. Data submitted in the NOC application shows renewable diesel fuel produces lower or comparable emissions than that of petroleum-based diesel fuel already permitted.

4. Question: Finally, is there a beneficial use permit that has been issued for the use of these solid wastes as alternatives to diesel?

Response: The renewable diesel fuel is not a solid waste; it is a refined product sold by a fuel supplier. Beneficial Use Determinations provide statewide exemption from local solid waste permitting where applicable. Because the fuel is not solid waste, no approval for its use is required by local health departments or Ecology's Solid Waste Management Program under Washington State solid waste rules. For more information concerning Beneficial Use Determinations, please contact Chuck Matthews of the Solid Waste Management Program at chuck.matthews@ecy.wa.gov or (360) 522-6852.

Out of Scope Comments:

General Response: Thank you for taking the time to comment on Ecology's proposed action. The proposed action consists of the addition of renewable diesel fuel as a fueling option for the facility's emergency generators. The comments below address issues that are outside the scope of the action we are considering.

5. Question: When the Columbia Data Center was first permitted there was a limit of 3 engines that could operate at the same time. Under the Operating Limitations of this permit, more than 3 engines are allowed to operate under multiple scenarios, including allowing up to 180 generator hours in one calendar day. That is the equivalent of approximately 7 engines running concurrently for 24 hours. We sit in a valley, how is this operational limit safe?

Response: In previous permitting actions, consultants modeled MWH Data Center's requested hours of operation on a per day basis to demonstrate that the generators'

requested operations would meet National Ambient Air Quality Standards. Additionally, maximum impacts from the generators were evaluated in health impact assessments.

6. Question: Daylight hours are not always 7:00 am to 7:00 pm. This should be corrected to indicate that daylight hours are in fact, those hours of the day when the sun is up and prior to its setting. If operating during daylight hours is a necessity for the safety of our community, then the engines should operate only during daylight hours.

Response: MWH Data Center proposed in previous permitting efforts, operation during daytime hours (on average) between 7 am to 7 pm for planned maintenance of the generators. This proposal was acceptable to Ecology. Strictly using daylight hours, would allow for very long days in the summer months (e.g. 4 am to 9 pm). Operation hours 7 am to 7 pm are more desirable from a noise perspective.

7. Question: Ecology should not waive 40 CFR 60.8(g), and does not have the authority to waive this requirement, i.e., "The performance testing SHALL include a test method performance audit (PA) during the performance test." (emphasis added)

Response: Ecology is allowed per 40 CFR 60.8(g)(i) as the compliance authority to waive the audit sample: "...The compliance authority responsible for the compliance test may waive the requirement to include an audit sample if they believe that an audit sample is not necessary....."

8. Question: I don't see any accounting for condensable particulate matter, i.e., the particulate matter that is not captured in the DPF, especially PM2.5. Why isn't this included in the permit? The permit accounts for only the "front-half" as DEEP, but not the condensable "back-half". This is not acceptable. Also, does the permit include the secondary formation of PM2.5?

Response: Particulate Matter, PM2.5, and PM10 are the total estimates of condensable particulate matter plus filterable particulate matter. They were modeled in previous permitted efforts to demonstrate that the NAAQS were met. However, secondary formation of PM2.5 was not evaluated.

9. Question: Why is there such a significant drop in VOCs by reducing the rolling average from 36-months to 12-months, but not in other air pollutants? Is that assumption based on the use of alternate fuels, when the permit allows the use of No. 2 fuel which represents the worst case VOC emissions?

Response: MWH's 2019 modification requested the reduction in the rolling average from 36-month to 12-months. All air pollutants yearly maximum emissions were reduced by two thirds. MWH requested a change to their order again in 2020 to reduce the total number of generators, as well as change the manufacturer options from Cummins and Caterpillar to just installing Caterpillar generators. The 2018 permitting effort looked at the worst case emissions from Cummins and Caterpillar and modeled them. Cummins Not-to-Exceed VOC

Emissions were higher than that of Caterpillar Not-to-Exceed VOC Emissions. VOC emissions went down more significantly in 2020 due to installing Caterpillar generators with lower VOC Not-to-Exceed emission estimates.

10. Question: Where are the toxic elements coming from in the cooling tower emissions?

Response: Toxic air pollutants from the cooling towers come from the trace amounts found in the water used in the cooling towers.

11. Question: Why are the cooling towers at MWH 01/02 unchanged for chloroform, bromoform and fluoride? What is the source of these substances? Does Ecology ever check to make sure that bacterial contamination doesn't occur in the cooling tower mists, e.g., Legionnaire's disease?

Response: Cooling tower emissions were conservatively assumed to be consistent all year long, so they did not decrease when the averaging changed for the generator hours and fuel. Emissions did decrease when MWH reduced the number of cooling towers for the rest of the facility (MWH 03/04/05/06) in 2020. When we permitted MWH 01/02, early emission estimates included chloroform, fluoride, and bromoform based on water sampling data. Later permitting efforts for MWH 03/04/05/06 did not have these compounds in the water sample data provided in the application. MWH has not requested a change to the MWH 01/02 cooling tower substances.

Ecology's Water Quality Program requires testing of the cooling tower blow down water, but not typically for bacteria. Additives to cooling tower water are usually anti-bacterial. If cooling towers are regularly maintained and cleaned there should not be any bacterial contamination.

12. Question: Please include "storm avoidance", "power outages" and "energizing of substations" in the permit as part of the reasons for engine operations. We have many electrical storms in the summer and running the engines would be "non-emergency" and should be accounted for to assure compliance with the regulations. Additionally, power outages, which we are assured don't happen anymore, should be recorded so that the public has this information available if requested.

Response: All generator hours must be recorded and accounted for regardless of use. The engine operation hours must be compared to facility and generator hours limits. The information is available in annual reports and can be requested from Ecology.

13. Question: With that said, I wanted to ask if you are aware that these engines are unable to meet the emission rates guaranteed by the manufacturer at each of the loads? The testing protocol requires a minimum 30 minute warm up, disregards malfunctions and doesn't consider the shut down emissions. Using a weighted 5 load average is the only way to make the emission limits.

Response: Testing performed by the data centers follows federal New Source Performance Standard guidelines. Testing for the purpose of comparing engine operation to certification specifications, allows for warmup and is trying to capture long term emissions. Also, when going through the permitting process, manufacturers provide Not-to Exceed values that are usually higher than the given certification standard. These worst case values are then used in the modeling to compare to National Ambient Air Quality Standards and Ecology's Acceptable Source Impact Levels.

14. Question: Finally, in reviewing the standards this morning I see that the new PM standard is lower than the previous 0.2 standard. Does this permit require compliance to the lower standard?

Response: Table 6 of the Preliminary Determination shows the filterable PM limit of 0.03 g/kW-hr.

Background and Description for Order 20AQ-E005

On December 11, 2019, Microsoft Corporation – MWH Data Center submitted a Notice of Construction (NOC) application to modify site layout and to reduce the number of generators and fluid coolers originally permitted with Order 18AQ-E024. MWH06 moved closer to the property line and Microsoft remodeled to show overall changes to impacted receptors. Overall facility emissions have been reduced (See the updated Tables 2 and 3 below). The following table summarizes equipment changes to MWH 03/04/05/06. Please see Appendix A for site history for MWH 01/02.

Table 1 - MWH 03/04/05/06 Equipment Changes

19AQ-E031 MWH-03/04/05/06	Total 19AQ- E031	19AQ-E031 MWH-03/04/05	20AQ-E005 MWH-06	Total 20AQ-E005	Change
4 x 1.0 or 1.5 MWe	6.0 MWe	1x1.0 MWe 2x1.5 MWe	1 x 0.5 MWe	4.5 MWe	-1.5 MWe
68 x 3.0 MWe	204 MWe	40 x 3.0 MWe	16 x 3.0 MWe	168 MWe	-36 MWe
72 generators	72 generators	60 generators	60 generators	60 generators	-12 generators
136 fluid coolers	136 fluid coolers	68 fluid coolers	32 fluid coolers	100 fluid coolers	-36 coolers

Please see updated Tables below for MWH 01/02/03/04/05/06 Criteria and Toxic Air Pollutants

Background and Description for Order 19AQ-E031

On May 15, 2019, Ecology received a NOC application from Microsoft, requesting that the 36-month averaging period for generator hours be reduced to a 12-month averaging period. This effectively reduces the potential to emit of the facility below Title V threshold for NOx. The following tables show the new potential to emit for criteria and toxic air pollutants. As this request is reduction of annual emissions, New Source Review is not triggered. The application was determined complete on May 24, 2019.

Table 2 - Criteria Pollutants (b) Potential to Emit for
 Total Facility MWH 01/02/03/04/05/06 (Tons/Year)

Pollutant	Annual Emissions 19AQ-E031	Annual with Commissioning Emissions 19AQ-E031	Annual Emissions 20AQ-E005	Annual with Commissioning Emissions 20AQ-E005
PM smaller than 10 microns in diameter (PM10)	39.3	40.9	24	25
PM smaller than 2.5 microns in diameter (PM2.5)(a)	13.6	15.1	10.0	10.5
PM2.5/PM10 (Gens Only)	3.4	4.9	1.7	2.2
Carbon monoxide (CO)	12.7	16.1	11	13
Nitrogen oxides (NOX)	58.5	73.3	53	64

Pollutant	Annual Emissions 19AQ-E031	Annual with Commissioning Emissions 19AQ-E031	Annual Emissions 20AQ-E005	Annual with Commissioning Emissions 20AQ-E005
Volatile organic compound (VOC)	5.7	8.4	1.5	1.7
Sulfur dioxide (SO2)	0.21	0.28	0.18	0.24

- (a) All PM emissions from the generator engines are PM2.5, and all filterable PM2.5 from the generator engines is Diesel Engine Exhaust Particulate (DEEP).
 (b) Pollutants above WAC 173-400-110(5) de minimis levels.

Table 3 - Toxic Air Pollutants(c) Potential To Emit for Total Facility MWH 01/02/03/04/05/06 (Tons/Year)

Pollutant	Annual Emissions 19AQ-E031	Annual with Commissioning Emissions 19AQ-E031	Annual Emissions 20AQ-E005	Annual with Commissioning Emissions 20AQ-E005
CO	12.7	16.1	11	13
Ammonia	4.0	5.7	3.5	4.8
Diesel Engine Exhaust Particulate (DEEP)(a)	1.3	1.6	0.97	1.1
SO2	0.21	0.28	0.18	0.24
Primary Nitrogen Dioxide (NO2)(b)	5.9	7.3	5.3	6.4
Benzene	7.3E-02	1.1E-01	6.0E-02	9.2E-02
Toluene	2.6E-02	4.1E-02	2.2E-02	3.3E-02
Xylenes	1.8E-02	2.8E-02	1.5E-02	2.3E-02
1,3-Butadiene	3.7E-03	5.7E-02	3.0E-03	4.6E-03
Formaldehyde	7.4E-03	1.1E-02	6.0E-03	9.4E-03
Acetaldehyde	2.4E-03	3.7E-03	1.9E-03	3.0E-03
Acrolein	7.4E-04	1.1E-03	6.0E-04	9.4E-04
Benzo(a)pyrene	2.4E-05	3.7E-05	2.0E-05	3.1E-05
Benzo(a)anthracene	5.8E-05	9.0E-05	4.8E-05	7.4E-05
Chrysene	1.4E-04	2.2E-04	1.2E-04	1.8E-04
Benzo(b)fluoranthene	1.0E-04	1.6E-04	8.5E-05	1.3E-04
Benzo(k)fluoranthene	2.0E-05	3.2E-05	1.7E-05	2.6E-05
Dibenz(a,h)anthracene	3.2E-05	5.0E-05	2.7E-05	4.1E-05
Ideno(1,2,3-cd)pyrene	3.9E-05	6.0E-05	3.2E-05	4.9E-05
Napthalene	1.2E-02	1.9E-02	1.0E-02	1.5E-02
Propylene	2.6E-01	4.1E-01	2.1E-01	3.3E-01

- (a) DEEP is filterable (front-half) particulate emissions.
 (b) NO2 is assumed to be equal to 10 percent of the total NOX emitted.

Table 4 - Toxic Air Pollutants(c) Potential To Emit for
 Total Facility MWH 01/02/03/04/05/06 (Tons/Year) Cooling Tower – TAPs from water

Pollutant	Annual Emissions 19AQ-E031	Annual with Commissioning Emissions 19AQ-E031	Annual Emissions 20AQ-E005	Annual with Commissioning Emissions 20AQ-E005
Arsenic	1.9E-05	1.9E-05	1.4E-05	1.4E-05
Beryllium	1.9E-05	1.9E-05	1.4E-05	1.4E-05
Cadmium	9.7E-06	9.7E-06	7.1E-06	7.1E-06
Chromium	1.9E-05	1.9E-05	1.4E-05	1.4E-05
Copper	2.6E-03	2.6E-03	1.9E-03	1.9E-03
Lead	1.9E-05	1.9E-05	1.4E-05	1.4E-05
Manganese	7.5E-04	7.5E-04	6.7E-04	6.7E-04
Mercury	1.9E-03	1.9E-03	1.4E-03	1.4E-03
Selenium	1.9E-05	1.9E-05	1.4E-05	1.4E-05
Vanadium	3.3E-04	3.3E-04	2.4E-04	2.4E-04
Total Cyanide	9.7E-05	9.7E-05	7.1E-05	7.1E-05
Total Phosphorus	3.4E-02	3.4E-02	2.5E-02	2.5E-02
Chloroform (MWH01/02)	2.6E-04	2.6E-04	2.6E-04	2.6E-04
Bromodichloromethane (M01/02)	2.6E-04	2.6E-04	2.6E-04	2.6E-04
Bromoform (MWH01/02)	6.9E-03	6.9E-03	6.9E-03	6.9E-03
Fluoride (MWH01/02)	4.8E-03	4.8E-03	4.8E-03	4.8E-03

(a) DEEP is filterable (front-half) particulate emissions.

(b) NO2 is assumed to be equal to 10 percent of the total NOX emitted.

Background and Description Order 18AQ-E024

On March 6, 2018, Ecology received a Notice of Construction application from Microsoft Corporation, requesting an expansion of the MWH Data Center - MWH 03/04/05/06. The expansion would include sixty-eight 3.0 MWe emergency backup generator engines, four 1.0 MWe or 1.5 MWe emergency backup generator engines and 136 evaporative fluid coolers. Initial review the application was considered incomplete. The application was considered complete on June 7, 2018. A Second Tier review and Health Impact Analysis was provided for this project for DEEP and NO2. A 30 day public comment period was conducted from July 26 through August 31, 2018, with a public hearing on August 27, 2018. SEPA review conducted by the City of Quincy was complete on October 11, 2018.

Emission Units and Pollution Control Equipment

Emergency Generator Engines and Cooling Equipment MWH 01/02/03/04/05/06(a)

Building	Quantity	Engines	Model
MWH 01 (b)	16	Primary 2.5 MWe	CAT – 3516C-HD-TA
MWH 01 (b)	4	Reserve 2.5 MWe	CAT – 3516C-HD-TA
MWH 01 (b)	4	2.0 MWe	CAT – 3516C-TA
MWH 01 (b)	1	0.75 MWe	CAT – C27ATAAC

Building	Quantity	Engines	Model
MWH 02 (c)	16	Primary 2.5 MWe	CAT – 3516C-HD-TA
MWH 02 (c)	4	Reserve 2.5 MWe	CAT – 3516C-HD-TA
MWH 02 (c)	4	2.0 MWe	CAT – 3516C-TA
MWH 02 (c)	1	0.75 MWe	CAT – C27ATAAC
MWH 03 (d)	8	3.0 MWe	Cummins C3000 D6e or CAT C175
MWH 03 (d)	1	1.0 MWe or 1.5 MWe	Cummins 1500DQGAF or CAT C32 or 3512C
MWH 04 (d)	20	3.0 MWe	Cummins C3000 D6e or CAT C175
MWH 04 (d)	1	1.0 MWe or 1.5 MWe	Cummins 1500DQGAF or CAT C32 or 3512C
MWH 05 (d)	20	3.0 MWe	Cummins C3000 D6e or CAT C175
MWH 05 (d)	1	1.0 MWe or 1.5 MWe	Cummins 1500DQGAF or CAT C32 or 3512C
MWH 06 (d)	20	3.0 MWe	Cummins C3000 D6e or CAT C175
MWH 06 (d)	1	1.0 MWe or 1.5 MWe	Cummins 1500DQGAF or CAT C32 or 3512C

- (a) All engines will meet EPA Tier 2 standards and have add on Selective Catalytic Reduction (SCR) and catalyzed Diesel Particulate Filter (DPF) equipment that will meet Tier 4 standards.
- (b) Cooling equipment: 16 Cooling Towers SPX-Marley – MD5008PAF2 (0.0005 percent drift rate)
- (c) Cooling equipment: 16 EVAPCO Cooling Towers (0.0005 percent drift rate)
- (d) Cooling equipment: 136 Baltimore Aircoil Company - HXV-1012C-24T-L-2 evaporative fluid coolers or equivalent cooling towers (0.0005 percent drift rate)

Existing Approval Orders

Approval Order No.: 17AQ-E002 –See pages 8-32 for technical support document for MWH 01 and 02.

Enforcement Issue(s)

There are no enforcement actions for this site.

Recommendation

Staff recommends that the operation of the MWH Data Center – MWH 01/02/03/04/05/06 be approved. This recommendation is based on the following facts and conditions: Information used in this review was derived from the application received 3/6/18 and additional information received on 6/6/2018. Hours of engine operation in the permit were based on modeling inputs.

Emission Calculations

Criteria Pollutants(b) Potential to Emit for Total Facility MWH 01/02/03/04/05/06 (Tons/Year)

Pollutant	Annual Emissions	Theoretical Maximum Emissions	Theoretical Maximum with Commissioning Emissions
PM smaller than 10 microns in diameter (PM10)	39.3	46.1	47.6
PM smaller than 2.5 microns in diameter (PM2.5)(a)	13.6	20.3	21.9
PM2.5/PM10 (Gens Only)	3.4	10.1	11.7
Carbon monoxide (CO)	12.7	38.1	41.5
Nitrogen oxides (NOX)	58.5	175.4	190.2
Volatile organic compound (VOC)	5.7	17.0	19.7
Sulfur dioxide (SO2)	0.21	0.62	0.40

(a) All PM emissions from the generator engines are PM2.5, and all filterable PM2.5 from the generator engines is Diesel Engine Exhaust Particulate (DEEP).

(b) Pollutants above WAC 173-400-110(5) de minimis levels

Toxic Air Pollutants(c) Potential To Emit for Total Facility MWH 01/02/03/04/05/06 (Tons/Year)

Pollutant	Annual Emissions	Theoretical Maximum Facility Emissions	Theoretical Maximum with Commissioning Emissions
CO	12.7	38.1	41.5
Ammonia	4.0	12.0	13.6
DEEP(a)	1.3	3.8	4.1
SO2	0.21	0.62	0.70
Primary nitrogen dioxide (NO2)(b)	5.9	17.5	19.0
Benzene	7.3E-02	2.2E-01	2.6E-01
Toluene	2.6E-02	7.9E-02	9.4E-02
Xylenes	1.8E-02	5.4E-02	6.4E-02
1,3-Butadiene	3.7E-03	1.1E-02	1.3E-02
Formaldehyde	7.4E-03	2.2E-02	2.62E-02
Acetaldehyde	2.4E-03	7.1E-03	8.4E-03
Acrolein	7.4E-04	2.2E-03	2.6E-03
Benzo(a)pyrene	2.4E-05	7.2E-05	8.6E-05
Benzo(a)anthracene	5.8E-05	1.7E-04	2.1E-04
Chrysene	1.4E-04	4.3E-04	5.1E-04

Pollutant	Annual Emissions	Theoretical Maximum Facility Emissions	Theoretical Maximum with Commissioning Emissions
Benzo(b)fluoranthene	1.0E-04	3.1E-04	3.7E-04
Benzo(k)fluoranthene	2.0E-05	6.1E-05	7.2E-05
Dibenz(a,h)anthracene	3.2E-05	9.7E-05	1.2E-04
Ideno(1,2,3-cd)pyrene	3.9E-05	1.2E-04	1.4E-04
Napthalene	1.2E-02	3.7E-02	4.3E-02
Propylene	2.6E-01	7.8E-01	9.3E-01
Fluoride	4.8E-03	4.8E-03	4.8E-03
Manganese	7.5E-04	7.5E-04	7.5E-04
Copper	2.6E-03	2.6E-03	2.6E-03
Chloroform	2.6E-04	2.6E-04	2.6E-04
Bromodichloromethane	2.6E-04	2.6E-04	2.6E-04
Bromoform	6.9E-03	6.9E-03	6.9E-03

- (a) DEEP is filterable (front-half) particulate emissions.
- (b) NO2 is assumed to be equal to 10 percent of the total NOX emitted.
- (c) Pollutants above WAC 173-460-150 de minimis levels.

Potential emissions are above the exemption limits in WAC 173-400-110(5) of 2.0 tpy NOx; 5.0 tpy CO; 2.0 tpy VOC; 1.25 tpy PM; 0.75 tpy PM10; and 0.5 tpy PM2.5, therefore the facility is subject to New Source Review (NSR). An action that triggers NSR is subject to review under WAC 173-460-040 for each toxic air pollutant. See ‘State Rule Applicability’ section for further information on TAPs.

Limited Potential to Emit

Modeling demonstrated the facility would not cause or contribute to a violation of the NAAQS based on worst-case load emissions for either Cummin’s or Caterpillar engines. Engines were limited to 86 hours per year on a 3-year average. All fluid coolers were assumed to operate 8760 hours per year.

County Attainment Status

Pollutant	Status
PM10	attainment
SO2	attainment
NO2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Part 70 Permit Determination

The MWH Data Center is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (1) Regulated Pollutant: NOX is greater than one hundred (100) tons per year; MWH Data Center is not a major source for HAP:
- (2) A single hazardous air pollutant (HAP) is less than ten (10) tons per year, and;
- (3) Any combination of HAPs is less than twenty-five (25) tons per year.

Federal Rule Applicability

- (1) New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines is applicable to this source. Requires each generator be manufactured and certified to meet EPA Tier 2 emission limits.
- (2) National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63 Subpart ZZZZ for Reciprocating Internal Combustion Engines is applicable to this source. Requires each generator be manufactured and certified to meet EPA Tier 2 emission limits and meet all requirements of 40 CFR Part 60 Subpart IIII.

NAAQS

Dispersion modeling was submitted which showed operation of the facility as permitted would not cause or contribute to a NAAQS exceedance.

Estimated Project and Background Impacts Compared to NAAQS

Pollutant	NAAQS Primary/Secondary	WA State Stds	Modeled Scenario	Modeled Impacts (µg/m3)	Background (µg/m3) Regb. + Local	Total Impact (µg/m3)
Carbon Monoxide (CO) 8-hour average 1-hour average	10,000 / -- 40,000 / --	10,000 40,000	Unplanned power outage	154 c 467 c	3,308 5,776	3,462 6,243
Sulfur Dioxide (SO2) 3-hour average 1-hour average	--/ 1,310 200	1,310 200	Unplanned power outage	5.1 d 10 d	2.1 2.6	7.2 12.7
Particulate Matter (PM10) 24-hour average	150	150	Unplanned power outage	67 d,e	83	149.9
Particulate Matter (PM2.5) Annual average 24-hour average	12 / 15 35	12 35	Theo. Max Yr Ranked Day 8	2.7 e 6.4 f,g	7.1 21.1	9.8 27.5
Nitrogen Oxides (NOx) Annual average 1-hour average	100 188 / --	100	Theo Max Yr Monte Carlo	8.6 e 96 h	6.2 16	14.8 112

Notes:

- ^a Local background sources, at the project-related maximum impact location.

- b Regional background level obtained from Ecology’s Air Monitoring Network website (WSU; accessed October 30, 2017).
- c Reported values represent the 2nd –highest modeled impacts.
- d Reported values represent the 1st – highest modeled impacts.
- e It was assumed that local data centers were concurrently operating in facility-wide power outage mode. The Lamb Weston (fka Con-Agra) facility was modeled as continuously operating at PTE rates. All cooling towers were modeled as continuously operating rates.
- f Monthly maintenance operations are expected to occur on each engine for 20 minutes per engine per month. In the event that complications arise during testing, this duration may be greater. Multiple sequential tests may occur within the same day for up to 12 hours per day.
- g This model conservatively assumes that two engines may be running at a time and that operations may occur any time during daytime hours (7 a.m. to 7 p.m.). In order to capture the worst-case emission impacts for this scenario, a test model was run with all project generators operating at full-variable load. The resultant emission impacts for each individual generator was ranked. The generator with the highest ranked impact was simulated to operate concurrently with a randomly chosen adjacent generator for this modeling demonstration. Local background modeling for this scenario assumed nearby data centers were operating generators in a maintenance run scenario.
- h Reported value is based on the Monte Carlo assessment for NO2.

Stack Parameters

The following table shows the stack height and diameter requirements that were used in the site modeling. The 72 foot stack heights were evaluated by the manufacturer Caterpillar and were determined that there would not be a back pressure issue if constructed as designed with no more than two long radius sweep 45 degree elbows in the stack.

Stack Dimension Requirements

Quantity	Engine Size	Minimum Stack Height (feet)	Maximum Stack Diameter (inches)	Height above building roof (feet)
68	3.0 MWe	72'	30"	26'+
40	2.5 MWe	40'	22"	12'
4	2.0 MWe	40'	22"	19'
4	1.0/1.5 MWe	72'	24"	26'+
1	0.75 MWe	35'	14"	12'

State Rule Applicability and Best Available Control Technology (BACT)

The proposed installation of emergency backup generators is subject to the requirements of:

- (1) WAC 173-400-113 - Requirements for new sources in attainment or unclassifiable areas, is the State regulation that defines the evaluations of Microsoft Corporation. The subsections of WAC 173-400-113 require the following:

- (a) WAC 173-400-113(1): “The proposed new source will comply with all applicable new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAP)...” New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines and National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63 Subpart ZZZZ for Reciprocating Internal Combustion Engines are applicable to this source.
- (b) WAC 173-400-113(2): “The proposed new source or modification will employ BACT for all pollutants not previously emitted or whose emissions would increase as a result of the new source or modification.” See the following BACT Table:

Best Available Control Technology (BACT) Determinations

Pollutant(s)	BACT Determination
PM, CO, and VOCs	Use of EPA Tier 2 certified engines installed and operated as emergency engines, as defined in 40 CFR Section 60.4219. Compliance with the operation and maintenance restrictions of 40 CFR Part 60, Subpart IIII. Use of high-efficiency drift eliminators which achieve a liquid droplet drift rate of no more than 0.0005 percent of the recirculation flow rate within each cooling tower.
NOX	Use of EPA Tier 2 certified engines installed and operated as emergency engines, as defined in 40 CFR Section 60.4219, and satisfy the written verification requirements of Approval Condition 2.e. Compliance with the operation and maintenance restrictions of 40 CFR Part 60, Subpart IIII.
SO2	Use of ultra-low sulfur diesel fuel containing no more than 15 parts per million by weight of sulfur.

- (i) While the BACT and tBACT emission limitation is EPA’s Tier 2 standards, Microsoft will voluntarily equip the generators with a selective catalytic reduction (SCR) and catalyzed diesel particulate filter (DPF) controls to meet EPA Tier 4 emission standards. The cost effectiveness (as dollars per ton of pollutant removed) of installing the Tier 4 integrated control package for control of NOx (\$15,353), PM10/PM2.5 (\$1.03 million), CO (\$140,412), VOCs (\$749,247), combined criteria air pollutants (\$13,413), and combined toxic air pollutants (\$65,235). The forecast cost effectiveness for control of individual and combined pollutants exceeds Ecology’s thresholds for cost effectiveness; therefore, the Tier 4 integrated control package is cost-prohibitive for reducing criteria and toxic air pollutant emissions.
- (c) WAC 173-400-113(3): “Allowable emissions from the proposed new source or modification will not delay the attainment date for an area not in attainment, nor cause or contribute to a violation of any air quality standard.”
- (d) WAC 173-400-110(2)(d): “If the proposed project will increase emissions of toxic air pollutants regulated under chapter 173-460 WAC, then the project must meet all applicable requirements of that program.” See the following tBACT Table:

tBACT Determinations

TAPs	tBACT Determination
Acetaldehyde, CO, acrolein, benzene, benzo(a)pyrene, 1,3-butadiene, DEEP, formaldehyde, toluene, total PAHs, xylenes, chrysene, benzo(a)anthracene, naphthalene, benzo(b)fluoranthene, propylene, dibenz(a,h)anthracene, Ideno(1,2,3-cd)pyrene, fluoride, manganese, copper, chloroform, bromodichloromethane, bromoform,	Compliance with the VOC and PM BACT requirement.
Ammonia	MWH 01 & 02 - No more than 15 parts per million volume-dry (ppmvd) at 15 percent oxygen per engine. MWH 03/04/05/06 – No more than 40 parts per million volume-dry (ppmvd) at 15 percent oxygen per engine.
NO2	Compliance with the NOX BACT requirement.
SO2	Compliance with the SO2 BACT requirement.

Conclusion

Ecology has determined the applicant, Microsoft Corporation, has satisfied all of the requirements of New Source Review for its proposal to expand the MWH Data Center by sixty-eight 3.0 MWe emergency backup generators, four 1.0 MWe or 1.5 MWe emergency backup generators and 136 evaporative fluid coolers in Quincy, WA. The operation of this facility shall be subject to the conditions of the attached proposed Approval Order No. 18AQ-E024.

**Appendix A: Pages 17-42 refer to the Technical Support Document that covered the Notice of Construction Approval Order for MWH 01 & 02 – Approval Order 17AQ-E002
Technical Support Document
Approval Order No: 17AQ-E002
Microsoft MWH Data Center**

1.0. Project Description

On January 27, 2014, Ecology received a Notice of Construction (NOC) application submittal from the Microsoft Corporation (Microsoft), the permittee, requesting approval for a permit application for Phases 1 and 2 of a new facility originally named the Oxford Data Center (Oxford) located at Industrial Park #5, west of Road R NW at the end of Port Industrial Parkway, Quincy, WA in Grant County.

The NOC application was determined to be incomplete, and an incompleteness letter was issued on February 26, 2014. A revised NOC application was received on March 17, 2014, and the application was considered complete on June 3, 2014. After a public comment period from June 19, 2014, through July 29, 2014, with a hearing and public meeting held in Quincy on July 24, 2014, Approval Order 14AQ-E537 was issued on August 15, 2014. Microsoft appealed the permit on September 1, 2014. Microsoft worked with Ecology through the NOC application process to address the concerns of their appeal and withdrew their appeal on September 22, 2015, before the appeal hearing date scheduled for January 2016.

On December 11, 2014, Ecology received an NOC application submittal from Microsoft requesting revisions to Approval Order 14AQ-E537. The NOC application was determined to be incomplete, and on January 7, 2015, Ecology issued an incompleteness letter to Microsoft. On February 2, 2015, Microsoft provided a revised NOC application to Ecology. The application was considered complete on March 17, 2015. Ecology provided a public comment period from May 18, 2015, through July 13, 2015, with a hearing and public meeting held in Quincy on July 9, 2015. Ecology received comments during the comment period and Ecology prepared responses to the comments. In September 2015, Ecology was prepared to issue the comments along with Approval Order 15AQ-E609 to replace Approval Order 14AQ-E537, but at Microsoft's request, Ecology did not issue the permit. Microsoft informed Ecology of additional changes that the facility was making from what was previously requested. Microsoft informed Ecology they were going to request those additional changes in another NOC application.

On January 13, 2016, Ecology received NOC application submittal from Microsoft requesting revisions to Approval Order 14AQ-E537 (dated August 15, 2014), for the newly named MWH Data Center (MWH) (FKA: Oxford) located at Industrial Park No. 5, west of Road R NW at the end of Port Industrial Parkway in Quincy, WA. The NOC application was determined to be incomplete, and on March 10, 2016, Ecology issued an incompleteness letter to Microsoft. On April 13, 2016, Ecology received a revised NOC application from Microsoft, with supplementary materials provided on September 9, 2016. The NOC application was considered complete on September 20, 2016.

The following information comprises the legal description of the facility provided by the applicant:

LOTS 2, 3, 4, 5, AND TRACT A, AMENDED PORT DISTRICT INDUSTRIAL PARK NO. 6 BINDING SITE PLAN, ACCORDING TO THE BINDING SITE PLAN THEREOF FILED IN VOLUME 2 OF BINDING SITE PLANS, PAGES 64 AND 65, RECORDS OF GRANT COUNTY, WASHINGTON. FARM UNITS 216 AND 217, IRRIGATION BLOCK 73, OXFORD BASIN PROJECT, ACCORDING TO THE PLAT THEROF FILED NOVEMBER 29, 1951, RECORDS OF GRANT COUNTY, WASHINGTON. STARTING AT THE NORTHWEST CORNER OF SAID FARM UNIT 216, IRRIGATION BLOCK 73, THE TRUE POINT OF BEGINNING, THENCE 173 (feet) EAST ALONG THE NORTH LINE OF SAID FARM UNIT; THENCE 242 FEET SOUTH OF A LINE PERPENDICULAR TO THE NORTH LINE OF SAID FARM UNIT; THENCE WEST 173 FEET; THENCE NORTH 242 FEET TO THE TRUE POINT OF BEGINNING.

In the revised permit, Ecology has concluded that this project has satisfied all NOC requirements including those regarding second tier analysis for two Toxic Air Pollutants (TAPs) (Diesel Engine Exhaust Particulate (DEEP) and Nitrogen Dioxide (NO₂)). The previous Approval Order (14AQ-E537) is rescinded and replaced entirely with this Approval Order.

MWH will contain four Phase 1 activity zone (AZ) buildings designated AZA, AZB, AZC, AZD, four core network room (CNR) buildings, an administrative building, and four Phase 2 activity zone buildings designated AZA, AZB, AZC, AZD. MWH Phases 1 and 2 will have 40 Caterpillar Model 3516C-HD-TA diesel powered electric emergency generators in the activity zone buildings with a power rating of 2.5 MWe per generator, four Caterpillar Model 3516C-TA diesel powered electric emergency generators in the CNR buildings with a power rating of 2.0 MWe per generator, and one Caterpillar Model C27ATAAC diesel powered electric emergency generator in the administrative building with a power rating of 0.75 MWe.

Eight of the 40 combined Phases 1 and 2 engines rated 2.5 MWe will be reserve emergency generators (reserve engines). The words “engine” or “generator” are used synonymously through the remainder of this permit to refer to the overall unit.

Each cooling tower has four cells and four fans. Each of the eight activity zone building will have four cooling towers for a total of 32 SPX-Marley model MD5008PAF2 cooling towers. Each of the 32 individual cooling towers has a design recirculation rate of 950 gallons per minute (gpm) and an airflow rate of 143,600 cubic feet per minute (cfm).

1.1. Potential to Emit for Criteria Pollutants and TAPS

Table 1 contains Potential To Emit (PTE) estimates. To achieve these emissions levels as listed in the permit, the permit requires that each engine must be equipped with Selective Catalytic Reduction (SCR) and catalyzed Diesel Particulate Filter (DPF) air pollution controls to meet the emission requirements of EPA Tier 4 engines.

Table 1. Potential To Emit For Phases 1 & 2 (TPY)

Pollutant	Emission Factor	Facility Potential to Emit	References
Criteria Pollutants	Units = g/kW-hr (except where noted)	(TPY)	(a)
NOx	(0.67) and Caterpillar based emission factors	33.0	(b),(e)
VOC	(0.19) and Caterpillar based emission factors	1.033	(a),(b),(e)
CO	(3.5) and Caterpillar based emission factors	7.3	(b)
PM2.5	(0.03) and Caterpillar based emission factors (See note j for cooling towers)	3.8	(b),(j)
PM10	NA (See note j for cooling towers)	13.6	(f),(j)
SO2	15 ppm	0.069	(c)
Lead	NA	Negligible	(d)
Ozone	NA	NA	(e)
Toxic Air Pollutants (TAPS)	Units = lb/MMBTU (except where noted)		(a)
Primary NO2	(0.67 g/Kw-hr) and Caterpillar based emission factors.	3.3	(b),(h)
Ammonia	15ppmv	1.14	(b),(g)
Diesel Engine Exhaust Particulate (DEEP)	(0.03 g/kW-hr) and Caterpillar based emission factors	0.814	(b),(f)
Carbon monoxide	(3.5 g/kW-hr) and Caterpillar based emission factors	7.3	(b)
Sulfur dioxide	15 ppm	0.069	(c)
Benzene	7.76E-04	3.5E-03	(i)
Toluene	2.81E-04	1.3E-03	(i)
Xylenes	1.93E-04	8.6E-04	(i)
1,3 Butadiene	3.91E-05	1.8E-04	(i)
Formaldehyde	7.89E-05	3.5E-04	(i)
Acetaldehyde	2.52E-05	1.1E-04	(i)
Acrolein	7.88E-06	3.5E-05	(i)
Benzo(a)Pyrene	2.57E-07	1.2E-06	(i)
Benzo(a)anthracene	6.22E-07	2.8E-06	(i)
Chrysene	1.53E-06	6.9E-06	(i)
Benzo(b)fluoranthene	1.11E-06	5.0E-06	(i)
Benzo(k)fluoranthene	2.18E-07	9.8E-07	(i)

Pollutant	Emission Factor	Facility Potential to Emit	References
Dibenz(a,h)anthracene	3.46E-07	1.6E-06	(i)
Ideno(1,2,3-cd)pyrene	4.14E-07	1.9E-06	(i)
Napthalene	1.30E-04	5.8E-04	(i)
Propylene	2.79E-03	1.3E-02	(i)
Fluoride	0.31 mg/L	4.8E-03	(j)
Manganese	0.03 mg/L	4.6E-04	(j)
Copper	0.01 mg/L	1.6E-04	(j)
Chloroform	0.0004 mg/L	2.6E-04	(k)
Bromodichloromethane	0.0004 mg/L	2.6E-04	(k)
Bromoform	0.0105 mg/L	6.9E-03	(k)

- ^a The list of EPA criteria pollutants that have related National Ambient Air Quality Standards (NAAQS). VOC is not a criteria pollutant but is included here per note (e). Toxic Air Pollutants (TAPs) are defined as those in WAC 173-460. Greenhouse gas is not a criteria pollutant or a TAP and is exempt from minor New Source Review requirements per WAC 173-400-110(5)(b).
- ^b Potential to Emit (PTE) estimates are based on one or more of the following: manufacturer 5-load final Tier 4 compliant engine test data (for NOx, VOC, CO, and PM2.5), Caterpillar test data, 1.20 safety factor, and applicable cold start (CS) factors for catalyst warm-up periods and black puff factors from California Energy Commission’s Air Quality Implications of Backup Generators in California” CEC-500-2005-049; July 2005 (see section 2.1.2).
- ^c Applicants estimated emissions based on fuel sulfur mass balance assuming 0.00150 weight percent sulfur fuel.
- ^d EPA’s AP-42 document does not provide an emission factor for lead emissions from diesel-powered engines. Lead emissions are presumed to be negligible.
- ^e Ozone is not emitted directly into the air, but is created when its two primary components, volatile organic compounds (VOC) and oxides of nitrogen (NOx), combine in the presence of sunlight. Final Ozone NAAQS Regulatory Impact Analysis EPA-452/R-08-003, March 2008, Chapter 2.1.
http://www.epa.gov/ttnecas1/regdata/RIAs/452_R_08_003.pdf
- ^f All PM emissions from the generator engines are considered PM2.5, and all PM2.5 from the generator engines is considered DEEP.
- ^g Based on 15 parts per million volume-dry (ppmvd) emission factor and facility operating parameters.
- ^h NO2 is assumed to be 10% of total NOx emitted.
- ⁱ EPA AP-42 § 3.3 or 3.4 from: Emissions Factors & AP 42, Compilation of Air Pollutant Emission Factors <http://www.epa.gov/ttn/chief/ap42/>.
- ^j Trace metals in city industrial wastewater as provided in application for cooling tower emissions. Total particulate matter from cooling towers based on the

following study: Calculating Realistic PM10 Emissions from Cooling Towers", Reisman and Frisbie, Environmental Progress, July 2002.

- ^k Concentration in cooling tower makeup water as provided in application for cooling tower emissions.

1.2. Maximum Operation Scenarios Based on Final Tier 4 Compliant Engines

Cold start adjustment factors are used to approximate the additional emissions from cold engines burning off the accumulated fuel and crankcase oil on cold cylinders. The VOC cold start factor adjustments for these calculations are provided below:

VOC Black Puff Cold-Start Adjustment Factors

Load	Spike Area (ppm-sec)	Steady-State Area (ppm-sec)	Total Area (ppm-sec)	Black Puff Factor
10%	6300	27000	33300	1.189
80%	6300	18000	24300	1.259
100%	6300	18000	24300	1.259

The CO cold start factor adjustments for these calculations are provided below:

CO Black Puff Cold-Start Adjustment Factors

Load	Spike Area (ppm-sec)	Steady-State Area (ppm-sec)	Total Area (ppm-sec)	Black Puff Factor
10%	15000	18000	33000	1.455
80%	15000	12000	27000	1.556
100%	15000	12000	27000	1.556

A NOX cold start factor of 1.0 was assumed because California Energy Commission tests (see "Air Quality Implications of Backup Generators in California" CEC-500-2005-049; July 2005); do not show short-term NOX spikes during cold starts.

Other cold-start related adjustments were also included in the application to account for heat-up times for catalysts in the add-on controls (see Section 4 regarding add-on controls) listed below.

Catalyst Delay Cold Start Adjustment

Control Device	Applicability	Adjustment
SCR catalyst and DPF oxidation catalyst	Cold start under idle load (less than or equal to 10%) for VOC, CO, and NOX	15 minutes at emission levels equivalent of generator equipped with Tier 2 level emission controls followed by final Tier 4 compliant emissions
SCR catalyst and DPF oxidation catalyst	Cold start under high load for VOC, CO, and NOX	10 minutes at emission levels equivalent of generator equipped with Tier 2 level emission controls followed by final Tier 4 compliant emissions

Ecology also asked Microsoft to demonstrate compliance with the NAAQS during a worst-year scenario with the following set of assumptions:

- All primary emergency generators operating for 256 hours in the single worst-case year (three times the permitted three-year rolling value of 86 hours per year).
- All reserve emergency generators operating for 120 hours for scheduled testing in the single worst-case year (three times the permitted three year rolling value of 40 hours per year).
- Commissioning of 18 generators in the single worst-case year.
- Conducting four stack emission test in the single worst-case year.

Although this scenario is unlikely and would only occur in one year, Microsoft has shown that the facility emissions would still comply with the NAAQS (See Section 5 of this TSD).

2.0. Applicable Requirements

The proposal by Microsoft qualifies as a new source of air contaminants as defined in Washington Administrative Code (WAC) 173-400-110 and WAC 173-460-040, and requires Ecology approval. The installation and operation of the MWH Data Center is regulated by the requirements specified in:

2.1. Chapter 70.94 Revised Code of Washington (RCW), Washington Clean Air Act,

2.2. Chapter 173-400 Washington Administrative Code (WAC), General Regulations for Air Pollution Sources,

2.3. Chapter 173-460 WAC, Controls for New Sources of Toxic Air Pollutants, and

2.4. 40 CFR Part 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ* (* See section 3.4.2)

All state and federal laws, statutes, and regulations cited in this approval shall be the versions that are current on the date the final approval order is signed and issued.

2.4.1. Support for permit Approval Condition 2.1 regarding applicability of 40 CFR Part 60 Subpart IIII:

As noted in the applicability section of 40CFR1039 (part 1039.1.c), that regulation applies to non-road compression ignition (diesel) engines and; *(c) The definition of nonroad engine in 40 CFR 1068.30 excludes certain engines used in stationary applications.* According to the definition in 40CFR1068.30(2)(ii): *An internal combustion engine is not a nonroad engine if it meets any of the following criteria: The engine is regulated under 40 CFR part 60, (or otherwise regulated by a federal New Source Performance Standard promulgated under section 111 of the Clean Air Act (42 U.S.C. 7411)).* Because the engines at MWH are regulated under 40CFR60 subpart IIII (per

40CFR60.4200), they are not subject to 40CFR1039 requirements except as specifically required within 40CFR60.

Some emergency engines with lower power rating are required by 40CFR60 to meet 40CFR1039 Tier 4 emission levels, but not emergency engines with ratings that will be used at MWH (0.750 MWe, 2.0 MWe, and 2.5 MWe). Instead, 40CFR60 requires the engines at MWH to meet the Tier 2 emission levels of 40CFR89.112 (see section 4 with respect to add-on controls). The applicable sections of 40CFR60 for engine owners are pasted below in italics with bold emphasis on the portions requiring Tier 2 emission factors for emergency generators such as those at MWH:

§60.4205 What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?

(b) Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in §60.4202 (see below), for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.

(Note: Based on information provided by the applicant, MWH will use the following engines specifications: August, 2013 Caterpillar Model C27ATAAC rated 0.75 MWe; February 2013 Caterpillar Model 3516C-TA rated 2.0 MWe; November 2012, Caterpillar Model 3516C-HD-TA rated 2.5 MWe. Based on these specifications, the 0.750 MWe engine has 27.03 liters displacement over 12 cylinders, or 2.25 liters per cylinder; the 2.0 MWe engines have 69.00 liters displacement over 16 cylinders, or 4.31 liters per cylinder; and the 2.5 MWe engines have 78.08 liters displacement over 16 cylinders, or 4.88 liters per cylinder. Thus, because the specified engines at MWH will all have a displacement of less than 30 liters per cylinder, and are for emergency purposes only, they are required to meet §60.4202 manufacturer requirements listed below).

§60.4202 What emission standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacturer?

(a) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (a)(1) through (2) of this section.

(1) For engines with a maximum engine power less than 37 KW (50 HP):

(i) The certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants for model year 2007 engines, and

(ii) The certification emission standards for new nonroad CI engines in 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, 40 CFR 1039.115, and table 2 to this subpart, for 2008 model year and later engines.

(2) For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants beginning in model year 2007.

(Note: Thus, as outlined in previous note, and based on the power ratings listed in 40 CFR 60.4202(a), the 0.75 MWe and 2.0 MWe engines at MWH are required to meet the applicable 40 CFR 89 Tier 2 emission standards.)

(b) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power greater than 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (b)(1) through (2) of this section.

(1) For 2007 through 2010 model years, the emission standards in Table 1 to this subpart, for all pollutants, for the same maximum engine power.

(2) For 2011 model year and later, the certification emission standards for new nonroad CI engines for engines of the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

(Note: Thus, as outlined previously, and based on the power ratings listed in 40 CFR 60.4202(b), the 2.5 MWe engines at MWH are required to meet the applicable 40CFR89 Tier 2 emission standards.)

2.4.2. Support for permit Approval Condition 1.2 regarding applicability of 40 CFR 60.4211(f):

The emergency engine generators approved for operation by the Order are to be used solely for those purposes authorized for emergency generators under 40 CFR 60, Subpart III. The permit allows emergency use consistent with the hourly operation requirements described in 40 CFR 60.4211(f), except that there shall be no operation of this equipment to produce power for demand-response arrangements, peak shaving arrangements, nor to provide power as part of a financial arrangement with another entity, nor to supply power to the grid. Operating generators for uses beyond what is allowed in Approval Condition 1.2 goes beyond the intended use of emergency generators for data center back-up power only. Approval Condition 1.2 is consistent with the provisions of other data center permits in Quincy.

2.4.3. Support for Approval Condition 8.5.3. This Condition is required for the following reasons (but not necessarily limited to these reasons only):

Recording the reason for operating engines is consistent with the provisions of other data center permits in Quincy. In order to demonstrate compliance with 40 CFR 60.4211(f), this Approval Condition requires that Microsoft record the reason for operating the engines at the MWH Data Center (including for emergency use). In addition to demonstrating compliance 40 CFR 60.4211(f), this condition is also required to show compliance with Approval Conditions 1.2 and 3.2., and because of its importance to Ecology and the Quincy community. Condition 8.6.3 simplifies recording the purpose of engine use to recording only the following reasons for operating: EMERGENCY SITUATIONS, STACK TESTING, COMMISSIONING, MAINTENANCE CHECKS, READINESS TESTING, DEVIATION OF VOLTAGE OR FREQUENCY, or UNSPECIFIED NON-EMERGENCY SITUATIONS. 40 CFR 60.4211(f)(2), allows up to 100 hours of engine operation per calendar year. Per 40 CFR 60.4211(f)(3), up to 50 hours of engine operation per calendar year of “UNSPECIFIED NON-EMERGENCY SITUATIONS” can be used, but those hours must be borrowed from the 100 hours allowed under 40CFR60.4211(f)(2).

2.4.4. Support for complying with 40 CFR 63 Subpart ZZZZ from Section 3 of TSD:

According to section 40 CFR 63 Subpart ZZZZ section 636590 part (c) and (c)(1), sources such as this facility, are required to meet the requirements of 40 CFR 60 IIII and “no further requirements apply for such engines under this (40 CFR 63 Subpart ZZZZ) part.”

3.0. Source Testing

Source testing requirements and test method options outlined in Table 4 of the Approval Order requires a five-load test for PM, NOX, CO, and VOC. PM is considered to be DEEP at size PM2.5 or smaller, which tests only for the filterable particulate matter to be consistent with California Code of Regulations § 93115.14 ATCM for Stationary CI Engines – Test Methods (measuring front half particulate only).

Ecology is including a Conditional Test Method (CTM) option for ammonia in the permit, because it is an EPA method (EPA CTM-027) that Ecology considers a viable test option to review performance of SCR catalyst beds and ammonia injection (slip).

Ecology also includes the partial dilution probe method from 40 CFR 1065 as an option. Use of this test more closely simulates the test that manufacturers are required to use to meet NSPS requirements, and will potentially reduce testing time compared to other test options. By reducing testing time, engine emissions from stack testing will be reduced.

For this permit, engine selection testing will be determined as follows:

3.1. New Engine Stack Testing

Microsoft can utilize multiple engine manufacturer and make options, Conditions 4.2 and 4.3 require testing of at least one engine from each manufacturer and each size engine from each manufacturer, immediately after commissioning any new proposed engine. These conditions apply in addition to the testing Microsoft has performed on existing engines already installed at the time of this permit. Because Microsoft tested multiple 2.5 MWe engines in 2016, Ecology did not require additional 2.5 MWe engine testing except for at least one reserve engine as described in Condition 4.4.9. In addition, Ecology is requiring that at least one 2.0 MWe engine and the 0.75 MWe engine be tested within 12 months of the date of the permit.

3.2. Periodic Stack Testing

Every 60 months after the first testing performed starting with engines tested after the date of this permit, Microsoft shall test at least one 2.5 MWe engine, including the engine with the most operating hours as long as it is a different engine from that which was tested during the previous 60 month interval testing.

3.3. Audit Sampling

According to Condition 4.2, audit sampling per 40 CFR 60.8(g), may be required by Ecology at their discretion. Ecology will not require audit samples for test methods specifically exempted in 40 CFR 60.8(g) such as Methods, 7E, 10, 18, 25A, and 320. For non-exempted test methods, according to 40 CFR 60.8(g):

“The compliance authority responsible for the compliance test may waive the requirement to include an audit sample if they believe that an audit sample is not necessary.”

Although Ecology believes that audit sampling is not necessary for certified engines, Ecology may choose at any time to require audit sampling for any stack tests conducted. Audit sampling could include, but would not necessarily be limited to, the following test methods: Methods 5, 201A, or 202.

4.0. Support For Best Available Control Technology Determination

As noted in Condition 2.2 of the Approval Order, each engine must be equipped with Selective Catalytic Reduction (SCR) and catalyzed Diesel Particulate Filter (DPF) controls to meet the emission requirements of EPA Tier 4 engines. Ecology does not consider this control equipment to be Best Available Control Technology (BACT) at MWH because of the reasons outlined in this section. BACT cost estimates were updated as of April 2016.

BACT is defined¹ as “an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70.94 RCW emitted from or which

¹ RCW 70.94.030(7) and WAC 173-400-030(12).

results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each such pollutant. In no event shall application of the "best available control technology" result in emissions of any pollutants which will exceed the emissions allowed by any applicable standard under 40 CFR Part 60 and Part 61. If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particular emissions unit would make the imposition of an emissions standard infeasible, a design, equipment, work practice, operational standard, or combination thereof, may be prescribed instead to satisfy the requirement for the application of best available control technology. Such standard shall, to the degree possible, set forth the emissions reduction achievable by implementation of such design, equipment, work practice or operation, and shall provide for compliance by means which achieve equivalent results.

For this project, Ecology is implementing the “top-down” approach for determining BACT for the proposed diesel engines. The first step in this approach is to determine, for each proposed emission unit, the most stringent control available for a similar or identical emission unit. If that review can show that this level of control is not technically or economically feasible for the proposed source (based upon the factors within the BACT definition), then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.² The "top-down" approach shifts the burden of proof to the applicant to justify why the proposed source is unable to apply the best technology available. The BACT analysis must be conducted for each pollutant that is subject to new source review.

The proposed diesel engines and/or cooling towers will emit the following regulated pollutants which are subject to BACT review: Nitrogen Oxides (NOx), Carbon Monoxide (CO), Volatile Organic Compounds (VOCs), Particulate Matter (PM10 and PM2.5), and Sulfur Dioxide (SO2). BACT for toxics (tBACT) is included in Section 4.5.

4.1. BACT Analysis for NOX from Diesel Engine Exhaust

Microsoft reviewed EPA’s RACT/BACT/LAER Clearinghouse (RBLC) database to look for controls recently installed on internal combustion engines. The RBLC provides a listing of BACT determinations that have been proposed or issued for large facilities within the United States, Canada, and Mexico.

² J. Craig Potter, EPA Assistant Administrator for Air and Radiation memorandum to EPA Regional Administrators, “Improving New Source Review (NSR) Implementation”, December 1, 1987.

4.1.1. BACT options for NOX

Microsoft's review of the RBLC found that urea -based SCR was the most stringent add-on control option demonstrated on diesel engines. The application of the SCR technology for NOX control was therefore considered the top-case control technology and evaluated for technical feasibility and cost-effectiveness. The most common BACT determination identified in the RBLC for NOX control was compliance with EPA Tier 2 standards using engine design, including Exhaust Gas Recirculation (EGR) or fuel injection timing retard with turbochargers. Other NOX control options identified by Ecology through a literature review include Selective Non-Catalytic Reduction (SNCR), Non-Selective Catalytic Reduction (NSCR), water injection, as well as emerging technologies. Ecology reviewed these options and addressed them below.

4.1.1.1. Selective Catalytic Reduction

The SCR system functions by injecting a liquid reducing agent, such as urea, through a catalyst into the exhaust stream of the diesel engine. The urea reacts with the exhaust stream converting nitrogen oxides into nitrogen and water. SCR can reduce NOX emissions by approximately 90 percent.

For SCR systems to function effectively, exhaust temperatures must be high enough (about 200 to 500oC) to enable catalyst activation. For this reason, SCR control efficiencies are expected to be relatively low during the initial minutes after engine start up, especially during maintenance, testing, and storm avoidance loads. Minimal amounts of the urea-nitrogen reducing agent injected into the catalyst does not react, and is emitted as ammonia. Optimal operating temperatures are needed to minimize excess ammonia (ammonia slip) and maximize NOX reduction. SCR systems are costly. Most SCR systems operate in the range of 290oC to 400oC. Platinum catalysts are needed for low temperature range applications (175oC–290oC); zeolite can be used for high temperature applications (560oC); and conventional SCR (using vanadium pentoxide, tungsten, or titanium dioxide) are typically used for temperatures from 340oC to 400oC.

Microsoft has evaluated the cost effectiveness of installing and operating SCR systems on each of the proposed diesel engines. Assuming no direct annual maintenance, labor, and operation costs, the analysis indicates that the use of SCR systems would have a lower cost range of approximately \$12,000 to \$16,000 per ton of NOX removed from the exhaust stream each year; or higher, if taking into account California Area Resource Board (CARB) estimated operation, labor, and maintenance costs, which could potentially be up to \$423,000 per year. If SCR is combined with a Tier 4 capable integrated control system, which includes SCR, as well as control technologies for other pollutants such as PM, CO, and VOC (see Section 4.3), the cost estimate would be approximately \$24,000 to \$33,700 for NOX alone or \$20,000 to \$28,800 per ton of combined pollutants removed per year.

Ecology concludes that while SCR is a demonstrated emission control technology for diesel engines, and preferred over other NOX control alternatives described in subsection 4.1.1.3., it is not economically feasible for this project. Furthermore, although NOx is a criteria pollutant, the only NOX that currently have NAAQS is NO2. Cost per ton removal of NO2 is an order of magnitude more expensive than for NOX, and is addressed under tBACT in Section 4.5.

Therefore, Ecology agrees with the applicant that this NOX control option can be excluded as BACT (both as SCR alone and as part of Tier 4 capable integrated control system, which includes a combination of SCR with other control technologies for other pollutants).

4.1.1.2. Combustion Controls, Tier 2 Compliance, And Programming Verification

Diesel engine manufacturers typically use proprietary combustion control methods to achieve the overall emission reductions needed to meet applicable EPA tier standards. Common general controls include fuel injection timing retard, turbocharger, a low-temperature aftercooler, use of EPA Tier-2 certified engines operated as emergency engines as defined in 40 CFR §60.4219, and compliance with the operation and maintenance restrictions of 40 CFR Part 60, Subpart IIII. Although it may lead to higher fuel consumption, injection timing retard reduces the peak flame temperature and resulting NOx emissions. While good combustion practices are a common BACT approach, for the MWH Data Center engines however, a more specific approach, based on input from Ecology inspectors after inspecting similar data centers, is to obtain written verification from the engine manufacturer that each engine of the same make, model, and rated capacity installed at a facility use the same electronic Programmable System Parameters, i.e., configuration parameters, in the electronic engine control unit. These BACT options are considered further in Section 4.1.2.

4.1.1.3. Other Control Options

Other NOX control options listed in this subsection were considered but rejected for the reasons specified:

4.1.1.3.1. Selective Non-Catalytic Reduction (SNCR)

This technology is similar to that of an SCR but does not use a catalyst. Initial applications of Thermal DeNOx, an ammonia based SNCR, achieved 50 percent NOX reduction for some stationary sources. This application is limited to new stationary sources because the space required to completely mix ammonia with exhaust gas needs to be part of the source design. A different version of SNCR called NOXOUT uses urea, and has achieved 50–70 percent NOX reduction. Because the SNCR system does not use a catalyst, the reaction between ammonia and NOX occurs at a higher temperature than with an SCR, making SCR applicable to more combustion sources. Currently, the preferred technology for back-end NOX control of

Reciprocating Internal Combustion Engine (RICE) diesel applications appears to be SCR with a system to convert urea to ammonia.

4.1.1.3.2. Non-Selective Catalytic Reduction (NSCR)

This technology uses a catalyst without a reagent and requires zero excess air. The catalyst causes NOX to give up its oxygen to products of incomplete combustion (PICs), CO, and hydrocarbons, causing the pollutants to destroy each other. However, if oxygen is present, the PICs will burn up without destroying the NOX. While NSCR is used on most gasoline automobiles, it is not immediately applicable to diesel engines because diesel exhaust oxygen levels vary widely depending on engine load. NSCR might be more applicable to boilers. Currently, the preferred technology for back-end NOX control of RICE diesel applications appears to be SCR with a system to convert urea to ammonia. See also Section 4.2.1.3 (Three-Way Catalysts).

4.1.1.3.3. Water Injection

Water injection is considered a NOX formation control approach and not a back-end NOX control technology. It works by reducing the peak flame temperature and therefore reducing NOX formation. Water injection involves emulsifying the fuel with water and increasing the size of the injection system to handle the mixture. This technique has minimal effect on CO emissions but can increase hydrocarbon emissions. This technology is rejected because there is no indication that it is commercially available and/or effective for new large diesel engines.

4.1.1.3.4. Other Emerging Technologies

Emerging technologies include NOX adsorbers, RAPER-NOX, ozone injection, and activated carbon absorption.

- **NOX Adsorbers:** NOX adsorbing technologies (some of which are known as SCONOX or EMxGT) use a catalytic reactor method similar to SCR. SNONOX uses a regenerated catalytic bed with two materials, a precious metal oxidizing catalyst (such as platinum) and potassium carbonate. The platinum oxidizes the NO into NO₂, which can be adsorbed onto the potassium carbonate. While this technology can achieve NOX reductions up to 90 percent (similar to an SCR), it is rejected because it has significantly higher capital and operating costs than an SCR. Additionally, it requires a catalyst wash every 90 days, and has issues with diesel fuel applications, (the GT on EMxGT indicates gas turbine application). A literature search did not reveal any indication that this technology is commercially available for stationary backup diesel generators.
- **Raper-NOX:** This technology consists of passing exhaust gas through cyanic acid crystals, causing the crystals to form isocyanic acid, which reacts with the NOX to form CO₂, nitrogen, and water. This technology is considered a form of SNCR,

but questions about whether stainless steel tubing acted as a catalyst during development of this technology, would make this another form of SCR. To date, it appears this technology has never been offered commercially.

- **Ozone Injection:** Ozone injection technologies, some of which are known as LoTOx or BOC, use ozone to oxidize NO to NO₂ and further to NO₃. NO₃ is soluble in water and can be scrubbed out of the exhaust. As noted in the literature, ozone injection is a unique approach because while NO_x is in attainment in many areas of the United States (including Quincy, WA), the primary reason to control NO_x is that it is a precursor to ozone. Due to high additional costs associated with scrubbing, this technology is rejected.
- **Activated Carbon Absorption with Microwave Regeneration:** This technology consists of using alternating beds of activated carbon by conveying exhaust gas through one carbon bed, while regenerating the other carbon bed with microwaves. This technology appears to be successful in reducing NO_x from diesel engine exhaust. However, it is not progressing to commercialization and is therefore rejected.

4.1.2. BACT Determination for NO_x

Ecology determines that BACT for NO_x is the use of EPA Tier-2 certified engines operated as emergency engines as defined in 40 CFR§60.4219, and compliance with the operation and maintenance restrictions of 40 CFR Part 60, Subpart IIII. In addition, the source must have written verification from the engine manufacturer that each engine of the same make, model, and rated capacity installed at the facility uses the same electronic Programmable System Parameters, i.e., configuration parameters, in the electronic engine control unit. “Installed at the facility” could mean at the manufacturer or at the data farm because the engine manufacturer service technician sometimes makes the operational parameter modification/correction to the electronic engine controller at the data farm. Microsoft will install engines consistent with this BACT determination. Ecology believes this is a reasonable approach in that this BACT requirement replaces a more general, common but related BACT requirement of “good combustion practices.”

Note: Because control options for PM, CO, and VOCs, are available as discussed in BACT Section 4.2., which are less costly per ton than the Tier 4 capable integrated control system option for those pollutants, both the SCR-only option as well as the Tier 4 capable integrated control system option are not addressed further within BACT.

4.2. BACT Analysis for PM, CO, and VOC from Diesel Engine Exhaust

Microsoft reviewed the available published literature and the RBLC and identified the following demonstrated technologies for the control of PM, CO, and VOC emissions from the proposed diesel engines:

4.2.1. BACT Options for PM, CO, And VOC from Diesel Engine Exhaust

4.2.1.1. Diesel Particulate Filters

These add-on devices include passive and active DPFs, depending on the method used to clean the filters (i.e., regeneration). Passive filters rely on a catalyst while active filters typically use continuous heating with a fuel burner to clean the filters. The use of DPFs to control diesel engine exhaust particulate emissions has been demonstrated in multiple engine installations worldwide. Particulate matter reductions of up to 85 percent or more have been reported. Therefore, this technology was identified as the top case control option for diesel engine exhaust particulate emissions from the proposed engines.

Microsoft has evaluated the cost effectiveness of installing and operating DPFs on each of the proposed diesel engines. The analysis indicates that the use of DPFs would cost approximately \$304,000 to \$352,000 per ton of engine exhaust particulate removed from the exhaust stream at MWH each year. DPFs also remove CO and VOCs at costs of approximately \$76,000 to \$131,000 and \$440,000 to \$614,000 per ton per year respectively. If the cost effectiveness of DPF use is evaluated using the total amount of PM, CO, and VOCs reduced, the cost estimate would be approximately \$53,500 to \$82,900 per ton of pollutants removed per year.

These annual estimated costs (for DPF use alone) provided by Microsoft are conservatively low estimates that take into account installation, tax, and shipping capital costs but assume a lower bound estimate for operational, labor and maintenance costs of \$0, whereas an upper bound CARB estimate could potentially amount to an additional \$282,000/year.

Ecology concludes that use of DPF is not economically feasible for this project. Therefore, Ecology agrees with the applicant that this control option can be rejected as BACT.

4.2.1.2. Diesel Oxidation Catalysts

This method utilizes metal catalysts to oxidize carbon monoxide, particulate matter, and hydrocarbons in the diesel exhaust. Diesel oxidation catalysts (DOCs) are commercially available and reliable for controlling particulate matter, carbon monoxide, and hydrocarbon emissions from diesel engines. While the primary

pollutant controlled by DOCs is carbon monoxide, DOCs have also been demonstrated to reduce diesel engine exhaust particulate emissions, and hydrocarbon emissions.

Microsoft has evaluated the cost effectiveness of installing and operating DOCs on each of the proposed diesel engines. The following DOC BACT cost details are provided as an example of the BACT and tBACT cost process that Microsoft followed for engines within this application (including for SCR-only, DPF-only, and Tier 4 capable integrated control system technologies).

- Microsoft obtained the following recent DOC equipment costs from a vendor on November 11, 2013: (\$52,100 for a stand-alone catalyzed DOC per single 2.5 MWe generator; add scaled amounts of \$25,299 for a single 0.750 MWe generator, and \$45,571 for four 2.0 MWe generators). For 40 2.5 MWe generators, four 2.0 MWe generators, and one 0.750 MWe generators, this amounts to \$2,291,585. According to the vendor, DOC control efficiencies for this unit are CO, HC, and PM are 90%, 80%, and 20%, respectively.
- The subtotal becomes \$2,555,117 after accounting for shipping (\$114,579), WA sales tax (\$148,953), and direct on-site installation (\$63,878).
- After adding indirect installation costs, the total capital investment amounts to \$3,092,383. Indirect installation costs include but are not limited to startup fees, contractor fees, and performance testing.
- Annualized over 25 years and included with direct annual costs based on EPA manual EPA/452/B-02-001, the total annual cost (capital recovery and direct annual costs) is estimated to be \$321,639.
- At the control efficiencies provided from the vendor, the annual tons per year (tpy) of emissions for CO (11.6 tpy), HC (2.26 tpy), and PM (3.07 tpy) become 10.4 tpy, 1.8 tpy, and 0.61 tpy removed, respectively.
- The last step in estimating costs for a BACT analysis is to divide the total annual costs by the amount of pollutants removed (\$321,639 divided by 10.4 tpy for CO, etc.).

The corresponding annual DOC cost-effectiveness value for CO destruction alone is approximately \$30,800 to \$40,500 per ton. If PM and hydrocarbons were individually considered, the cost-effectiveness values would be equal to or exceed \$524,000 and \$178,000 per ton of pollutant removed annually, respectively. If the cost-effectiveness of using DOC is evaluated using the total amount of CO, PM, and hydrocarbons reduced, the cost estimate would be approximately \$25,000 to \$40,500 per ton of pollutants removed per year.

These annual estimated costs (for DOC use alone) provided by Microsoft are conservatively low estimates that take into account installation, tax, shipping, and other capital costs as mentioned above, but assume a lower bound estimate for operational, labor and maintenance costs of \$0, whereas an upper bound CARB estimate could potentially amount to an additional \$28,000 per year.

Ecology concludes that use of DOC is not economically feasible for this project. Therefore, Ecology agrees with the applicant that these control option can be rejected as BACT.

4.2.1.3. Three-Way Catalysts

Three-Way Catalyst (TWC) technology can control CO, VOC, and NOX in gasoline engines. However, Ecology concludes that a three-way catalyst is not feasible for this project and can be rejected as BACT based on a review of the following literature:³

“The TWC catalyst, operating on the principle of non-selective catalytic reduction of NOx by CO and HC, requires that the engine is operated at a nearly stoichiometric air to- fuel (A/F) ratio... In the presence of oxygen, the three-way catalyst becomes ineffective in reducing NOx. For this reason, three-way catalysts cannot be employed for NOx control on diesel applications, which, being lean burn engines, contain high concentrations of oxygen in their exhaust gases at all operating conditions.”

4.2.2. BACT Determination for PM, CO, and VOC

Ecology determines BACT for particulate matter, carbon monoxide and volatile organic compounds is restricted operation of EPA Tier-2 certified engines operated as emergency engines as defined in 40 CFR §60.4219, and compliance with the operation and maintenance restrictions of 40 CFR Part 60, Subpart IIII. Microsoft will install engines consistent with this BACT determination.

4.3. BACT Analysis for Sulfur Dioxide from Diesel Engine Exhaust

4.3.1. BACT Options for SO2

Microsoft did not find any add-on control options commercially available and feasible for controlling sulfur dioxide emissions from diesel engines. Microsoft’s proposed BACT for sulfur dioxide is the use of ultra-low sulfur diesel fuel (15 ppm by weight of sulfur).

4.3.2. BACT Determination for SO2

Ecology determines that BACT for sulfur dioxide is the use of ultra-low sulfur diesel fuel containing no more than 15 parts per million by weight of sulfur.

4.4 BACT Analysis for PM from Cooling Towers

The direct contact between the cooling water and air results in entrainment of some of the liquid water into the air. The resulting drift droplets contain Total Dissolved Solids (TDS) in the cooling tower water, which can evaporate into air as particulate matter. For the MWH

³ DieselNet, an online information service covering technical and business information for diesel engines, published by Ecopoint Inc. of Ontario, Canada (<https://www.dieselnet.com>).

facility, the recirculation water in the cooling towers will be pre-softened using the proprietary Water Conservation Technology International (WCTI) “pre-treatment system” to replace scale-forming mineral compounds (e.g., calcium and magnesium) with other non-toxic, non-scaling mineral compounds (e.g., sodium), which will allow the cooling towers to be operated with very high “cycles of concentration.” Microsoft analyzed the industrial wastewater used in the cooling towers, which includes trace metals and chlorine disinfection byproducts, and estimates that cooling tower TAP emissions from all cooling towers combined (after implementing their proposed BACT in Section 4.4.1.1) will not exceed the respective small quantity emission rates (SQERs) for any TAP.

4.4.1. BACT Options for PM from Cooling Towers

Microsoft reviewed the available published literature and the RBLC and identified drift eliminators as demonstrated technologies for the control of PM from the proposed cooling towers. Drift eliminators can reduce the amount of drift, and therefore the amount of particulate matter released into the air.

4.4.1.1. Cooling Towers with 0.0005 Percent Drift Efficiency

Microsoft proposes to use high-efficiency drift eliminators that will achieve a liquid droplet drift rate of no more than 0.0005 percent of the recirculation flow rate within each cooling tower. Microsoft estimates that by using a 0.0005 percent drift rate and a total dissolved solids (TDS) concentration of 69,000 mg/L, only 13 percent of the solid evaporated drift particles will be smaller than 2.5 microns in diameter (PM_{2.5}), and 56 percent will be smaller than PM₁₀ (based on sizing approach presenting in: “Calculating Realistic PM₁₀ Emissions from Cooling Towers”, Reisman and Frisbie, Environmental Progress, July 2002). Microsoft’s original application dated January 17, 2014, stated that a cooling tower with 0.0005 percent drift efficiency is the most efficient drift eliminator that is commercially available.

4.4.1.2. Cooling Towers with 0.0003 Percent Drift Efficiency

In Ecology’s February 26, 2014, incompleteness letter for the original January 2014 Microsoft “Oxford” application (the name at the time); Ecology noted that a cooling tower with 0.0003 percent drift rate was in use at the Harquahala power plant in Arizona, which is regulated by the Maricopa County Air Pollution Control District (APCD). Because of this, Ecology asked Microsoft to defend or revise the claim in the original application stating that a cooling tower with 0.0005 percent drift efficiency is the most efficient drift eliminator that is commercially available. Upon review, Microsoft’s consultant (Landau Associates) learned that the 0.0003 percent drift cooling tower at Harquahala is custom built for that large utility electric power plant. It has a water recirculation rate of 15,000 gpm, and is not comparable to what is needed at MWH, which has a water recirculation rate of only 950 gpm. When Microsoft requested price quotes for cooling towers with 0.0003 percent drift efficiency for the cooling towers to be used at the MWH Data Center, vendors responded that a cooling

tower with 0.0003 percent drift efficiency is not a commercially available product because it is below field measurement capabilities, and could not be proven. According to EPA's BACT/LAER Clearinghouse database, Microsoft found BACT levels for cooling towers from 0.005 percent and 0.0005 percent. Of 30 cooling towers identified between 2003-2013, twenty-four had BACT determinations of 0.0005 percent, and six had BACT determinations from between 0.005 percent to 0.0005 percent.

Thus, Ecology considers this information to be a reasonable justification to accept high efficiency drift eliminators rated at 0.0005 percent drift to be the most efficient drift eliminators that are commercially available for the induced-draft mechanical cooling towers to be used at MWH. Therefore, no other control options are considered.

4.4.2. BACT Determination for PM from Cooling Towers

Ecology accepts as BACT for particulate matter, cooling tower drift eliminators that can achieve a 0.0005 percent rate. These are the most efficient drift eliminators that are commercially available for the induced-draft mechanical cooling towers to be used at MWH. As noted in this Technical Support Document (Section 4), federal regulations require that BACT decisions are made on a case-by-case basis. This specific BACT decision is based on the information provided in Section (4.4); including consideration of the high TDS content resulting from the anti-scaling WCTI approach used by MWH.

4.5. Best Available Control Technology for Toxics

Best Available Control Technology for Toxics (tBACT) means BACT, as applied to TAPs.⁴ One of the TAPs, Ammonia, is used as part of the SCR control technology described in Section 4.1.1.1. Another data center in Quincy has used a tBACT for ammonia of 15 ppmvd at 15 percent oxygen (O₂) per engine to address ammonia slip. Although BACT and tBACT are considered on a case-by-case basis as described in Section 4, Ecology has decided, and Microsoft has agreed on a similar tBACT for ammonia as listed in Table 4.5. For the rest of the TAPs that exceed Small Quantity Emission Rates (SQERs), the procedure for determining tBACT followed the same procedure used above for determining BACT. Of the technologies Microsoft considered for BACT, the minimum estimated costs as applied to tBACT are as follows:

- The minimum estimated costs to control diesel engine exhaust particulate (DEEP) is estimated to be \$300,000 per ton removed.
- The minimum estimated cost to control NO₂ is estimated to be \$116,000 per ton removed.
- The minimum estimated cost to control CO is estimated to be \$31,000 per ton removed.
- The minimum estimated costs to control acrolein, which could be treated with the VOC treatment listed under BACT, are estimated to be greater than approximately \$200 million per ton.

⁴ WAC 173-460-020.

- The minimum estimated costs to control benzene, which could be treated with the VOC treatment listed under BACT, are estimated to be greater than approximately \$2 million per ton.

Under state rules, tBACT is required for all toxic air pollutants for which the increase in emissions will exceed de minimis emission values as found in WAC 173-460-150. Based on the information presented in this TSD, Ecology has determined that Table 4.5 below represents tBACT for the proposed project.

Table 4.5. tBACT Determination

Toxic Air Pollutant	tBACT
Primary NO2	Compliance with the NOx BACT requirement
Diesel Engine Exhaust Particulate	Compliance with the PM BACT requirement
Carbon monoxide	Compliance with the CO BACT requirement
Sulfur dioxide	Compliance with the SO2 BACT requirement
Ammonia	Ammonia emissions shall not exceed 15 per million volume-dry (ppmvd) at 15% Oxygen (O2) per engine.
Benzene	Compliance with the VOC BACT requirement
Toluene	Compliance with the VOC BACT requirement
Xylenes	Compliance with the VOC BACT requirement
1,3 Butadiene	Compliance with the VOC BACT requirement
Formaldehyde	Compliance with the VOC BACT requirement
Acetaldehyde	Compliance with the VOC BACT requirement
Acrolein	Compliance with the VOC BACT requirement
Benzo(a)Pyrene	Compliance with the VOC BACT requirement
Benzo(a)anthracene	Compliance with the VOC BACT requirement
Chrysene	Compliance with the VOC BACT requirement
Benzo(b)fluoranthene	Compliance with the VOC BACT requirement
Benzo(k)fluoranthene	Compliance with the VOC BACT requirement
Dibenz(a,h)anthracene	Compliance with the VOC BACT requirement
Ideno(1,2,3-cd)pyrene	Compliance with the VOC BACT requirement
Napthalene	Compliance with the VOC BACT requirement
Propylene	Compliance with the VOC BACT requirement
Fluoride	Compliance with PM Cooling Tower BACT requirement
Manganese	Compliance with PM Cooling Tower BACT requirement
Copper	Compliance with PM Cooling Tower BACT requirement
Chloroform	Compliance with PM Cooling Tower BACT requirement
Bromodichloromethane	Compliance with PM Cooling Tower BACT requirement
Bromoform	Compliance with PM Cooling Tower BACT requirement

5.0. Ambient Air Modeling

Ambient air quality impacts at and beyond the property boundary were modeled using EPA's AERMOD dispersion model, with EPA's PRIME algorithm for building downwash.

5.1 AERMOD Data and Assumptions

The AERMOD model used the following data and assumptions:

- (a) Five years of sequential hourly meteorological data from Moses Lake Airport were used. Twice-daily upper air data from Spokane were used to define mixing heights.
- (b) The AMS/EPA Regulatory Model Terrain Pre-processor (AERMAP) was used to obtain height scale, receptor base elevation, and to develop receptor grids with terrain effects. For area topography required for AERMAP, Digital topographical data (in the form of Digital Elevation Model files) were obtained from www.webgis.com.
- (c) Each 2.5 MWe generator was modeled with a stack height of 40 feet above local ground; each 2.0 MWe generator was modeled with a stack height of 40 feet above local ground; the 0.750 MWe generator was modeled with a stack height of 35 feet above local ground;
- (d) The data center buildings, in addition to the individual generator enclosures were included to account for building downwash.
- (e) The receptor grid for the AERMOD modeling was established using a 10-meter grid spacing along the facility boundary extending to a distance of 350 meters from each facility boundary. A grid spacing of 25 meters was used for distances of 350 meters to 800 meters from the boundary. A grid spacing of 50 meters was used for distances from 500 meters to 2000 meters from the boundary. A grid spacing of 100 meters was used for distances beyond 2000 meters from the boundary.
- (f) Dispersion modeling is sensitive to the assumed stack parameters (i.e., flowrate and exhaust temperature). The stack temperature and stack exhaust velocity at each generator stack were set to values corresponding to the engine loads for each type of testing and power outage.
- (g) AERMOD Meteorological Pre-processor (AERMET) was used to estimate boundary layer parameters for use in AERMOD.
- (h) AERSURFACE was used to determine the percentage of land use type around the facility based on albedo, Bowen ratio, and surface roughness parameters.
- (i) One-hour NO₂ concentrations at and beyond the facility boundary were modeled using the Plume Volume Molar Ratio Method (PVMRM) module, with default concentrations of 49 parts per billion (ppb) of background ozone, and an equilibrium NO₂ to NO_x ambient ratio of 90 percent.
- (j) As described in the application, AERMOD modeling results showed the highest 1-hour NO₂ impact occurs at the unpopulated northern property line of the facility. In order for the MWH Data Center to exceed the 1-hour NO₂ NAAQS on any given day at any given receptor location, the following events must occur simultaneously:
 - The generators must be operating with a high NO_x emission rate during a facility-wide power outage affecting all 45 generators simultaneously.

- The wind must be blowing directly toward the given receptor location.
- The atmospheric dispersion conditions must be unusually poor.

Ecology's stochastic Monte Carlo statistical package was used to evaluate the eighth highest daily 1-hour NO₂ impacts caused by randomly occurring emissions distributed throughout the data center. The stochastic Monte Carlo analysis considered conservatively high occurrences of two runtime events (power outages and maintenance activities).

5.1.1. Power Outage – 1-hour NO₂ NAAQS Compliance

As described in the application: A conservatively high four calendar days per year of facility-wide power outages (with the 37 primary generators operating at 100 percent load while the eight new reserve generators operate at 10 percent load). In reality, power outages at the Quincy data centers occur infrequently, so a facility-wide power outage is unlikely to actually occur more than one day per year. The emission rates assume every generator is subject to a cold start.

5.1.2. Maintenance – 1-hour NO₂ NAAQS Compliance

As described in the application: 16 days per year of electrical bypass maintenance randomly distributed at various locations within the data center (with each day of electrical bypass consisting of four generators at 100 percent load). This frequency is equivalent to two days per year of electrical bypass at each of the eight AZ buildings. That frequency is conservatively high, because Microsoft plans its transformer and switchgear maintenance in a manner so no AZ building is likely to require more than 1 day per year of electrical bypass. Furthermore, Microsoft plans to conduct transformer and switchgear maintenance at each building on a 3-year cycle, rather than annually as modeled for this analysis. The emission rates assume every generator is subject to a cold start.

5.1.3. Monte Carlo Results for 1-hour NO₂ NAAQS Compliance

Using conservative assumptions, the Monte Carlo model predicts the data center will comply with the 98th percentile NO₂ NAAQS:

- MWH-only 98th percentile impact 100 µg/m³
- Regional plus local background 16 µg/m³
- Cumulative impact 116 µg/m³
- Allowable NAAQS limit 188 µg/m³

Using more realistic operation assumptions, the Monte Carlo model predicts the data center will comply with an even greater margin below the 98th percentile NO₂ NAAQS:

- MWH-only 98th percentile impact 27 µg/m³
- Regional plus local background 16 µg/m³

- Cumulative impact 43 µg/m³
- Allowable NAAQS limit 188 µg/m³

Except for diesel engine exhaust particulate, which is predicted to exceed its ASIL, AERMOD model results show that no NAAQS or ASIL will be exceeded at or beyond the property boundary. The modeling results as listed in the application are provided below:

Table 5.1. Modeling Results for Criteria Pollutants

Criteria Pollutant	Primary NAAQS(d) (µg/m ³)	Secondary NAAQS(d) (µg/m ³)	Maximum Ambient Impact Concentration (µg/m ³)	AERMOD Filename	Background Concentrations (µg/m ³) (a)	Maximum Ambient Impact Concentration Added to Background (µg/m ³) (If Available)
Particulate Matter (PM10) 1st-Highest 24-hour average during power outage with cooling towers	150	150	26.6	PM10_081915	89	116
Particulate Matter (PM2.5) Annual average	12	15	0.152	DEEP_081815	6.75	6.9
Particulate Matter (PM2.5) 1st-highest 24-hour average for cooling towers and electrical bypass	35	35	8.4	PM25_081915 (a-e)	21.7	30.2
Carbon Monoxide (CO) 8-hour average	10,000		205	CO_081915	482	687
Carbon Monoxide (CO) 1-hour average	40,000		421	CO_081915	842	1,263
Nitrogen Oxides (NO ₂) Annual average (b),(c)	100	100	19.4	NO ₂ _081915	2.8	22.2

Criteria Pollutant	Primary NAAQS(d) (µg/m3)	Secondary NAAQS(d) (µg/m3)	Maximum Ambient Impact Concentration (µg/m3)	AERMOD Filename	Background Concentrations (µg/m3) (a)	Maximum Ambient Impact Concentration Added to Background (µg/m3) (If Available)
Nitrogen Oxides (NO2) 1-hour average	188	--	100	NO2-NAAQS Monte Carlo	16	116
Sulfur Dioxide (SO2) 3-hour average	--	1,300	NA	NA	NA	<1,300
Sulfur Dioxide (SO2) 1-hour average	195	--	NA	NA	NA	<195

Notes:

NA = not applicable and/or not provided

µg/m3 = Micrograms per cubic meter.

ppm = Parts per million.

ASIL = Acceptable source impact level.

DEEP = Diesel engine exhaust, particulate

(a) Sum of "regional background" plus "local background" values. Regional background concentrations obtained from WSU NW Airquest website. Local background concentrations derived from AERMOD modeling and include emissions from Con Agra Foods, Microsoft Columbia Data Center, and the Dell Data Center.

(b) For determining the three year average, five separate models were run (one for each year of meteorological data) to determine the 98th percentile concentration for each year based on the NAAQS.

(c) Annually averaged concentrations are based on the theoretical maximum annual concentration, which assumes the worst-case scenario that the three year rolling average permit limit is released entirely within a single year.

Ecology interprets compliance with the National Ambient Air Quality Standards (NAAQS) as demonstrating compliance with the Washington Ambient Air Quality Standards (WAAQS).

Table 5.2. Modeling Results for Toxic Air Pollutants

Toxic Air Pollutant	ASIL (µg/m3)	Averaging Period	1st-Highest Ambient Concentration (µg/m3)	AERMOD Filename
DEEP	0.00333	Annual average	0.152	DEEP_081815
NO2	470	1-hour average	606	NO2_081915
CO	23,000	1-hour average	1,263	CO_081915
Ammonia	70.8	24-hour average	25	CO_081915
Acrolein	0.06	24-hour average	0.001	CO_081915
Benzene	0.0345	Annual Average	0.001	CO_081915

Microsoft has demonstrated compliance with the NAAQS and ASILs except for DEEP. As required by WAC 173-460-090, emissions of DEEP are further evaluated in the following section of this document.

6.0. Second Tier Review For Diesel Engine Exhaust Particulate

Proposed emissions of DEEP and NO2 from the thirty-seven (37) MWH engines exceed the regulatory trigger level for TAPs (also called an ASIL). A second tier review was required for DEEP and NO2 in accordance with WAC 173-460-090, and MWH was required to prepare a health impact assessment (HIA). The HIA presents an evaluation of both noncancerous hazards and increased cancer risk attributable to MWH’s increased emissions of all identified carcinogenic compounds (including DEEP, NO2, and numerous other constituents), ammonia, carbon monoxide, benzene, and acrolein. MWH also reported the DEEP and NO2 cumulative risks associated with MWH and prevailing sources in their HIA document based on a cumulative modeling approach. The MWH cumulative risk study is based on proposed generators, nearby existing permitted data center sources, and other background sources including highways and railroads. The MWH HIA document along with a brief summary of Ecology’s review will be available on Ecology’s website.

7.0. Conclusion

Based on the above analysis, Ecology concludes that operation of the 45 generators and 32 cooling towers will not have an adverse impact on air quality. Ecology finds that Microsoft’s MWH Data Center has satisfied all requirements for NOC approval.