

## **Microsoft Corporation – MWH Data Center NOC application General Information and FAQ**

### **What is MWH requesting to change?**

The operating limitations and emission limits in the existing Approval Order are calculated based on the assumption that MWH may average annual fuel use and annual operating hours over a 3-year rolling period, meaning that theoretical maximum emissions are based on a worst-case year in which MWH would use three times the average annual fuel limit and operate three times the average annual hourly limit. This application proposes to remove MWH's option to average annual usage over a rolling 3-year period and it will be replaced with a rolling 12-month average. The proposed change to the operating limits represents a decrease in permitted worst-case annual emissions. Hourly emission limits and operating scenarios would not change.

### **What is the change in emissions for NO<sub>x</sub>?**

Worst-case emissions for Nitrogen Oxides (NO<sub>x</sub>) are currently permitted at 190.2 tons per year. This proposal will reduce the worst-case emissions for NO<sub>x</sub> to 73.3 tons per year, below Title V thresholds.

### **Will the engine controls stay the same?**

Yes. The Microsoft MWH Data Center (MWH) is currently permitted to install and operate 117 diesel powered emergency generators, 32 cooling towers and 136 evaporative coolers. All generators will be Tier 2-certified and will be equipped with a catalyzed diesel particulate filter and urea-based selective catalytic reduction to meet emission requirements of US Environmental Protection Agency Tier 4 engines.

### **Will Microsoft be required to submit a Title V application?**

No. If this project is approved and an Approval Order issued before October 23<sup>rd</sup>, 2019, Microsoft will not be required to submit a Title V, Air Operating Permit (AOP) application as they will be below the 100 ton per year trigger for Title V.

### **Since MWH will no longer be Title V source, will it have less restrictive emission standards?**

No. Hourly emission limits and operating scenarios will not change. The Title V, air operating program is not designed to require substantive new requirements of a source, it does require that fees be imposed on sources and that certain procedural measures be adopted with respect to compliance (WAC 173-401-100).

### **Is MWH planning to change equipment in the future?**

Yes. MWH is planning to reduce the number of diesel emergency engines and evaporative cooling units in a NOC application to be submitted later this year.