



STATEMENT OF BASIS
Page 1 of 4
 BAQ Air Permitting Division

Company Name:	Gannett Enterprises LLC	Permit Writer:	Diana L Zakrzwski
Agency Air Number:	0900-0145	Date:	December 19, 2024
Permit Number:	CP-50000227 v1.0		

DATE APPLICATION RECEIVED: August 14, 2024
DATE ACCEPTED INTO EXPEDITED REVIEW: August 27, 2024
DATE OF CZC APPROVAL: December 16, 2024

FACILITY AND PROJECT DESCRIPTION

SIC CODE: 7374 – Computer Processing and Data Preparation and Processing Services
 NAICS CODE: 518210 – Data Processing, Hosting, and Related Services

The facility wishes to construct a new data center facility which will include emergency generators which can be fueled by diesel or hydrotreated vegetable oils (HVO) or blends of the two fuels, fuel tanks and cooling towers. The facility has requested that the quantity and size of the generators remain confidential. The construction permit includes the emergency generators only since the cooling towers and fuel tanks will be exempt from permitting based on emission levels.

OPERATING PERMIT INCORPORATION

This action is the original construction permit for this facility. The facility shall submit a timely and complete Title V permit application within twelve (12) months of startup.

EMISSIONS

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled	PTE
	TPY	TPY
NO _x	1443.41	Less than 250.0
CO	333.14	Less than 250.0
VOC	48.41	48.41
PM	65.37	65.37
PM ₁₀	62.12	62.12
PM _{2.5}	61.21	61.21
SO ₂	0.81	0.81
Total HAPs	0.76	0.76

Emission calculations were done using emission factors from AP-42 Section 3.4: Large Stationary Diesel Tables 3.4-1, 3.4-2, 3.4-3, and 3.4-4 or manufacturer specifications. For small generators Tier 3 emission factors were utilized. Emissions were based on the worst case diesel fuel. Emissions from the combustion of HVO fuel are less than or equal to the emissions from diesel (for additional information see confidential file). All emergency generators are calculated at 500 hours/year. Emissions include exempt sources. The potential to emit (PTE) for NO_x and CO are based on synthetic minor emission levels included in this permit.

SPECIAL CONDITIONS, MONITORING, LIMITS

The facility has requested the ability to add new model year emergency generators as needed to the facility without additional construction permits for up to ten years after the date of the first engine installation. The facility will remain below the limits included in the construction permit (synthetic minor) and will comply with all applicable regulations. (See condition below.)



STATEMENT OF BASIS
Page 2 of 4
 BAQ Air Permitting Division

Company Name:	Gannett Enterprises LLC	Permit Writer:	Diana L Zakrzwski
Agency Air Number:	0900-0145	Date:	December 19, 2024
Permit Number:	CP-50000227 v1.0		

The following activity shall be allowed, without a construction permit, or without revising or reopening the operating permit unless otherwise specified by any State or Federal requirement providing that the activity will not result in emissions that will exceed any limit in this permit and all applicable State and Federal requirements are met including 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ.

The owner/operator is granted permission to install and operate additional new model year emergency generators with displacement of less than 30 L per cylinder for up to ten years after the date of the first engine installation. The facility is required to maintain a log on site that includes the date that the additional emergency generators were installed and their corresponding power output. This log shall be made available to Department representatives upon request. The log shall be submitted annually to the Director of Air Permitting and shall also include manufacturer specifications including appropriate emission factors for any new emergency generators. If no additional emergency generators were installed during the reporting period, then a letter shall be submitted to indicate such.

REGULATIONS

Applicable - Section II(E) (Synthetic Minor) This permit includes the following synthetic minor limits to remain below PSD major source status.

Synthetic Minor Limits					
Permit ID	Equipment ID	Permit Issue Date	Pollutant	Emission Limit (TPY)	Explanation
CA	Facility wide	Current permit action	NO _x and CO	< 250.0 each	Synthetic minor limit to remain below PSD major source threshold.

The algorithm for the emission calculations includes emission factors that are based on manufacturer specifications. Emissions factors for engines combusting HVO have been shown to be equivalent or less than the emission factors for the equivalent engines utilizing diesel as fuel based on manufacturer specifications and alternative fuel documents. Therefore, for worst case emissions, the algorithm will utilize the emission factors for diesel fuel for both HVO and diesel fuel. Further information on HVO documents is available in the confidential permit file.

Applicable - Standard No. 1 (Emissions from Fuel Burning Operations) – All engines are direct fired and therefore not subject to this regulation.

Not Applicable - Standard No. 3 (state only) (Waste Combustion and Reduction) The Hydrotreated vegetable oil (HVO) is considered to be a renewable diesel fuel that meets the requirements of ASTM D975 and therefore is granted a renewable energy exemption.

Applicable - Standard No. 4 (Emissions from Process Industries) – The facility does not have PM limits since the engines are not considered processes (per Section VIII). All equipment onsite is subject to the opacity limitation of 20% (per Section IX).

Not Applicable - Standard No. 5 (Volatile Organic Compounds) No applicable equipment (tanks are less than 40,000 gallons) and are not considered existing equipment.



Company Name:	Gannett Enterprises LLC	Permit Writer:	Diana L Zakrzwski
Agency Air Number:	0900-0145	Date:	December 19, 2024
Permit Number:	CP-50000227 v1.0		

Not Applicable - Standard No. 5.2 (*Control of Oxides of Nitrogen (NOx)*) – The engines are not subject to this regulation due to being a source that qualifies as exempt per SC Regulation 61-62.1 Section II (B)(2) - “Generators of greater than 150 kW rated capacity designated for emergency use only and are operated a total of 500 hours per year or less for testing and maintenance and have a method to record the actual hours of use such as an hour meter.” Exemption listed in SC Regulation 62.5, Standard 5.2, Section I (B)(2).

Not Applicable - Standard No. 7 (*Prevention of Significant Deterioration*) – The facility has taken synthetic minor limits to remain below the major source threshold for NO_x and CO (see above).

Applicable - 61-62.6 (*Control of Fugitive Particulate Matter*) The facility will be subject to the state-wide fugitive emissions requirements; however, the facility does not have sources that typically create fugitive PM (Dust) emissions at undesirable levels.

40 CFR 60 and 61-62.60 (*New Source Performance Standards (NSPS)*)

Applicable - Subpart IIII (*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*) – The emergency engines at this facility are subject to this regulation and shall comply with all applicable requirements. The conditions included in the permit are for units with a displacement of less than 30 L per cylinder; therefore, no engines are allowed under this construction permit with a displacement of greater than or equal to 30 L per cylinder.

Not Applicable - Subpart Kb (*Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984*) – The exempt fuel tanks at the facility are less than 19,813 gallons and therefore not subject to this regulation.

Not Applicable - 40 CFR 61 and 61-62.61 (*National Emission Standards for Hazardous Air Pollutants (NESHAP)*) - This project does not emit pollutants from processes subject to this standard.

40 CFR 63 and 61-62.63 (*National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories*)

Applicable - Subpart ZZZZ (*National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*) – Since the emergency generators are subject to 40CFR60, Subpart IIII and the facility is an area source for HAP emissions, the generators will meet the requirements of this regulation by meeting the requirements of NSPS Subpart IIII. (40CFR63.6590(c))

Not Applicable - 61-62.68 (*Chemical Accident Prevention Provisions*) – No chemicals above the threshold quantity.

AMBIENT AIR STANDARDS REVIEW

Not Applicable - Standard No. 2 (*Ambient Air Quality Standards*) – Emissions from emergency generators (with an installed hour meter) are not required to model emissions for this regulation.

Not Applicable - Standard No. 8 (state only) (*Toxic Air Pollutants*) – Emissions from virgin fuel burning are not required to model emissions for this regulation.



Company Name:	Gannett Enterprises LLC	Permit Writer:	Diana L Zakrzwski
Agency Air Number:	0900-0145	Date:	December 19, 2024
Permit Number:	CP-50000227 v1.0		

PUBLIC NOTICE

This construction permit(s) has undergone a 30-day public notice period, in accordance with SC Regulation 61-62.1, Section II(N) and SC Regulation 61-62.1, Section II(E) to establish synthetic minor limits to remain below PSD major source threshold with Nitrogen Oxides (NO_x) emissions and Carbon Monoxide (CO) emissions limited to less than 250.0 tons per year (TPY) each. The comment period was open from November 4, 2024 to December 3, 2024 and the draft permit was placed on the BAQ website during that time period. Comments were received during the comment period.

ADDRESS CHANGE

At the time of application submittal, the facility had a location of the facility but not a full physical address. The noticed draft permit had a street name of Pecan Road listed. The full physical street address is 550 Sugar Hill Road which has been added to the permit.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.