



# CONSTRUCTION PERMIT

Permit number: **18DE0403** Issuance: **1**

Date issued: May 16, 2019

Issued to: **Iron Mountain Data Centers, LLC**

Facility Name: Fortrust  
Plant AIRS ID: 031/2431  
Physical Location: 4300 Brighton Blvd  
County: Denver  
General Description: Data center

Equipment or activity subject to this permit:

| Facility Equipment ID | AIRS Point | Description                                                                                                                                                                                                                                                                                   |
|-----------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| B4                    | 010        | Diesel fueled engine powering an electrical generator<br>Caterpillar, Model: 3516C, SN: SBK00411<br>Design rated at 3634 BHP at sea level, 2847 BHP Site rated<br>Manufacture date of 10/14/2001, date of entry into Colorado of 2008<br>This engine is subject to NSPS IIII Tier 2 Standards |

This engine may be replaced with another engine in accordance with the temporary engine replacement provision or with another Caterpillar 3516C engine in accordance with the permanent replacement provision of the Alternate Operating Scenario (AOS), included in this permit as Attachment A.

**THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR POLLUTION PREVENTION AND CONTROL ACT C.R.S. (25-7-101 et seq), TO THOSE GENERAL TERMS AND CONDITIONS INCLUDED IN THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:**



## **REQUIREMENTS TO SELF-CERTIFY FOR FINAL APPROVAL**

1. **YOU MUST notify the Air Pollution Control Division (Division) no later than fifteen days after commencement of operation under this permit by submitting a Notice of Startup (NOS) form to the Division.** The Notice of Startup (NOS) form may be downloaded online at <https://www.colorado.gov/pacific/cdphe/other-air-permitting-notice>. Failure to notify the Division of startup of the permitted source is a violation of AQCC Regulation Number 3, Part B, III.G.1 and can result in the revocation of the permit.
2. Within one hundred and eighty days (180) after commencement of operation or issuance of this permit, whichever is later, compliance with the conditions contained on this permit must be demonstrated to the Division. It is the permittee's responsibility to self certify compliance with the conditions. Failure to demonstrate compliance within 180 days may result in revocation of the permit or enforcement action by the Division. Information on how to certify compliance was mailed with the permit or can be obtained from the Division's website at <https://www.colorado.gov/pacific/cdphe/air-permit-self-certification>. (Reference: Regulation Number 3, Part B, III.G.2).
3. Within one hundred and eighty days (180) after commencement of operation or issuance of this permit, whichever is later, the operator must complete all initial compliance testing and sampling as required in this permit and submit the results to the Division as part of the self-certification process. (Reference: Regulation Number 3, Part B, III.G.2.)
4. Within thirty (30) days after commencement of operation or issuance of this permit, whichever is later, the permit number must be marked on the subject equipment for ease of identification. (Reference: Regulation Number 3, Part B, III.E.) (State only enforceable)

## **EMISSION LIMITATIONS AND RECORDS**

5. Emissions of air pollutants must not exceed the following limitations (as calculated using the emission factors included in the Notes to Permit Holder section of this permit). (Reference: Regulation Number 3, Part B, II.A.4)

### **Annual Limits:**

| Facility Equipment ID | AIRS Point | Tons per Year |                  |                   |                 |                 |     |    | Emission Type |
|-----------------------|------------|---------------|------------------|-------------------|-----------------|-----------------|-----|----|---------------|
|                       |            | PM            | PM <sub>10</sub> | PM <sub>2.5</sub> | NO <sub>x</sub> | SO <sub>2</sub> | VOC | CO |               |
| B4                    | 011        | -             | -                | -                 | 2.6             | -               | -   | -  | Point         |

*See "Notes to Permit Holder #3" for information on emission factors and methods used to calculate limits.*

The owner or operator must use the emission factors found in "Notes to Permit" to calculate emissions and show compliance with the limits. The owner or operator must submit an Air Pollutant Emission Notice (APEN) and receive a modified permit prior to the use of any other method of calculating emissions.

## **PROCESS LIMITATIONS AND RECORDS**

6. This source must be limited to the following maximum consumption, processing and/or operational rates as listed below. Annual and hourly records of the actual process rate must be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation Number 3, Part B, II.A.4)

#### Process/Consumption Limits

| Facility Equipment ID | AIRS Point | Process Parameter  | Annual Limit       |
|-----------------------|------------|--------------------|--------------------|
| B4                    | 011        | Hours of Operation | 100 hours per year |

Compliance with these consumption limits will be demonstrated by installing a non-resettable hour meter on the engine and recording the hours of the engine's operation.

### **STATE AND FEDERAL REGULATORY REQUIREMENTS**

7. Visible emissions must not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment visible emissions must not exceed 30% opacity for more than six minutes in any sixty consecutive minutes. Opacity must be determined using EPA Method 9. (Reference: Regulation Number 1, II.A.1. & 4.)
8. This source is subject to the odor requirements of Regulation Number 2. (State only enforceable)
9. This source is subject to the New Source Performance Standards requirements of Regulation Number 6, Part A, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) including, but not limited to, the following:

[The requirements below reflect the rule language of 40 CFR Part 60 Subpart IIII published in the Federal Register on 1/30/2013. However, if revisions to this Subpart are published at a later date, the owner or operator is subject to the requirements contained in the revised version of 40 CFR Part 60, Subpart IIII.]

- a. Emissions of Non-Methane Hydrocarbons and Nitrogen Oxides combined shall not exceed 4.8 grams per horsepower hour.
- b. Emissions of Carbon Monoxide shall not exceed 2.6 grams per horsepower hour.
- c. Emissions of Particulate Matter shall not exceed 0.15 grams per horsepower hour.
- d. All fuel purchased shall meet the following specifications:

(1) Sulfur content shall not exceed 15 ppm.

(2) Have a minimum cetane index of 40 or

Have a maximum aromatic compound content of 35% by volume.

Compliance shall be demonstrated by maintaining copies of the fuel specifications provided by the supplier on-site or in a readily accessible location and made available to the Division for inspection upon request.

- e. All engines and control devices must be installed, configured, operated, and maintained according to the specifications and instructions provided by the engine manufacturer.
- f. If engine is equipped with a diesel particulate filter, the filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure

limit of the engine is approached. Records shall be kept of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit is approached.

- g. If engine is used for emergency purposes, a non-resettable hour meter must be installed prior to start-up. (Reference: NSPS IIII, § 60.4209 (a))

The owner or operator of this facility is subject to the following requirements of Regulation Number 6, Part A, Subpart A, General Provisions (40CFR part 60, Subpart A).

- h. At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (Reference: Regulation Number 6, Part A. General Provisions from 40 CFR 60.11)
  - i. No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§ 60.12)
10. This source is located in an ozone non-attainment or attainment-maintenance area and subject to the Reasonably Available Control Technology (RACT) requirements of Regulation Number 3, Part B, III.D.2. RACT for this source is determined to be “no control” due to limits on fuel use and emissions and the excessive cost per ton of emission removed.

## **OPERATING & MAINTENANCE REQUIREMENTS**

11. This source is not required to follow a Division-approved operating and maintenance plan. The source must follow the manufacturer’s operating and maintenance recommendations or must follow good air pollution control practices.

## **COMPLIANCE TESTING AND SAMPLING**

### **Initial Testing Requirements**

12. Within 180 days of startup, the owner or operator must demonstrate compliance with Condition 7, using EPA Method 9 to measure opacity from the engine. This measurement must consist of a minimum twenty-four consecutive readings taken at fifteen second intervals over a 6 minute period. (Reference: Regulation Number 1, II.A.1 & 4)

### **Periodic Testing Requirements**

13. Replacements of this unit completed as Alternative Operating Scenarios may be subject to additional testing requirements as specified in Attachment A.

## **ADDITIONAL REQUIREMENTS**

14. The permit number must be marked on the subject equipment for ease of identification. (Reference: Regulation Number 3, Part B, III.E.) (State only enforceable)
15. A Revised Air Pollutant Emission Notice (APEN) must be filed: (Reference: Regulation Number 3, Part A, II.C.)
  - a. By April 30 of the year following a significant increase in emissions. A significant increase in emissions is defined as follows:

**For any criteria pollutant:**

For sources emitting **less than 100 tons per year**, a change in actual emissions of five tons per year or more, above the level reported on the last APEN submitted; or

For volatile organic compounds (VOC) and nitrogen oxide (NO<sub>x</sub>) sources in an ozone non-attainment area emitting **less than 100 tons of VOC or nitrogen oxide per year**, a change in actual emissions of one ton per year or more or five percent, whichever is greater, above the level reported on the last APEN submitted; or

For sources emitting **100 tons per year or more of a criteria pollutant**, a change in actual emissions of five percent or 50 tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

For sources emitting **any amount of lead**, a change in actual emissions, above the level reported on the last APEN submitted, of fifty (50) pounds of lead

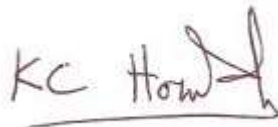
**For any non-criteria reportable pollutant:**

If the emissions increase by 50% or five (5) tons per year, whichever is less, above the level reported on the last APEN submitted to the Division.
  - b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
  - c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment; or
  - d. Whenever a permit limitation must be modified; or
  - e. No later than 30 days before the existing APEN expires.
16. The terms, conditions and information contained in Attachment A are hereby incorporated into this permit, and are enforceable as if fully set forth herein including, but not limited to, emission point description, emission factor summary, emission limits or other limitations, controls, and specific requirements. (Reference: Regulation Number 3, Part B III.E.)

## **GENERAL TERMS AND CONDITIONS:**

17. This permit and any attachments must be retained and made available for inspection upon request. The permit may be reissued to a new owner by the Division as provided in Regulation Number 3, Part B, II.B upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.

18. If this permit specifically states that final approval has been granted, then the remainder of this condition is not applicable. Otherwise, the issuance of this construction permit is considered initial approval and does not provide "final" approval for this activity or operation of this source. Final approval of the permit must be secured from the APCD in writing in accordance with the provisions of 25-7-114.5(12)(a) C.R.S. and AQCC Regulation Number 3, Part B, III.G. Final approval cannot be granted until the operation or activity commences and has been verified by the APCD as conforming in all respects with the conditions of the permit. Once self-certification of all points has been reviewed and approved by the Division, it will provide written documentation of such final approval. **Details for obtaining final approval to operate are located in the Requirements to Self-Certify for Final Approval section of this permit.** The operator must retain the permit final approval letter issued by the Division after completion of self-certification with the most current construction permit.
19. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduct of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity(ies) specifically identified in this permit. If subsequent operations or testing at the source indicate the information supplied to obtain this permit and relied upon in the creation and issuance of this permit is inaccurate, the source must submit an application to modify the permit to address the inaccuracy(ies). (Reference: Regulation Number 3, Part B III.E.)

By: 

KC Houlden  
Permit Engineer

By: 

R K Hancock III, P.E.  
Construction Permits Unit Supervisor

#### Permit History

| Issuance    | Date          | Description                               |
|-------------|---------------|-------------------------------------------|
| Issuance #1 | This Issuance | Issued to Iron Mountain Data Centers, LLC |

#### Notes to Permit Holder (as of date of permit issuance):

- 1) The production or raw material processing limits and emission limits contained in this permit are based on the production/processing rates requested in the permit application. These limits may be revised upon request of the permittee providing there is no exceedence of any specific emission control regulation or any ambient air quality standard. A revised air pollution emission notice (APEN) and application form must be submitted with a request for a permit revision. (Reference: Regulation Number 3, Part B II.A.4.)
- 2) This source is subject to the Common Provisions Regulation Part II, Subpart E, Affirmative Defense Provision for Excess Emissions During Malfunctions. The permittee must notify the Division of any malfunction condition which causes a violation of any emission limit or limits stated in this permit as soon as possible, but no later than noon of the next working day, followed by written notice to the Division addressing all of the criteria set forth in Part II.E.1. of the Common Provisions Regulation. See: <https://www.colorado.gov/pacific/cdphe/aqcc-reg>.

- 3) The emission levels contained in this permit are based on the following emission factors:

**Point 011:**

| Pollutant       | Emission Factors (lbs/hr) |            |        |
|-----------------|---------------------------|------------|--------|
|                 | Uncontrolled              | Controlled | Source |
| NO <sub>x</sub> | 50.59                     | -          | Mfg    |

- 4) In accordance with C.R.S. 25-7-114.1, each Air Pollutant Emission Notice (APEN) associated with this permit is valid for a term of five years from the date it was received by the Division. A revised APEN must be submitted no later than 30 days before the five-year term expires. Please refer to the most recent annual fee invoice to determine the APEN expiration date for each emissions point associated with this permit. For any questions regarding a specific expiration date call the Division at (303)-692-3150.

- 5) This facility is classified as follows:

| Applicable Requirement | Status       |
|------------------------|--------------|
| Operating Permit       | Minor Source |
| PSD                    | Minor Source |
| NANSR                  | Minor Source |

- 6) This engine is subject to 40 CFR, Part 63, Subpart ZZZZ - **National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (Federally enforceable only)**. A copy of the complete subpart is available on the EPA website at: <http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.14.63.zzzz>. All initial notifications, compliance demonstrations, and required documentation should be submitted directly to U.S. EPA Region 8 and copies sent to the Colorado Air Pollution Control Division
- 7) Full text of the Title 40, Protection of Environment Electronic Code of Federal Regulations can be found at the website listed below:

[http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=2a3f8e8f5c2f47006ad49ae4b4c080&mc=true&tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=2a3f8e8f5c2f47006ad49ae4b4c080&mc=true&tpl=/ecfrbrowse/Title40/40tab_02.tpl)

| Part 60: Standards of Performance for New Stationary Sources                            |                 |              |
|-----------------------------------------------------------------------------------------|-----------------|--------------|
| NSPS                                                                                    | 60.4200-60.4219 | Subpart IIII |
| Part 63: National Emission Standards for Hazardous Air Pollutants for Source Categories |                 |              |
| MACT                                                                                    | 63.6580-63.6675 | Subpart ZZZZ |

- 8) Manufacturer's certification of compliance with the New Source Performance Standards Subpart IIII was submitted with the original application for this permit.
- 9) The permit holder is required to pay fees for the processing time for this permit. An invoice for these fees will be issued after the permit is issued. Failure to pay the invoice will result in revocation of this permit. The permit holder must pay the invoice within 30 days of receipt of the invoice (Reference: Regulation Number 3, Part A, VI.B.).
- 10) Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the Division to be necessary to assure compliance with the

provisions of Section 25-7-114.5(7)(a), C.R.S.

- 11) Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of a condition hereof must constitute a rejection of the entire permit and upon such occurrence, this permit must be deemed denied *ab initio*. This permit may be revoked at any time prior to self-certification and final authorization by the Division on grounds set forth in the Colorado Air Pollution Prevention and Control Act and regulations of the AQCC including failure to meet any express term or condition of the permit. If the Division denies a permit, conditions imposed upon a permit are contested by the applicant, or the Division revokes a permit, the applicant or owner or operator of a source may request a hearing before the AQCC for review of the Division's action. (Reference: Regulation Number 3, Part B III.F.)
- 12) Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollutant Emission Notice (APEN) must **pay an annual emission fee**. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.
- 13) Violation of the terms of a permit or of the provisions of the Colorado Air Pollution Prevention and Control Act or the regulations of the AQCC may result in administrative, civil or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), -122.1 (criminal penalties), C.R.S.

**ATTACHMENT A:**  
**ALTERNATIVE OPERATING SCENARIOS**  
**STATIONARY (CI) ENGINE**

October 1, 2011

The current AOS requirements have been included as per below. AOS requirements can change based on new/modified regulations or changes to the facility status. The permittee must comply with the appropriate AOS requirements contained in the most recently issued version of PS-Memo 11-04, available on the Division's website, which may be different than the requirements below.

**1. Alternative Operating Scenarios**

The following Alternative Operating Scenario (AOS) for the temporary and permanent replacement of Stationary (CI) engines has been reviewed in accordance with the requirements of Regulation Number 3., Part A, IV.A, Operational Flexibility- Alternative Operating Scenarios, Regulation Number 3, Part B, Construction Permits, and Regulation Number 3, Part D, Major Stationary Source New Source Review and Prevention of Significant Deterioration, and it has been found to meet all applicable substantive and procedural requirements. This permit incorporates and must be considered a Construction Permit for any engine replacement performed in accordance with this AOS, and the owner or operator must be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

**1.1 Engine Replacement**

The following AOS is incorporated into this permit in order to deal with an engine breakdown or periodic routine maintenance and repair of an existing onsite engine that requires the use of either a temporary or permanent replacement engine. "Temporary" is defined as in the same service for 90 operating days or less in any 12 month period. "Permanent" is defined as in the same service for more than 90 operating days in any 12 month period. The 90 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day must count as a single day towards the 90-day total. The compliance demonstrations and any periodic monitoring required by this AOS are in addition to any compliance demonstrations or periodic monitoring required by this permit.

All replacement engines are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping).

The results of any all tests and the associated calculations required by this AOS must be submitted to the Division within 60 days. Results of all tests must be kept on site for five (5) years and made available to the Division upon request.

The owner or operator must maintain a log on-site and contemporaneously record the start and stop date of any engine replacement, the manufacturer, date of manufacture, model number, horsepower, and serial number of the engine(s) that are replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine.

- 1.1.1 The owner or operator may **temporarily** replace an existing engine that is covered by this permit with a different engine without modifying this permit, so long as the temporary replacement engine complies with all permit limitations and other

requirements applicable to the existing engine. Calculation of emissions from the temporary replacement engine must be made as set forth in section 2.1.3.

- 1.1.2 An Air Pollutant Emissions Notice (APEN) that includes the specific manufacturer, model and serial number and horsepower of the permanent replacement engine must be filed with the Division for the permanent replacement engine within 14 calendar days of commencing operation of the replacement engine. The APEN must be accompanied by the appropriate APEN filing fee, a cover letter explaining that the owner or operator is exercising an alternative operating scenario and is installing a permanent replacement engine and an analysis of any new applicable requirements for the replacement engine as required by Condition 2.2. This submittal must be accompanied by a certification from the Responsible Official indicating that “based on the information and belief formed after reasonable inquiry, the statements and information included in the submittal are true, accurate and complete”.

This AOS cannot be used for permanent engine replacement of a grandfathered or permit exempt engine or an engine that is not subject to emission limits.

The owner or operator must agree to pay fees based on the normal permit processing rate for review of information submitted to the Division in regard to any permanent engine replacement.

- 1.1.3 Compliance of the replacement engine with the applicable emission limitations of the original engine must be monitored by one of the following methods:
- 1) Manufacturer certified emission factors showing compliance.
  - 2) Stack tests of same make and model showing compliance. This would only be considered if the test was done under similar conditions to Colorado (i.e. at altitude).
  - 3) Stack tests on the engine.

## 1.2 Applicable Regulations for Permanent Engine Replacements

- 1.2.1 NSPS for stationary compression ignition internal combustion engines: 40 CFR Part 60, Subpart IIII.

A permanent replacement engine that is ordered after July 11, 2005 and manufactured after April 1, 2006 or is modified or reconstructed after July 11, 2005 is subject to the requirements of 40 CFR Part 60, Subpart IIII. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement must be included in any request for a permanent engine replacement.

Note that under the provisions of Regulation Number 6. Part B, I.B. that Relocation of a source from outside of the State of Colorado into the State of Colorado is considered to be a new source, subject to the requirements of Regulation Number 6 (i.e., the date that the source is first relocated to Colorado becomes equivalent to the date of manufacture for purposes of determining the applicability of NSPS IIII requirements).

1.2.2. MACT for Stationary Reciprocating Internal Combustion Engines: 40 CFR Part 63, Subpart ZZZZ.

Any permanent replacement engine located at either an area or major source is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement must be included in any request for a permanent engine replacement.

1.3 Additional Sources

The replacement of an existing engine with a new engine is viewed by the Division as the installation of a new emissions unit, not “routine replacement” of an existing unit. The AOS is therefore essentially an advanced construction permit review. The AOS cannot be used for additional new emission points for any site; an engine that is being installed as an entirely new emission point and not as part of an AOS-approved replacement of an existing onsite engine has to go through the appropriate Construction/Operating permitting process prior to installation.