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June 27, 2025

Colorado Department of Public Health and Environment
Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

RE: Amazon Data Services, Inc. General Permit 03 (GP-03) Application – AIRS ID 005-1722

To Whom It May Concern:

Trinity Consultants, on behalf of Amazon Data Services, Inc. (Amazon) is submitting this letter to the Air Pollution Control Division (APCD), a division of the Colorado Department of Public Health and Environment (CDPHE) to request coverage under the general permit (GP03) for the Amazon construction activities occurring at the existing DEN-22 facility in Arapahoe County, Colorado.

The general location for this project is the plot of land located east of Havana Street and north of Qunicy Avenue in Aurora, Colorado. The total area subject to earth moving activities will be 24.5 acres; however less than that will be disturbed at any given time. Earth moving activities are anticipated to commence in June 2025, with the entire project completed by May 2026.

This application package includes the following:

- ▶ Cover letter summarizing project and regulatory analysis;
- ▶ Attachment 1: Application Completeness Checklist (APCD-100);
- ▶ Attachment 2: APEN and GP03 Filing Fee Receipt;
- ▶ Attachment 3: Form APCD-223 Land Development APEN (completed online);
- ▶ Attachment 4: Emissions Analysis;
- ▶ Attachment 5: Environmental Justice Letter of Concurrence;
- ▶ Attachment 6: Current GP03.

This application is being submitted in electronic form per the current guidance from the Air Pollution Control Division (the Division). This application contains all elements required for a complete permit application per Regulation 3 and on-line guidance at the Air Pollution Control Division's website.

Sincerely,
TRINITY CONSULTANTS

Hanna Warlick
Managing Consultant

Attachments

cc: Dan Glazer, Amazon

HEADQUARTERS

12700 Park Central Dr, Ste 600, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

ATTACHMENT 1

APCD-100



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

Permit Application/Registration Checklist Form APCD-100

- A complete permit application must include the documentation outlined in this form unless otherwise noted.
- If the permit application does not include the required documentation, **it may be rejected.**
- Filing fees for permit applications that are rejected due to incompleteness **will not be refunded.**
- Certain types of emission sources may require additional forms. Refer to the Division's [APENs and air permits webpage](#) to see whether any APEN supplement forms are required for your source.
- If the application is for a major NANSR or PSD permit, send eight (8) total copies.

Company Name: Amazon Data Services, Inc.

Facility/Site Name(s): DEN-22

What type of permit coverage is requested by this application?

- ☐ Traditional construction permit
☒ General permit (e.g. GP01, GP03, etc.)

Are you requesting (an) individual or facility-wide permit(s)?

- ☒ Individual permit(s) covering (a) single emissions point(s).
☐ Facility-wide permit covering multiple emissions points.

Check one box in each section of the following table to certify that the referenced documentation is included with the permit application. Do not check more than one box per section unless otherwise noted.

Section	Description of Required Permit Application Element
A	☒ The relevant filing fee(s) are being submitted with this application, or were already submitted.
B	☒ This application contains the relevant Air Pollutant Emission Notice(s). (APCD Form Series 200)
C	☒ This application contains relevant emission calculations and supporting documentation.
D	☐ This application contains company contact information documentation. (Form APCD-101)
	☒ There is only a single point of contact for this application. (Form APCD-101 is not required.)

(Checklist continued on next page)

Required Permit Application Element Checklist (continued):

E	<u>Environmental Justice Documentation</u> ☒ A complete Environmental Justice (EJ) Summary for this project was submitted prior to this application, and was reviewed and verified by the Division. The verification number for this EJ Summary is <u>85952240</u>. ☐ This application is exempt from EJ Summary requirements for the following reason(s), per Colorado Regulation Number 3, Part B, Section III.B.5.e. (check all that apply): ☐ This application is only for an administrative permit amendment. (Section III.B.5.e.(i)) ☐ This application requests an overall decrease or no change in the facility-wide annual emission limits of NO_x, VOC, PM_{2.5}, and BTEX pollutants. (Section III.B.5.e.(ii)) ☐ This application is for a modification at an existing source of emissions, and an up-to-date EJ Summary was already verified by the Division on _____. (Section III.B.5.e.(iii))
F	<u>Ambient Air Impact Analysis Documentation</u> ☒ This application is exempt from modeling determination requirements for the following reason(s), per the document Permitting Section Addendum to the Modeling Guideline (2/21/2024) (check all that apply): ☐ “No Emission Increases or ‘Pure Decreases’ in a Permit Modification” (Section 2.1) ☐ “Only VOC Increases” (Section 2.2) ☐ “APEN-exempt and Permit-exempt Emission Sources” (Section 2.3) ☒ “Land Development Projects Requesting Coverage Under a General Permit (GP03)” (Section 2.4) ☐ A request for modeling determination for the project(s) included in this application has been submitted, and the Division determined that additional modeling was not required. This application contains the version of the modeling determination request that was <u>reviewed and approved by the Division</u>. (Form APCD-114) ☐ This application is for a traditional construction permit, and a modeling analysis for the project(s) included in this application has been submitted, but not yet approved by the Division. ☐ A modeling analysis for the project(s) included in this application has been approved by the Division. This application contains any relevant documentation of this approval, including the submitted modeling analysis and the Division’s modeling review comments which document compliance with the NAAQS and the conditions of approval for the proposed project(s). ☐ This application is for a traditional construction permit, and a NAAQS monitoring plan is being submitted with this application, or has already been submitted. If this monitoring plan has already been reviewed and approved by the Division, this application contains the plan itself and documentation of plan approval.

(Checklist continued on next page)

Required Permit Application Element Checklist (continued):

G	General Permit Monitoring Compliance Documentation	
	☐ This application is: A) requesting coverage under a traditional construction permit, and/or B) the emission source(s) contained in this application are not located in a Disproportionately Impacted (DI) Community.	
	(For the following three options) This application is requesting coverage under a general permit, the emission source(s) contained in this application are located in a Disproportionately Impacted (DI) Community, and:	
	☐ This source will comply with source-specific monitoring requirements as outlined in Regulation Number 3, Part B, Section III.J.2.	
	☐ This source will pay community monitoring fees as outlined in Regulation Number 3, Part B, Section III.J.3.	
☐ This source will comply with well production facility monitoring requirements as outlined in Regulation Number 3, Part B, Section III.J.4.		
☒ This source is not subject to Regulation Number 3, Part B, Sections III.J.2., III.J.3, or III.J.4.		
H	☒ This application contains a facility-wide emissions inventory. (Form APCD-102 for oil & gas sources, or form APCD-102a for non-oil & gas sources) *Not included with GP-03 for single-point	
I	☒ This application contains a process description, flow diagram, and plot plan of the emissions unit and/or facility, as relevant. *Flow diagram and plot plan are not relevant	
J	☐ This application contains the relevant Operating & Maintenance (O&M) Plan documentation. (APCD Form Series 300)	
	☒ This application is: A) for a true minor source of emissions, and/or B) for an emissions source that is not associated with the oil & gas industry, and/or C) requesting coverage under a general permit. (APCD Form Series 300 is not required.)	

Applicant Certification:

I hereby certify that all information contained herein and information submitted with this application is complete, true, and correct.

Signed by:

Robb Truedinger

June 27, 2025

Signature of Legally Authorized Person (not a vendor or consultant)

Date

Robb Truedinger

Director Environmental

Name (print)

Title

Send the application with all required information/documentation (including this form) and any applicable fees to:

CDPHE - Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

ATTACHMENT 2

APEN and GP-03 Filing Fee



ATTACHMENT 4
Emissions Analysis

Air Emission Calculator for Land Development Projects

General Permit (GP03)

This calculator is intended for use with land development projects requesting coverage under the land development general permit (GP03).

Instructions: Fill out the orange-highlighted cells with information from your project. Values that aren't highlighted in orange are automatically calculated. Since the GP03 lists the specific controls that must be applied, the "Emission Controls" section cannot be altered.

General Information

Company name:

Amazon Data Services, Inc.

Project name:

DEN-22

General description of land development project:

Construction of a new data center building (Pad 2) adjacent to the existing Pad 1 facility.

Location of project:

Arapahoe County, S10, T4S, R66W

Project Timeline

Date earthmoving will commence:

6/1/2025

Date earthmoving will stop:

5/1/2026

Duration of earthmoving:

11 months

Estimated time to complete entire project (includes buildings):

22 months

Project Area

Total area of project subject to earthmoving:

24.5 acres

Maximum disturbed area at any one time:

24.5 acres

Paving

Does this project include paving operations?

Yes

Area to be paved:

6.4 acres

Date paving to be completed:

6/1/2026

Time prior to paving completion:

12 months

Time following paving completion:

-1 months

The following sections only include emission controls that are required by the land development project general permit, and cannot be edited.

Dust control plans can only be customized for land development projects that are not requesting coverage under the GP03.

Emission Controls

Control of Unpaved Roads On-Site (Section 5A)

Which of the following controls are applied?

Watering as-needed

Frequent watering

Surface graveling

Chemical stabilizer application

Limits on vehicle speed

Posted speed limit

Yes
No
No
No
Yes
30 mph

Control of Disturbed Surface Areas On-Site (Section 5B)

Which of the following controls are applied?

Watering as-needed

Frequent watering

Chemical stabilizer application

Limits on vehicle speed

Posted speed limit

Revegetation (without mulch)

Revegetation (with mulch)

Furrows at right angle to prevailing wind

Yes
No
No
Yes
30 mph
No
No
No

Compaction of disturbed soil (foundation areas only)

Compaction of disturbed soil (all disturbed soil)

Wind breaks

Synthetic or natural cover for steep slopes

Other control

No *
No *
No
No
No

**If applied, compaction must occur on a daily basis, and to within 90% of maximum compaction (as determined by a Proctor test).*

Prevention of Fugitive Dust from Paved Surfaces (Section 5C)

Which of the following controls are applied?

Gravel entryways

Washing of vehicle wheels

Yes
No

Cleanup of Fugitive Dust from Paved Surfaces (Section 5D)

Frequency of cleanup:

How is the cleanup performed?

Street sweeping

Hose with water

1+ times per day
No
No

Total Calculated Emission Rates

Uncontrolled Emission Rates

Pollutant	Daily Emission Rate
Total Particulate Matter (PM)	53 pounds
Particulate Matter With Diameter $\leq 10 \mu\text{m}$ (PM_{10})	25 pounds
Particulate Matter With Diameter $\leq 2.5 \mu\text{m}$ ($\text{PM}_{2.5}$)	4 pounds
Pollutant	Annual Emission Rate
Total Particulate Matter (PM)	9.1 tons
Particulate Matter With Diameter $\leq 10 \mu\text{m}$ (PM_{10})	4.3 tons
Particulate Matter With Diameter $\leq 2.5 \mu\text{m}$ ($\text{PM}_{2.5}$)	0.7 tons

Controlled Emission Rates

Pollutant	Daily Emission Rate
Total Particulate Matter (PM)	20 pounds
Particulate Matter With Diameter $\leq 10 \mu\text{m}$ (PM_{10})	10 pounds
Particulate Matter With Diameter $\leq 2.5 \mu\text{m}$ ($\text{PM}_{2.5}$)	1 pounds
Pollutant	Annual Emission Rate
Total Particulate Matter (PM)	3.6 tons
Particulate Matter With Diameter $\leq 10 \mu\text{m}$ (PM_{10})	1.7 tons
Particulate Matter With Diameter $\leq 2.5 \mu\text{m}$ ($\text{PM}_{2.5}$)	0.3 tons