

***CONSTRUCTION PERMIT APPLICATION  
EVALUATION AND REVIEW  
(Permit No. 01156-01PC)***

***Colossus Data Center  
CTC Property LLC***

***March 2025***

**SHELBY COUNTY HEALTH DEPARTMENT  
AIR POLLUTION CONTROL SECTION  
MAJOR SOURCES BRANCH**

# PERMIT APPLICATION EVALUATION

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# ***CONSTRUCTION PERMIT APPLICATION EVALUATION AND REGULATORY REVIEW***

This narrative was prepared to assist the reviewer in understanding the facility and sources being permitted, and the content, the regulatory basis, and decisions made in preparing this Synthetic Minor construction permit action. This document was also prepared to meet the requirements for the statement of basis in 40 CFR § 70.7(a)(5). This document will become a part of the permanent facility record maintained by the Pollution Control Section of the Shelby County Health Department (Department).

## **I. FACILITY INFORMATION**

|                                            |                                                                                                                                 |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>Facility Name:</b>                      | Colossus Data Center (Center)                                                                                                   |
| <b>Facility Address:</b>                   | 3231 Paul R Lowry Road<br>Memphis, Tennessee 38109                                                                              |
| <b>Mailing Address:</b>                    | Same                                                                                                                            |
| <b>Facility Owner:</b>                     | CTC Property LLC                                                                                                                |
| <b>Owner Address:</b>                      | Same                                                                                                                            |
| <b>Responsible Official, Title:</b>        | Brent Mayo, Authorized Representative                                                                                           |
| <b>Mailing Address:</b>                    | Same                                                                                                                            |
| <b>Telephone:</b>                          | (901) 264-5805                                                                                                                  |
| <b>Technical or Environmental Contact:</b> | Shannon G. Lynn, P.E.<br><br>(281) 928-3123 |
| <b>Mailing Address:</b>                    | Same                                                                                                                            |
| <b>Email:</b>                              | slynn@trinityconsultants.com                                                                                                    |
| <b>Billing Contact:</b>                    | Brent Mayo                                                                                                                      |
| <b>Mailing Address:</b>                    | Same                                                                                                                            |
| <b>Telephone:</b>                          | (901) 264-5805                                                                                                                  |
| <b>Owner's Registered Agent:</b>           | Registered Agent Solutions, Inc.                                                                                                |
| <b>Facility's Primary Activity:</b>        | Supercomputer/Data Center                                                                                                       |
| <b>NAICS Code:</b>                         | 518210                                                                                                                          |
| <b>Existing Permits:</b>                   | None                                                                                                                            |

## II. APPLICATION INFORMATION

**Application Received:** January 3, 2025  
January 7, 2025 (Revision)  
February 5, 2025 (Revision)  
March 7, 2025 (Revision)  
**Application Dated:** September 3, 2024  
January 8, 2025 (Revision)  
February 5, 2025 (Revision)  
February 27, 2025 (Revision)

**Permit Engineer:** Jianing Li

**Completeness Determination:** February 18, 2025

**Surrounding States Notice Date:** TBD

**Public Notice Date:** TBD

**Public Hearing:** TBD

**Comments Received:** TBD

**EPA Notice:** TBD

**EPA Comments Received:** TBD

**Permit Issue Date:** TBD

### **Facility classification:**

- ☐ Major-NSR/PSD
- ☐ Major-Title V
- ☒ Synthetic Minor
- ☒ NSPS Federal (40 CFR Part 60) *Subpart KKKK- Standards of Performance for Stationary Combustion Turbines*
- ☐ NSPS Local (1200-3-16)
- ☐ NESHAP (40 CFR Part 61)
- ☐ MACT (40 CFR Part 63)

### **Type of permit:**

- ☒ New construction
- ☐ Initial Filing
- ☐ Modification TV: ☐ Minor ☐ Major
- ☐ Amendment

### **Emission change:**

- ☒ Emissions increase (PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC<sub>s</sub>, HAPs)
- ☐ Emissions decrease
- ☐ Emissions the same

### III. PURPOSE of APPLICATION

The Department received an initial filing application for the Center on January 3, 2025, along with the revisions submitted on January 8 and February 5, 2025. This permit is being processed as a construction permit (Construction Permit No. 01156-01PC).

The Center constructed fifteen (15) natural gas-fired Solar SMT-130 turbine generators, each rated at 16.48 megawatts (MW), providing a total of 300 MW of continuous power. This includes a 150 MW capacity supplied by Memphis Light, Gas, and Water (MLGW), which helps meet the energy demands of information technology hardware and supporting infrastructure.

Each turbine is equipped with Solar's Dry Low Emission (DLE)/SoLoNO<sub>x</sub> control technology, followed by selective catalytic reduction (SCR) and oxidation catalyst systems to reduce emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC<sub>s</sub>). As a result, the Center qualifies for synthetic minor permitting and is classified as an area source for hazardous air pollutants (HAP<sub>s</sub>).

### IV. EMISSION UNITS, POINTS and CONTROLS

| Emission Unit<br>(Model)                     | Description                                                                                     | Emissions                                                                                                     | Emission Points and Control Devices                                                                                                                                                                                                                                |
|----------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>EU-1 through EU-15</b><br>(Solar SMT-130) | Fifteen Natural-gas-fired<br>Turbine Generators,<br>Maximum Power Output<br>Rate: 16.48 MW each | PM/PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> ,<br>CO, VOC <sub>s</sub> , NH <sub>3</sub> ,<br>HAPs | Each turbine has an exhaust stack as the<br>emission point (EP 1 through EP 15) and is<br>equipped with emission controls as follows:<br><br>1. Oxidation Catalysts for VOC and CO<br>2. DLE/SoLoNO <sub>x</sub> for NO <sub>x</sub><br>3. SCR for NO <sub>x</sub> |

Note: DLE or lean-premix combustion reduces the conversion of atmospheric nitrogen to NO<sub>x</sub> by reducing the combustor's flame temperature.

## V. PROCESS DESCRIPTION

### Electrical Supply and Infrastructure

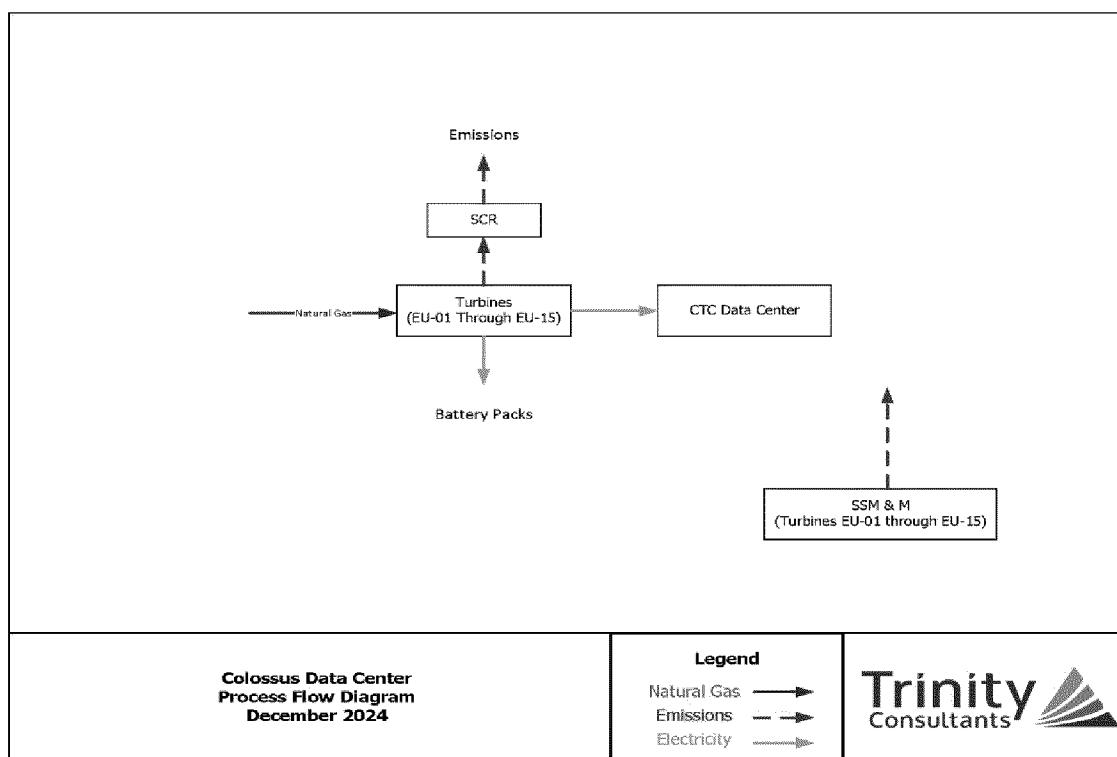
To maintain operations, the Center requires a continuous 300 MW electrical supply. This is achieved through a collaboration with local utilities (external sources), including the Tennessee Valley Authority (TVA) and Memphis Light, Gas, and Water (MLGW), which provide a partial supply of 150 MW. The additional on-site electric power generation capacity is crucial to meet the Center's demands, supported by 15 turbine generators (Model: Solar SMT-130). Each turbine is equipped with emission control devices to reduce emission levels of nitrogen oxides (NO<sub>x</sub>) to 2 ppm, carbon monoxide (CO) to 2.5 ppm, and volatile organic compounds (VOC<sub>s</sub>) to 2 ppm.

The Center has requested 22 startups and 22 shutdowns per year per turbine. According to Solar's Product Information Letter (PIL) 170, each event lasts 10 minutes, resulting in 110 turbine running hours annually without emission controls in SoLoNO<sub>x</sub> mode.

### Battery Packs for Peak Demand Management

The Center deploys Tesla battery packs for peak shaving, which store energy during low-demand periods and release the energy to the grid during high-demand periods. This enhances grid stability and ensures efficient energy management. The Battery Energy Storage System (BESS) facilitates a quick response to demand fluctuations and supports the integration of intermittent renewable energy sources. The system reduces the overall generation capacity required from both the grid and on-site generators.

### Process Flow Chart



## VI. REGULATORY ANALYSIS *(See Appendix A for a full regulatory applicability overview)*

### 1) New Source Review (NSR/PSD)

#### NSR:

The United States Environmental Protection Agency designated Shelby County as in attainment of the national ambient air quality standard for ozone within the Federal Register (effective July 25, 2016). Shelby County is in attainment for all NSR pollutants currently.

NSR is not applicable to Shelby County at this time.

#### PSD

Under PSD, an affected source is a facility with emissions exceeding 250 tons per year of any regulated NSR pollutants, or emissions exceeding 100 tons per year of any regulated NSR pollutants at sources in specific categories. The emissions from the Center are less than the thresholds:

- 87.14 tons per year for NO<sub>x</sub>,
- 29.58 tons per year for SO<sub>2</sub>,
- 72.95 tons per year for PM,
- 93.96 tons per year for CO,
- 84.82 tons per year for VOC,
- 13.71 tons per year for total HAPs.
- No single HAP is more than 10 tons per year.

Thus, the permit application will not trigger a PSD review. However, since Shelby County is currently in violation of the Ozone under the National Ambient Air Quality Standards (NAAQS), the Department requires Best Available Control Technology (BACT) for the combustion turbines, even though the project is not classified as a PSD major source.

### 2) New Source Performance Standards (NSPS) – 40 CFR Part 60

#### • Subpart A – General Provisions

The Center is subject to the general provisions of NSPS Subpart A unless specifically excluded by the source-specific NSPS. Subpart A requires initial notification and performance testing, recordkeeping, monitoring, provides reference methods, and mandates general control device requirements for all other subparts as applicable.

- Subpart GG – Standards of Performance for Stationary Gas Turbines

The Center is exempt from the requirements of NSPS GG since it will become subject to the requirements of NSPS KKKK following the installation of stationary combustion turbines. as stated at § 60.4305(b), “Stationary combustion turbines regulated under this subpart are exempt from the requirements of Subpart GG of this part. Heat recovery steam generators and duct burners regulated under this subpart are exempted from the requirements of Subparts Da, Db, and Dc of this part.”

- Subpart KKKK - Standards of Performance for Stationary Combustion Turbines (EU01 – EU15)

✓ The Center’s stationary combustion turbines, constructed after the applicability date for NSPS Subpart KKKK, are subject to this subpart.

### **§ 60.4305 Does this subpart apply to my stationary combustion turbine?**

(a) If you are the owner or operator of a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, your turbine is subject to this subpart. Only heat input to the combustion turbine should be included when determining whether or not this subpart is applicable to your turbine. Any additional heat input to associated heat recovery steam generators (HRSG) or duct burners should not be included when determining your peak heat input. However, this subpart does apply to emissions from any associated HRSG and duct burners.

✓ The heat input for all turbines at the Center are greater than 10 MMBtu/hr.

(b) Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of this part. Heat recovery steam generators and duct burners regulated under this subpart are exempt from the requirements of subparts Da, Db, and Dc of this part.

Based on this paragraph, the Center is exempt from NSPS GG.

### **§ 60.4310 What types of operations are exempt from these standards of performance?**

The turbines at the Center do not meet any of the exemption criteria listed below.

(a) Emergency combustion turbines, as defined in § 60.4420(i), are exempt from the nitrogen oxides (NO<sub>x</sub>) emission limits in § 60.4320.

(b) Stationary combustion turbines engaged by manufacturers in research and development of equipment for both combustion turbine emission control techniques and combustion turbine efficiency improvements are exempt from the NO<sub>x</sub> emission limits in § 60.4320 on a case-by-case basis as determined by the Administrator.

(c) Stationary combustion turbines at integrated gasification combined cycle electric utility steam generating units that are subject to subpart Da of this part are exempt from this subpart.

(d) Combustion turbine test cells/stands are exempt from this subpart.

**§ 60.4315 What pollutants are regulated under this subpart?**

The pollutants regulated under this subpart are nitrogen oxide (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>).

**§ 60.4320 What emission limits must I meet for nitrogen oxides (NO<sub>x</sub>)?**

✓ The Center is subject to these requirements.

(a) You must meet the emission limits for NO<sub>x</sub> specified in Table 1: 25 ppm at 15 percent O<sub>2</sub> or 150 ng/J of useful output (1.2 pounds per megawatt-hour (lbs./MWh).

The Center uses SCR to control NO<sub>x</sub> emissions to 2 ppm NO<sub>x</sub> at 15 percent O<sub>2</sub> for all natural-gas-fired turbine generators.

(b) If you have two or more turbines that are connected to a single generator, each turbine must meet the emission limits for NO<sub>x</sub>.

The Center does not have two or more turbines that are connected to a single generator.

**§ 60.4330 What emission limits must I meet for sulfur dioxide (SO<sub>2</sub>)?**

✓ The Center is subject to these requirements.

(a) If your turbine is located in a continental area, you must comply with either paragraph (a)(1), (a)(2), or (a)(3) of this section. If your turbine is located in Alaska, you do not have to comply with the requirements in paragraph (a) of this section until January 1, 2008.

(1) You must not cause to be discharged into the atmosphere from the subject stationary combustion turbine any gases which contain SO<sub>2</sub> in excess of 110 nanograms per Joule (ng/J) (0.90 lbs./MWh) gross output;

(2) You must not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO<sub>2</sub>/J (0.060 lbs. SO<sub>2</sub>/MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement; or

(3) For each stationary combustion turbine burning at least 50 percent biogas on a calendar month basis, as determined based on total heat input, you must not cause to be discharged into the atmosphere from the affected source any gases that contain SO<sub>2</sub> in excess of 65 ng SO<sub>2</sub>/J (0.15 lbs. SO<sub>2</sub>/MMBtu) heat input.

**§ 60.4333 What are my general requirements for complying with this subpart?**

✓ The Center is subject to the requirements.

- (a) You must operate and maintain your stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

**§ 60.4335 How do I demonstrate compliance for NO<sub>x</sub> if I use water or steam injection?**

✓ The Center demonstrates compliance by using SCR technology in performance tests.

**§ 60.4340 How do I demonstrate continuous compliance for NO<sub>x</sub> if I do not use water or steam injection?**

✓ The Center is subject to the requirements.

- (a) If you are not using water or steam injection to control NO<sub>x</sub> emissions, you must perform annual performance tests in accordance with § 60.4400 to demonstrate continuous compliance. If the NO<sub>x</sub> emission result from the performance test is less than or equal to 75 percent of the NO<sub>x</sub> emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO<sub>x</sub> emission limit for the turbine, you must resume annual performance tests.

- (b) As an alternative, you may install, calibrate, maintain and operate one of the following continuous monitoring systems:

(1) Continuous emission monitoring as described in §§ 60.4335(b) and 60.4345, or

(2) Continuous parameter monitoring as follows:

(i) For a diffusion flame turbine without add-on selective catalytic reduction (SCR) controls, you must define parameters indicative of the unit's NO<sub>x</sub> formation characteristics, and you must monitor these parameters continuously.

(ii) For any lean premix stationary combustion turbine, you must continuously monitor the appropriate parameters to determine whether the unit is operating in low-NO<sub>x</sub> mode.

(iii) For any turbine that uses SCR to reduce NO<sub>x</sub> emissions, you must continuously monitor appropriate parameters to verify the proper operation of the emission controls.

(iv) For affected units that are also regulated under part 75 of this chapter, with state approval you can monitor the NO<sub>x</sub> emission rate using the methodology in

appendix E to part 75 of this chapter, or the low mass emissions methodology in § 75.19, the requirements of this paragraph (b) may be met by performing the parametric monitoring described in section 2.3 of part 75 appendix E or in § 75.19(c)(1)(iv)(H).

**§ 60.4345 What are the requirements for the continuous emission monitoring system equipment, if I choose to use this option?**

The Center reserves the right to install and operate a continuous emission monitoring system in the future.

**§ 60.4360 How do I determine the total sulfur content of the turbine's combustion fuel?**

You must monitor the total sulfur content of the fuel being fired in the turbine, except as provided in §60.4365. The sulfur content of the fuel must be determined using total sulfur methods described in §60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than half the applicable limit, ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see §60.17), which measure the major sulfur compounds, may be used.

- ✓ The Center utilizes pipeline quality natural gas with a rating of 1 grain of sulfur per 100 standard cubic feet (scf.).

**§ 60.4365 How can I be exempted from monitoring the total sulfur content of the fuel?**

You may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO<sub>2</sub>/J (0.060 lbs. SO<sub>2</sub>/MMBtu) heat input for units located in continental areas and 180 ng SO<sub>2</sub>/J (0.42 lbs. SO<sub>2</sub>/MMBtu) heat input for units located in noncontinental areas or a continental area that the Administrator determines does not have access to natural gas and that the removal of sulfur compounds would cause more environmental harm than benefit. You must use one of the following sources of information to make the required demonstration:

- (a) The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for oil use in continental areas is 0.05 weight percent (500 ppm<sub>w</sub>) or less and 0.4 weight percent (4,000 ppm<sub>w</sub>) or less for noncontinental areas, the total sulfur content for natural gas use in continental areas is 20 grains of sulfur or less per 100 scf. and 140 grains of sulfur or less per 100 scf. for noncontinental areas, has potential sulfur emissions of less than less than 26 ng SO<sub>2</sub>/J (0.060 lbs. SO<sub>2</sub>/MMBtu) heat input for continental areas and has potential sulfur emissions of less than less than 180 ng SO<sub>2</sub>/J (0.42 lbs. SO<sub>2</sub>/MMBtu) heat input for noncontinental areas; or

The Center is exempt from monitoring total sulfur by maintaining documentation that the maximum total sulfur content will be 20 grains of sulfur or less per 100 scf.

**§ 60.4375 What reports must I submit?**

✓ The Center is subject to the requirements.

- (b) For each affected unit that performs annual performance tests in accordance with § 60.4340(a), you must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.

**§ 60.4380 How are excess emissions and monitor downtime defined for NO<sub>x</sub>?**

For the purpose of reports required under § 60.7(c), periods of excess emissions and monitor downtime that must be reported are defined as follows:

- (a) For turbines using water or steam to fuel ratio monitoring:

The Center is not using water nor steam to fuel ratio monitoring.

- (b) For turbines using continuous emission monitoring, as described in §§ 60.4335(b) and 60.4345:

The Center does not implement continuous emission monitoring.

- (c) For turbines required to monitor combustion parameters or parameters that document proper operation of the NO<sub>x</sub> emission controls:

The Center does not implement parametric monitoring.

**§ 60.4385 How are excess emissions and monitoring downtime defined for SO<sub>2</sub>?**

The Center is exempt from sulfur content monitoring. The remaining paragraphs have been omitted for brevity.

**§ 60.4395 When must I submit my reports?**

All reports required under § 60.7(c) must be postmarked by the 30th day following the end of each 6-month period.

**§ 60.4400 How do I conduct the initial and subsequent performance tests, regarding NO<sub>x</sub>?**

✓ The Center is subject to the requirements.

- (a) You must conduct an initial performance test, as required in § 60.8. Subsequent NO<sub>x</sub> performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test).

The Center will conduct the initial performance test and subsequent performance tests, as required.

(1) There are two general methodologies that you may use to conduct the performance tests. For each test run:

- (i) Measure the NO<sub>x</sub> concentration (in parts per million (ppm)), using EPA Method 7E or EPA Method 20 in appendix A of this part. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in appendix A of this part, and measure and record the electrical and thermal output from the unit. Then, use the following equation to calculate the NO<sub>x</sub> emission rate:

$$E = \frac{1.194 \times 10^{-7} \cdot (\text{NO}_x)_c \cdot Q_{\text{std}}}{P} \quad \text{(Eq. 5)}$$

Where:

E = NO<sub>x</sub> emission rate, in lbs./MWh

$1.194 \times 10^{-7}$  = conversion constant, in lbs./dry scf.-ppm

(NO<sub>x</sub>)<sub>c</sub> = average NO<sub>x</sub> concentration for the run, in ppm

Q<sub>std</sub> = stack gas volumetric flow rate, in dry scf./hr.

P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to § 60.4350(f)(2); or

- (ii) Measure the NO<sub>x</sub> and diluent gas concentrations, using either EPA Methods 7E and 3A, or EPA Method 20 in appendix A of this part. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of this part to calculate the NO<sub>x</sub> emission rate in lbs./MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in § 60.4350(f) to calculate the NO<sub>x</sub> emission rate in lbs./MWh.

(2) Sampling traverse points for NO<sub>x</sub> and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.

(3) Notwithstanding paragraph (a)(2) of this section, you may test at fewer points than are specified in EPA Method 1 or EPA Method 20 in appendix A of this part if the following conditions are met:

- (i) You may perform a stratification test for NO<sub>x</sub> and diluent pursuant to
  - (B) The procedures specified in section 6.5.6.1(a) through (e) of appendix A of part 75 of this chapter.
- (ii) Once the stratification sampling is completed, you may use the following alternative sample point selection criteria for the performance test:
  - (A) If each of the individual traverse point NO<sub>x</sub> concentrations is within  $\pm 10$  percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than  $\pm 5$  ppm or  $\pm 0.5$  percent CO<sub>2</sub> (or O<sub>2</sub>) from the mean for all traverse points, then you may use three points (located either 16.7, 50.0 and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The three points must be located along the measurement line that exhibited the highest average NO<sub>x</sub> concentration during the stratification test; or
  - (B) For turbines with a NO<sub>x</sub> standard greater than 15 ppm @ 15% O<sub>2</sub>, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO<sub>x</sub> concentrations is within  $\pm 5$  percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than  $\pm 3$  ppm or  $\pm 0.3$  percent CO<sub>2</sub> (or O<sub>2</sub>) from the mean for all traverse points; or

The Center has a NO<sub>x</sub> standard greater than 15 ppm @ 15% O<sub>2</sub>, and may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO<sub>x</sub> concentrations is within  $\pm 5$  percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than  $\pm 3$  ppm or  $\pm 0.3$  percent CO<sub>2</sub> (or O<sub>2</sub>) from the mean for all traverse points.

- (C) For turbines with a NO<sub>x</sub> standard less than or equal to 15 ppm @ 15% O<sub>2</sub>, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO<sub>x</sub> concentrations is within  $\pm 2.5$  percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than  $\pm 1$  ppm or  $\pm 0.15$  percent CO<sub>2</sub> (or O<sub>2</sub>) from the mean for all traverse points.
- (b) The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. You may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. You must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

- (1) If the stationary combustion turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel.
- (2) For a combined cycle and combined heat and power turbine systems with supplemental heat (duct burner), you must measure the total NO<sub>x</sub> emissions after the duct burner rather than directly after the turbine. The duct burner must be in operation during the performance test.
- (3) If water or steam injection is used to control NO<sub>x</sub> with no additional post-combustion NO<sub>x</sub> control and you choose to monitor the steam or water to fuel ratio in accordance with § 60.4335, then that monitoring system must be operated concurrently with each EPA Method 20 or EPA Method 7E run and must be used to determine the fuel consumption and the steam or water to fuel ratio necessary to comply with the applicable § 60.4320 NO<sub>x</sub> emission limit.
- (4) Compliance with the applicable emission limit in § 60.4320 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO<sub>x</sub> emission rate at each tested level meets the applicable emission limit in § 60.4320.
- (5) If you elect to install a continuous emission monitoring system (CEMS), the performance evaluation of the CEMS may either be conducted separately or (as described in § 60.4405) as part of the initial performance test of the affected unit.
- (6) The ambient temperature must be greater than 0 °F during the performance test.

**§ 60.4415 How do I conduct the initial and subsequent performance tests for sulfur?**

✓ The Center is subject to the requirements.

- (a) You must conduct an initial performance test, as required in § 60.8. Subsequent SO<sub>2</sub> performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). There are four methodologies that you may use to conduct the performance tests.

- (1) The use of a current, valid purchase contract, tariff sheet, or transportation contract for the fuel specifying the maximum total sulfur content of all fuels combusted in the affected facility. Alternately, the fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter may be used.

The Center obtains a valid purchase contract, tariff sheet, or transportation contract for natural gas specifying the maximum total sulfur content annually.

- 3) National Emission Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 61

None of the seven (7) hazardous air contaminants regulated by this part are emitted from the Center.

4) NESHAP/Maximum Achievable Control Technology (MACT) – 40 CFR Part 63

- **Subpart A – General Provisions**

All affected sources are subject to the general provisions of Part 63 NESHAP Subpart A unless specifically excluded by the source-specific NESHAP. Subpart A requires initial notification and performance testing, recordkeeping, monitoring, provides reference methods, and mandates general control device requirements for all other subparts as applicable. Because various other Part 63 subparts are applicable, the provisions of Subpart A also apply.

- **Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines**

The Center is exempt from this rule, as it only applies to HAP major sources.

5) Greenhouse Gas (GHG) (40 CFR Parts 52, 70 and 98)

The Center has GHG emissions resulting from the 15 identical natural-gas-fired combustion turbines (EU-1 through EU-15). The maximum heat input capacity for each turbine is 168.2 MMBtu/hr. Total CO<sub>2e</sub> emissions from this Center are approximately 1,322,664.39 U.S. short tons per year based on an average natural gas BTU content of 1,067.65 Btu/scf.

- 40 CFR Parts 52 and 70 (PSD Applicability and Title V Permitting)

The GHG Tailoring Rule sets the threshold for both Title V permitting and PSD applicability at 100,000 tons per year.

The Center is classified as a synthetic minor source. The regulations in these Parts are not applicable.

- U.S. Supreme Court Decision in Utility Air Regulatory Group v. EPA

On June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA* (No. 12-1146). The Court said that EPA may not treat greenhouse gases as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or title V permit.

- 40 CFR Part 98 (Mandatory GHG Reporting)

This rule is applicable to sources with CO<sub>2e</sub> emissions that are greater than the 25,000 metric tons per year. If potential emissions exceed this threshold, just state that reporting may be required. The GHG calculation tables and results have been included in the permit application. Note that since this is not an “applicable requirement” per EPA, it will not be incorporated into this permit.

6) Compliance Assurance Monitoring – 40 CFR Part 64

CAM does not apply to the Center. The requirements of this part shall apply to a pollutant-specific emissions unit at a major source.

**VIII.POTENTIAL to EMIT (PTE) EVALUATION**

In order to be eligible for a synthetic minor (conditional major) permit, a facility must have a PTE that is less than a Title V major source emission threshold (100 tons per year of NO<sub>x</sub>, CO, VOC<sub>s</sub>, PM, or SO<sub>2</sub>, 10 tons per year of any single hazardous air pollutant (HAP<sub>s</sub>), and 25 tons per year of all HAP<sub>s</sub> combined) and must accept conditions limiting the facility to less than the applicable threshold.

Allowable critical emissions are detailed in the table below.

| Emission Unit       | Emissions              | Normal Operating<br>(tons per year) | SSM Events<br>(tons per year) | Total<br>(tons per year) |
|---------------------|------------------------|-------------------------------------|-------------------------------|--------------------------|
| EU-1 through EU-15* | NO <sub>x</sub>        | 86.83                               | 0.31                          | 87.14                    |
|                     | CO                     | 66.07                               | 27.89                         | 93.96                    |
|                     | VOC <sub>s</sub>       | 83.22                               | 1.6                           | 84.82                    |
|                     | SO <sub>2</sub>        | 29.58                               | <0.01 (Negligible)            | 29.58                    |
|                     | PM                     | 72.95                               | <0.01 (Negligible)            | 72.95                    |
|                     | Total HAP <sub>s</sub> | 11.50                               | 2.21                          | 13.71                    |

\* Each SMT-I30 Turbine is equipped with emission controls of Oxidation Catalysts for VOC and CO, DLE/SoLoNO<sub>x</sub> for NO<sub>x</sub>, and SCR for NO<sub>x</sub>.

Allowable HAPs emissions are detailed in the table below.

| Emission Unit       | Emissions    | Normal Operating<br>(tons per year) | SSM Events<br>(tons per year) | Total<br>(tons per year) |
|---------------------|--------------|-------------------------------------|-------------------------------|--------------------------|
| EU-1 through EU-15* | Acetaldehyde | 0.461                               | 0.089                         | 0.55                     |
|                     | Acrolein     | 0.074                               | 0.014                         | 0.088                    |
|                     | Benzene      | 0.143                               | 0.027                         | 0.17                     |
|                     | Ethylbenzene | 0.369                               | 0.071                         | 0.44                     |
|                     | Formaldehyde | 8.220                               | 1.570                         | 9.79                     |
|                     | Xylenes      | 0.740                               | 0.140                         | 0.88                     |
|                     | Toluene      | 1.500                               | 0.290                         | 1.79                     |

\* Each SMT-I30 Turbine is equipped with emission controls of Oxidation Catalysts for VOC and CO, DLE/SoLoNO<sub>x</sub> for NO<sub>x</sub>, and SCR for NO<sub>x</sub>.

## VIII. FEES

The following fee is applicable to this permit action.

| No.    | Description             | Fee       |
|--------|-------------------------|-----------|
| 1      | Construction Permit Fee | \$ 400.00 |
| 2      | Publication Fee         | \$ 250.00 |
| 3      | NSPS Regulations        | \$ 900.00 |
| Total: |                         | \$1550.00 |

## APPENDIX A

### (Regulatory Applicability Overview Table)

**Colossus Data Center - CTC Property LLC (Source No. 01156)**  
**Federal Regulatory Overview**  
**Construction Permit No. 01156-01PC**  
**(February 14, 2025)**

| CFR Part                 | Description                                                                                                                                     | Applicable Req. | Notes                                                                                                                                                                                                           |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 40 CFR 50.1 — 50.18      | National Primary and Secondary Ambient Air Quality Standards                                                                                    | Yes             | Contains general requirements                                                                                                                                                                                   |
| 40 CFR 60 (Subpart A)    | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines                                                        | Yes             | Contains general requirements                                                                                                                                                                                   |
| 40 CFR 60 (Subpart KKKK) | Standards of Performance for Stationary Combustion Turbines                                                                                     | Yes             | Contains specific requirements applicable to 15 turbine generators (EU-1 through EU-15)                                                                                                                         |
| 40 CFR 82 (Subpart A)    | Protection of Stratospheric Ozone – Production and Consumption Controls                                                                         | Yes             | The Center has air conditioners and/or refrigeration units that use ozone depleting substances (ODS). The Center personnel do not maintain, service, repair, and/ or dispose of motor vehicle air conditioners. |
| 40 CFR 82 (Subpart C)    | Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances | Yes             | Contains general requirements                                                                                                                                                                                   |
| 40 CFR 82 (Subpart F)    | Recycling and Emissions Reduction                                                                                                               | Yes             | Contains general requirements                                                                                                                                                                                   |
| 40 CFR 98                | Mandatory Greenhouse Gas Reporting Rule                                                                                                         | Yes             | Contains specific recordkeeping and reporting requirements.                                                                                                                                                     |

**Colossus Data Center - CTC Property LLC (Source No. 01156)**  
**State and Local Regulatory Overview**  
**Construction Permit No. 01156-01PC**  
**(February 14, 2025)**

| TDEC/Shelby/Memphis                  | Description                                                | Applicable Req. | Notes                                                                            |
|--------------------------------------|------------------------------------------------------------|-----------------|----------------------------------------------------------------------------------|
| <b>CHAPTER 1200-3-2(3-1A)(16-46)</b> | <b>DEFINITIONS</b>                                         |                 |                                                                                  |
| 1200-3-2-.01                         | General Definitions                                        | Yes             | Defines terms used in chapter                                                    |
| <b>CHAPTER 1200-3-3(3-6)(16-49)</b>  | <b>AMBIENT AIR QUALITY STANDARDS</b>                       |                 |                                                                                  |
| 1200-3-3-.01                         | Primary Air Quality Standard                               | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-3-.02                         | Secondary Air Quality Standard                             | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-3-.03                         | Tennessee's Ambient Air Quality Standard                   | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-3-.04                         | Nondegradation Standard                                    | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-3-.05                         | Achievement                                                | Yes             | Contains general requirements. The last sentence of 1200-3-3-.05 does not apply. |
| <b>CHAPTER 1200-3-5(3-17)(16-83)</b> | <b>VISIBLE EMISSIONS</b>                                   |                 |                                                                                  |
| 1200-3-5-.01                         | General Standards                                          | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-5-.02                         | Exceptions                                                 | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-5-.03                         | Method of Recording                                        | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-5-.04                         | Exemption                                                  | Yes             | Contains general facility-wide requirements                                      |
| <b>CHAPTER 1200-3-7(3-20)(16-78)</b> | <b>PROCESS EMISSION STANDARDS (PM)</b>                     |                 | Not Applicable                                                                   |
| 1200-3-7-.01                         | General Process Particulate Emission Standards             | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-7-.02                         | Choice of Particulate Emission Standards                   | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-7-.03                         | New Processes                                              | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-7-.04                         | Limiting Allowable Emissions                               | Yes             | Contains general facility-wide requirements                                      |
| <b>CHAPTER 1200-3-9(3-5)(16-77)</b>  | <b>CONSTRUCTION AND OPERATING PERMITS</b>                  |                 |                                                                                  |
| 1200-3-9-.01                         | Construction Permits                                       | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-9-.02                         | Operating Permits                                          | Yes             | Contains general facility-wide requirements, including.                          |
| 1200-3-9-.03                         | General Provisions                                         | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-9-.04                         | Exemptions                                                 | Yes             | Contains general facility-wide requirements                                      |
| 1200-3-9-.05                         | Appeal of Permit Application Denials and Permit Conditions | Yes             | Contains general facility-wide requirements                                      |

|                                       |                                                                                                               |     |                                                       |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------------|
| <b>CHAPTER 1200-3-10(3-7)(16-85)</b>  | <b>REQUIRED SAMPLING, RECORDING, AND REPORTING</b>                                                            |     |                                                       |
| 1200-3-10-.01                         | Sampling Required to Establish Air Contaminant Emissions Levels                                               | Yes | Contains general facility-wide requirements           |
| 1200-3-10-.02                         | Monitoring of Source Emissions, Recording and Reporting of Same are Required                                  | Yes | Contains general facility-wide requirements           |
| 1200-3-10-.04                         | Sampling, Recording and Reporting Required for Major Stationary Sources                                       | Yes | Contains general facility-wide requirements           |
| <b>CHAPTER 1200-3-11(3-25)(16-81)</b> | <b>HAZARDOUS AIR CONTAMINANTS</b>                                                                             |     | Not Applicable                                        |
| <b>CHAPTER 1200-3-12(3-8)(16-86)</b>  | <b>METHODS OF SAMPLING AND ANALYSIS</b>                                                                       |     |                                                       |
| 1200-3-12.01                          | General                                                                                                       | Yes | Contains general facility-wide requirements           |
| 1200-3-12.01                          | Procedures for Ambient Air Sampling and Analysis                                                              | Yes | Contains general facility-wide requirements           |
| 1200-3-12-.03                         | Source Sampling and Analysis                                                                                  | Yes | Contains general facility-wide requirements           |
| <b>CHAPTER 1200-3-14(3-24)(16-82)</b> | <b>SULFUR DIOXIDE EMISSIONS</b>                                                                               |     |                                                       |
| 1200-03-14-.01                        | General Provisions                                                                                            | Yes | Contains general requirements.                        |
| 1200-03-14-.02                        | Non-Process Emission Standards                                                                                | Yes | Contains requirements for all fuel-burning equipment. |
| <b>CHAPTER 1200-3-16(3-15)(16-76)</b> | <b>NEW SOURCE PERFORMANCE STANDARDS</b>                                                                       |     |                                                       |
| 1200-3-16-.01                         | General Provisions                                                                                            | Yes | Contains general requirements.                        |
| <b>CHAPTER 1200-3-18(3-22)(16-80)</b> | <b>VOLATILE ORGANIC COMPOUNDS</b>                                                                             |     |                                                       |
| 1200-3-18-.01                         | Definitions                                                                                                   | Yes | Defines terms in the chapter.                         |
| 1200-3-18-.02                         | General Provisions and Applicability                                                                          | Yes | Contains general requirements.                        |
| 1200-3-18-.04                         | Compliance Certification, Record Keeping, and Reporting Requirements for Non-Coating and Non-Printing Sources | Yes | Contains specific requirements.                       |
| <b>CHAPTER 1200-3-20(3-9)(16-87)</b>  | <b>LIMITS ON EMISSIONS DUE TO MALFUNCTIONS, STARTUPS, AND SHUTDOWNS</b>                                       |     |                                                       |
| 1200-3-20-.01                         | Purpose                                                                                                       | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.02                         | Reasonable Measures Required                                                                                  | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.03                         | Notice Required When Malfunction Occurs                                                                       | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.04                         | Logs and Reports                                                                                              | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.05                         | Copies of Logs Required                                                                                       | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.06                         | Report Required Upon the Issuance of a Notice of Violation                                                    | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.07                         | Special Reports Required                                                                                      | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.08                         | Rights Reserved                                                                                               | Yes | Contains general facility-wide requirements           |
| 1200-3-20-.09                         | Additional Sources Covered                                                                                    | Yes | Contains general requirements.                        |

|                                               |                                                                                    |     |                                             |
|-----------------------------------------------|------------------------------------------------------------------------------------|-----|---------------------------------------------|
| <b>CHAPTER 1200-3-21(3-28)(16-90)</b>         | <b>GENERAL ALTERNATE EMISSION STANDARDS</b>                                        |     | Not Applicable                              |
| <b>CHAPTER 1200-3-22(3-29)(16-91)</b>         | <b>LEAD EMISSION STANDARDS</b>                                                     |     | Not Applicable, not a significant source    |
| <b>CHAPTER 1200-3-24(3-40)(16-52)</b>         | <b>GOOD ENGINEERING PRACTICE STACK HEIGHT REGULATIONS</b>                          |     |                                             |
| 1200-3-24-.01                                 | General Provisions                                                                 | Yes | Contains general facility-wide requirements |
| 1200-3-24-.02                                 | Definitions                                                                        | Yes | Defines terms used in chapter               |
| 1200-3-24-.03                                 | Good Engineering Practice Stack Height Standards                                   | Yes | Contains general facility-wide requirements |
| 1200-3-24-.04                                 | Specific Emission Standards                                                        | Yes | Contains general facility-wide requirements |
| <b>CHAPTER 1200-3-25(3-39)(16-91.1)</b>       | <b>STANDARDS FOR INFECTIOUS WASTE INCINERATORS</b>                                 |     | Not Applicable                              |
| <b>CHAPTER 1200-3-30(3-36)(16-91.2)</b>       | <b>ACIDIC PRECIPITATION CONTROL</b>                                                |     | Not Applicable                              |
| <b>CHAPTER 1200-3-31(3-37)(16.91.3)</b>       | <b>CASE BY CASE DETERMINATIONS OF HAZARDOUS AIR POLLUTANT CONTROL REQUIREMENTS</b> |     | Not Applicable                              |
| <b>CHAPTER 1200-3-32(3-38)(16-91.4)</b>       | <b>PREVENTION OF ACCIDENTAL RELEASES</b>                                           |     | Not Applicable                              |
| <b>OTHER (LOCAL ONLY)</b>                     |                                                                                    |     |                                             |
| (3-2)(16-56)                                  | Enforcement - Violations of Chapter - Notice; Citation; Injunctive Relief          | Yes | Contains general requirements               |
| (3-3)(16-57)                                  | Penalties - Misdemeanor, Civil, and Noncompliance                                  | Yes | Contains general requirements               |
| (3-4)(16-59)                                  | Enforcement - Emergency Powers of Health Officer                                   | Yes | Contains general requirements               |
| (3-10)(16-58)                                 | Enforcement - Variances                                                            | Yes | Contains general requirements               |
| (3-11)(16-51)                                 | Severability                                                                       | Yes | Contains general requirements               |
| (3-12)(16-48)                                 | Words, Phrases Substituted in State Regulations Adopted by Reference               | Yes | Contains general requirements               |
| (3-16)(16-50)                                 | Open Burning                                                                       | Yes | Contains general requirements               |
| (3-18)(16-89)                                 | Fugitive Dust                                                                      | Yes | Contains general requirements               |
| (3-19)(16-88)                                 | Nuisance Abatement                                                                 | Yes | Contains general requirements               |
| (3-35)(16-71)                                 | Created; Membership; Term of Office; Jurisdiction; Hearings; Appeals               | Yes | Contains general requirements               |
| (14.5-27-28, 30-32, 34-36)(16-93 through 100) | Permits and Fees (Various)                                                         | Yes | Contains general requirements               |
| (14.5-35)(16-101)                             | Penalty Provisions                                                                 | Yes | Contains general requirements               |
| (14.5-36)(16-102)                             | Annual Review of Fee Structure and Financial Need                                  | Yes | Contains general requirements               |

## APPENDIX B

### (Emission Summary Table)

| DATE     | SOURCE # | FACILITY NAME                           | FACILITY CLASSIFICATION |       |                 | LAST INSPECTION |  | PERMIT ENGINEER: |  |
|----------|----------|-----------------------------------------|-------------------------|-------|-----------------|-----------------|--|------------------|--|
| 02/14/25 | 01156    | Colossus Data Center - CTC Property LLC | MAJOR                   | MINOR | SYNTHETIC MINOR | Not Available   |  | JL               |  |
|          |          |                                         |                         |       | X               |                 |  | RECORD: 5959     |  |

| ALLOWABLE PERMITTED POLLUTANTS (tons per 12-month rolling period)                                                           |        |         |         |                     |                 |              |              |                 |    |              |                   | Check if Applicable   |                         |                                   |            |
|-----------------------------------------------------------------------------------------------------------------------------|--------|---------|---------|---------------------|-----------------|--------------|--------------|-----------------|----|--------------|-------------------|-----------------------|-------------------------|-----------------------------------|------------|
| PERMIT #                                                                                                                    | ISSUED | REVISED | EXPIRED | PM/PM <sub>10</sub> | SO <sub>2</sub> | VOC          | CO           | NO <sub>x</sub> | Pb | HAPs         | GHG's             | MACT (40 CFR Part 63) | NESHAP (40 CFR Part 63) | NSPS (40 CFR Part 63)             | PSD OR NSR |
| 01156-01PC                                                                                                                  | TBD    |         | TBD     | 72.95               | 29.58           | 84.82        | 93.96        | 87.14           |    | 13.71        | 1322664.39        |                       |                         | X                                 |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              |                   |                       |                         |                                   |            |
| <b>TOTAL TONS:</b>                                                                                                          |        |         |         | <b>72.95</b>        | <b>29.58</b>    | <b>84.82</b> | <b>93.96</b> | <b>87.14</b>    |    | <b>13.71</b> | <b>1322664.39</b> |                       |                         |                                   |            |
| Classification for each pollutant should be added here based on number of tons:<br>A = Major SM = Synthetic Minor B = Minor |        |         |         | B                   | B               | SM           | SM           | SM              |    | SM           |                   |                       |                         |                                   |            |
| CHECK IF NONATTAINMENT STATUS APPLIES:                                                                                      |        |         |         |                     |                 |              |              |                 |    |              | Subparts:         |                       |                         | KKKK                              |            |
|                                                                                                                             |        |         |         |                     |                 |              |              |                 |    |              | Pollutant:        |                       |                         | NO <sub>x</sub> , SO <sub>2</sub> |            |

# APPENDIX C Colossus Data Center Area Map

CTC Property LLC - Memphis, Shelby County, Tennessee

