

November 8, 2019

Matt Hoffman
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Ave Suite 400
Portland, OR 97201

Re: QTS Investment Properties Hillsboro, LLC
Standard Air Contaminant Discharge Permit Application, Revision 3
Hillsboro, Oregon

Dear Mr. Hoffman:

QTS Investment Properties Hillsboro, LLC (QTS) is submitting the attached revision of the Standard Air Contaminant Discharge Permit (ACDP) application for the data center located at 4950 NE Huffman Street, Hillsboro, Oregon, in response to the requested revisions in the letter, dated October 11, 2019, from the Oregon Department of Environmental Quality (ODEQ). Note that a Standard ACDP application was initially submitted in January 2019. A revised application was submitted in June 2019, followed by a second revision of the application submitted in September 2019. This revision is submitted pursuant to ODEQ's request for additional information, corrections, and updates regarding the second revision submitted on September 12, 2019.

In the revised Standard ACDP application submitted in June 2019, QTS proposed to update the make and model of the diesel-fired emergency generators to MTU 16V4000 DS2250, each rated at 2,250 kWe, to implement load tracking and to include necessary documentation to begin the Cleaner Air Oregon (CAO) risk assessment process. In the second revision of the application submitted in September 2019, QTS proposed to reduce the number of requested emergency generators from 20 to nine, due to a change in anticipated demand for the facility. With this third revision of this submittal package, QTS is addressing all comments from ODEQ regarding the submittal in September 12, 2019, and is proposing the installation and operation of four (4) emergency generators (GN01 – GN04) instead of nine to meet the actual demand of the first upcoming project. QTS will start the permitting process for the additional emergency generators once the timeline of the next project phase of the facility is known. The projected actual facility-wide emissions, based on 52 hours per year per generator at 50% load, for the pollutant emitted at the greatest rate, nitrogen oxides (NOx), is 1.63 tons per year (tpy), well below the 39 tpy PSEL. Note that a revised Modeling Protocol and a revised Level 1 Risk Assessment addressing ODEQ's comments are being submitted in parallel with this application.

To reduce administrative burden, QTS proposes that language be included in the permit to allow the addition, removal, or modification of an emergency engine-generator set without notification. However,

this would only be included provided the new or modified emergency engine-generator set does not increase criteria pollutant emissions from routine maintenance checks and readiness testing activities in excess of de minimis levels as defined in OAR 340-200-0020(39).

As part of this revised application package, QTS has included the following updated documents:

- Appendix A: Required application forms for a Standard ACDP Source;
- Appendix B: Process flow diagram, plot plan, site map;
- Appendix C: Detailed emissions calculations; and
- Appendix D: Engine specifications and emissions data;

If you or your staff require any additional information regarding this request, please contact me at (678) 835-5215 or Tiffany Johnston of Environmental Resources Management (ERM) at (513) 830-9062.

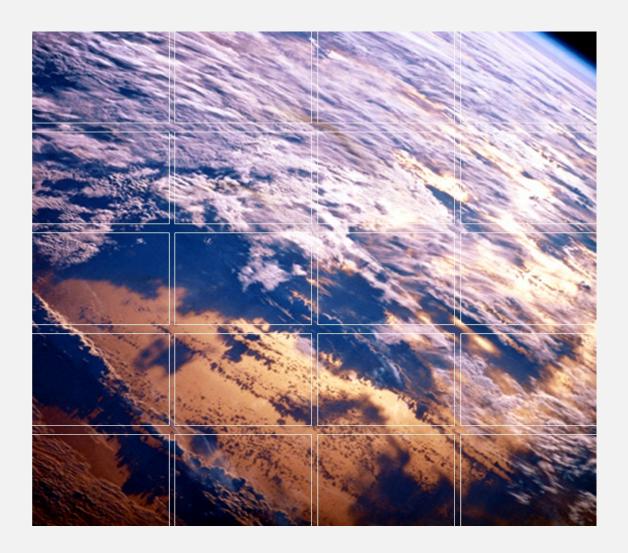
Sincerely,

Laney Marinich,

Vice President - Property Development

cc: William Fowler, QTS

Tiffany Johnston, ERM



Standard Air Contaminant Discharge Permit Application Revision 3

QTS Investment Properties Hillsboro, LLC

8 November 2019

Project No.: 0483509



Signature Page

8 November 2019

Standard Air Contaminant Discharge Permit Application Revision 3

QTS Investment Properties Hillsboro, LLC

Tiffany A. Johnston Partner-In-Charge

Environmental Resources Management, Inc.

9825 Kenwood Road, Suite 100 Cincinnati, Ohio 45242 513-830-9030

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www.erm.com Version: 3.1 Project No.: 0483509 Client: Quality Investment Properties Hillsboro, LLC

8 November 2019

CONTENTS

1.	INTRODUCTION1					
2.	PROJECT DESCRIPTION					
3.	B. PROJECT EMISSIONS					
4.	REGULATORY APPLICABILITY					
	4.1	Federal	Regulations	4		
		4.1.1 4.1.2	New Source Performance Standards National Emission Standards for Hazardous Air Pollutants			
	4.2	OREGO	N STATE REGULATIONS	5		
		4.2.1 4.2.2 4.2.3 4.2.4 4.2.5 4.2.6 4.2.7 4.2.8 4.2.9 4.2.10 4.2.11	OAR 340-206: Air Pollution Emergencies OAR 340-208: Visible Emissions and Nuisance Requirements OAR 340-212: Stationary Source Testing and Monitoring OAR 340-214: Stationary Source Reporting Requirements OAR 340-215: Greenhouse Gas Reporting Requirements OAR 340-222: Stationary Source Plant Site Emission Limits OAR 340-226: General Emission Standards OAR 340-228: Requirements for Fuel Burning Equipment and Fuel Sulfur Content OAR 340-238: New Source Performance Standards OAR 340-242: Rules Applicable to the Portland Area OAR 340-245: Cleaner Air Oregon	5 6 6 6 6 6		
APP	ENDIX A	A OF	REGON DEQ FORMS			
APP	ENDIX	в Р	ROCESS FLOW DIAGRAM, PLOT PLAN, SITE MAP			
APP	ENDIX (C EN	MISSION CALCULATIONS			
APP	ENDIX	D EN	IGINE MANUFACTURER SPECIFICATIONS			
	of Table					
			Emission Factors per Generator			
ıabl	e 3-2: Pi	roject Act	ual Site-Wide NO _X Emissions	3		

1. INTRODUCTION

QTS Investment Properties Hillsboro, LLC (QTS) proposes to construct and operate four diesel-fired emergency generators and associated fuel storage tanks at a new data center located at 4950 NE Huffman Street, Hillsboro, Oregon in Washington County ("the facility", "the data center"). The location is currently designated as in attainment or unclassifiable for all criteria pollutants. QTS is proposing to construct these generators in order to ensure constant electrical supply for the new site, and to accommodate current and expected future market demands, starting November 2019.

In the revised Standard Air Contaminant Discharge Permit (ACDP) application submitted in June 2019, QTS proposed to update the make and model of the 20 diesel fired emergency generators from the original application submitted in January 2019, and included the necessary documentation to begin the Cleaner Air Oregon (CAO) risk assessment process. In the second revision of the application submitted in September 2019, QTS proposed to reduce the number of requested emergency generators from 20 to nine, due to a change in anticipated demand for the facility. With this third revision of this Standard ACDP application, QTS is addressing all comments in the letter from the Oregon Department of Environmental Quality (ODEQ) dated October 11, 2019, regarding the submittal on September 12, 2019. Additionally, QTS is proposing the installation and operation of four emergency generators (GN01 – GN04) instead of nine to meet the actual demand of the first upcoming project. QTS will start the permitting process for the additional emergency generators once the timeline of the next project phase of the facility is known. Please note that a revised Modeling Protocol and a revised Level 1 Risk Assessment addressing ODEQ's comments are being submitted in parallel with this application.

2. PROJECT DESCRIPTION

QTS seeks to authorize the installation and operation of four MTU 16V4000 DS2250 diesel-fired standby emergency generators (GN01 – GN04); each rated at 2,250 kWe via Standard Air Contaminant Discharge Permit (ACDP). In accordance with Oregon Administrative Code (OAR) 340-216-0025(5) (a) (B), QTS is applying for a Standard ACDP in lieu of a Simple ACDP due to the facility's complexity and applicable rules. These generators will be used to provide backup power for site operations in case of utility failure or other related on-site power failure. Each generator will be equipped with a diesel fuel storage tank that will be exempt from permitting under OAR 340-232-0150 and are not subject to any federal regulations.

Additionally, QTS requests that language be included in the permit to allow the addition, removal, or modification of an emergency engine-generator set without notification; provided the new or modified emergency engine-generator set does not increase criteria pollutant emissions from routine maintenance checks and readiness testing activities in excess of de minimis levels as defined in OAR 340-200-0020(39). QTS will maintain records of such changes, make them available to the ODEQ upon request, and provide written notification of such changes within 30 days of completing commissioning.

With this Standard ACDP application, QTS will maintain compliance with the Generic Plant Site Emission Limits (PSEL) for all criteria pollutants, pursuant to OAR 340-200-0020(72). QTS proposes to implement load tracking with specific emission factors supplied by the manufacturer to more accurately report emissions and to demonstrate compliance with the PSEL. Detailed information regarding load tracking, emissions calculations, and compliance with the PSEL can be found in Section 3 of this document.

The proposed new generators are subject to New Source Performance Standards (NSPS) Subpart IIII. As required by NSPS Subpart IIII, the emergency generators are Tier 2 certified and will be operated to comply with the corresponding testing and maintenance operating limit of 100 hours per year per unit. The emergency generators will be equipped with a non-resettable hour meter to track compliance with

QTS Investment Properties Hillsboro, LLC

this limit. Additionally, QTS will only use ultra-low sulfur diesel (ULSD) fuel to maintain compliance with the fuel sulfur content usage restrictions per NSPS Subpart IIII. Logs will be kept to track operating load and hours of operation for compliance with the Generic PSEL for the facility. The new proposed emergency generators will not be used for peak shaving or as part of an Emergency Demand Response Program (EDRP) as described in 40 CFR 60.4211(f) (2). Per 40 CFR 60.4211(f) (3), each emergency generator's operation for non-emergency purposes unrelated to maintenance and testing of the emergency generators is limited to 50 hours per calendar year. These 50 hours are included as part of the 100 hours per year limit for maintenance and testing. Detailed information regarding the emergency generators is included in Appendix D. Additional regulatory discussion for the site is provided in Section 4 of this application.

3. PROJECT EMISSIONS

QTS proposes to use the manufacturer-supplied emission factors corresponding to each load percentage (i.e., 25%, 50%, 75%, 100%) as well as hours operated to determine monthly and 12-month rolling actual emissions. To be conservative and ensure permit compliance, QTS will round the average actual monthly load to the next higher load increment; for example, if the average monthly load for a specific generator is 33% of capacity, emissions would be determined using the 50% load emission rate. Accounting for the reduced operating loads that the emergency generators experience will result in a more accurate estimate of actual pollutant emissions and in turn help ensure ongoing compliance with the facility's Generic PSEL. Table 3-1 below presents the emission factors per generator for use when accounting for actual operating load. These emission factors are based on the enclosed manufacturer specifications (Appendix D).

		Emission Factor (EF) (lb/hr) [2,3,4]			
Source	Pollutant [1]	25% Load	50% Load	75% Load	100% Load
	VOC	2.20	2.04	1.86	1.60
	NO _X	6.19	15.71	30.54	46.81
GN01 – GN04	СО	3.58	3.86	5.78	9.36
	PM/PM ₁₀ /PM _{2.5}	0.66	0.50	0.78	0.50
	SO ₂	0.01	0.02	0.03	0.04

Table 3-1: Proposed Emission Factors per Generator

Notes:

- 1. Conservatively assumes $PM = PM_{10} = PM_{2.5}$, that HC emissions approximate VOC, and that all engines use only ultra-low sulfur diesel fuel.
- 2. EFs for GN01 GN04 are based on MTU 16V4000 DS2250 manufacturer specifications.
- 3. EFs were converted from manufacturer-supplied g/kWh to lb. /hr. by multiplying by the kilowatt-hour corresponding to each load and then converting from grams to pounds. See Appendix C for detailed emission calculations.
- 4. SO₂ emissions based on AP-42 Section 3.4 (10/96) emission rate of 8.09e-3 lb. /hp-hr. * Sulfur Content. Sulfur content of ultra-low sulfur diesel is 15 ppm.

$$Equation A: Site Wide Monthly Emissions (tons) = \frac{\sum_{l=1}^{n} (Emission \ Factor \ @ \ Load \ L \ \left(\frac{lb}{hr}\right)*hrs))}{2000 \frac{lb}{ton}}$$

Where:

- Emission Factor @ Load L = manufacturer-supplied, generator-specific emission rate corresponding to the average monthly generator load, where the average actual load is rounded up to the next higher level of 25%, 50%, 75%, or 100% load;
- hrs. = total non-emergency operating hours for each engine in the given month;
- i = generator number; and
- *n* = number of emergency generators on site.

Projected actual site-wide NO_X emissions, summarized in Table 3-2 below, are based on 52 hours per year per generator for non-emergency use at each operating load and demonstrate compliance with the site's PSEL of 39 tpy. When quantifying emissions from diesel combustion, NO_X is the pollutant of concern because it is emitted at the greatest rate. All other pollutants are emitted at rates far below their respective PSELs. Detailed emissions calculations for all pollutants are included in Appendix C of this application.

Table 3-2: Project Actual Site-Wide NO_X Emissions

	GN01 – GN04			Site Wide	
Operating Load	Emission Factor		Projected Actual Emissions	PSEL	
	Value	Units	tpy	tpy	
25%	4.5	g/kWh	0.64		
50%	5.7	g/kWh	1.63		
75%	7.4	g/kWh	3.18	39	
100%	8.5	g/kWh	4.87		

All emergency generators at the facility are equipped with a non-resettable hour meter and a corresponding system for recording operating load. The above proposed method of calculating emissions will allow the facility to more accurately track and report actual emissions, reduce the over-reporting of emissions, and account for the partial load under which the generators typically operate, while still demonstrating permit compliance.

4. REGULATORY APPLICABILITY

The proposed QTS data center will be located in Washington County, which is in attainment or unclassifiable for all criteria pollutants. The following regulatory analysis identifies potentially applicable state and federal air quality regulations and explains why each regulation is or is not considered applicable to the proposed project.

4.1 Federal Regulations

4.1.1 New Source Performance Standards

New Source Performance Standards (NSPS) require new, modified, or reconstructed sources to control emissions to the level achievable by the best-demonstrated technology as specified in the applicable provisions. The NSPS regulations may be found in 40 CFR 60. An analysis of potentially applicable NSPS subparts is presented below.

4.1.1.1 Subpart A – General Provisions

Facilities subject to source-specific NSPS are also subject to the general provisions of NSPS Subpart A. Because the facility is subject to another 40 CFR 60 subpart, as discussed in Section 4.1.1.2, the provisions of Subpart A are applicable. NSPS Subpart A may require the following of facilities subject to a source-specific NSPS:

- Initial construction/reconstruction notifications
- Initial startup notifications
- Performance tests
- Performance test date initial notifications
- General monitoring requirements
- General recordkeeping requirements
- Semiannual monitoring system and/or excess emissions reports.

The facility will comply with the provisions of NSPS Subpart A, as applicable.

4.1.1.2 Subpart IIII – NSPS for Stationary Compression Ignition Internal Combustion Engines

NSPS Subpart IIII establishes emission standards and compliance requirements for the control of emissions from stationary compression ignition (CI) internal combustion engines (ICE) which are constructed, reconstructed, or modified after July 11, 2005.

With this application, QTS proposes to install four new CI ICE. Thus, QTS will operate a total of four CI ICE, which were constructed after July 2005. Therefore, the facility contains units subject to NSPS IIII and is required to comply with the provisions of this subpart.

Because the proposed generators are identified as emergency, they will be equipped with a non-resettable hour meter and will not operate for greater than 100 hours per year for maintenance and testing purposes. The engines will comply with EPA Tier 2 emission standards and with the fuel requirements of this subpart by using only 15 ppm or lower sulfur diesel fuel.

4.1.2 National Emission Standards for Hazardous Air Pollutants

National Emission Standards for Hazardous Air Pollutants (NESHAP) are emission standards for hazardous air pollutants (HAP) that are generally applicable to major sources of HAPs, but also apply to certain area sources of HAPs. A HAP major source is defined as having potential emissions in excess of 10 tons per year for any individual HAP and/or 25 tons per year for total HAPs. NESHAP apply to specific pollutant sources (40 CFR 61), or to sources in specifically regulated industrial source categories (CAA Section 112(d)), or on a case-by-case basis (Section 112(g) or 112(j)) for facilities not regulated as a specific industrial source type (40 CFR 63). The facility will be an area source for HAPs. An applicability analysis of potentially applicable NESHAP (Part 63) subparts is presented below.

4.1.2.1 Subpart A – General Provisions

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

4.1.2.2 Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines

NESHAP Subpart ZZZZ provides HAP emission limitations and operating limitations for stationary reciprocating internal combustion engines (RICE), including emergency engines, located at facilities that are major or area sources of HAP emissions.

QTS proposes to operate a total of four CI ICE. The facility will have the potential to emit approximately 0.029 tons of total HAP per year, as shown in the emissions calculations included in Appendix C. Thus, proposed HAP emissions are below the major source threshold of 25 tpy combined HAP or 10 tpy for any single HAP, and the facility will be considered an area source of HAP.

Per 40 CFR 63.90(c)(1), QTS will comply with the New Source Performance Standard provisions in 40 CFR 60, Subpart IIII for the existing and planned generator engines. Consequently, no further provisions under NESHAP Subpart ZZZZ will apply to these engines.

4.2 OREGON STATE REGULATIONS

The following regulatory review identifies potentially applicable state air quality regulations and explains why each regulation is or is not considered applicable to the facility.

4.2.1 OAR 340-206: Air Pollution Emergencies

This division establishes criteria for identifying and declaring air pollution levels that would be of significant harm for regulated pollutants in nonattainment areas. QTS is located in Washington County, which is not considered a nonattainment area, thus QTS is not subject to the requirements of this division.

4.2.2 OAR 340-208: Visible Emissions and Nuisance Requirements

This division establishes standards for visible and nuisance emissions in all areas of Clackamas, Columbia, Multnomah, and Washington Counties. QTS is located in Washington County and the particulate matter emissions from each emergency generator is 0.022 lb. PM/MMBtu, well below 0.272 lb. PM/MMBtu limit per OAR 340-208-0610(1). Thus, QTS is subject to and will comply with the requirements of this division.

4.2.3 OAR 340-212: Stationary Source Testing and Monitoring

This division specifies the testing and monitoring requirements and procedures for all stationary sources in the state, which includes some general recordkeeping and reporting requirements. QTS is proposing to permit the new facility under a Standard ACDP with this application package and included supporting documentation for all air pollution sources located at the facility. QTS will track engine operating hours, operating load, fuel usage, and run reason in order to maintain compliance with all applicable state and federal standards. Thus, QTS is subject to and will comply with the requirements of this division.

4.2.4 OAR 340-214: Stationary Source Reporting Requirements

This division specifies recordkeeping reporting requirements and procedures for all stationary sources in the state. QTS will maintain applicable records for preparation of required reporting to demonstrate compliance with all state and federal requirements. Unless otherwise required by the permit, QTS will submit semi-annual reports for the periods of January 1st through June 30th, and July 1st through December 31st within 30 days after the period ends.

4.2.5 OAR 340-215: Greenhouse Gas Reporting Requirements

Pursuant to OAR 340-215-0030, sources are subject to registration and reporting requirements if they emit more than 2,500 metric tons (2,756 ton) per calendar year of actual emissions of GHG on a carbon dioxide equivalent (CO₂e) basis. Projected actual CO₂e emissions from the QTS site is 202 tons, well below the 2,756 ton threshold. QTS will continue to track GHG emissions closely under a Standard ACDP. Should the site exceed this threshold, QTS will register and report its greenhouse gas emissions with ODEQ in accordance with OAR 340-215.

4.2.6 OAR 340-222: Stationary Source Plant Site Emission Limits

This division outlines procedures to establish a PSEL, which is required for all ACDPs. QTS is applying for a Standard ACDP, thus they are subject to the requirements of this division and are requesting Generic PSELs as defined in OAR 340-200-0020(72). Projected actual site-wide NO_X emissions, the pollutant of concern for QTS, for the site's emergency generators at various operating loads demonstrate compliance with the site's PSEL of 39 tpy.

4.2.7 OAR 340-226: General Emission Standards

This division establishes general emission limits and standards and applies to all areas of the state. QTS operates fuel burning equipment that are Tier 2 certified and in compliance with NSPS and NESHAP requirements. As discussed in this section, QTS is in compliance with all applicable rules in OAR 340-208 through 268. Therefore, QTS is in compliance with the applicable section of this division.

4.2.8 OAR 340-228: Requirements for Fuel Burning Equipment and Fuel Sulfur Content

This division establishes requirements and standards for the types of fuel used in fuel burning equipment and applies to all areas of the state. QTS will only purchase ULSD fuel to maintain compliance with the fuel sulfur content usage restrictions per NSPS Subpart IIII and OAR 340-228-0110(2).

QTS Investment Properties Hillsboro, LLC

4.2.9 OAR 340-238: New Source Performance Standards

This division adopts 40 CFR 60, Standards of Performance for certain new stationary sources. 40 CFR 60 requires new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. An analysis of potentially applicable NSPS subparts is presented in Section 4.1.1 above.

4.2.10 OAR 340-242: Rules Applicable to the Portland Area

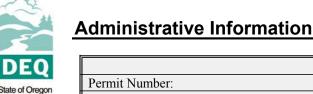
This division establishes specific rules to the Portland Air Quality Maintenance Area (AQMA) as it relates to the PSEL donation program, industrial growth, and employee commuting options. This division applies to employers within the Portland AQMA with more than 100 employees at a work site, and to new sources or modifications that have increases of VOC or NO_X equal to or greater than the Significant Emission Rate (SER). QTS is located within the Portland AQMA and will employ 25 people at the data center. Projected actual site-wide NO_X emissions demonstrate compliance with the site's Generic PSEL. Thus, the rules of this division are not applicable.

4.2.11 OAR 340-245: Cleaner Air Oregon

This division establishes specific rules for Oregon's risk-based toxic air contaminant permitting program, known as Cleaner Air Oregon (CAO). This division applies to all areas of the state and to all sources, excluding sources located on tribal and federal lands that are not subject to regulation by DEQ. QTS is proposing to permit the new facility under a Standard ACDP, therefore is subject to the rules of this division. QTS has submitted a revised Level 1 Risk Assessment, a revised Modeling Protocol and relative forms in parallel with this Standard ACDP application. The results from the revised Level 1 Risk Assessment indicate residential cancer Risk Action Level (RAL) at 7.26, with the remaining cancer and non-cancer RAL all below 1. QTS understands and will follow all community engagement requirements for new facilities with an RAL above 5 and below 10. Pursuant OAR 340-245-0120, QTS will engage in any public meetings or public notice to ensure that consideration of environmental justice is appropriately emphasized. Additionally, QTS will work with the DEQ to submit any additional information requested for completion of this Cleaner Air Oregon program.

TANDARD AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVISION 3				
APPENDIX A	OREGON DEQ FORMS			

www.erm.com Version: 3.1 Project No.: 0483509 Client: Quality Investment Properties Hillsboro, LLC 8 November 2019



Department of Environmental Quality

FOR DEQ USE ONLY						
Permit Number: Type of Application:						
Application No:	RNW	MOD	NEW	EXT		
Date Received :	IXI VV	МОВ	11277	2281		
Regional Office:	Check No.		Amount \$			

1. Company	2. Facility Location			
Legal Name:	Name:			
Mailing	Street			
Address:	Address:			
City, State,	City, County,			
Zip Code:	Zip Code:			
Number of employees (corporate):	Number of employees (facility):			
3. Facilty Contact Person	4. Industrial Classification Code(s)			
Name:	Primary SIC			
	and NAICS:			
Title:	Secondary SIC			
	and NAICS:			
Telephone number:	5. Other DEQ Permits			
Fax. number:				
e-mail address:				
6. Permit Action:				
Short Term Activity ACDP				
New Simple ACDP				
New Construction ACDP				
New Standard ACDP				
New Standard ACDP (PSD/NSR)				
Renewal of an existing permit without	changes (include form AQ403 for Standard ACDPs)			
Renewal of an existing permit with char	nges (include form AQ403 for Standard ACDPs)			
Revision (or Modification) to an existing	ng permit application			
7. Signature				
I hereby apply for permission to discharge air contaminants in the State of Oregon, as stated or described in this				
application, and certify that the information contained in this application and the schedules and exhibits				
appended hereto, are true and correct to the best of my knowledge and belief.				

Title of official and phone number

11/11/2019

Date

Name of official (Printed or Typed)

Lany Mainile

Signature of official





FEE INFORMATION

(Make the check payable to DEQ)

Note: The initial application fees and annual fees specified below (OAR 340-216-8020, Table 2, Parts 1 and 2) are only required for initial permit applications. These fees are not required for an application to renew or modify an existing permit. The appropriate specific activity fee(s) specified below (OAR 340-216-8020, Table 2, Part 3) applies to permit modifications or may be in addition to initial permit application fees.

OAR 340-216-8020, Table 2, Part 1 – INITIAL PERMITTING APPLICATION FEES:					
Short Term Activity ACDP					
Basic ACDP					
Assignment to General ACDP					
Simple ACDP					
Construction ACDP					
Standard ACDP					
Standard ACDP (Major NSR or Type A State NSR)					
OAR 340-216-8020, TABLE 2, PART 2 - ANNUAL FEES:					
Simple ACDP – Low Fee Class					
Simple ACDP – High Fee Class					
Standard ACDP					
OAR 340-216-8020, TABLE 2, PART 3 - SPECIFIC ACTIVITY FEB	ES:				
Non-Technical Permit Modification					
Basic Technical Permit Modification					
Simple Technical Permit Modification					
Moderate Technical Permit Modification					
Complex Technical Permit Modification					
Major NSR or type A State NSR Permit Modification					
Modeling review (outside Major NSR or Type A State NSR)					
Public Hearing at Source's Request					
State MACT Determination					
TOTAL FEES					

Submit two copies of the completed application to:

New or Modified Permits (inclu	de fees):	Permit Renewals (no fees):
Oregon Department of Environ Financial Services - Revenue S	` '	Oregon Department of Environmental Quality Air Quality Program, Northwest Region Office
700 NE Multnomah St., Suite 6		700 NE Multnomah St., Suite 600
Portland, OR 97232-4100		Portland, OR 97232-4100





Administrative Information

CONTACT LIST

1.	Com	pany	Inform	ation:
----	-----	------	--------	--------

Legal Name:	Other company name (if different than legal name):
2. Site Contact Person: (A person wh	no deals with DEQ staff about equipment problems.)
Name:	Telephone number:
Title:	Email address:
3. Facility Contact Person: (If other facility although they may be house	than the site contact person, a person involved with all environmental issues at the ed at a different site.)
Name:	Telephone number:
Title:	Email address:
4. Mailing Contact Person: (If other communications directed.)	than the site contact person, a person to whom the company would like all agency
Name:	Telephone number:
Title:	Email address:
	than the site contact person, a valid contact information to which invoices and g invoice questions can be directed.)
Name:	Telephone number:
Title:	Email address:





NOTICE OF INTENT TO CONSTRUCT

FOR DEQ USE ONLY			
Permit Number:	Regional Office:		
Application No:	Date Received:		

1. Source Number:		
2. Company	3. Facility Location	
Legal Name: QTS Investment Properties Hillsboro, LLC	Name: QTS Investment Properties Hillsboro, LLC	
Ownership type: LLC	Plant start date: 05/2019	
Mailing Address: 12851 Foster Street	Street Address: 4950 NE Huffman Street	
City, State, Zip Code: Overland Park, Kansas, 66213	City, County, Zip Code: Hillsboro, Washington County, 97124	
4. Number of Employees (corporate): 700	Number of Employees (plant site): 25	
5. Facility Contact Person	6. Industrial Classification Code(s)	
Name: William Fowler	SIC: 3751	

5. Facility Contact Person	6. Industrial Classification Code(s)
Name: William Fowler	SIC: 3751
Title: Site Services Manager	NAICS:
Phone number: 804-952-8421	7. Type of construction/change: (see instructions)
Fax number: N/A	New Facility
e-mail address: William.Fowler@qtsdatacenters.com	

8. Signature	
I certify that the information contained in this notice, incl are true and correct to the best of my knowledge and belie	· .
Laney Marinich	Vice President, Property Development - (678) 835-5215
Name of official (Printed or Typed)	Title of official and phone number
Lany Mainile	11/11/2019
Signature of official	Date





Construction Information

9. Description of proposed construction:

QTS seeks to authorize the installation and operation of four MTU 16V4000 DS2250 diesel-fired emergency generators (GN01 - GN04); each rated at 2,250 kW via Standard Air Contaminant Discharge Permit (ACDP). In accordance with Oregon Administrative Code (OAR) 340-216-0025(5)(a)(B), QTS is applying for a Standard ACDP in lieu of a Simple ACDP due to the facility's complexity and applicable rules. These generators will be used to provide backup power for site operations in case of utility failure or other related on-site power failure. Each generator will be equipped with a diesel fuel storage tank that will be exempt from permitting under OAR 340-232-0150 and are not subject to any federal regulations.

Additionally, QTS requests that language be included in the permit to allow the addition, removal, or modification of an emergency engine-generator set without notification; provided the new or modified emergency engine-generator set does not increase criteria pollutant emissions from routine maintenance checks and readiness testing activities in excess of de minimis levels as defined in OAR 340-200-0020(39). QTS will maintain records of such changes, make them available to the ODEQ upon request, and provide written notification of such changes within 30 days of completing commissioning.

10.	Will the construction increase the capacity of the facility? Yes If yes, how much?			
	New Facility			
11.	Will the construction increase pollutant emissions? Yes If yes, how much (see question 19)?			
	See Form AQ104			
12.	Will the construction cause new pollutant emissions? Yes If yes, which pollutants and how much?			
	See Form AQ104			
13.	Estimated timing of construction.			
	a. Commence date: b. Begin date: 11/2019 c. Completion date: 12/2019			
14.	Will tax credits be requested once construction is completed? no			
15.	Attach relevant forms from Form Series AQ200, Device/Process Forms. Appendix A			
16.	Attach relevant forms from Form Series AQ300, Control Device Description Forms, if applicable.			
17. 18.	Not Applicable Attach process flow diagram. Appendix B Attach a city map or drawing showing the facility location.			
19.	Appendix B If applicable, attach a Land Use Compatibility Statement.			

Appendix A

Emissions Data

20. Pre-and Post-Construction emission summary data

		c. Pre-Construction Emissions		d. Post-Construc	ction Emissions
		short-term	Annual	short-term	Annual [1]
a. Emissions Point	b. Pollutant	(lb/hr)	(tons/year)	(lb/hr)	(tons/year)
GN01 - GN04	VOC @ 25% Load			2.20, each	0.11, each
GN01 - GN04	VOC @ 50% Load			2.04, each	0.10, each
GN01 - GN04	VOC @ 75% Load			1.86, each	0.09, each
GN01 - GN04	VOC @ 100% Load			1.60, each	0.08, each
GN01 - GN04	NO _X @ 25% Load			6.19, each	0.31, each
GN01 - GN04	NO _X @ 50% Load			15.71, each	0.79, each
GN01 - GN04	NO _X @ 75% Load			30.54, each	1.53, each
GN01 - GN04	NO _X @ 100% Load			46.81, each	2.34, each
GN01 - GN04	CO @ 25% Load			3.58, each	0.18, each
GN01 - GN04	CO @ 50% Load			3.86, each	0.19, each
GN01 - GN04	CO @ 75% Load			5.78, each	0.29, each
GN01 - GN04	CO @ 100% Load			9.36, each	0.47, each
GN01 - GN04	SO ₂ @ 25% Load			0.01, each	0.001, each
GN01 - GN04	SO ₂ @ 50% Load			0.02, each	0.001, each
GN01 - GN04	SO ₂ @ 75% Load			0.03, each	0.002, each
GN01 - GN04	SO ₂ @ 100% Load			0.04, each	0.002, each
GN01 - GN04	PM @ 25% Load			0.66, each	0.03, each
GN01 - GN04	PM @ 50% Load			0.50, each	0.02, each
GN01 - GN04	PM @ 75% Load			0.78, each	0.04, each
GN01 - GN04	PM @ 100% Load			0.50, each	0.02, each
GN01 - GN04	PM ₁₀ @ 25% Load			0.66, each	0.03, each
GN01 - GN04	PM ₁₀ @ 50% Load			0.50, each	0.02, each
GN01 - GN04	PM ₁₀ @ 75% Load		-	0.78, each	0.04, each
GN01 - GN04	PM ₁₀ @ 100% Load			0.50, each	0.02, each
GN01 - GN04	PM _{2.5} @ 25% Load			0.66, each	0.03, each
GN01 - GN04	PM _{2.5} @ 50% Load			0.50, each	0.02, each
GN01 - GN04	PM _{2.5} @ 75% Load			0.78, each	0.04, each
GN01 - GN04	PM _{2.5} @ 100% Load			0.50, each	0.02, each

^{1.} Post-construction annual emissions (tons/year) are based on 100 hour per generator per year at respective operating loads.

SECTION 1 - TO BE	COMPLETED BY APPLICANT
1A. Applicant Name: William Fowler	1B. Project Name: QTS Investment Properties Hillsboro, LLC
Contact Name: Kevin Snead	Physical Address: 4950 NE Huffman Street
Mailing Address: 6000 Technology Blvd	City, State, Zip: Hillsboro, Washington County, 97124
City, State, Zip: Sandston, VA 23150	Tax Lot #: 1N221000 - 2603, and 3100
Telephone: (804) 952-8365	Township: T1N Range: R2W Section: 21 and 22
Tax Account #:	Latitude: 45° 33′ 32.67″ N
30-0885235	Longitude: 122° 55′ 46.37″ W
operate 20 diesel-fired emergency generators at a Hillsboro, Oregon in Washington County, current The facility will maintain business-critical informa	perties Hillsboro, LLC (QTS) proposes to construct and new data center located at 4950 NE Huffman Street, ly designated as in attainment for all criteria pollutants. It is and other computer-related services on servers and these generators in order to ensure constant electrical ent and expected future market demands.
1D. Check the type of DEQ permit(s) or approval(s) being Air Quality Notice of Construction Air Contaminant Discharge Permit (excludes portable facility permits) Air Quality Title V Permit Air Quality Indirect Source Permit Parking/Traffic Circulation Plan Solid Waste Land Disposal Site Permit Solid Waste Treatment Facility Permit Solid Waste Composting Facility Permit (includes Anaerobic Digester) Conversion Technology Facility Permit Solid Waste Letter Authorization Permit Solid Waste Material Recovery Facility Permit Solid Waste Energy Recovery Facility Permit Solid Waste Transfer Station Permit Waste Tire Storage Site Permit Permit Renewal New	 □ Pollution Control Bond Request □ Hazardous Waste Treatment, Storage, or Disposal Permit □ Clean Water State Revolving Fund Loan Request □ Wastewater/Sewer Construction Plan/Specifications (includes review of plan changes that require use of new land) □ Water Quality NPDES Individual Permit (for onsite construction-installation permits use the DEQ Onsite LUCS form) □ Water Quality NPDES Stormwater General Permit (1200-A, 1200-C, 1200-CA, 1200-COLS, and 1200-Z) □ Water Quality General Permit (all general permits, except 600, 700-PM, 1700-A, and 1700-B when they are mobile.) □ Water Quality 401 Certification for federal permit or license
SECTION 2 - TO BE COMPLETED	BY CITY OR COUNTY PLANNING OFFICIAL
uses allowed outright by the acknowledged comprehensive pl specific plan policies, criteria, or standards that were relied up justified based on the plan policies, criteria, or standards.	re required; written findings from previous actions are acceptable. For an, DEQ will accept written findings in the form of a reference to the son in rendering the decision with an indication of why the decision is
2A. The project proposal is located: 🔀 Inside city limits	✓ Inside UGB □ Outside UGB
2B. Name of the city or county that has land use jurisdiction property or land use): 1111 shows	on (the legal entity responsible for land use decisions for the subject

SECTION 2 - TO BE COMPLETED BY	CITY OR COUNTY PLANNING OFFICIAL
Applicant Name: William Fowler	Project Name: QTS Investment Properties
2C. Is the activity allowed under Measure 49 (2007)? 🔀 No	o, Measure 49 is not applicable Yes; if yes, then check one:
Express; approved by DLCD order #:	
Conditional; approved by DLCD order #:	
☐ Vested; approved by local government decision or cour	t judgment docket or order #:
2D. Is the activity a composting facility? No ☐ Yes; Senate Bill 462 (2013) notification	requirements have been met.
page). If the activity or use is to occur in multiple phases, p 1.C. For example, if the applicant's project is described in	which the applicant is seeking approval (see 1.C on the previous please ensure that your approval addresses the phases described in 1.C as a subdivision and the LUCS indicates that only clearing ether the subdivision is approved, DEQ will delay permit issuance
☐ The activity or use is specifically exempt by the acknow	ledged comprehensive plan; explain:
Yes, the activity or use is pre-existing nonconforming u	se allowed outright by (provide reference for local ordinance):
Yes, the activity or use is allowed outright by (provide)	reference for local ordinance):
Yes, the activity or use received preliminary approval the findings are attached.	hat includes requirements to fully comply with local requirements;
Yes, the activity or use is allowed; findings are attached	i.
☐ No, see 2.C above, activity or use allowed under Measu	re 49; findings are attached.
before compatibility can be determined):	nce and identify requirements the applicant must comply with
Relevant specific plan policies, criteria, or standards:	
Provide the reasons for the decision:	
Additional comments (attach additional information as needed)):
Development Review oxprove Case File No. DR-039-17	al granted by City.
Planning Official Signature: Ruth 11	Title: Sevier Planner
Print Name: Ruth Klein Tele	ephone #: 503-681-6465 Date: 12/27/18
If necessary, depending upon city/county agreement on jur	isdiction outside city limits but within UGB:
Planning Official Signature:	Title:
Print Name: Tele	ephone #: Date:

POWER	SUPPI	YGEN	IERAT	'ORS



Facility Name:	Permit Number:	

Provide the requested information for each generator used to power the plant. If any one of several generators might be used at the plant at any given time, describe the generator with the highest power rating. If more than one generator is permanently located at the plant, describe all of them.

	Primary generator	Generator 2	Generator 3
ID No.			
Manufacturer			
Year manufactured			
Size (enter units ^a)			
Type of fuels used			
Maximum amount of fuel to be used per hour ^b			
Projected maximum amount of fuel to be used per year ^b			
Projected maximum number of hours to be operated in one year.			
Maintenance schedule ^c			
Manufacturer's emission rates attached (yes/no)			

^a Units for generator size are either kilowatt or horsepower (kW or hp).

^b Units for the amount of fuel are cubic feet, therms, gallons, etc.

^c "Maintenance schedule" refers to regularly scheduled maintenance only, i.e., annual, monthly, weekly, or none.



Plant Site Emissions Detail Sheet Current/Future Operations Form AQ402 Answer Sheet

TBD

Permit Number:

Facility Name: QTS Investment Properties Hillsboro, LLC

		ion Rates			Emission Factors			sions
1. Emissions Point	2. Short-term	3. Annual	4. Pollutant	5. Short-term	6. Long-term	7. Reference(s)	8. Short-term	9. Annual
CNIO1 CNIO4	(Specify units)	(hrs/year/gen)	NOC O 250/ I	(g/kWh)	(g/kWh)		(lb/hr)	(tons/year)
GN01 - GN04 GN01 - GN04	n/a	-	VOC @ 25% Load	1.60, each	1.60, each	Manufacturer	2.20, each 2.04, each	0.11, each
GN01 - GN04 GN01 - GN04	n/a n/a	100	VOC @ 50% Load VOC @ 75% Load	0.74, each 0.45, each	0.74, each 0.45, each	Manufacturer Manufacturer	2.04, each	0.10, each 0.09, each
GN01 - GN04 GN01 - GN04	n/a		VOC @ 100% Load	0.45, each	0.43, each	Manufacturer	1.60, each	0.09, each
GN01 - GN04	n/a		NO _x @ 25% Load	4.50, each	4.50, each	Manufacturer	6.19, each	0.31, each
GN01 - GN04 GN01 - GN04	n/a	1	NO _X @ 23% Load NO _X @ 50% Load	5.70, each	5.70, each	Manufacturer	15.71, each	0.31, each
GN01 - GN04	n/a	100	NO _X @ 75% Load	7.40, each	7.40, each	Manufacturer	30.54, each	1.53, each
GN01 - GN04	n/a	1	NO _X @ 100% Load	8.50, each	8.50, each	Manufacturer	46.81, each	2.34, each
GN01 - GN04	n/a		CO @ 25% Load	2.60, each	2.60, each	Manufacturer	3.58, each	0.18, each
GN01 - GN04	n/a	1	CO @ 50% Load	1.40, each	1.40, each	Manufacturer	3.86, each	0.19, each
GN01 - GN04	n/a	100	CO @ 75% Load	1.40, each	1.40, each	Manufacturer	5.78, each	0.29, each
GN01 - GN04	n/a	1	CO @ 100% Load	1.70, each	1.70, each	Manufacturer	9.36, each	0.47, each
GN01 - GN04	n/a		SO ₂ @ 25% Load	0.01, each	0.01, each	15 ppm sulfur fuel	0.01, each	0.001, eac
GN01 - GN04	n/a	1	SO ₂ @ 50% Load	0.01, each	0.01, each	15 ppm sulfur fuel	0.02, each	0.001, eac
GN01 - GN04	n/a	100	SO ₂ @ 75% Load	0.01, each	0.01, each	15 ppm sulfur fuel	0.03, each	0.002, eac
GN01 - GN04	n/a	1	SO ₂ @ 100% Load	0.01, each	0.01, each	15 ppm sulfur fuel	0.04, each	0.002, eac
GN01 - GN04	n/a		PM @ 25% Load	0.48, each	0.48, each	Manufacturer	0.66, each	0.03, each
GN01 - GN04	n/a	1	PM @ 50% Load	0.18, each	0.18, each	Manufacturer	0.50, each	0.02, each
GN01 - GN04	n/a	100	PM @ 75% Load	0.19, each	0.19, each	Manufacturer	0.78, each	0.04, each
GN01 - GN04	n/a	1	PM @ 100% Load	0.09, each	0.09, each	Manufacturer	0.50, each	0.02, eacl
GN01 - GN04	n/a	İ	PM ₁₀ @ 25% Load	0.48, each	0.48, each	Assume PM ₁₀ =PM	0.66, each	0.03, eacl
GN01 - GN04	n/a	100	PM ₁₀ @ 50% Load	0.18, each	0.18, each	Assume PM ₁₀ =PM	0.50, each	0.02, eacl
GN01 - GN04	n/a	100	PM ₁₀ @ 75% Load	0.19, each	0.19, each	Assume PM ₁₀ =PM	0.78, each	0.04, eacl
GN01 - GN04	n/a	1	PM ₁₀ @ 100% Load	0.09, each	0.09, each	Assume PM ₁₀ =PM	0.50, each	0.02, eacl
GN01 - GN04	n/a		PM _{2.5} @ 25% Load	0.48, each	0.48, each	Assume PM _{2.5} =PM	0.66, each	0.03, eacl
GN01 - GN04	n/a	100	PM _{2.5} @ 50% Load	0.18, each	0.18, each	Assume PM _{2.5} =PM	0.50, each	0.02, eacl
GN01 - GN04	n/a	100	PM _{2.5} @ 75% Load	0.19, each	0.19, each	Assume PM _{2.5} =PM	0.78, each	0.04, eacl
GN01 - GN04	n/a	1	PM _{2.5} @ 100% Load	0.09, each	0.09, each	Assume PM _{2.5} =PM	0.50, each	0.02, eacl
GN01 - GN04	n/a		CO2e @ 25% Load	682.49, each	682.49, each	40 CFR 98	938.90, each	46.94, eac
GN01 - GN04	n/a	100	CO2e @ 50% Load	704.62, each	704.62, each	40 CFR 98	1941.76, each	97.09, eac
GN01 - GN04	n/a	100	CO ₂ e @ 75% Load	672.92, each	672.92, each	40 CFR 98	2777.17, each	138.86, ea
GN01 - GN04	n/a		CO ₂ e @ 100% Load	668.28, each	668.28, each	40 CFR 98	3680.32, each	184.02, eac
TOTAL	n/a		VOC @ 25% Load	-	-	-	19.81	0.99
TOTAL	n/a	1	VOC @ 50% Load	-	-	-	18.35	0.92
TOTAL	n/a	100	VOC @ 75% Load	-	-	-	16.71	0.84
TOTAL	n/a	İ	VOC @ 100% Load	_	-	-	14.37	0.72
TOTAL	n/a		NO _X @ 25% Load	-	-	-	55.72	2.79
TOTAL	n/a	i	NO _x @ 50% Load	_	-	-	141.37	7.07
TOTAL	n/a	100	NO _x @ 75% Load	_	-	-	274.86	13.74
TOTAL	n/a	i	NO _X @ 100% Load	-	-	-	421.30	21.06
TOTAL	n/a		CO @ 25% Load	_	-	-	32.19	1.61
TOTAL	n/a		CO @ 50% Load		-	_	34.72	1.74
TOTAL	n/a	100	CO @ 75% Load		_	_	52.00	2.60
TOTAL	n/a	1	CO @ 100% Load	_	_	-	84.26	4.21
TOTAL	n/a		SO ₂ @ 25% Load	_	-	-	0.09	0.00
TOTAL	n/a	1	SO ₂ @ 25% Load SO ₂ @ 50% Load	_	-	-	0.18	0.01
TOTAL	n/a	100	SO ₂ @ 75% Load	_	-	-	0.27	0.01
TOTAL	n/a	1	SO ₂ @ 100% Load	_	-	-	0.37	0.02
TOTAL	n/a		PM @ 25% Load		_	-	5.94	0.30
TOTAL	n/a	1	PM @ 50% Load		_	-	4.46	0.22
TOTAL	n/a	100	PM @ 75% Load	-	-	-	7.06	0.22
TOTAL	n/a	1	PM @ 100% Load		-	-	4.46	0.22
TOTAL	n/a		PM ₁₀ @ 25% Load	-	-	-	5.94	0.30
TOTAL	n/a	1	PM ₁₀ @ 50% Load	_	-	-	4.46	0.22
TOTAL	n/a	100	PM ₁₀ @ 75% Load	-	-	-	7.06	0.35
TOTAL	n/a	1	PM ₁₀ @ 100% Load	-	-	-	4.46	0.22
TOTAL	n/a		PM _{2.5} @ 25% Load	_	-	-	5.94	0.30
TOTAL	n/a	†	PM _{2.5} @ 50% Load	<u> </u>	-	-	4.46	0.22
TOTAL	n/a	100	PM _{2.5} @ 75% Load	-	-	-	7.06	0.22
TOTAL	n/a	†	PM _{2.5} @ 100% Load	-	-	-	4.46	0.33
TOTAL	n/a		CO ₂ e @ 25% Load	-	-	-	8450.06	422.50
TOTAL	n/a	1	CO ₂ e @ 25% Load CO ₂ e @ 50% Load	<u> </u>	-	-	17475.88	873.79
TOTAL	n/a	100	CO ₂ e @ 75% Load	<u> </u>	-	-	24994.57	1249.73
			LUNC IM. 1370 LOAD	-			ムサフプサ.ン /	1249./3

Facility Name: QTS Investment Properties Hillsboro, LLC Permit Number: TBD

Emissions Data

	2. Annual Production				6. Annual Emission
	Rate [1]		4. Emission Factor [1,6]		[3,6]
1. Emissions Point	(MMBtu/yr)	3. Pollutant ^[2,4,5]	(lb/MMBtu)	5. EF Reference	(tons/yr)
		Benzene	1.35E-03		6.07E-03
		1,3-Butadiene	1.58E-03		7.09E-03
		Benzo[a]pyrene	2.57E-07		1.16E-06
		Cadmium	1.09E-05		4.89E-05
		Formaldehyde	1.25E-02		5.63E-02
		Hexavalent Chromium	7.25E-07		3.26E-06
		Arsenic	1.16E-05		5.22E-05
		Lead	6.01E-05		2.71E-04
		Acrolein	2.46E-04	SCAQMD Supplemental Instructions of Reporting Procedures for AB2588 Facilities for Reporting their Quadrennial Air Toxics Emissions Inventory	1.11E-03
	2,249	Nickel	2.83E-05		1.27E-04
		Ammonia	5.80E-03		2.61E-02
GN01 - GN04		PAHs (excluding Naphthalene)	2.62E-04		1.18E-03
		Naphthalene	1.43E-04		6.42E-04
		Acetaldehyde	5.68E-03		2.55E-02
		Copper	2.97E-05		1.34E-04
		Ethyl Benzene	7.90E-05		3.55E-04
		Hexane	1.95E-04		8.77E-04
		Hydrogen Chloride	1.35E-03		6.07E-03
		Manganese	2.25E-05		1.01E-04
		Mercury	1.45E-05		6.52E-05
		Selenium	1.59E-05		7.17E-05
		Toluene	7.64E-04		3.44E-03
		Xylenes	3.07E-04		1.38E-03
		Diesel Particulate Matter	4.99E-01		5.79E-01
		Total TAP			0.72

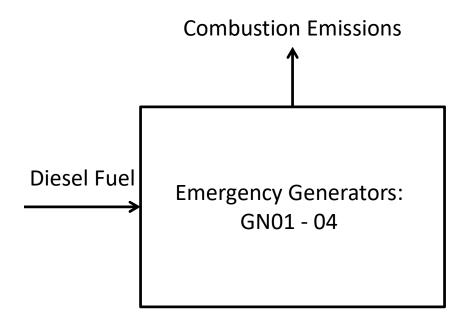
Applications for Standard ACDPs must also include the most recent Toxics Release Inventory report, if applicable (see instructions).

- 1. Annual production rate and emission factors are per generator.
- 2. Includes pollutants listed in Table 1 of OAR 340-244-0040 and OAR 340-246-0090(3) that are emitted from the sources.
- 3. Annual emissions (tons/year) is site-wide total emissions with 100 hours per generator operating at 100% load.
- $4.\ Diesel\ Particulate\ Matter\ Emission\ factor\ based\ on\ maximum\ PM+HC\ emission\ factor\ from\ \overline{MTU}\ 16V4000G84S\ emission\ specifications\ which\ occurs\ at\ 25\%\ operating\ load.$
- 5. Fuel usage at 100% operating load used for all pollutants except DPM, which uses fuel usage at 25% load to correspond with maximum PM + HC emission factor in lb/hr.
- 6. Cold-start DPM emission is not taken into account in the emission factor (lb/MMBtu), but it is calculated in the annual emission rate conservatively assuming 20 cold starts per generator per year (1 per month and 4 additional for maintenance events if needed). Each cold start is assumed to be 1 minute. See sample calculation below:

$$DPM\left(\frac{lb}{hr}\right) \times \left(Annual\ Operational\ Hr - \frac{\#of\ cold\ starts}{60\ min}\right) + DPM\left(\frac{lb}{hr}\right) \times Cold\ Start\ Factor \times (\frac{\#of\ cold\ starts}{60\ min})$$

STANDARD AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVISION 3		
APPENDIX B	PROCESS FLOW DIAGRAM, PLOT PLAN, SITE MAP	

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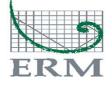
Environmental Resources Management

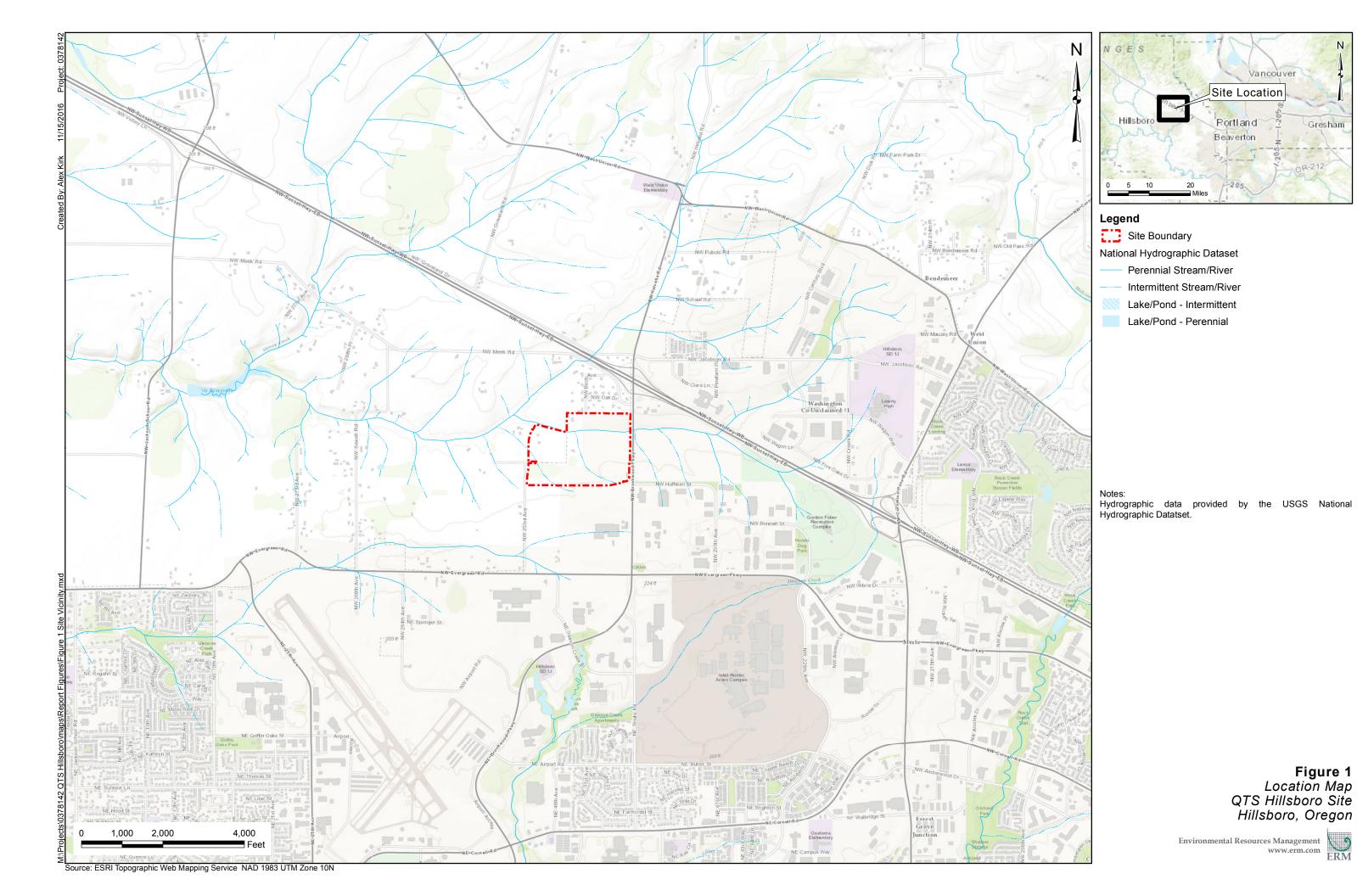
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 DRAWN:
 B. WILDEY
 CHKD::
 K. CREWS

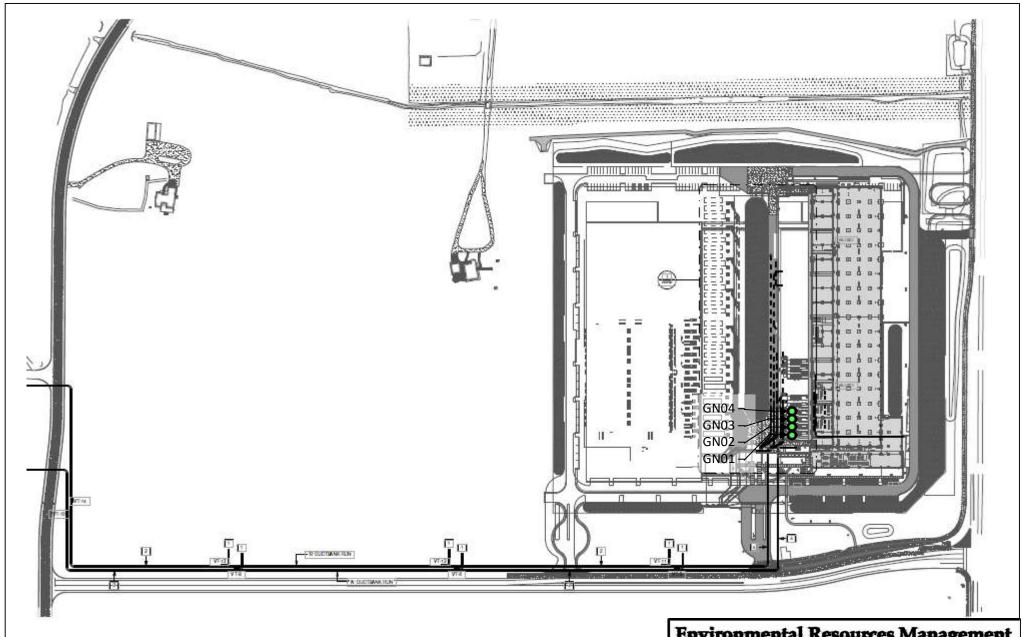
 DATE:
 10/23/2019
 SCALE:
 n/a
 REVISION:
 0.0

Appendix B - Process Flow Diagram

QTS Investment Properties Hillsboro Data Center QTS Investment Properties Hillsboro, LLC Hillsboro, Oregon







• Proposed Generator Location

Environmental Resources Management

Site Map QTS Hillsboro Hillsboro, Oregon



DESIGN:	DRAWN:	CHKD.:			
DATE: 10/23/2019	SCALE:	REV.:			
W.O.NO.: Q:\Team\AQCC\QTS\Hillsboro\SitePlan.dwg, 11/8/2018 3:57:57 Pl					

STANDARD AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVISION 3						
APPENDIX C	EMISSION CALCULATIONS					

www.erm.com Version: 3.1 Project No.: 0483509 Client: Quality Investment Properties Hillsboro, LLC 8 November 2019

Table 1 Emergency Standby Generator Specifications

Manufactures	NATI I
Manufacturer	MTU
Model	16V4000G84S
Rating [1]	2,250 kWe
EPN	GN01 - GN04
Power generation per unit @ 50% load ^[1]	1,250 kWm
Power generation per unit @ 50% load	1,676 bhp
Power generation per unit @ 100% load [1]	2,498 kWm
Power generation per unit @ 100% load	3,280 bhp
Number of units	4
Annual max operating hours (non-emergency) ^[2]	100
Annual projected actual operating hours (non-emergency) ^[3]	52
Fuel type	Diesel
Fuel high heat value	0.138 MMBtu/gal

- 1. Based on manufacturer specifications for MTU 16V4000 DS2250 diesel generator set.
- 2. Per 40 CFR 60 Subpart IIII, maintenance and testing of emergency standby generators must not exceed 100 hours per year.
- 3. Projected actual operating hours per year are based on one hour per week per generator.

Appendix C Emission Calculations

Table 2 Generator Manufacturer Specifications^[1]

	GN01 - GN04				
Operating Load	Ra	Fuel Consumption			
	(kWm)	(bhp)	(gal/hr)		
25%	624	837	42		
50%	1,250	1,676	86		
75%	1,872	2,510	123		
100%	2,498	3,350	163		

^{1.} Based on manufacturer specifications for MTU 16V4000 DS2250 diesel generator set.

Table 3 GN01 - GN04 Emission Factors

	25% Load Emission Factor		50% Load Emission Factor		75% Load Emission Factor		100% Load Emission Factor	
Pollutant [1,2,3,4,5]								
	(g/kWh)	(lb/hr)	(g/kWh)	(lb/hr)	(g/kWh)	(lb/hr)	(g/kWh)	(lb/hr)
VOC	1.60	2.20	0.74	2.04	0.45	1.86	0.29	1.60
NO_{χ}	4.5	6.19	5.7	15.71	7.4	30.54	8.5	46.81
со	2.6	3.58	1.4	3.86	1.4	5.78	1.7	9.36
SO ₂	0.007	0.01	0.007	0.02	0.007	0.03	0.007	0.04
PM	0.48	0.66	0.18	0.50	0.19	0.78	0.09	0.50
CO ₂	680.2	936	702.2	1,935	670.6	2,768	666.0	3,668
CH₄	0.028	0.04	0.028	0.08	0.027	0.11	0.027	0.15
N ₂ O	0.006	0.01	0.006	0.02	0.005	0.02	0.005	0.03
CO₂e	682	939	705	1,942	673	2,777	668	3,680

- 1. Based on manufacturer specifications for MTU 16V4000G84S for standby operation. Emission factors were converted from (g/kWh) to (lb/hr) by multiplying by the corresponding kilowatt-hour (kWh) and converting from grams to pounds.
- 2. SO₂ emissions based on AP-42 Section 3.4 (10/96) emission rate of 8.09E-3 lb/hp-hr * Sulfur Content. Sulfur content of ultra-low sulfur diesel is 15 ppm.
- 3. CO₂e emissions based on 40 CFR 98 Global Warming Potentials for CH₄ and N₂O from Table A-1 and emission factors for N₂O, CH₄, and CO₂ from Tables C-1 and C-2.
- 4. Sample Calculation:

25% Load
$$NO_X(lb/hr) = 4.5 (g/kWh) * 624 kWm * (\frac{1 lb}{453.592 g}) = 6.19 lb/hr$$

ERM 2019

Appendix C Emission Calculations

Table 4 Criteria Pollutant Site-Wide Projected Actual Emissions [1]

	GN01 - GN04					
Pollutant	Emission Facto	r per Generator	Site-Wide Projected Actual Emissions			
	Value	Units	lb/hr	tpy		
NO _X	5.70	g/kWh ^[2]	62.83	1.63		
SO ₂	0.01	g/kWh ^[3]	0.08	0.002		
СО	1.40	g/kWh ^[2]	15.43	0.40		
VOC	0.74	g/kWh ^[2]	8.16	0.21		
PM	0.18	g/kWh ^[2]	1.98	0.05		
PM ₁₀	0.18	g/kWh ^[4]	1.98	0.05		
PM _{2.5}	0.18	g/kWh ^[4]	1.98	0.05		
CO ₂ e	705	g/kWh ^[5]	7,767	202		

- 1. Projected actual emissions are based on 52 hours per year per generator for non-emergency use at 50% standby load.
- 2. Based on manufacturer data for MTU 16V4000G84S, "50% Standby" operation.
- 3. Each unit fires or will fire 15 ppm (0.0015%) sulfur diesel fuel. Emission Factor calculated based on AP-42 Chapter 3, Section 4: 8.09E-3*S = 8.09E-3*0.0015 = 1.2E-5 lb/hp-hr.
- 4. Conservatively assumes $PM_{10} = PM_{2.5} = PM$.
- 5. CO_2e emissions based on 40 CFR 98 Global Warming Potentials for CH_4 and N_2O from Table A-1 and emission factors for N_2O , CH_4 , and CO_2 from Tables C-1 and C-2.

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Appendix C Emission Calculations

Table 5 Hazardous Air Pollutant Projected Site-Wide Actual Emissions [1]

Pollutant	Emission Factor per Generator ^[2]		ojected Actual GEN 01-04)
	lb/MMBtu	lb/hr	tpy
1,3-Butadiene	1.58E-03	7.48E-02	1.94E-03
Acetaldehyde	5.68E-03	0.27	7.01E-03
Acrolein	2.46E-04	1.17E-02	3.03E-04
Arsenic	1.16E-05	5.50E-04	1.43E-05
Benzene	1.35E-03	6.41E-02	1.67E-03
Cadmium	1.09E-05	5.16E-04	1.34E-05
Copper	2.97E-05	1.41E-03	3.67E-05
Ethyl Benzene	7.90E-05	3.75E-03	9.75E-05
Formaldehyde	1.25E-02	0.59	1.54E-02
Hexane	1.95E-04	9.25E-03	2.41E-04
Hexavalent Chromium	7.25E-07	3.44E-05	8.94E-07
Lead	6.01E-05	2.86E-03	7.42E-05
Manganese	2.25E-05	1.07E-03	2.77E-05
Mercury	1.45E-05	6.88E-04	1.79E-05
Naphthalene	1.43E-04	6.78E-03	1.76E-04
Nickel	2.83E-05	1.34E-03	3.49E-05
PAHs (excluding Naphthalene)	2.62E-04	1.25E-02	3.24E-04
Selenium	1.59E-05	7.57E-04	1.97E-05
Toluene	7.64E-04	3.63E-02	9.43E-04
Xylenes	3.07E-04	1.46E-02	3.79E-04
	Total HAP	1.11	2.88E-02

^{1.} Projected actual emissions are based on 52 hours per year per generator for non-emergency use at 50% standby load.

Table 6 Projected Actual Site-Wide NOx Emissions at Varying Loads [1]

		GN01 - GN04			
Operating Load		Emission Factor per Generator ^[2]		Site-Wide Projected Actual Emissions	
	Value	Units	lb/hr	tpy	TPY
25%	4.5	g/kWh	24.76	0.64	
50%	5.7	g/kWh	62.83	1.63	39
75%	7.4	g/kWh	122.16	3.18	
100%	8.5	g/kWh	187.24	4.87	

^{1.} Projected actual emissions are based on 52 hours per year per generator for non-emergency use at various standby loads (25%, 50%, 75%, and 100%).

ERM 2019

^{2.} Emission factors from SCAQMD Supplemental Instructions of Reporting Procedures for AB2588 Facilities for Reporting their Quadrennial Air Toxics Emissions Inventory , Table B-2, per generator.

^{2.} Emission factors based on manufacturer data for MTU 16V4000G84S.

STANDARD AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVISION 3						
APPENDIX D	ENGINE MANUFACTURER SPECIFICATIONS					

www.erm.com Version: 3.1 Project No.: 0483509 Client: Quality Investment Properties Hillsboro, LLC 8 November 2019

DIESEL GENERATOR SET MTU 16V4000 DS2250

2250 kWe / 60 Hz / Standby 380 - 13.8kV

Reference MTU 16V4000 DS2250 (2045 kWe) for Prime Rating Technical Data



SYSTEM RATINGS

Standby

Voltage (L-L)	380V	480V*	600V	4160V	12470V	13200V	13800V
Phase	3	3	3	3	3	3	3
PF	0.8	0.8	0.8	0.8	0.8	0.8	0.8
Hz	60	60	60	60	60	60	60
kW	2250	2250	2250	2250	2250	2250	2250
kVA	2812	2812	2812	2812	2812	2812	2812
Amps	4273	3383	2706	390	130	123	117
skVA@30%							
Voltage Dip	3625	8400	3900	5000	4120	4120	4900
Generator							
Model	1020FDL1102	744RSL4058	1020FDS1120	744FSM4376	1020FDH1246	1020FDH1244	1020FDH1246
Temp Rise	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C
Connection	6 LEAD WYE	4 LEAD WYE	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE

^{*} UL 2200 Offered

CERTIFICATIONS AND STANDARDS

- // Emissions EPA Tier 2 Certified
- // Generator set is designed and manufactured in facilities certified to standards ISO 9001:2008 and ISO 14001:2004
- // Seismic Certification Optional
 - IBC Certification
 - OSHPD Pre-Approval
- // UL 2200 Listed Optional

// Performance Assurance Certification (PAC)

- Generator Set Tested to ISO 8528-5 for Transient Response
- Verified product design, quality and performance integrity
- All engine systems are prototype and factory tested

// Power Rating

- Accepts Rated Load in One Step Per NFPA 110
- Permissible average power output during 24 hours of operation is approved up to 85%.

- // MTU Onsite Energy is a single source supplier
- // Global Product Support
- // 2 Year Standard Warranty
- // 16V4000 Diesel Engine
 - 76.3 Liter Displacement
 - Common Rail Fuel Injection
 - 4-Cycle
- // Complete Range of Accessories

- // Generator
 - Brushless, Rotating Field Generator
 - 2/3 Pitch Windings
 - PMG (Permanent Magnet Generator) supply to regulator
 - 300% Short Circuit Capability
- // Digital Control Panel(s)
 - UL Recognized, CSA Certified, NFPA 110
 - Complete System Metering
 - LCD Display
- // Cooling System
 - Integral Set-Mounted
 - Engine-Driven Fan

STANDARD EQUIPMENT*

// Engine

Air Cleaners
Oil Pump
Oil Drain Extension and S/O Valve
Full Flow Oil Filter
Closed Crankcase Ventilation
Jacket Water Pump
Inter Cooler Water Pump
Thermostats
Blower Fan and Fan Drive
Radiator - Unit Mounted
Electric Starting Motor - 24V
Governor - Electronic Isochronous
Base - Structural Steel
SAE Flywheel and Bell Housing
Charging Alternator - 24V
Battery Box and Cables
Flexible Fuel Connectors
Flexible Exhaust Connection
EPA Certified Engine

// Generator

NEMA MG1, IEEE and ANSI standards compliance for temperature rise and motor starting
Sustained short circuit current of up to 300% of the rated current for up to 10 seconds
Self-Ventilated and Drip-Proof
Superior Voltage Waveform
Digital, Solid State, Volts-per-Hertz Regulator

No Load to Full Load Regulation
Brushless Alternator with Brushless Pilot Exciter
4 Pole, Rotating Field
130 °C Max. Standby Temperature Rise
1 Bearing, Sealed
Flexible Coupling
Full Amortisseur Windings
125% Rotor Balancing
3-Phase Voltage Sensing
±0.25% Voltage Regulation
100% of Rated Load - One Step
5% Max. Total Harmonic Distortion

// Digital Control Panel(s)

Digital Metering
Engine Parameters
Generator Protection Functions
Engine Protection
CANBus ECU Communications
Windows®-Based Software
Multilingual Capability
Remote Communications to RDP-110 Remote Annunciator
Programmable Input and Output Contacts
UL Recognized, CSA Certified, CE Approved
Event Recording
IP 54 Front Panel Rating with Integrated Gasket
NFPA110 Compatible

^{*} Represents standard product only. Consult Factory/MTU Onsite Energy Distributor for additional configurations.

// Engine

Manufacturer	MTU
Model	16V4000G84S
Туре	4-Cycle
Arrangement	16-V
Displacement: L (in³)	76.3 (4,656)
Bore: cm (in)	17 (6.69)
Stroke: cm (in)	21 (8.27)
Compression Ratio	16.5:1
Rated RPM	1,800
Engine Governor	Electronic Isochronous (ADEC)
Max. Power: kWm (bhp)	2,500 (3,353)
Speed Regulation	±0.25%
Air Cleaner	Dry
•	

// Liquid Capacity (Lubrication)

Total Oil System: L (gal)	300 (79.3)
Engine Jacket Water Capacity: L (gal)	175 (46.2)
After Cooler Water Capacity: L (gal)	50 (13.2)
System Coolant Capacity: L (gal)	547 (145)

// Electrical

Electric Volts DC	24
Cold Cranking Amps Under -17.8 °C (0 °F)	2,800

// Fuel System

Fuel Supply Connection Size	-16 JIC 37° Female
	1" NPT Adapter Provided
Fuel Return Connection Size	-16 JIC 37° Female
	1" NPT Adapter Provided
Max. Fuel Lift: m (ft)	1 (3)
Recommended Fuel	Diesel #2
Total Fuel Flow: L/hr (gal/hr)	1,200 (317)

// Fuel Consumption

At 100% of Power Rating: L/hr (gal/hr)	617 (163)
At 75% of Power Rating: L/hr (gal/hr)	467 (123)
At 50% of Power Rating: L/hr (gal/hr)	325 (86)

// Cooling - Radiator System

Ambient Capacity of Radiator: °C (°F)	40 (104)
Max. Restriction of Cooling Air: Intake	
and Discharge Side of Rad.: kPa (in. H ₂ 0)	0.12 (0.5)
Water Pump Capacity: L/min (gpm)	1,350 (357)
After Cooler Pump Capacity: L/min (gpm)	583 (154)
Heat Rejection to Coolant: kW (BTUM)	930 (52,888)
Heat Rejection to After Cooler: kW (BTUM)	680 (38,671)
Heat Radiated to Ambient: kW (BTUM)	206 (11,711)
Fan Power: kW (hp)	95.4 (128)

// Air Requirements

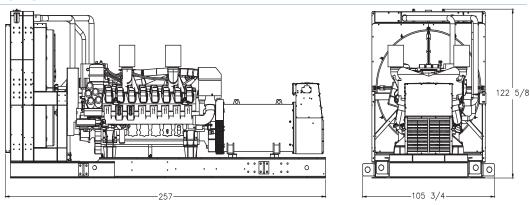
Aspirating: *m³/min (SCFM)	192 (6,780)
Air Flow Required for Rad.	
Cooled Unit: *m³/min (SCFM)	2,053 (72,500)
Remote Cooled Applications;	
Air Flow Required for Dissipation	
of Radiated Generator Set Heat for a	
Max. of 25 °F Rise: *m³/min (SCFM)	752 (26,412)

^{*} Air density = $1.184 \text{ kg/m}^3 (0.0739 \text{ lbm/ft}^3)$

// Exhaust System

Gas Temp. (Stack): °C (°F)	505 (941)
Gas Volume at Stack	
Temp: m³/min (CFM)	504 (17,799)
Max. Allowable	
Back Pressure: kPa (in. H ₂ 0)	8.5 (34.1)

WEIGHTS AND DIMENSIONS



Drawing above for illustration purposes only, based on standard open power 480 volt generator set. Lengths may vary with other voltages. Do not use for installation design. See website for unit specific template drawings.

System Open Power Unit (OPU)

Dimensions (LxWxH)

6,528 x 2,686 x 3,115 mm (257 x 105.7 x 122.6 in)

Weight (less tank)

16,429 kg (36,220 lb)

Weights and dimensions are based on open power units and are estimates only. Consult the factory for accurate weights and dimensions for your specific generator set.

SOUND DATA

Unit Type

Standby Full Load

Level 0: Open Power Unit dB(A)

98.7

Sound data is provided at 7 m (23 ft). Generator set tested in accordance with ISO 8528-10 and with infinite exhaust.

EMISSIONS DATA

5.07	

0.52

0.04

All units are in g/hp-hr and shown at 100% load (not comparable to EPA weighted cycle values).

Emission levels of the engine may vary with ambient temperature, barometric pressure, humidity, fuel type and quality, installation parameters, measuring instrumentation, etc. The data was obtained in compliance with US EPA regulations. The weighted cycle value (not shown) from each engine is guaranteed to be within the US EPA Standards.

RATING DEFINITIONS AND CONDITIONS

- // Standby ratings apply to installations served by a reliable utility source. The standby rating is applicable to varying loads for the duration of a power outage. No overload capability for this rating. Ratings are in accordance with ISO 8528-1, ISO 3046-1, BS 5514, and AS 2789. Average load factor: ≤ 85%.
- // Deration Factor:

Altitude: Consult your local MTU Onsite Energy Power Generation Distributor for altitude derations.

Temperature: Consult your local MTU Onsite Energy Power Generation Distributor for temperature derations.

C/F = Consult Factory/MTU Onsite Energy Distributor

N/A = Not Available

MTU Onsite Energy

	Genset	Marine	O & G	Rail	C & I		
Application	Х						
Engine model	16V4000G	84S					
Rated power [kW]	2500						
Rated speed [rpm]	1800	800					
Application group	3D	3D					
Emission Stage/Optimisation	EPA Statio	EPA Stationary EMERG T2 (40CFR60)					
Test cycle	D2	D2					
Data Set No.	XZ5955410	XZ59554101095					
Data Set Basis	EPA Statio	EPA Stationary EMERG T2 (40CFR60)					
Fuel sulphur content [ppm]	8,1	3,1					

Inhalt content	Notiz Note	Seite <i>Pag</i> e	Buchstabe/Revision change index
Emissions Daten Blatt (EDS) emission Data Sheet (EDS)	O2 gem. O2 meas.	2	
Not to exceed Werte Not to exceed values	O2 gem. O2 meas.	3	

Unterschriftenweg	EDS erstellt	TETC Teamleiter	TET Leiter OrgEinheit	Baureihen - Teamleiter	Baureihen Leiter OrgEinheit	Freigabe im Windchill
Datum	07.06.2018	-	-	07.06.2018	07.06.2018	07.06.2018
OrgEinheit	TETE	-	-	TKFV1	TKF	TKM
Name	T.Lenhof	-	-	Dr. Kneifel	Dr. Baumgarten	Link

			mtu MTU	WORD	Datum/ Date	Name	Projekt-/Auftrags-Nr. Project/Order No. Verwendbar f.Typ Applicable to Model		Format/Size
			Friedrichshafen GmbH	Erstell. Drawn	12.02.2018 13:49:48	link	Material-Nr./Material No.		
			Alle Rechte aus Schutzrechtsanmeldungen vorbehalten.	Bearb. Change	14.06.2018 11:06:11	link	EDS 4	1000 1234	
Aenderungsbeschreibung/Description of Revision Kommt vor/Frequency Freigabe				Inhalt Content	07.06.2018	Lenhof	Benennung/ Title		
			verpflichten zum Schadensersatz. All industrial property rights reserved.	Gepr. Checked	14.06.2018 11:06:11	baumgart en	EMISSIONSD	ATENBLA	TT
		Disclosure, reproduction or use for any other purpose is prohibited unless our express permission has been given. Any infringement results in liability to pay damages.		Engine Type /4000G	84S	EMISSION DATA SHEET		Т	
			Zeichnungs-Nr./Drawing No.		ZNG0	001326	67	Blatt/ She	et
Buchst./Rev. Ltr.	Aenderungs-Nr./Revision Notice No.	Bearbeitungsstatus/Lifecycle	Beschreibung/Description					von/of	
3	PR030109	Freigegeben						3	

Revision			
Change index			

Motordaten

engine data

	Genset	Marine	O & G	Rail	C & I		
Application	X						
Engine model	16V4000G	16V4000G84S					
Application group	3D	3D					
Emission Stage/Optimisation	EPA Stationary EMERG T2 (40CFR60)						
Test cycle	D2						
fuel sulphur content [ppm]	8,1						
mg/mN³ values base on residual oxygen value of [%]	measured						

Engine raw emissions*

Cycle point	[-]	n1	n2	n3	n4	n5	n6	n7	n8
Power (P/Pcycle)	[-]	1	0,75	0,50	0,25	0,10			
Power	[kW]	2498	1872	1250	624	250			
Speed (n/nN)	[-]	1	1	1	1	1			
Speed	[rpm]	1800	1800	1801	1801	1801			
Exhaust temperature after turbine	[°C]	501	424	373	335	240			
Exhaust massflow	[kg/h]	14327	13109	11239	8380	5530			
Exhaust back pressure (static)	[mbar]	88	69	48	26	11			
NO	[g/kWh]	6,5	5,7	4,4	3,0	8,3			
NOx	[mg/mN³]	1533	1076	639	286	483			
СО	[g/kWh]	1,0	0,8	0,7	1,3	4,2			
CO	[mg/mN³]	244	168	113	131	257			
НС	[g/kWh]	0,17	0,26	0,39	0,80	1,63			
InC	[mg/mN³]	42	53	61	82	101			
O2	[%]	10,1	12,4	14,1	15,9	17,7			
Double date we are used	[g/kWh]	0,06	0,12	0,12	0,32	0,76			
Particulate measured	[mg/mN³]	15	24	19	33	47			
Dominion late a plantage	[g/kWh]	-	-	-	-	-			
Particulate calculated	[mg/mN³]	-	-	-	-	-			
Dust (only TA-Luft)	[mg/mN³]	-	-	-	-	-			
FSN	[-]	0,6	0,7	0,3	0,7	0,4			
NO/NO2**	[-]	-	-	-	-	-			
603	[g/kWh]	659,6	665,6	713,0	854,0	1044,0			
CO2	[mg/mN³]	164166	133820	110475	87696	64408			
202	[g/kWh]	0,003	0,003	0,004	0,004	0,005			
SO2	[mg/mN³]	0,8	0,7	0,6	0,5	0,3			
CLICO	[g/kWh]	-	-	-	-	-			
CH2O	[mg/mN³]	-	-	-	-	-			

^{*} Emission data measurement procedures are consistent with the respective emission evaluation process. Noncertified engines are measured to sales data (TVU/TEN) standard conditions.

These boundary conditions might not be representative for detailed dimensioning of exhaust gas aftertreatment, in this case it is recommended to contact the responsible department for more information.

Measurements are subject to variation. The nominal emission data shown is subject to instrumentation, measurement, facility, and engine-to-engine variations.

All data applies to an engine in new condition and were measured after combined exhaust streams. Over extended operating time deterioration may occur which might have an impact on emission. Exhaust temperature depends on engine ambient conditions.

** No standard test. To be measured on demand.

PR030109

Freigegeben

			mtu	WORD	WORD Datum/		Projekt-/Auftrags-Nr. Project/Order No. Verwendbar f.Typ		Format/Size
			MTU Friedrichshafen GmbH	Erstell. Drawn	12.02.2018 13:49:48	link	Applicable to Model Material-Nr./Material No.		
			Alle Rechte aus Schutzrechtsanmeldungen vorbehalten.	Bearb. Change	14.06.2018 11:06:11	link	EDS 4000 1234		
		nicht gestattet. Zuwiderhandlungen	Inhalt Content	07.06.2018	Lenhof	Benennung/ Title			
			verpflichten zum Schadensersatz. All industrial property rights reserved.	Gepr. Checked	14.06.2018 11:06:11	baumgart en	EMISSIONS	DATENBLA	TT
Aenderungsbeschreibung/Description of Revision Freigabe Kommt vor/Frequency		Disclosure, reproduction or use for any other purpose is prohibited unless our express permission has been given. Any infringement results in liability to pay damages.		Motortyp / Engine Type 16V4000G84S		EMISSION DATA SHEET		Т	
			Zeichnungs-Nr./Drawing No.		ZNG0	001326	67	Blatt/ She	et
Buchst./Rev. Ltr.	Aenderungs-Nr./Revision Notice No.	Bearbeitungsstatus/Lifecycle	Beschreibung/Description					von/of	

Revision			
Change index			

Motordaten

engine data

	Genset	Marine	O&G	Rail	C & I		
Application	Х						
Engine model	16V4000G8	16V4000G84S					
Application group	3D	3D					
Emission Stage/Optimisation	EPA Station	EPA Stationary EMERG T2 (40CFR60)					
Test cycle	D2						
fuel sulphur content [ppm]	8,1	8,1					
mg/mN³ values base on residual oxygen value of [%]	measured						

Not to exceed Values*

Cycle point	[-]	n1	n2	n3	n4	n5	n6	n7	n8
Power (P/Pcycle)	[-]	1	0,75	0,50	0,25				
Power	[kW]	2498	1872	1250	624				
Speed (n/nN)	[-]	1	1	1	1				
Speed	[rpm]	1800	1800	1801	1801				
Exhaust back pressure (static)	[mbar]	88	69	48	26				
NOx	[g/kWh]	8,5	7,4	5,7	4,5				
NOX	[mg/mN³]	1993	1399	831	429				
СО	[g/kWh]	1,7	1,4	1,4	2,6				
CO	[mg/mN ³]	415	286	215	262				
HC	[g/kWh]	0,29	0,45	0,74	1,60				
TIC	[mg/mN ³]	71	90	116	164				
O2	[%]	10,1	12,4	14,1	15,9				
Particulate measured	[g/kWh]	0,09	0,19	0,18	0,48				
Faiticulate measureu	[mg/mN ³]	23	39	28	50				
CH2O	[g/kWh]	-	-	-	-				
GHZO	[mg/mN³]	-	-	-	_				

^{*} Calculated values are not proven by tests and therefore the accuracy cannot be guaranteed.

Emissions data measurement procedures are consistent with those described in the applicable rules and standards.

The NOx, CO, HC and PM emission data tabulated here were taken from a single new engine under the test conditions shown above and are valid for the following conditions:

- Ambient air pressure 1 bar
- Air intake temperature approx. 25°C
- Rel. Humidity 30%-60%
- New Engine
- New standard- air filter
- Exhaust gas back pressure according the given value in this EDS
- Fuel according to EN 590 or US EPA 40CFR89
- Coolant and Lubricants according MTU Fuels and Lubricants Specification
- measured after combined exhaust streams.

The nominal emissions data shown is subject to instrumentation, measurement, facility and engine to engine variations. Emissions data is based on single operating points and thus cannot be used to compare to EPA regulations which use values based on a weighted cycle. Emissions data may vary depending on the type of exhaust gas aftertreatment that may be installed on the engine, therefore it is suggested that the engine manufacturer be contacted directly for further information.

Field emission test data are not guaranteed to these levels. Actual field test results may vary due to test site conditions, installation, fuel specification, test procedures, and instrumentation. Over time deterioration may occur which may have an impact on emission levels. Engine operation with excessive air intake or exhaust restriction beyond published maximum limits, or with improper maintenance, may results in elevated emission levels.

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GASEOUS EMISSIONS DATA MEASUREMENTS ARE CONSISTENT WITH THOSE DESCRIBED IN EPA 40 CFR PART 60 SUBPART IIII FOR MEASURING HC, CO, PM, AND NOX.								
Locality	Agency	Regulation	Tier/Stage	Ma	x. Limit G/(kW	-HR)		
			Emergency Stationary	NOx+	T2	T3		
U.S. (INCL CALIF)	EPA	Stationary	Tier 2 (>560kW)	NMHC:	6,4	4,0		
			Tier 3 (<560kW)	CO:	3,5	3,5		
				PM:	0,20	0,20		

^{**} No standard test. To be measured on demand.

PR030109

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Table B-2: DEFAULT EF FOR DIESEL / DISTILLATE OIL FUEL COMBUSTION (LB / 1000 GAL)

SOURCE: External Combustion Equipment (Boiler, Oven, Dryer, Furnace, Heater, Afterburner)

TAC		` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	<u> </u>
Code	POLLUTANT	CAS NO.	ALL SIZES
2	Benzene	71432	0.0044
4	1,3-Butadiene	106990	0.0148
5	Cadmium	7440439	0.0015
12	Formaldehyde	50000	0.3506
13	Hexavalent chromium	18540299	0.0001
14	Arsenic	7440382	0.0016
15	Lead	7439921	0.0083
17	Nickel	7440020	0.0039
19	Total PAHs (excluding Naphthalene)	1151	0.0445
19	Naphthalene	91203	0.0053
29	Acetaldehyde	75070	0.3506
30	Acrolein	107028	0.3506
32	Ammonia*	7664417	2.9000
36	Copper	7440508	0.0041
40	Ethyl Benzene	100414	0.0002
44	Hexane	110543	0.0035
46	Hydrogen chloride	7647010	0.1863
49	Manganese	7439965	0.0031
50	Mercury	7439976	0.0020
64	Selenium	7782492	0.0022
68	Toluene	108883	0.0044
70	Xylenes	1330207	0.0016

SOURCE: Stationary and Portable

Internal Combustion Engines (ICE)

TAC			
Code	POLLUTANT	CAS NO.	ALL SIZES
2	Benzene	71432	0.1863
4	1,3-Butadiene	106990	0.2174
5	Cadmium	7440439	0.0015
12	Formaldehyde	50000	1.7261
13	Hexavalent chromium	18540299	0.0001
14	Arsenic	7440382	0.0016
15	Lead	7439921	0.0083
17	Nickel	7440020	0.0039
19	Naphthalene	91203	0.0197
19	PAHs (excluding Naphthalene)	1151	0.0362
29	Acetaldehyde	75070	0.7833
30	Acrolein	107028	0.0339
32	Ammonia*	7664417	2.9000
36	Copper	7440508	0.0041
40	Ethyl Benzene	100414	0.0109
44	Hexane	110543	0.0269
46	Hydrogen Chloride	7647010	0.1863
49	Manganese	7439965	0.0031
50	Mercury	7439976	0.0020
64	Selenium	7782492	0.0022
68	Toluene	108883	0.1054
70	Xylenes	1330207	0.0424
72	Diesel exhaust particulates	9901	33.5000

SOURCE: Turbines

TAC			
Code	POLLUTANT	CAS NO.	ALL SIZES
2	Benzene	71432	0.1863
4	1,3-Butadiene	106990	0.2174
5	Cadmium	7440439	0.0015
12	Formaldehyde	50000	1.7261
13	Hexavalent chromium	18540299	0.0001
14	Arsenic	7440382	0.0016
15	Lead	7439921	0.0083
17	Nickel	7440020	0.0039
19	Naphthalene	91203	0.0197
19	PAHs (excluding Naphthalene)	1151	0.0362
29	Acetaldehyde	75070	0.7833
30	Acrolein	107028	0.0339
32	Ammonia*	7664417	2.9000
36	Copper	7440508	0.0041
40	Ethyl Benzene	100414	0.0109
44	Hexane	110543	0.0269
46	Hydrogen Chloride	7647010	0.1863
49	Manganese	7439965	0.0031
50	Mercury	7439976	0.0020
64	Selenium	7782492	0.0022
68	Toluene	108883	0.1054
70	Xylenes	1330207	0.0424

 $^{^*}$ This value corresponds to equipment with SNCR, for equipment with SCR substitute listed value by 1.4 lbs/1000 gal, and for equipment without SNCR or SCR by 0.8 lbs/1000 gal.

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