

Public Meeting

concerning

TransGas Development Systems, LLC

Adams Fork Harless Data Center Energy Campus (R13-3714)

Adams Fork Data Center Energy Campus (R13-3715)

August 18, 2025

**WVDEP - Division of Air Quality
Public Meeting**

Presentation Outline

- **Review Summary**
- **Project Overview**
- **DAQ Documents**
- **What Happens Next?**
- **Summary and Contact Information**

DAQ Review Summary

- **TransGas submitted both permit applications on March 26, 2025**
- **Revised permit applications were submitted on May 14, 2025**
- **Applications submitted as a minor source (45CSR13)**
- **TransGas Legal Advertisements: April 9, 2025**
 - **No air quality related comments or public meeting requests received**
- **DAQ Public Advertisements: July 9, 2025**
 - **Preliminary Review Complete: Draft Permit/Fact Sheet Available**
 - **Preliminary Determination**
 - **30-Day Comment Period**
 - **Public meeting requests received**

Non-AQ Issues

- **DAQ does not have control over**
 - **Zoning Issues**
 - **Job Creation**
 - **Economic viability of project**
 - **Strategic energy issues**
 - **Non-AQ environmental impacts**
 - **Noise pollution**
 - **Light pollution**
 - **Tourism**
 - **Road Traffic**
 - **Nuisance Issues**
 - **Water Issues**
- **Contact local officials**

Statutory Authority

- **The DAQ's permitting authorization is afforded under 45 CSR 13**
- **Pursuant to §45-13-5.7, the DAQ shall issue a permit unless:**
 - **a determination is made that the proposed construction, modification, registration or relocation will violate applicable emission standards, will interfere with attainment or maintenance of an applicable ambient air quality standard, cause or contribute to a violation of an applicable air quality increment, or be inconsistent with the intent and purpose of this rule or W. Va. Code §22-5-1 et seq., in which case an order denying such construction, modification, relocation and operation shall be issued. The Secretary shall, to the extent possible, give priority to the issuance of any such permit so as to avoid undue delay and hardship.**
- **It is clear under 45 CSR 13 that denial of a permit must be based on one of the above explicitly stated criteria or, as noted, is inconsistent with the intent of 45 CSR 13 or §22-5-1, et. seq. As is stated above, it is the DAQ's position that the intent of both the APCA and 45 CSR 13 is to limit the authority of the DAQ to air quality issues as outlined in the APCA and in West Virginia's State Implementation Plan (SIP).**

TransGas Project Overview

- **2 Locations**
- **Facilities are identical (different locations)**
- **R13-3714 – near Holden located in Mingo County on Mine Road adjacent to Mohawk Industries**
- **R13-3715 – Wharncliffe in Mingo County on the site of the Twisted Gun Golf Course**
- **Off-grid Power Generation Facilities**
 - **Purpose of facilities are to provide power to adjacent data center operations**
 - **117 engines with the ability to operate on natural gas or diesel fuel**
 - **Each engine is 28,194 hp and will have a maximum power output of 21 MW**
 - **Aggregate power output – 2,457 MW**

TransGas Project Overview *(cont.)*

- Engines utilize control device systems to control emissions from NO_x, CO, VOC, PM, and SO₂
- All individual pollutant emissions below major source PSD thresholds
- TransGas will be required to obtain Title V Operating Permits for each location
- Detailed information in the permit application and Engineering Evaluation/Fact Sheet

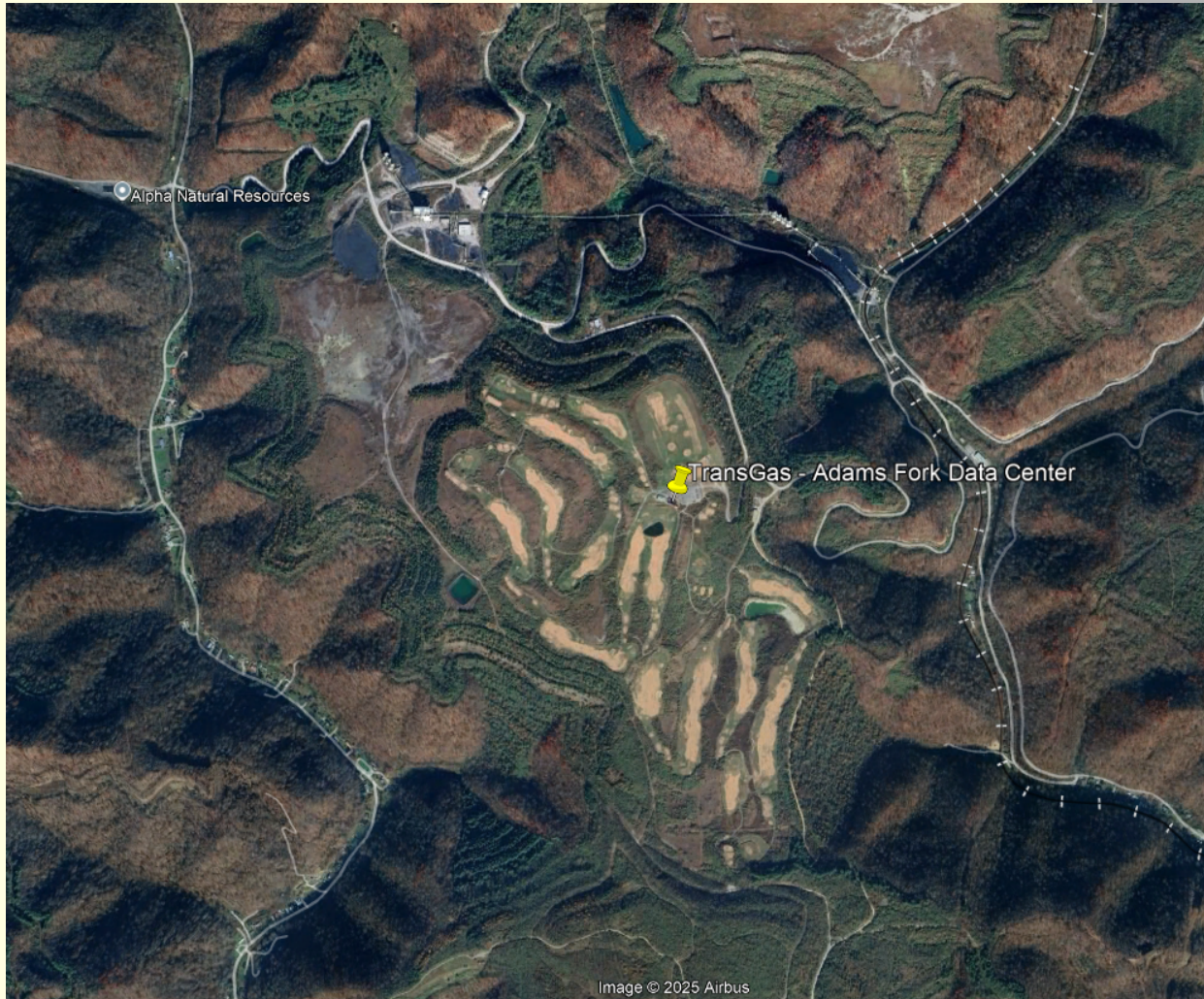
R13-3714 Facility Location



R13-3714 Facility Location



R13-3715 Facility Location



R13-3715 Facility Location



What is Being Proposed?

- Facility powered by engines equipped with control device systems to control air emissions
- 114 engines operate full time and 3 engines in reserve
- Engines are dual-fuel units that can operate on natural gas or diesel
- Under normal operations, engines consume natural gas as primary fuel with a pilot injection of ULSD (approx. 2% from pilot fuel)
- Emissions are regulated due to operating modes
- Diesel storage tanks
- Diesel Unloading
- Miscellaneous control device liquids tanks (ammonia, caustic soda, sulfuric acid, sodium chlorite, sodium hydrosulfide)

What is Being Proposed? *(cont.)*

- **Monitor and maintain records of the operation type, startups/shutdowns, hours of operation, fuel consumption/type, air pollution control devices, fuel unloading, road inspections**
- **Rolling 12-month monthly emission calculations to ensure their emissions remain below any major source thresholds**
- **Required fuel meters**
- **Required hour meters**
- **Monitor control device operations**
- **Engine Testing (NOx, PM)**

Estimate of Emissions

- **Engines**
 - **Manufacturer Data (criteria pollutants)**
 - **AP-42 (HAPs)**
- **Diesel Storage Tanks/Unloading**
 - **EPA TANKS 4.09d**
- **Paved Roadways**
 - **AP-42**
- **Fugitive Emissions**
 - **EPA Protocol for Equipment Leak Emission Estimates**

Facility PTE

Emission Source	Annual Emissions (tons/year)					
	NO _x	CO	VOC	SO ₂	PM ₁₀	Total HAPs
Engines	194.30	205.62	116.59	9.93	186.53	0.86
Storage Tanks	-	-	0.75	-	-	-
Paved Haul Roads	-	-	-	-	1.43	-
Fugitive Leaks	-	-	0.31	-	-	0.01
Facility PTE	194.30	205.62	117.66	9.93	187.96	0.87

Applicable Air Quality Rules

■ WV Legislative Rules

- 45CSR4: To Prevent and Control the Discharge of Air Pollutants into the Open Air Which Causes or Contributes to an Objectionable Odor or Odors
- 45CSR13: Minor Source Permitting Rule
- 45CSR16: Standards of Performance for New Stationary Sources (Incorporates applicable Federal Air Quality Regulations)
- 45CSR17: To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter
- 45CSR30: Requirements for Operating Permits
- 45CSR34: Emission Standards for Hazardous Air Pollutants

■ Federal Air Quality Regulations

- 40CFR60, Subpart IIII: Engines
- 40CFR63, Subpart ZZZZ: Engines

WVDAQ Documents

- **Engineering Evaluation/Fact Sheet**

- **Rationale document for Preliminary Determination**

- **Draft Permit**

- **Includes operating restrictions, emission limitations and monitoring, recordkeeping and reporting requirements**
 - **Enforces the potential-to-emit (PTE) upon which Preliminary Determination was made**

Engineering Evaluation/Fact Sheet

- **Administrative information**
- **Discussion of Confidential Business Information**
- **Description of proposed facility/emission units**
- **Discussion of emission calculations**
- **Quantifies proposed emissions per pollutant**
- **Applicability and compliance with federal regulations and state air quality rules**
- **Monitoring, record keeping, reporting, and testing requirements**
- **DAQ statutory authority**

Draft Permit

- **Facility-wide requirements**
- **Specific unit requirements**
 - **Limitations and standards**
 - **Operating Requirements**
 - **Fuel specifications**
 - **Control technology requirements**
 - **Monitoring requirements**
 - **Performance testing and compliance requirements**
 - **Recordkeeping requirements**
 - **Reporting requirements**

What Happens Next?

- **Comment period was scheduled to conclude on August 8, 2025, at 5:00 PM**
- **Comment period extended until August 22, 2025, at 5:00 PM**
- **Prior to a final determination, the DAQ will evaluate and respond to timely comments that are relevant to air quality issues**
- **DAQ will make a Final Determination pursuant to the requirements §45-13-5.7**
- **Final Determination will be available in same locations as Engineering Evaluation/Fact Sheet and Draft Permit**

Summary

- **TransGas is proposing to build 2 off-grid power generating facilities to provide power to adjacent data centers in Mingo County**
- **DAQ has made a preliminary determination that the proposed construction will meet all applicable state rules and federal air quality regulations**
- **Engineering Evaluation/Fact Sheet and Draft Permit have been available for review since publication of the legal advertisement (July 9, 2025)**
- **DAQ will continue to accept public comments until 5:00 PM on August 22, 2025**
- **DAQ will evaluate and respond to all timely public air quality-related comments**
- **DAQ will make a final determination on this permitting action and make this determination and any related documents available at that time**

Contact Information

**West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304**

Attention: Jerry Williams
jerry.williams@wv.gov

**** TransGas Development Comments as subject line ****

<https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx>