

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit: 102026-007 Project: 2026-05-031
Installation ID: 219-0056

Owner or Operator: Warrenton DC Owner 1 LLC

Owner or Operator Address: 255 Fillmore Street, Suite 300, Denver, CO 80206

Installation Name: Warrenton Data Center

Installation Address: 22151 NW Service Road, Warrenton, MO 63383

Location Information: Warren County, S19, T47N, R02W

Application for Authority to Construct was made for:
Installation of four emergency generators, two fire pumps engines, and six belly tanks. This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*.

-
- ☐ Standard Conditions (on reverse) are applicable to this permit.
- ☒ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Director or Designee
Department of Natural Resources

October 8, 2026

Effective Date

STANDARD CONDITIONS:

The permit will become invalid if construction or modification work is not commenced within two years from the date of permit issuance or if work is suspended for more than 18 months and if— (I) The delay was reasonably foreseeable by the permittee at the time the permit was issued; (II) The delay was not due to an act of God or other conditions beyond the control of the permittee; or (III) Failure to consider the permit invalid would be unfair to other potential applicants. The permittee shall notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification has not begun in the two years since permit issuance or if construction or modification is suspended for one year or more. An installation may request an extension for starting construction related to the permit in accordance with provisions stated in 10 CSR 10-6.060(3)(I). The extension request must be submitted to the permitting authority at a minimum of 30 days prior to the date when the permit will become invalid.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. If there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program and the Department's St. Louis Regional Office within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitute your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
573-751-4817

The regional office information can be found at the following website:
<https://dnr.mo.gov/about-us/division-environmental-quality/regional-office>

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically §643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060(3)(E) "Conditions required by permitting authority."

Warrenton Data Center
Warren County, S19, T47N, R02W

1. NO_x Emission Limitation
 - A. The permittee shall emit less than 40.0 tons of NO_x in any consecutive 12-month period from the entire installation (see Table 1). The permittee shall include all actual emissions in the limit, including SSM emissions as well as any excess SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions*. All operations count toward this limit, including emergency operation, maintenance, and readiness testing.
 - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program, shall be used to demonstrate compliance with Special Condition 1.A.
2. Operational Limitations for Emergency Generator Engines
 - A. The permittee shall not operate any emergency generator engine more than a total of 100 hours for the purpose of planned, routine testing or maintenance in any rolling 12-month period.
 - B. Each emergency power generating engine is limited to providing electrical power or mechanical work during an emergency situation for the duration of time that the outage is entirely beyond the control of the permittee. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc.
 - C. Emergency power generating engines cannot be used to generate income for the facility to supply power to the electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. The permittee shall not operate any emergency power generating engine as a peak shaving or demand response unit.

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

3. Record Keeping and Reporting Requirements
 - A. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources personnel upon request.
 - B. The permittee shall report no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
 - C. The permittee shall report no later than 10 days after records indicate a deviation of any process limitation, including pressure drop, fuel sulfur content, moisture content, etc.
 - D. The reports of emission limit exceedances and deviations from requirements shall be sent to the Air Pollution Control Program's Compliance/Enforcement Section:
 - 1) By mail at P.O. Box 176 Jefferson City, MO 65102 and by email at AirComplianceReporting@dnr.mo.gov; or
 - 2) By any other means that comply with 40 CFR Part 3.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project: 2026-05-031
Installation ID: 219-0056
Permit: 102026-007

Installation Address:
Warrenton Data Center
22151 NW Service Road
Warrenton, MO 63383

Owner or Operator:
Warrenton DC Owner 1 LLC
255 Fillmore Street, Suite 300
Denver, CO 80206

Warren County, S19, T47N, R02W

REVIEW SUMMARY

- The permittee has applied for authority to install four 3.0 MW emergency generator engines, two 0.3 MW firewater pump engines, four 10,000 gallon diesel fuel belly tanks, and two 500 gallon diesel fuel horizontal storage tanks.
- The application was deemed complete on July 22, 2026.
- HAP emissions are expected from the proposed equipment. HAP of concern from this process are the products from the combustion of diesel fuel.
- 40 CFR Part 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* applies to the emergency generator engines (EU-01, EU-02, EU03, and EU-04) and the firewater pump engines (EU-05 and EU06).
- 40 CFR Part 63, Subpart ZZZZ - *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* applies to the emergency generator engines (EU-01, EU-02, EU03, and EU-04) and the firewater pump engines (EU-05 and EU06). If the NSPS IIII requirements are met, then no further requirements apply under the MACT.
- None of the NESHAP apply to this installation.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of NO_x are conditioned below de minimis levels.
- This installation is located in Warren County, an attainment/unclassifiable area for all criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are conditioned below de minimis levels.
- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.
- No operating permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Warrenton DC Owner 1 LLC has applied for the authority to install four emergency generator engine sets, four associated diesel fuel belly tanks, two firewater pump engine sets, and two associated diesel fuel horizontal storage tanks at their new data center, Warrenton Data Center, which will be located northeast of Warrenton, MO, in Warren County. The facility will consist of two data center buildings which will be primarily powered by the electrical grid and supported by the permitted generator engine sets for backup power and the permitted firewater pump engine sets for fire emergencies. This installation will be a minor source under construction permitting and will not require an operating permit.

No permits have been issued to Warrenton Data Center from the Air Pollution Control Program.

PROJECT DESCRIPTION

Warrenton DC Owner 1 LLC plans to install four Tier II 3.0 MW CAT 3516E Diesel Generator Sets for emergency power generation and two 0.3 MW Clarke C13H0-UFAD-52D Firewater Pump Engine Sets for fire emergencies at their new data center, as well as four 10,000 gallon diesel fuel belly tanks associated with the emergency generator engine sets and two 500 gallon horizontal diesel fuel storage tanks associated with the firewater pump engine sets. A full list of the new installation's emission units and their operational ratings is given below in Table 1. Emissions from all engines will be uncontrolled.

Table 1: Installation Emission Units

Emission Unit ID	Description	Equipment Rating
EU-01, EU-02, EU-03, and EU-04	Tier II 3.0 MW CAT 3516E Diesel Generator Set	3.0 MW each
EU-05 and EU-06	0.3 MW Clarke C13H0-UFAD-52D Firewater Pump Engine Set	0.3 MW each

Emission Unit ID	Description	Equipment Rating
EU-07, EU-08, EU-09, and EU-10	Belly Tank for Emergency Diesel Fuel Storage	10,000 gal each
EU-11 and EU-12	Horizontal Storage Tank for Firewater Pump Engine Diesel Fuel Storage	500 gal each

EMISSIONS/CONTROLS EVALUATION

The emission factors used to calculate emissions for the four emergency generator engines (EU-01, EU-02, EU-03, and EU-04) and the two firewater pump engines (EU-05 and EU-06) in this analysis were obtained from the EPA documents AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 3.4 *Large Stationary Diesel And All Stationary Dual-Fuel Engines* (April 2025) and Section 3.3 *Gasoline And Diesel Industrial Engines* (April 2025) respectively for SO_x and HAP emissions and from the respective manufacturers' data for NO_x, CO, VOC, and PM emissions. All engine emissions were calculated using the engines' standby power and fuel consumption ratings at full load operation and assuming a diesel heating value of 19,300 Btu/lb, density of 7.1 lb/gal, and fuel sulfur content of 0.0015% [as limited by 40 CFR 60.4207(b)]. PM₁₀ and PM_{2.5} emissions were conservatively assumed to be equal to PM emissions for all engines.

The emission factors used to calculate emissions from breathing and working losses for the four 10,000 gallon diesel fuel belly tanks (EU-07, EU-08, EU-09, and EU-10) and the two 500 gallon diesel fuel horizontal storage tanks (EU-11 and EU-12) in this analysis were obtained from the EPA's online emission database WebFIRE under SIC 40301019 and SIC 40301021.

The following table provides an emissions summary for this project. The potential emissions of the application represent the potential of the equipment assuming 500 hours of operation per year. The conditioned potential emissions of the installation represent the potential of the equipment based on the less than 40 tons per year limitation on NO_x emissions.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Potential Emissions of the Project	New Installation Conditioned Potential
NO _x	40.0	66.71	< 40.00
CO	100.0	12.38	7.42
SO _x	40.0	0.05	0.03
VOC	40.0	11.68	7.00
PM	25.0	0.61	0.36
PM ₁₀	15.0	0.61	0.36
PM _{2.5}	10.0	0.61	0.36
Combined HAPs	10.0/25.0	0.06	0.03

All individual HAPs are expected to be emitted in amounts less than their respective Screening Model Action Level (SMAL).

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of NO_x are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Warrenton Data Center shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions*
- 10 CSR 10-6.110 *Reporting Emission Data, Emission Fees, and Process Information*
- 10 CSR 10-6.165 *Restriction of Emission of Odors*
- 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*

SPECIFIC REQUIREMENTS

- 10 CSR 10-6.070 *New Source Performance Regulations*
 - 40 CFR Part 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*
- 10 CSR 10-6.075 *MACT Regulations*
 - 40 CFR Part 63, Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

OTHER DETERMINATIONS

- 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*
 - This rule does not apply to internal combustion engines per 10 CSR 10-6.220(1)(A); therefore, the installation is exempt from this rule.

- 10 CSR 10-6.390 *Control of NO_x Emissions From Large Stationary Internal Combustion Engines*
 - All engines meet the definition of *emergency standby engines* in 10 CSR 10-6.390(2)(D); therefore, the installation is exempt from this rule under 10 CSR 10-6.390(1)(B)1.
- 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes*
 - All engines combust liquid fuel, which is excluded from the definition of *process weight* in 10 CSR 10-6.020(2)(P); therefore, the installation is exempt from this rule.
- 10 CSR 10-6.070 *New Source Performance Regulations*
 - 40 CFR Part 60, Subpart Kc - *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023*,
 - This rule does not apply to storage vessels with capacities less than 20,000 gallons; therefore, the installation is exempt from this rule.

STAFF RECOMMENDATION

Based on this review conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 20, 2026, received May 21, 2026, designating Warrenton DC Owner 1 LLC as the owner and operator of the installation.

Attachment A –

Installation-Wide NO_x Compliance Worksheet

Warrenton Data Center

Warren County, S19, T47N, R02W

Project: 2026-05-031

Installation ID: 219-0056

Permit: 102026-007

This sheet covers the period from _____ to _____. (Copy as needed)

(month, year)

(month, year)

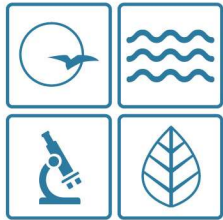
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1. Determine each engine's monthly hours by subtracting the previous month's non-resettable hour meter reading from the current reading. Enter the sum of the individual engine hours for the emergency generator engines (EU-01, EU-02, EU-03, and EU-04) in column 2 and the firewater pump engines (EU-05 and EU-06) in column 4. (e.g., four engines each operating 10 hours = 40 hours). Maintain separate records of each engine's monthly meter reading.
2. Emission rates calculated using emission factors from manufacturers' stack testing and units' MDHRs.
3. Calculate by multiplying the monthly hours of operation by the provided emission factor for the emergency engine generator sets and the firewater pump engine sets and adding the two values together, then dividing by 2,000 to convert from pounds to tons.
4. Include any Startup, Shutdown, and Malfunction (SSM) emissions, including any excess emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.
5. Calculate by summing the NO_x and SSM emissions of the current month and the NO_x and SSM emissions of the previous 11 months. **A total of less than 40.0 tons of NO_x is necessary for compliance.**

APPENDIX A

Abbreviations and Acronyms

% percent	MMBtu Million British thermal units
°F degrees Fahrenheit	MMCF million cubic feet
acfm actual cubic feet per minute	MSDS Material Safety Data Sheet
BACT Best Available Control Technology	NAAQS ... National Ambient Air Quality Standards
BMPs Best Management Practices	NESHAPs National Emissions Standards for Hazardous Air Pollutants
Btu British thermal unit	NO_x nitrogen oxides
CAM Compliance Assurance Monitoring	NSPS New Source Performance Standards
CAS Chemical Abstracts Service	NSR New Source Review
CEMS Continuous Emission Monitor System	PM particulate matter
CFR Code of Federal Regulations	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
CO carbon monoxide	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CO₂ carbon dioxide	ppm parts per million
CO_{2e} carbon dioxide equivalent	PSD Prevention of Significant Deterioration
COMS Continuous Opacity Monitoring System	PTE potential to emit
CSR Code of State Regulations	RACT Reasonable Available Control Technology
dscf dry standard cubic feet	RAL Risk Assessment Level
EQ Emission Inventory Questionnaire	SCC Source Classification Code
EP Emission Point	scfm standard cubic feet per minute
EPA Environmental Protection Agency	SDS Safety Data Sheet
EU Emission Unit	SIC Standard Industrial Classification
fps feet per second	SIP State Implementation Plan
ft feet	SMAL Screening Model Action Levels
GACT Generally Available Control Technology	SO_x sulfur oxides
GHG Greenhouse Gas	SO₂ sulfur dioxide
gpm gallons per minute	SSM Startup, Shutdown & Malfunction
gr grains	tph tons per hour
GWP Global Warming Potential	tpy tons per year
HAP Hazardous Air Pollutant	VT vehicle miles traveled
hr hour	VOC Volatile Organic Compound
hp horsepower	
lb pound	
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	
Mgal 1,000 gallons	
MW megawatt	
MHDR maximum hourly design rate	



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Jake Buxton
Director

October 8, 2026

Kevin Barnard
Director of Environmental Permitting
Warrenton Data Center
255 Fillmore Street, Suite 300
Denver, CO 80206

RE: New Source Review Permit - Project: 2026-05-031;
Installation ID: 219-0056

Dear Kevin Barnard:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled "Review of Application for Authority to Construct" is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <https://dnr.mo.gov/about-us/division-environmental-quality/regional-office>. The online CAV request can be found at <https://dnr.mo.gov/compliance-assistance-enforcement/request-visit>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to §621.250 and §643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High



Kevin Barnard
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Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: <https://ahc.mo.gov>

If you have any questions regarding this permit, please do not hesitate to contact Bethany Eppinger at the Department of Natural Resources' Air Pollution Control Program by mail at P.O. Box 176, Jefferson City, MO 65102 or by phone at 573-751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Alana Hess
Unit Chief

AH:be

Enclosures

c: St. Louis Regional Office
PAMS File: 2026-05-031

Permit: 102026-007

