



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of JP Morgan Chase
Inspection Date(s): March 13, 2024
Regulatory Program(s): SIP, NESHAP, and NSPS
Company Name: JP Morgan Chase
Facility Name: Same as above
Facility Location: 4001 Governor Printz Blvd
Wilmington, DE 19802
Latitude: 39.75358 **Longitude:** -75.51867
County/Parish: New Castle County
AFS/ICIS-Air Number: DE0000001000300686
Permit Number: APC-2003/0284
NAICS Code: 518210 **SIC:** 7374
DSB ID #: ECAD-92

Facility Representatives:	Point of Contact
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EPA Lead Inspector

Signature

Carly Joseph

Date

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Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at JP Morgan Chase (JP Morgan or Facility) to verify compliance with applicable State and Federal regulations. The Delaware Department of Natural Resources and Environmental Control (DNREC) was notified of the inspection on February 26, 2024, via email. On March 11, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Carll Human, prior to the inspection (see Attachment 1).

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 4001 Governor Printz Blvd, Wilmington, DE 19802. This location is a data center that stores data for JP Morgan Chase. Other JP Morgan Chase locations provide consumer banking to more than 60 million customers and offers millions of consumers card services for businesses payment solutions that are convenient, secure and rewarding to help them meet their financial goals as stated on their website <https://careers.jpmorgan.com/us/en/about-us/locations/wilmington>. They are classified as a Computing Infrastructure Providers, Data Processing, Web Hosting, and Related Services with a NAICS code of 518210.

The Facility received a Synthetic Minor Source 80 Permit (APC-2003/0284)-OPERATION (Amendment 4)(SM)(MACT) from DNREC issued on August 1, 2023.

JP Morgan Chase is classified as a natural minor for Sodium Oxide , Hazardous Air Pollutants, and Particulate Matter and a synthetic minor for NO_x, Total Hydrocarbons, and CO. The Facility has operational limitations for the number of hours per year they operate their generators. The Facility is subject to, or potentially subject to, the following federal regulations:

- 40 C.F.R Part 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 C.F.R. Part 60 Subpart IIII: New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines
- 40 C.F.R. Part 60 Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

B. Inspection Opening Conference

At 8:00 AM on March 13, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference at 8:30 AM. JP Morgan was represented by Dan Laczko and Scott Lupinek, Senior Chief Engineer and Chief Engineer of JLL; JLL is the operator for the Facility. Also, David Potter and Ramy Hassan of DNREC were present. EPA inspectors, Carly Joseph and Dean DeLuca, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Dan Laczko and Scott Lupinek did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

JP Morgan is a data center that stores data for JP Morgan and its customers. There are also two additional data centers located in Delaware. JP Morgan is publicly owned and has no parent companies. JP Morgan's U.S. headquarters are in Wilmington, DE. The Facility located at 4001 Governor Printz Blvd, Wilmington, DE opened in 2004. The Facility is 276,000 square foot or 14 acres. JP Morgan operates 24 hours a day, seven days a week. There are 27 JLL employees, 2 JP Morgan employees, and Allied Security employees at this location. JLL is the operator of the site on JP Morgan's behalf. JLL is a separate company from JP Morgan.

The Facility operates eight emergency generators, one diesel fire pump, and eight UPS systems that work as a pair to provide uninterrupted power. The building is designed for 14,700 kW of power. The UPS system is utilized to convert "dirty" AC electricity from Del Marva Utility Company to DC and then converts back to clean AC electricity for JP Morgan's equipment. The UPS system has an output range of 478-480 volts at 60 hertz. Mr. Lupinek stated the Facility's equipment is very sensitive to voltage changes and "dirty" electricity. There is no delay during a power outage for the UPS system to begin operation and in one minute and five seconds the generators will automatically begin operation. After a power outage, the Facility waits 30 minutes before it manually switches back to Del Marva electricity and operates utilizing the generators during this time frame. Mr. Lupinek indicated that the eight generators are not required to conduct stack testing, nor do they have any Continuous Emission Monitoring Systems (CEMS). The eight generators also do not participate in any emergency load demand programs.

The opening conference concluded at 9:00 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:10 AM after the records review by Dan Laczo and Scott Lupinek of JP Morgan. David Potter and Ramy Hassan of DNREC were also present for the walkthrough. EPA inspectors noted photos would be taken by Dean DeLuca during the Facility walkthrough (Attachment 2).

The inspection team began the walkthrough by exiting the conference room and walking to observe the Uninterruptible Power Supply “UPS MGE” room. The team observed three modules in room B and three modules located in room A. The systems are used to clean the energy that powers the data center floor and provide uninterrupted power to the building. Each UPS system has its own subsystem and battery room. The current batteries are the Facilities second set. There are 60 batteries per string.

Next, the inspection team observed the room that contains the facilities diesel fired fire pump. Mr. Lupinek indicated that the internals of the fire pump were replaced in 2018. The fire pump is used for the sprinkler system. The fuel room that contains the fire pumps diesel gas is located in the room beside the fire pump. Mr. Lupinek stated the fire pump was tested the morning of the inspection and JP Morgan is required to test weekly and complete annual oil changes. The Facility utilizes about a gallon of fuel per test and test runs last approximately 30 minutes. The total hours on the fire pump at the time of the inspection were 526.1.

Lastly, the inspection team observed eight diesel fired engines . Engine 1 is a 675 kW diesel fired generator, model year 2003, with 1,756 hours. Engine 2 is a 675 kW diesel fired generator, model year 2003, with 1,767.6 hours. Engine 3 is a 675 kW diesel fired generator, model year 2003, with 1765.3 hours. Engine’s 1-3 also have the same engine family. Engine 4 stated on the label “intended solely for export to Australia” and the engine family stated, “non road”. Engine 4 is a Detroit Diesel engine with 1786.7 hours and the model year is 2004. Mr. Lupinek stated every engine has four turbo chargers and that air comes in through the front of the engine, over the radiator, and exits through the exhaust that vents to atmosphere. Next, the team walked over to observe engines 5-8 which were located on the other side of the building. Engine 5 is a 675 kW diesel fired generator, model year 2003, with 1,762.7 hours. Engine 6 is a 675 kW diesel fired generator, model year 2003, with 1,772.7 hours. Engine 7 is a 675 kW diesel fired generator, model year 2003, with 1,754.5 hours. Engine’s 5-7 have the same engine family as engines 1-3. Engine 8 stated on the label “intended solely for export to Australia” and the engine family stated, “non road”. Engine 8 is a Detroit Diesel engine with 1767.4 hours and model year 2004.

The walkthrough concluded at 11:22 PM.

IV. Records Review

The records review commenced immediately after the opening conference at 9:04 AM. EPA inspectors reviewed documents requested in the March 11, 2024, email to Carl Human (see Attachment 1). Dan Laczo and Scott Lupinek showed the team an excel spreadsheet with the engines’ hours of operation

and reason for operation. The Facility tracks the hours of each generator individually. In August 2020 the generators operated for four hours due to inclement weather. Mr. Lupinek stated the last time the generators operated was in March 2022 due to a static switch “going bad”. The Facility’s equipment is sensitive to “dirty electricity” therefore, the use of the generators was necessary to clean the “dirty electricity” and provide clean energy to the data center since one of the UPS systems static switches were down. Records were provided on March 13, 2024, via file sharing secure link goanywhere by Gina Hunt of JLL representing JP Morgan the morning of the inspection. Below is a list of additional records requested during the records review. The following requested items were provided via file sharing secure link goanywhere by Dan Laczko on May 6, 2024.

- Visible emission records for all engines for the past two years,
- Annual tune-ups for each engine for the past three years;
- Annual oil changes for the engines for the past three years;
- Annual oil cleaner inspection records for the past two years; and
- Manufacture specifications for Engine #1, #4, and #8.

V. Closing Conference

After the walkthrough, EPA inspectors, Dan Laczko, Scott Lupinek, and, David Potter and Ramy Hassan of DNREC had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 11:35 AM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by Dan Laczko.

- Engines #4 and #8 have a label stating, “intended solely for export to Australia”. Further research is needed to verify that these two engines meet EPA’s engines specifications and are allowed to operate in the United States.

VI. List of Attachments

- Attachment 1: Email correspondence to Facility Representative Carll Human of records requested to review during inspection
- Attachment 2: Photo Log

Attachment 2: PHOTO LOG

Facility: JP Morgan Chase

Location: 4001 Governor Printz Blvd

Inspection Date: March 13, 2024

EPA Inspector(s): Carly Joseph and Dean DeLuca

Photographer: Dean DeLuca



Photo Number: 1

Photo Description: Fire Pump



Photo Number: 2

Photo Description: Fire Pump Label



Photo Number: 3

Photo Description: Fire Pump Screen



Photo Number: 4

Photo Description: Fire Pump Hour Meter



Photo Number: 5

Photo Description: Engine #1



Photo Number: 6

Photo Description: Engine #1 label

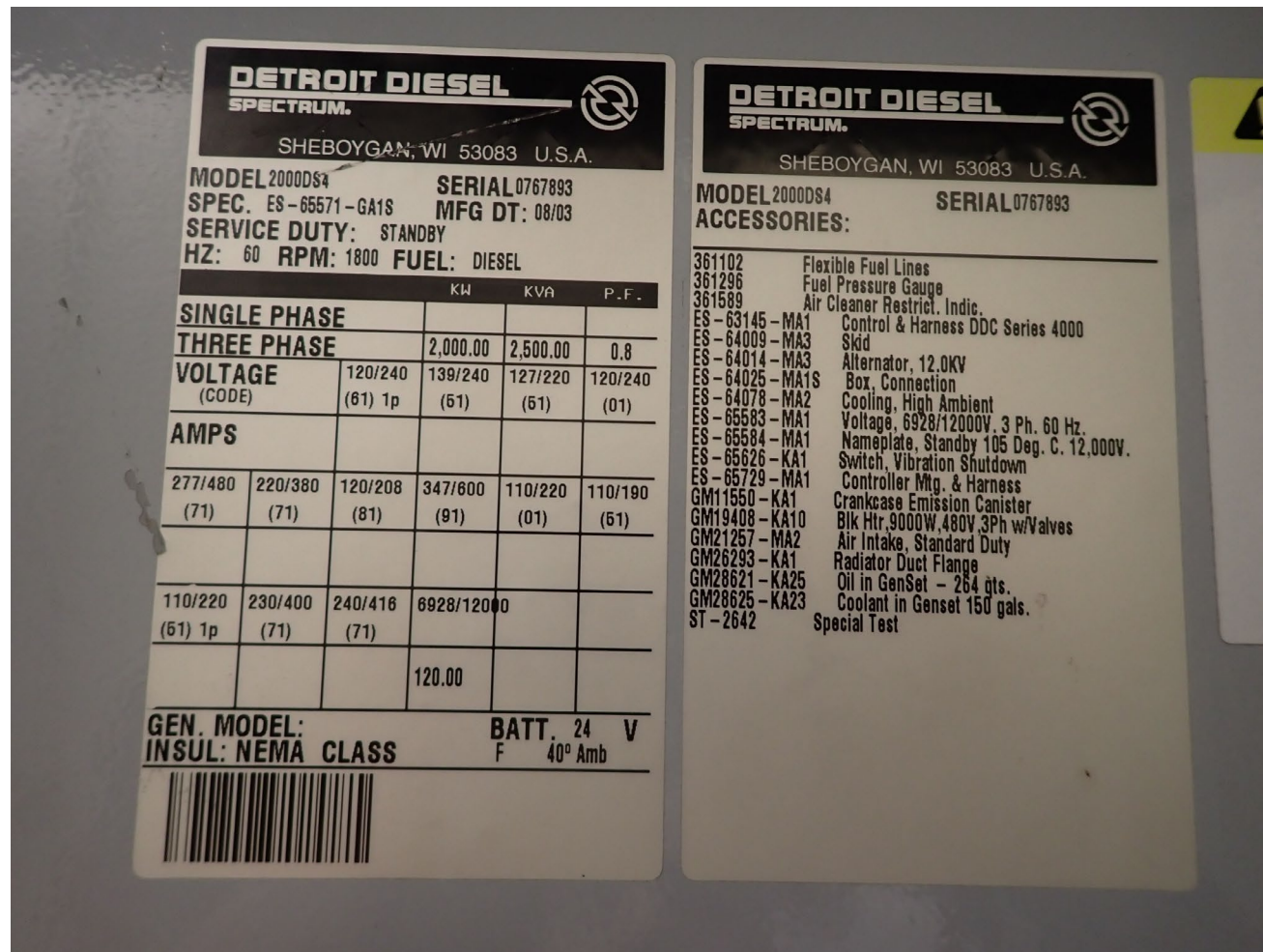


Photo Number: 7

Photo Description: Engine #1 label

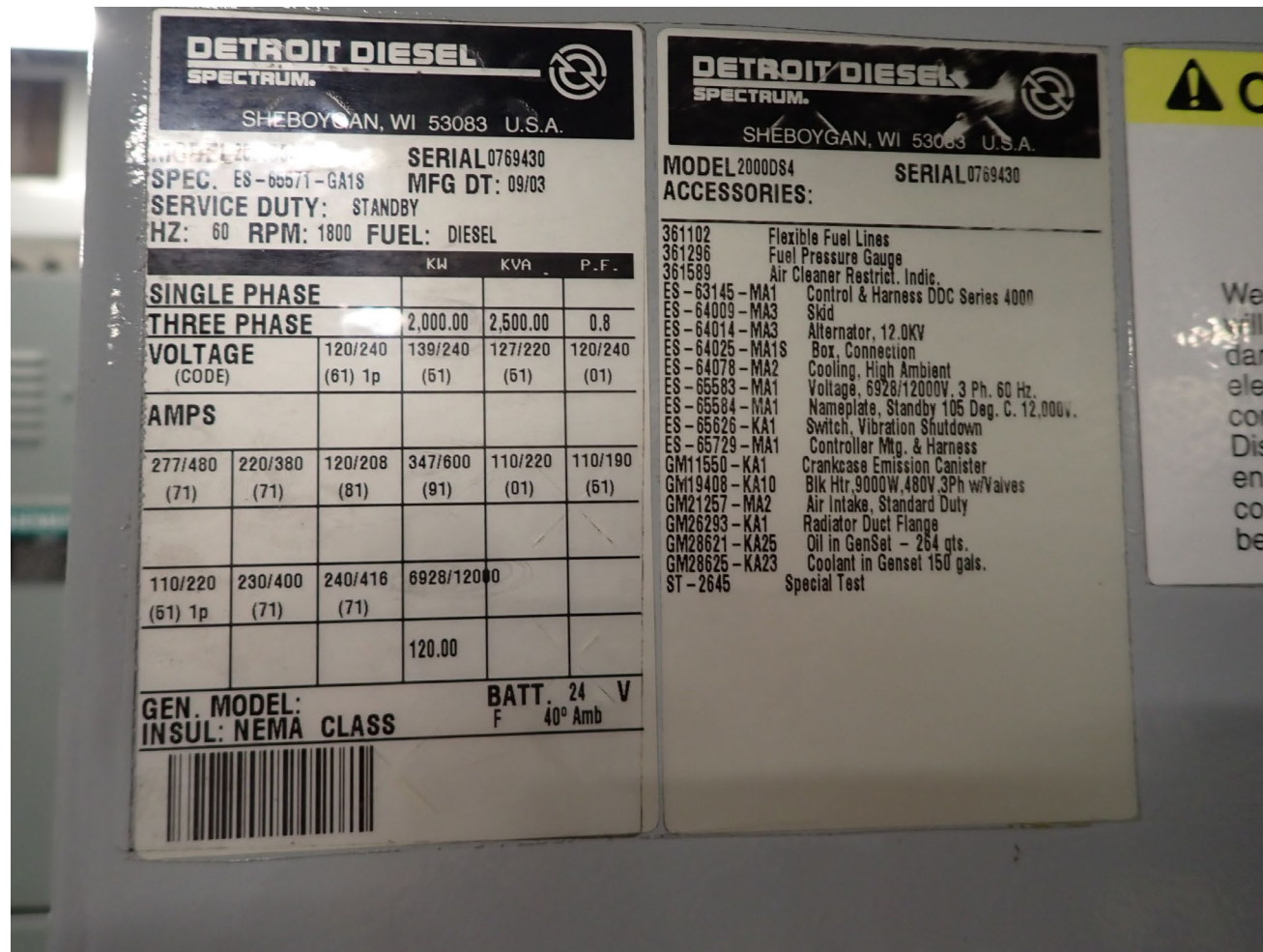


Photo Number: 8

Photo Description: Engine #2 label

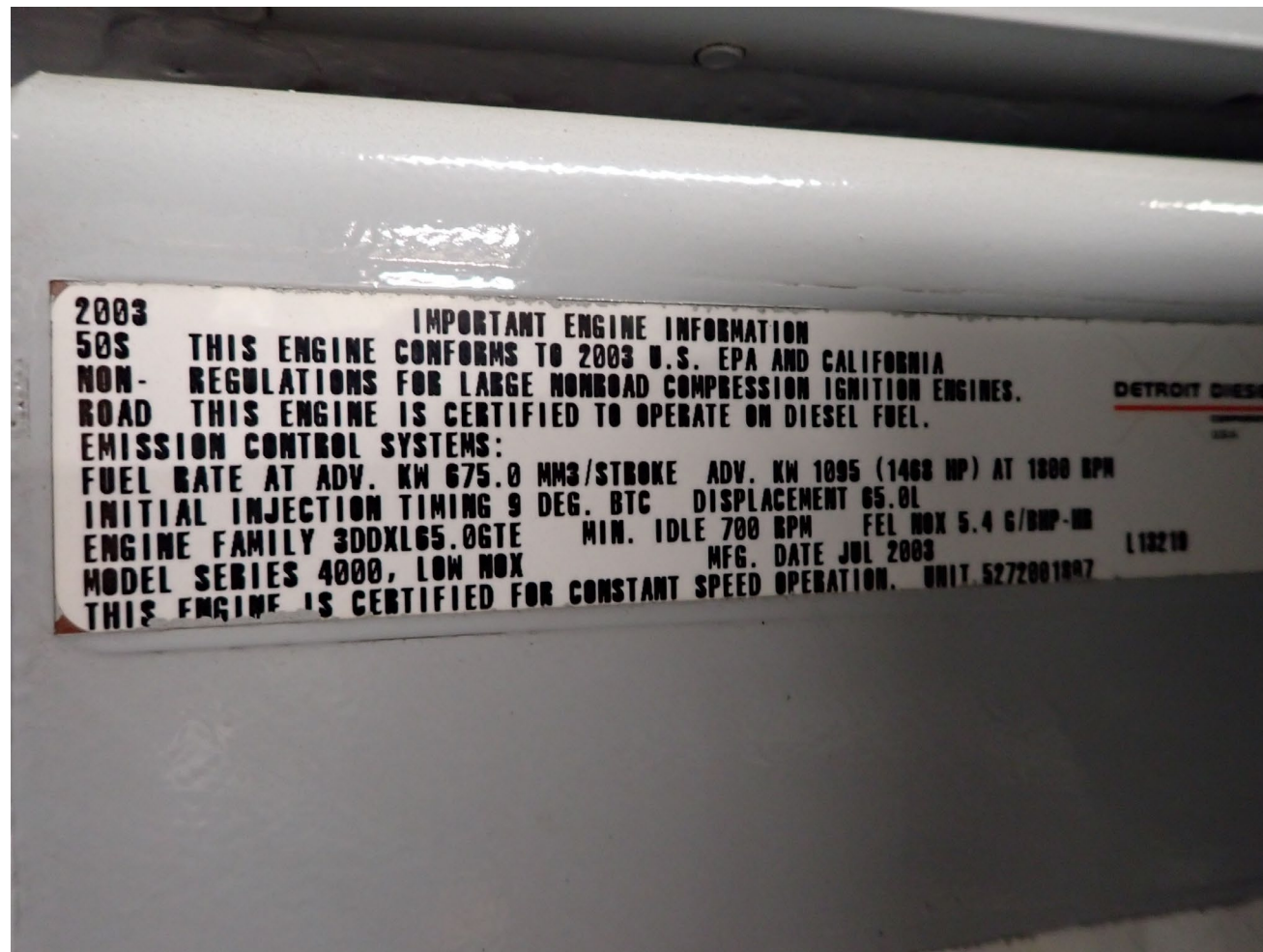


Photo Number: 9

Photo Description: Engine #2 label

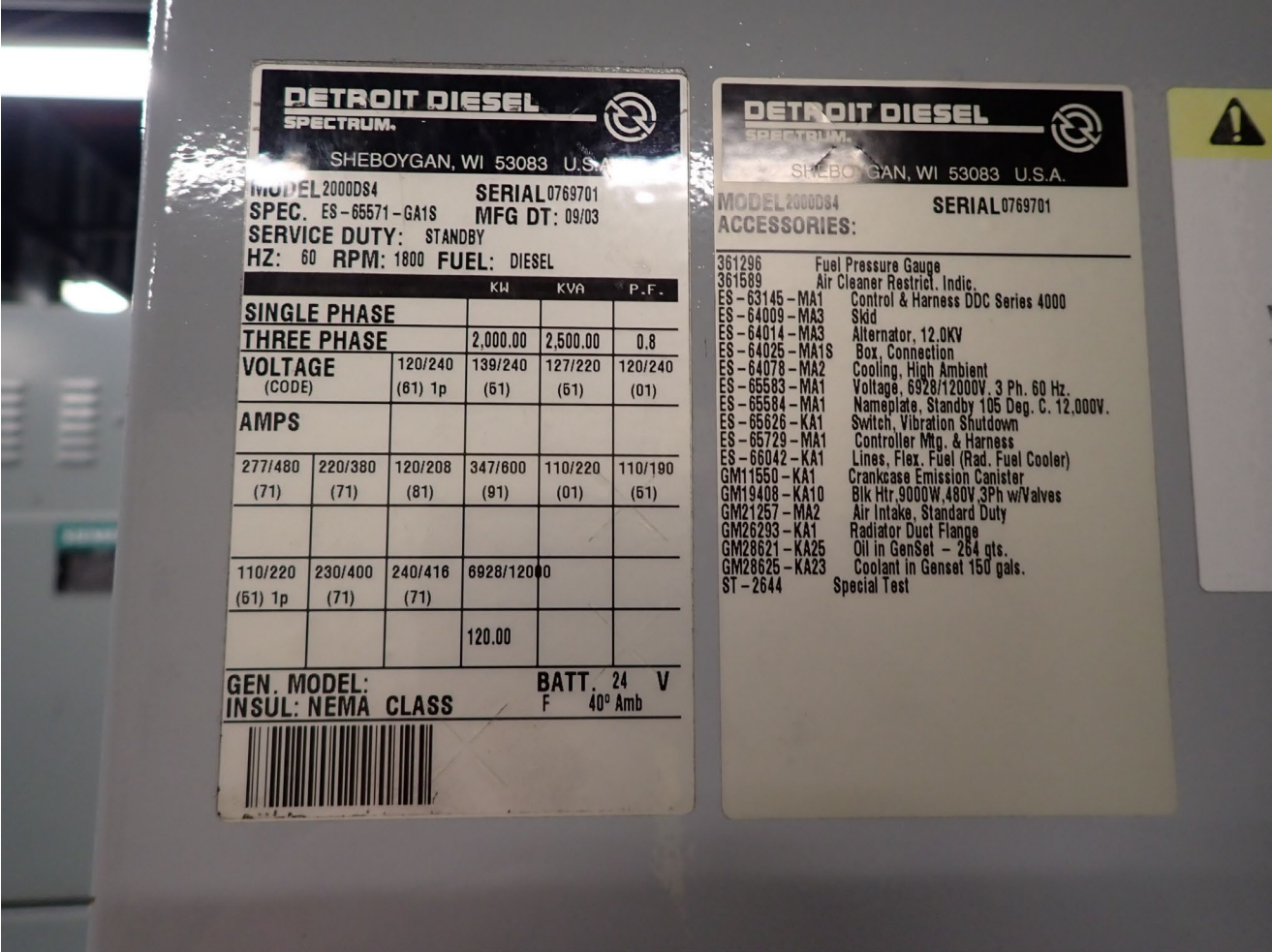


Photo Number: 10
Photo Description: Engine #3 label

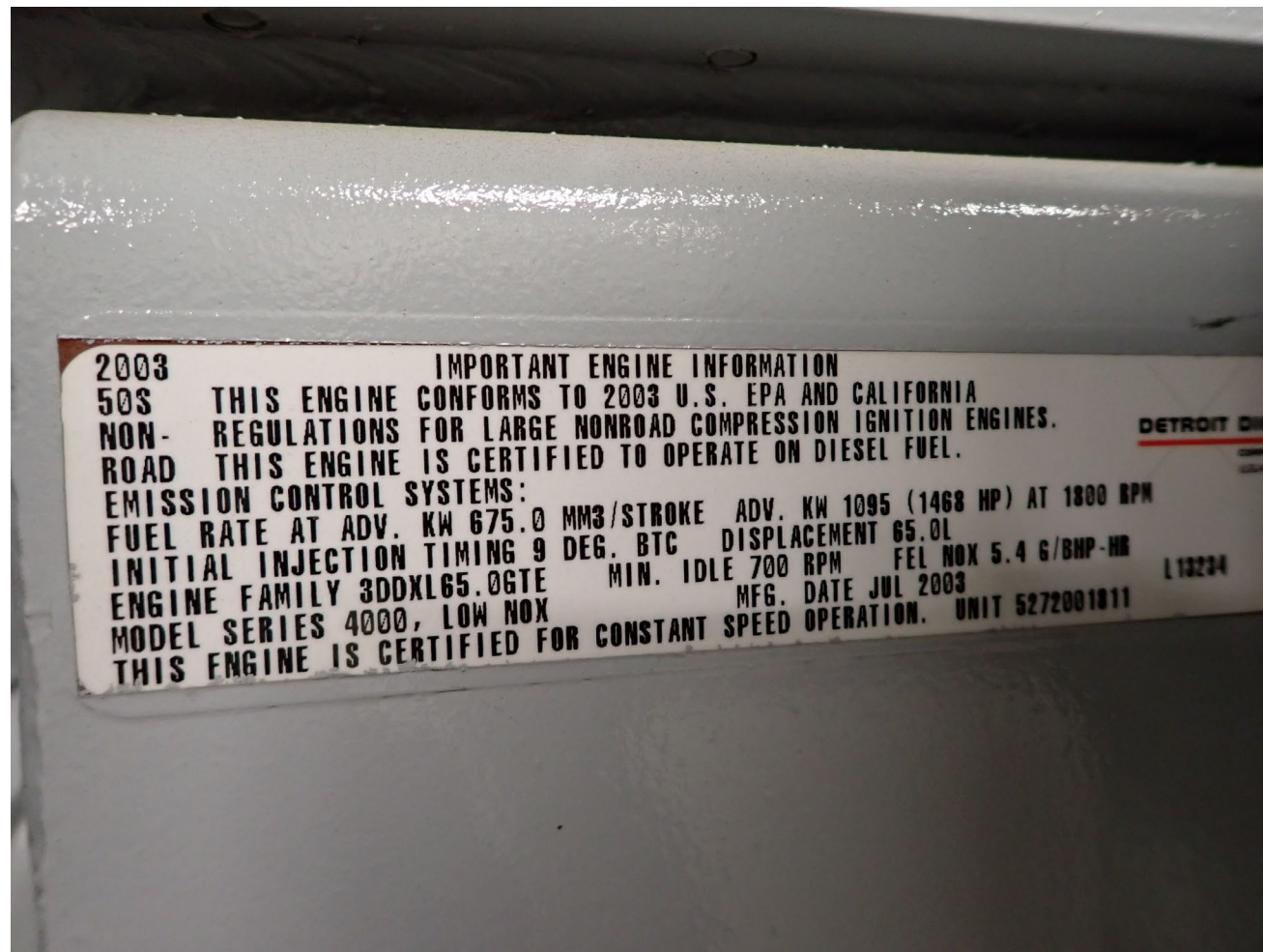


Photo Number: 11

Photo Description: Engine #3 label

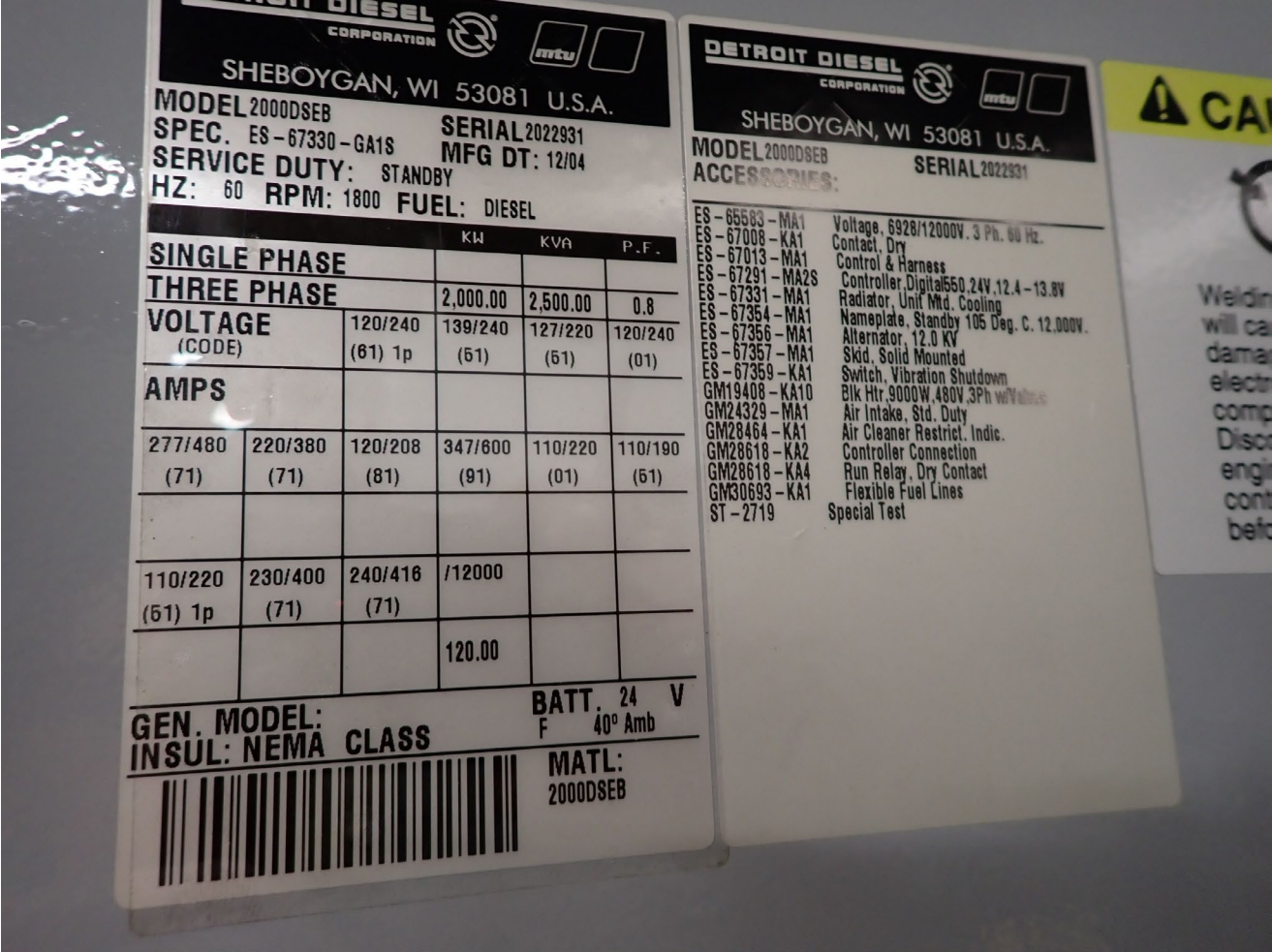


Photo Number: 12

Photo Description: Engine #4 label



Photo Number: 13

Photo Description: Engine #4 label

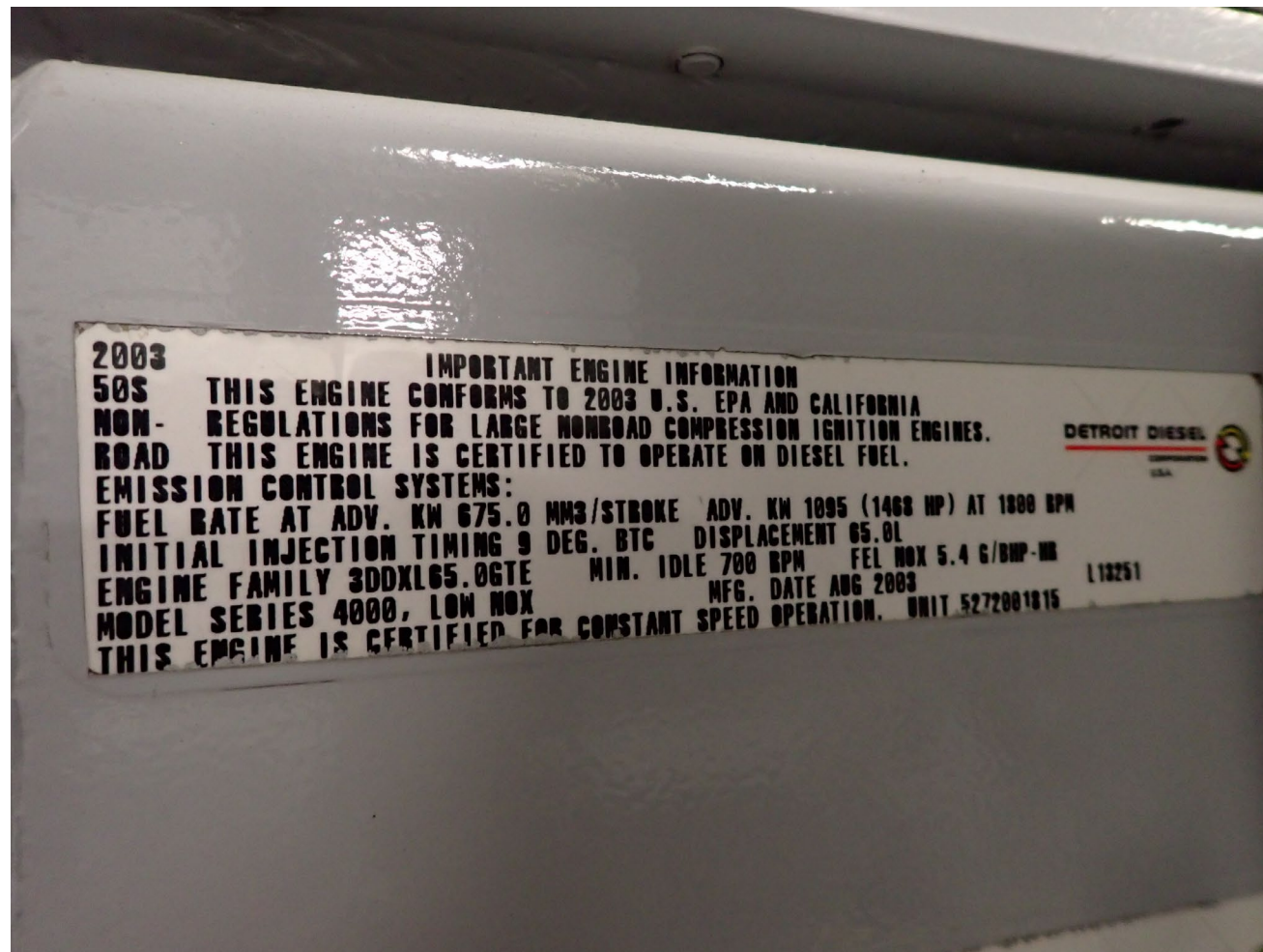


Photo Number: 14

Photo Description: Engine #5 label

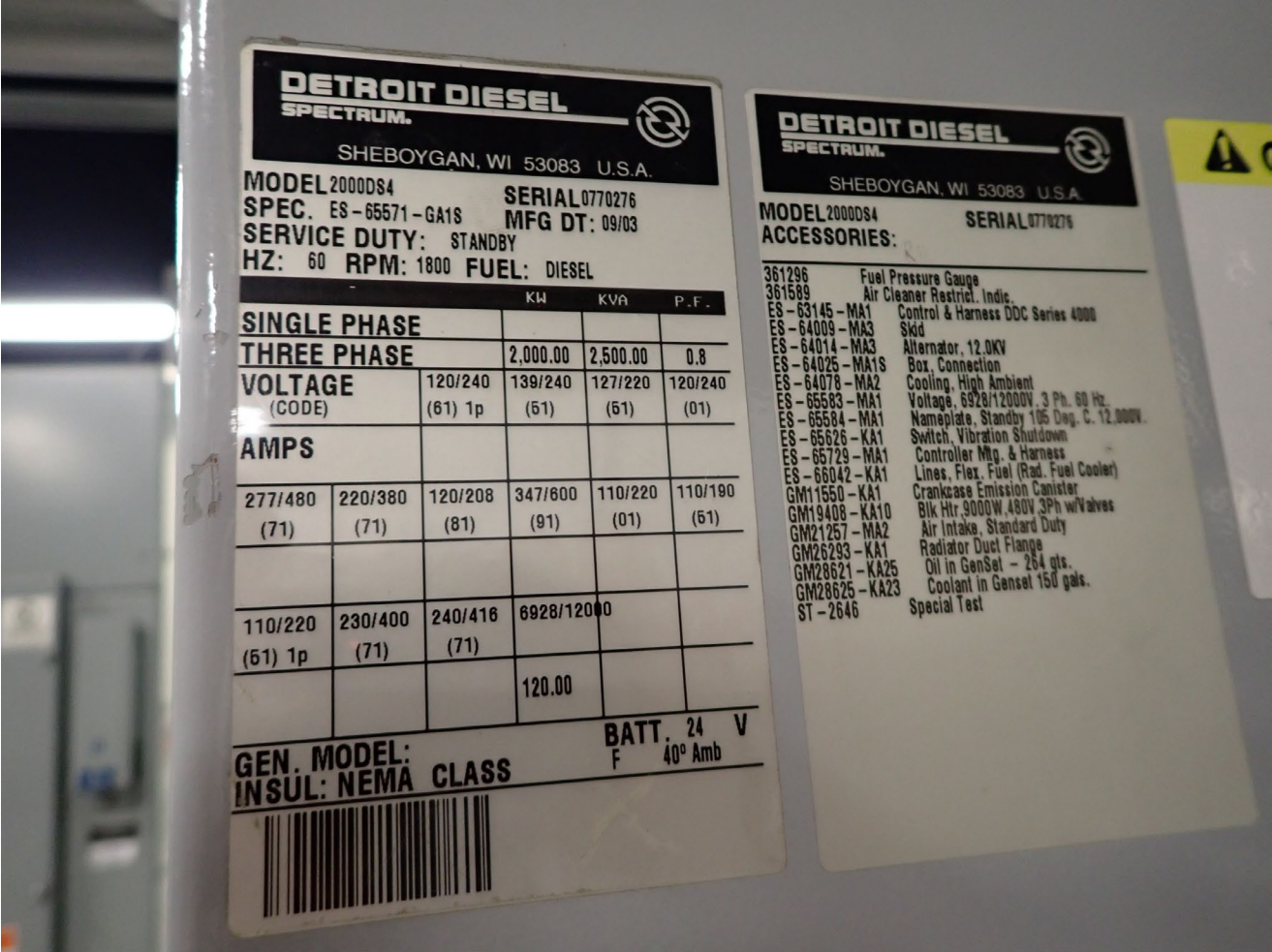


Photo Number: 15

Photo Description: Engine #5 label

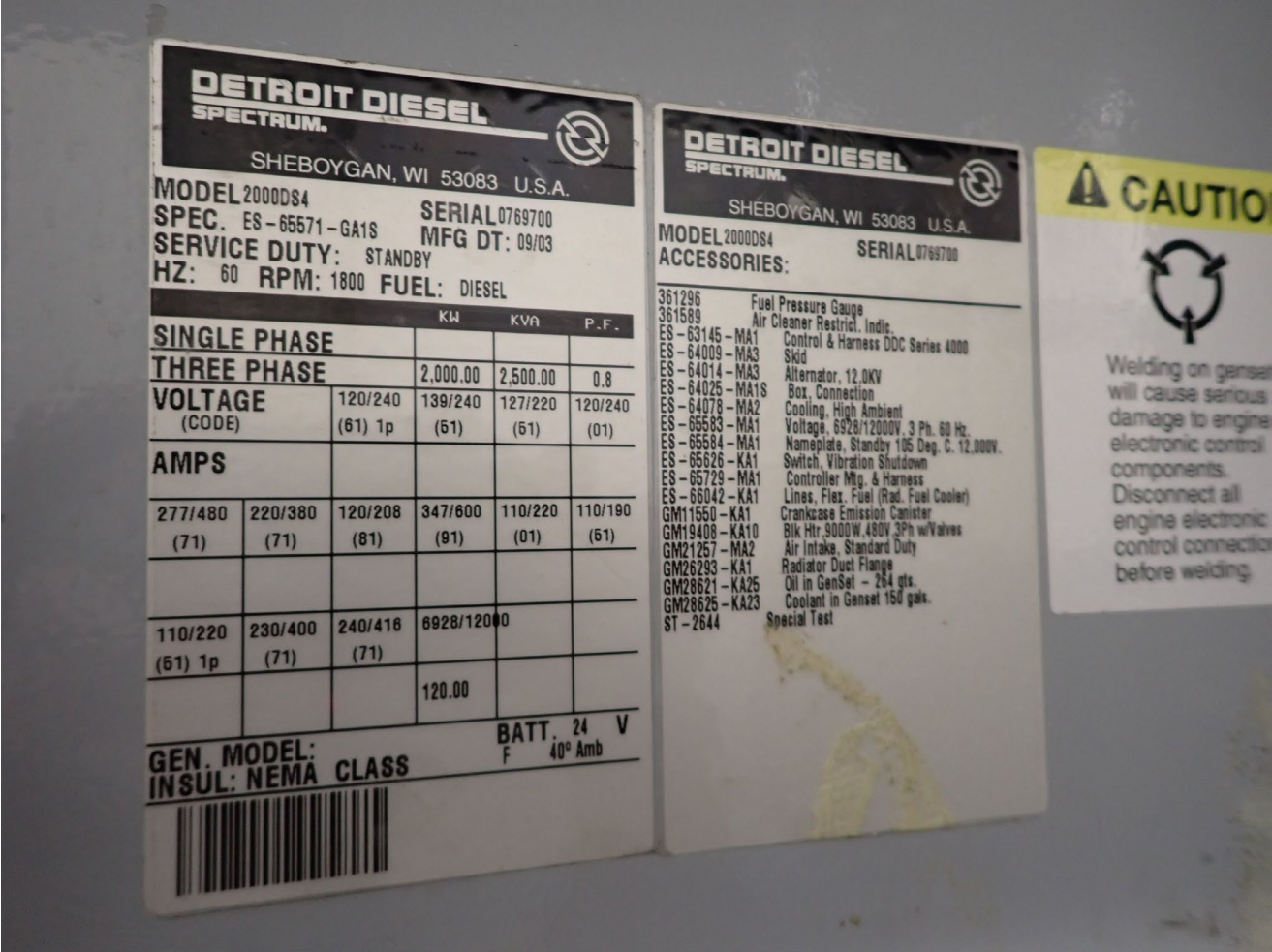


Photo Number: 16

Photo Description: Engine #6 label



Photo Number: 17

Photo Description: Engine #6 label

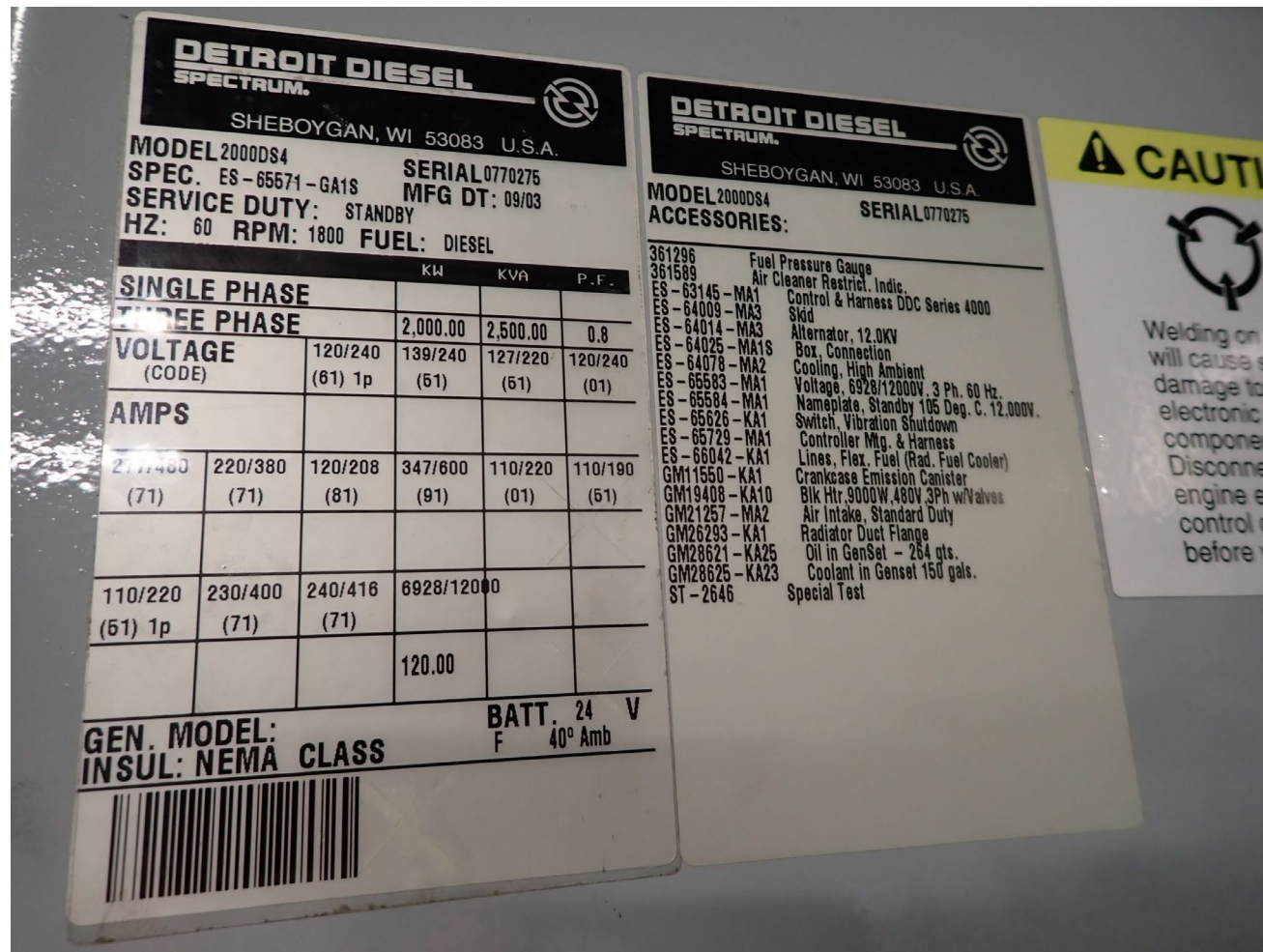


Photo Number: 18

Photo Description: Engine #7 label

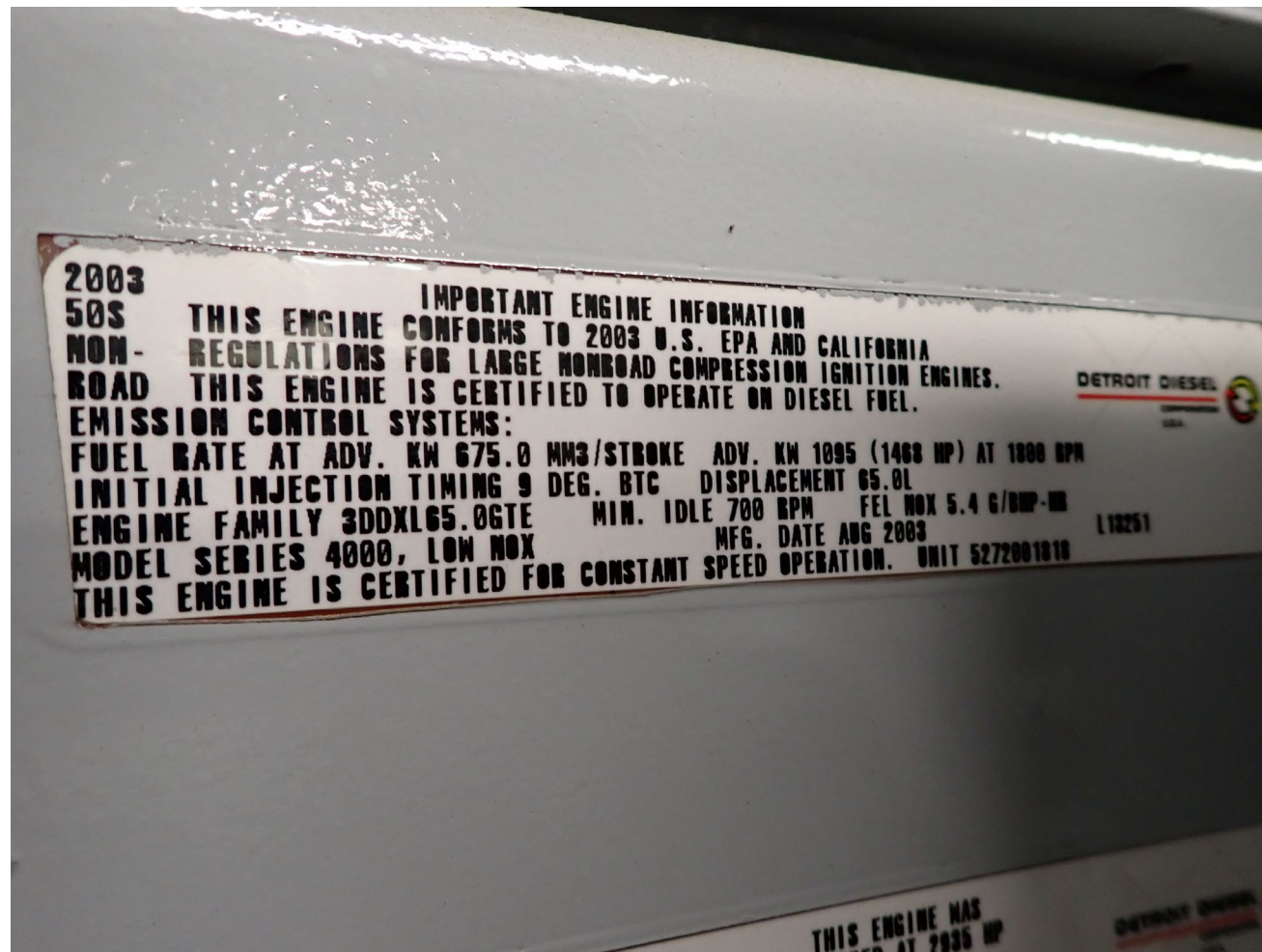


Photo Number: 19

Photo Description: Engine #7 label



Photo Number: 20

Photo Description: Engine #8

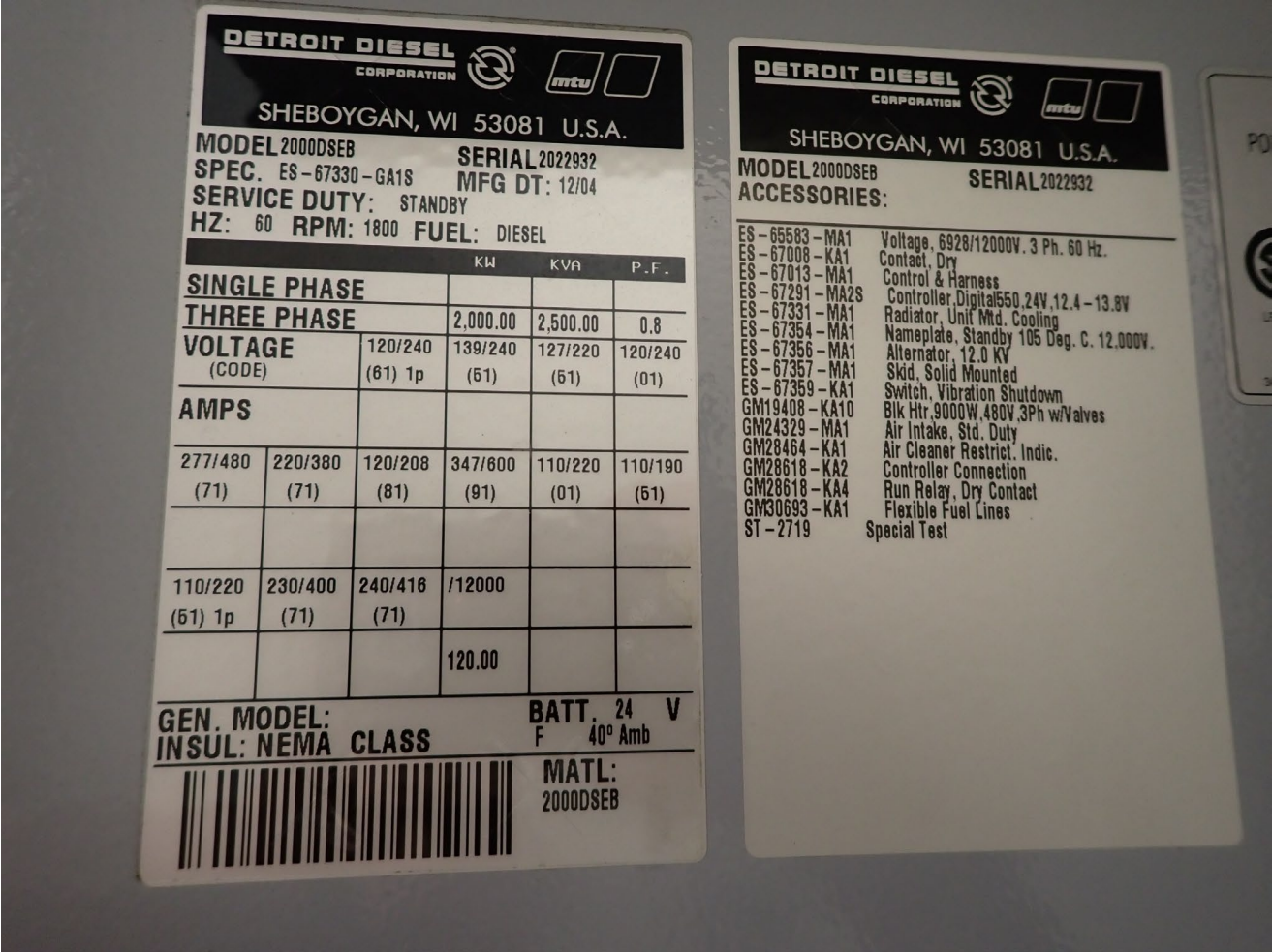


Photo Number: 21

Photo Description: Engine #8 label

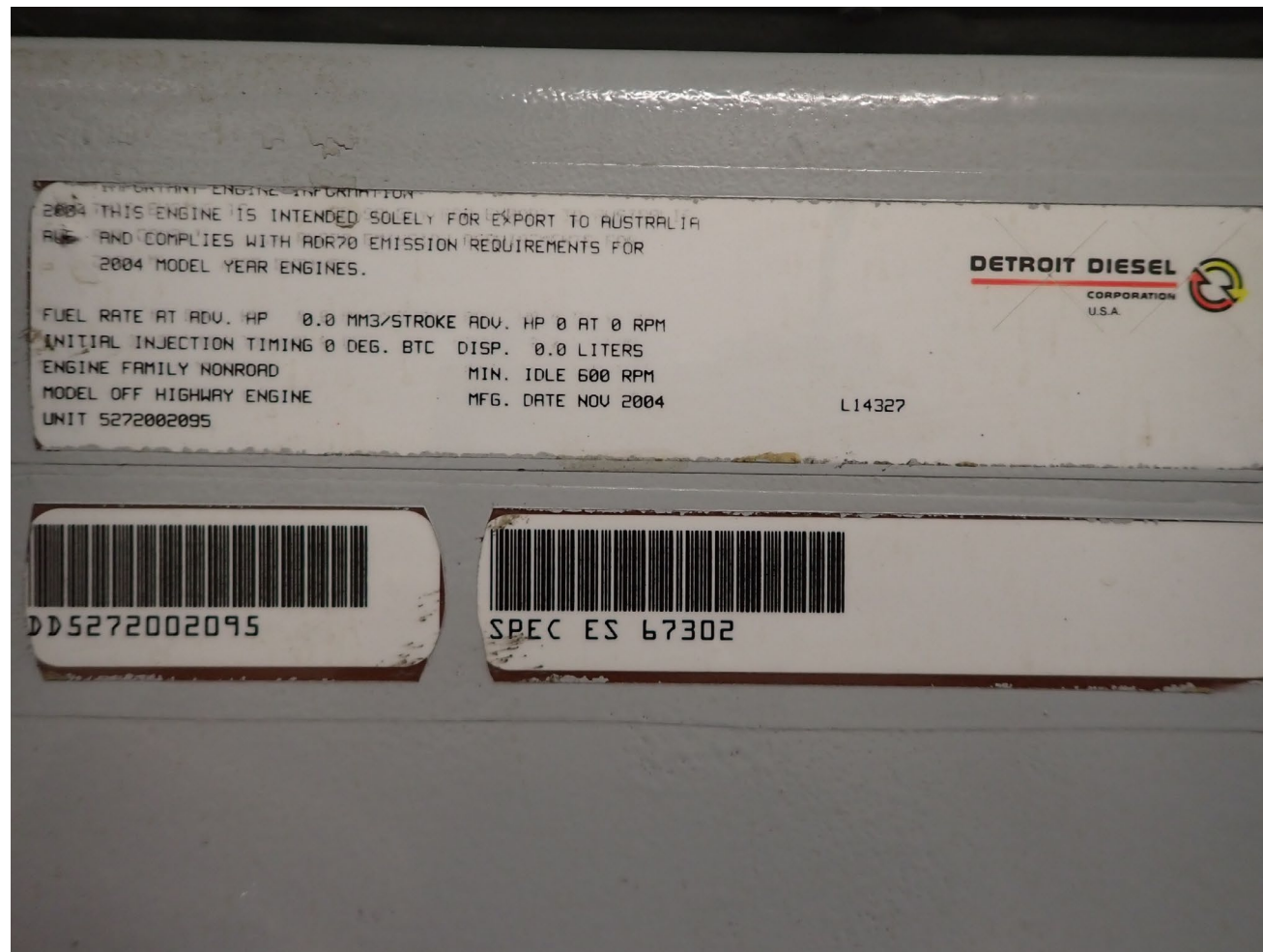


Photo Number: 22

Photo Description: Engine #8 label

From: [Joseph, Carly](#)
To: carll.human@jpmchase.com
Cc: carll.human@jill.com; [Deluca, Dean](#)
Subject: CAA Inspection of JP Morgan Chase at 4001 Governor Printz Blvd.
Date: Monday, March 11, 2024 12:50:00 PM
Attachments: [JP Morgan Chase Combustion Source List - Spreadsheet Response.xlsx](#)
[JP Morgan Chase - March Records Request.docx](#)

Good afternoon Carll Human,

As discussed on our voice message and later over the phone on March 8, 2024, EPA Region 3 will be conducting a Clean Air Act (CAA) inspection of this Wednesday, March 13, 2024.

My colleague, Dean DeLuca, and I anticipate arriving at 4001 Governor Printz Blvd, Wilmington DE around 8:00 AM.

This inspection will focus on the existing air permit and applicable regulations. The inspection will include, but may not be limited to: a brief opening conference reviewing historical operations and overview of the facility's processes, a facility walk-through (during which photographs will be taken), and a review of records requested (see attached). Delaware Department of Natural Resources and Environmental Control (DNREC) has been notified of the inspection and plan to attend the inspection.

To help facilitate the inspection, it would be appreciated if the records in the attached document were made available for review. I can send a separate link using our secure file sharing site goanywhere.com where you can upload responsive records upon request. Please note that JP Morgan Chase has the right to claim any documents it feels confidential as confidential business information (CBI). If USALCO is claiming any material CBI, please note each page that is CBI and let me know. Please let me know if you have any questions.

For security clearance into the facility I am providing my colleague and I's name, organization, and title as stated on our Credentials. Please let me know if any other information needs to be provided.

Name as it appears on photo ID: Joseph, Carly J.

Name as it appears on Photo ID: Deluca, Dean A.

Organization: Environmental Protection Agency (EPA)

Title: Inspector

Thank you,

Carly Joseph

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