REGION 3
PHILADELPHIA, PA 19103

Report Title:	Clean Air Act Inspection of Fannie Mae Urbana Technology Center		
Inspection Date(s):	12/13/2024		
Regulatory Program(s):	NSPS, SIP		
Company Name:	Fannie Mae		
Facility Name:	Fannie Mae Urbana Technology Center		
Facility Location:	9107 Bennett Creek Blvd Urbana, MD 21704		
Latitude:	39.322162	**Longitude:**	-77.351997
County/Parish:	Frederick County		
AFS/ICIS-Air Number:	MD0000002402100599		
Permit Number:	021-0599		
NAICS Code:	518210	**SIC:**	N/A
DSB ID #:	ECAD-95		

Facility Representatives: **Point of Contact**

Micah O'Dell, Fannie Mae, Facilities Operations Senior Manager ☒
Phone: 972-773-7406 Email: Micah_S_odell@fanniemae.com
William Hornbeah, Fannie Mae, Building Manager ☐
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Matthew W. Maxwell, Sodexo, Director of Facility Operations ☐
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Additional Facility Representatives found in Attachment 1: Sign-In Sheet

EPA Inspectors:

Scott Yanos, Life Scientist, 3ED21
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Parmatma Adhikari
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State/Local Inspectors:

N/A

EPA Lead Inspector Signature SCOTT YANOS Digitally signed by SCOTT YANOS Date: 2024.02.06 12:48:19 -05'00'

Scott Yanos **Date**

1600 John F Kennedy Blvd
Philadelphia, PA 19103-2852

Supervisor Signature	KRISTEN HALL Digitally signed by KRISTEN HALL Date: 2024.02.06 14:23:32 -05'00'	
	Kristen Hall	**Date**

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Fannie Mae Urbana Technology Center (Fannie Mae or Facility) to verify compliance with applicable State and Federal regulations. The Maryland Department of the Environment (MDE) was notified of the inspection on November 27, 2023, via email. On December 6, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Micha O'Dell, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

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 9107 Bennet Creek Blvd, Frederick, MD 21704. Fannie Mae facilitates in finding equitable and sustainable access to homeownership and that affordable housing is available. The data center is used by Fannie Mae to store all the data generated and transferred during these operations.

The Facility received a Synthetic Minor Permit (021-0599) from MDE issued on February 15, 2022.

Fannie Mae is classified as synthetic minor source for NOx. The MDE permit states The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR Part 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

At 09:33 AM on December 13, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Fannie Mae was represented by Micha O'Dell, Facility Operations Senior Manager; William Hornbeah, Building Manager; William Maxwell, Director of Facility Operations; Craig Stambaught, Customer Service Representative; Douglas Zizzi, Critical Environments Manager; Ramey Lewis Lead Critical Environments Technician and Stephanie Korzec, Project Scientist. EPA inspectors, Scott Yanos and Parmatma Adhikari, 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, Micah O'Dell claimed the file titled as "EPA Presentation 12-13-2023" that includes description of processes at the facility, building layout, description of the electrical and mechanical infrastructure systems and recently completed/upcoming capital improvement projects as CBI.

II. Site Activity/Process Description

The Fannie Mae Urbana Technology Center is a part of a network of facilities that handles the data storage and transfer to support Fannie Mae's operations to help provide equitable and sustainable access to homeownership as well as ensure that there is quality and affordable rental housing in America. Fannie Mae has other offices in Boston, MA; New York City, NY; Philadelphia, PA; Washington D.C.; Reston, VA; Chicago, IL; Plano, TX; and San Francisco, CA with the offices in Urbana, Plano and Washington D.C. doing the majority of the work for the organization.

Fannie Mae was established in 1938 through the National Housing Act as a part of the New Deal. Fannie Mae is a government-sponsored enterprise and is a public company. Fannie Mae holds over 17 million mortgages and guarantee one-fifth of multifamily mortgage debt outstanding in the United States.

The Urbana Technology Center sits on 36 acres of land while the actual footprint of the facility is 19 acres. The remainder of the space is available for expansion, but Fannie Mae has worked with the township to provide space for sports field and recreation for the township.

Fannie Mae operates 12 Galaxy gas fired hot water boilers (Model GG-300 EC), which provide comfort heat for the facility. In addition, the Facility operates six Caterpillar 3516 2885-BHP 2,000 kW emergency generators as well as one Caterpillar 3516C-HD 2937-BHP 2,000 kW emergency generator. Each generator has a urea catalyst as a form of emission control. The site has two 30,000 gallon diesel tanks for fuel and a 10,000 gallon tank for the urea. Fannie Mae only records the total fuel used for the site, not for individual generators. Fuel is certified by the fuel delivery company. In the past, the Fannie Mae Urbana Technology Center provided Emergency Demand Response power but as of May 2023, they did not renew their contract and they have no plans to renew the contract.

The operations of the facility are 24 hours a day, seven days a week and 365 days a year with employees always at the site. There are currently 30-35 employees at the Fannie Mae Urbana Technology Center.

The opening conference concluded at 10:45 AM.

III. Observations

EPA inspectors were led on a walkthrough after completing the records review of the Facility at 10:48 AM by Micah O'Dell, William Hornbeah, William Maxwell, and Stephanie Korzec for Fannie Mae. EPA inspectors noted photos would be taken during the Facility walkthrough but due to equipment malfunction, the photos were lost and will not be included with the inspection.

The walkthrough started with observing the 12 natural gas boilers used for comfort heat in the facility. The EPA Inspectors observed that the boilers were Galaxy gas fired hot water boilers Model GG-300 EC and are the original boilers installed when the building was built in 2004. Electric pumps are used for the boiler system.

After inspecting the boilers, the EPA Inspectors observed the technology room. Next the EPA Inspectors inspected the emergency generators. Each is a diesel generator with a urea injection port at the base of the stack with all the generators having their own stack. The following are the engine hours recorded for each generator:

- Caterpillar Engine No. 3516; 2,000 kW; 2,002.9 engine hours; Construction date: November 2004
  Caterpillar Engine No. 3516; 2,000 kW; 1,979.0 engine hours; Construction date: November 2004
- Caterpillar Engine No. 3516; 2,000 kW; 1,930.0 engine hours; Construction date: November 2004
- Caterpillar Engine No. 3516C; 2,190 kW; 1,227.5 engine hours; Construction date: February 2013
- Caterpillar Engine No. 3516; 2,000 kW; 2,039.8 engine hours; Construction date: November 2004
- Caterpillar Engine No. 3516; 2,000 kW; 2,017.4 engine hours; Construction date: November 2004
- Caterpillar Engine No. 3516; 2,000 kW; 2,027.7 engine hours; Construction date: November 2004

After observing the emergency generators, the walkthrough proceeded outside to observe the diesel tanks and the urea tank, all three are above ground storage tanks in a containment area. The EPA Inspectors were then led to the fire pump room where they observed that the fire pump was electric.

The walkthrough concluded at 11:51 AM.

IV. Records Review

The records review commenced immediately after the opening conference at 10:14 AM. EPA inspectors reviewed documents requested in the December 6, 2023, email to Micah O'Dell (see

Attachment 1). Records were provided at the time of the inspection by Micah O'Dell. Below are the records requested and what was provided:

1. Provide a plot plan of the Facility. Also, provide a paper copy during the opening conference.
   Provided during the time of the inspection – Contained within file "EPA Presentation 12-13-2023" and portions of this are claimed as Confidential Business Information (CBI)

2. Provide a detailed description of Fannie Mae UTC Data Center's process(es).
   Provided during the time of the inspection – Contained within file "EPA Presentation 12-13-12023" and portions of this are claimed as Confidential Business Information (CBI)

3. A list of all combustion sources at the Facility such as furnaces, boilers, and/or engines.
   a. For each boiler or engine identified, provide:
      i. Date of installation;
      ii. Type of fuel(s) combusted;
      iii. Maximum heat input rating (MMbtu, HP or kW/hr);
      iv. Days each unit operated and hours of operation[1] monthly from January 2020 to the present.
   b. Fuel usage on a monthly basis for any combustion equipment at the Facility (boilers, emergency generators, fire pumps, etc.) since January 2020.
   c. Records of each tune-up conducted at each unit since January 2020.
      Provided during the time of the inspection.

4. Provide copies of the emission statements submitted to MDE for the years 2020-2022. These emission statements shall include the emission factors used to determine emissions and the derivation of each factor (stack test, CEMS, AP-42, etc.).
   Provided during the time of the inspection.

5. Annual emissions calculations (preferably emailed in an unlocked Microsoft Excel format) since 2020, including but not limited to:
   a. Monthly rolling emissions of VOCs, HAPs and NOx for each process unit and facility wide along with supporting calculations for 2020-2023 (lbs/hr).
      Provided during the time of the inspection.

6. Provide a list of any and each control device currently in use at Fannie Mae UTC Data Center used to control or reduce emissions from any emission point at the site. The list should include:
   a. The make/model of the control;
   b. Date of installation at the Facility;
   c. Which pollutant(s) are being controlled;
   d. Each source or emission point being controlled;

e. The capture and destruction efficiency for each control;
Provided during the time of the inspection

7. Copies of any stack tests conducted on any engines or boilers to determine emission rate, control efficiency, or for compliance demonstrations, etc. conducted at the Facility since 2010.
Provided during the time of the inspection.

8. Provide a list of each request for permit determination or permit application submitted to the MDE since January 2020. Also, provide a list of each permit or permitting determination issued to Fannie Mae UTC Data Center. This should include the date of the request/permit and the permit number, if applicable.
Provided during the time of the inspection.

9. Identify whether conducts peak shaving or has entered into contracts for emergency demand response. If so, provide copies of any contracts related to these operating scenarios.
Provided during the time of the inspection.

10. Provide copies of any initial notifications, compliance reports, and/or periodic reports submitted to either EPA or MDE pursuant to applicable regulations under 40 C.F.R. Part 60 and 63
Provided during the time of the inspection.

V. Closing Conference

After the walkthrough, EPA inspectors, Micha O'Dell, William Hornbeah and Stephanie Korzec 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 in 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 12:00 PM.

VI. List of Attachments

Attachment 1:	Email correspondence to Micah O'Dell of records requested to review during inspection
Attachment 2:	Sign-In Sheet