



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of 401 North Broad Lessee (Netrality)
Inspection Date(s): 11/28/2023
Regulatory Program(s): NSPS, SIP

Company Name: Netrality, LP
Facility Name: 401 North Broad Lessee
Facility Location: 401 North Broad St
Philadelphia, PA 19108

Latitude: 39.959995 **Longitude:** -75.16196
County/Parish: Philadelphia County

AFS/ICIS-Air Number: PAPAM0004210106950
Permit Number: OP17-000003
NAICS Code: 531312 **SIC:** 6531
Unique Project #: 3E23CA62A

Facility Representatives:	Point of Contact
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(Additional facility representatives included on the Attachment 2: Inspection Sign-In Sheet)

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EPA Lead Inspector

Signature

Scott Yanos

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Date

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 401 North Broad Lessee (Netrality) (Netrality or Facility) to verify compliance with applicable State and Federal regulations. The Philadelphia Air Management Services (Philadelphia AMS) was notified of the inspection on November 13, 2023 via email. On November 28, 2023, EPA notified the Facility of the planned inspection via phone.

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 401 North Broad St, Philadelphia, PA. Netrality is a nonresidential property management company who leases space to other companies for data centers in order to provide a central location for information technology companies to co-locate with each other to allow for easier networking between these companies. In addition to leasing to other companies, Netrality also hosts its own data center at this location under the name 401 N Broad Lessee, which is the name listed on the permit.

The Facility received a Natural Minor Operating Permit (OP17-000003) from Philadelphia AMS which was issued on August 8, 2017. Netrality has sent a Permit renewal to Philadelphia AMS and are currently waiting for approval for the renewal.

401 North Broad Lessee (Netrality) is classified as minor source for particulate matter (PM), Carbon Monoxide (CO), Hazardous Air Pollutants (HAPs) and Nitrogen Oxides (NOx). 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 Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 CFR Part 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources

B. Inspection Opening Conference

At 09:05 AM on November 28, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Netrality was represented by Natalie Kidd, General Manage;

Devin Lashbrook, Direct-DC Ops; Anthony Santino, Engineering Manager; and Michael Kober, Assistant Engineering Manager. Also, Fouad Richard Khalife from Philadelphia AMS was present. EPA inspectors, Scott Yanos, Bruce Augustine, and Alex Everhart 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). During the opening conference, Netrality representatives did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

Netrality is primarily a nonresidential property management company specializing in data centers to allow companies to co-locate their data center with other companies and provide easy, accessible networking between the companies. Netrality houses their own data center at this location. In addition to providing space and capabilities for data centers, Netrality leases office and laboratory space to a variety of different companies. The laboratory space is specifically for the life sciences who require a lot of power and cooling for their businesses similarly to the data centers.

Netrality purchased the property at 401 N Broad St, Philadelphia, PA in 2014 from Amerimar Realty Company, which is when construction began for the data center. By 2015, the construction was complete and Netrality started operating their data center and leasing space for other companies to house their data centers at the location. Macquarie Asset Management acquired Netrality in 2019 and is the company that currently owns the building. Netrality manages the building. Netrality has 16 buildings across the nation with the Philadelphia building being the largest among these.

Netrality currently has a dozen leases for data centers at 401 N Broad Street which is about 30% of their capacity for datacenters at this location. Each company is responsible for the generation of their own emergency power and their own cooling systems but have the option to lease these services from Netrality. Currently only one company leases emergency power from Netrality

The buildings heat capabilities come from the steam provided by the city of Philadelphia. Anthony Santino explained that the building heat and hot water was recently converted over from two diesel boilers that were located in the basement, but the boilers were taken out of service after they were turned off in April 2023. Each of the boilers were attached to two 15,000 gallon diesel tanks.

Netrality maintains two 4,000 kW emergency diesel generators in the basement of the facility. Each generator has a 30,000 gallon diesel tank, which is housed underground. This allows for a 72-hour run time for both generators on full capacity load. Netrality has a contract with six different diesel providers to provide fuel in case of an emergency. None of the other tenants in the building use the diesel tanks, they are only used by these two generators. The emergency generators are not used for peak power shaving and are only utilized for emergency power. Netrality has a double ended line for power with PECO so if one line goes down, they can switch to the other in order to maintain power in

the building. It is only when both lines go down that the data center would use the emergency generators. The emergency generators are tested monthly for about 5-10 minutes each. There is a yearly test that the emergency generators are put under a full load but for no more than two hours. Netrality stated they coordinate with Philadelphia AMS on when they can conduct their testing due to ozone season restrictions on operation. The fuel used is tested quarterly and Netrality receives certification on the invoice that the diesel being delivered is ultra-low sulfur diesel from the company providing the fuel. Engine hours are tracked manually in a logbook which are then entered into an electronic log book. The emergency generators can only be manually started, there is no automatic or remote start for them. Urea is used as a NOx emission control and is injected at the base of the stacks for both generators.

Netrality does not use or store any hazardous chemicals in their space. Any space which is leased by life sciences laboratories purchase and store any chemicals they need and Netrality does not maintain or monitor which chemicals are used.

The opening conference concluded at 10:01 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:05 AM by Anthony Santino of Netrality and Fouad Richard Khalife of Philadelphia AMS also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 1).

During the inspection of the two diesel generators, Anthony Santino explained that the urea emission control system doesn't start injecting urea at the base of the stacks until the stacks hit around 500 degrees Fahrenheit and that the generators are outfitted with noise inhibitors. Generator one was observed to have 157.0 hours run time and generator two had 185.1 hours run time. The EPA Inspectors asked if the maintenance record on the generator control panels was accurate and Anthony Santino said they were not because not every technician who services the diesel generators fills it out but Netrality did have up to date records of all the servicing that had been completed on the generators. Each generator has its own fuel pump. Each fuel pump draws from both of the diesel tanks. The generators each have their own stack and urea injection but combine into a single stack prior to venting to the atmosphere.

The EPA inspection team then observed both of the boilers that were taken out of service when the facility switched over to steam provided by the City of Philadelphia. The boilers were taken out of service using a blind flange and turning valves. New piping showing that the facility was using city steam was observed.

Anthony Santino did confirm that the building had a diesel fire pump. The fire pump uses a 208 horsepower engine and has a 280 gallon diesel tank as a fuel source. Netrality is responsible for filling

the diesel tank which it does once a year. Netrality does not keep a log of the run time or the maintenance for the fire pump.

Fouad Richard Khalife left before the conclusion of the walkthrough.

The walkthrough concluded at 11:11 AM.

IV. Closing Conference

After the records review, EPA inspectors, and Anthony Santino had a brief closing conference to ask additional questions and discuss observations. Anthony Santino said that the boilers were permitted when they were in use and could provide that documentation with the document request. 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 11:15 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 Netrality.

- The boilers found on site were not listed or included in the Natural Minor Operating Permit (OP17-000003). These boilers are potentially subject to 40 C.F.R. Part 60 Subpart JJJJJ because they provide steam for the process. Documentation showing the boilers were properly permitted and properly decommissioned in accordance with regulations has been requested from Netrality.
- There are multiple tenants located at this location that operate diesel fired emergency generators. These generators are subject to 40 C.F.R. Part 60 Subpart IIII and 40 C.F.R. Part 63 Subpart ZZZZ. EPA has requested the list of tenants to determine who potentially operates engines as well as records maintained for the generators that Netrality maintains.

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VI. List of Attachments

Attachment 1: Photo Log

Attachment 2: Inspection Sign-In Sheet