Environmental Justice (EJ) Fact Sheet: The Markley Group

Address: 1 Markley Way, Lowell, Massachusetts, 01852

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Overview of The Markley Group

The Markley Group (Markley) is a company that provides reliable power and environmental control systems (cooling, heating, humidity, and ventilation) to its client's technology operations. Markley owns and operates two data centers (one center in Boston, and one center in Lowell).

Markley leases its facilities to public entities including state governments, transportation systems, public education systems, hospitals and corporate clients looking to outsource their data center requirements. The facility is currently categorized as a "synthetic minor source" and plans to accept permit conditions to continue that status.

Markley - Current Operations

To provide reliable power for its clients, Markley uses batteries called "Uninterruptable Power Systems". Each of these systems require diesel emergency generators in case there is a power outage. For the environmental control systems, Markley facilities require mechanical cooling systems and heat rejection (cooling and fan). These systems are found either at ground level or on the rooftops of the buildings. Markley also makes frequent improvements and upgrades to the existing infrastructure.

Markley has operated emergency generators with applicable permits since the facility opened in 2016. All emergency generators have completed the proper MassDEP air quality permitting process as required. Markley partners with the engineers and scientists at VHB to provide MassDEP with the data, modeling, and other related information to ensure that Markley maintains compliance with MassDEP rules and regulations as well as the Clean Air Act.

Compliance and Air Permit History

Markley currently has a valid Comprehensive Air Plan Approval (Approval #NE-22-016) which covers the installation and operation of eleven (11) emergency engine generators, and another application currently under review for an additional eight (8) generators, bringing the total to nineteen (19). Of these eleven, seven (7) are currently installed and operational. The facility's emissions are currently categorized as a "synthetic minor source" and plans to accept permit conditions to continue that status.

MassDEP issued a Comprehensive Air Plan Approval on March 25,2025. This Comprehensive Plan Approval was appealed and is being litigated at the Office of Appeals and Dispute Resolution.

Proposed Project Details

On behalf of Markley, VHB has submitted an Air Quality Plan Approval application to install and operate an additional eight (8) 3,000 kW engine generators, bringing the total to 27 generators. In accordance with the Massachusetts Air Pollution Control Regulations, each engine/generator set shall only operate during emergencies in cases of power outages or loss of incoming utility power due to distribution failure, and for routine maintenance and testing periods. Routine maintenance and testing consist of approximately 5 minutes per generator weekly and once per year for two hours. The engines are subject to the New Source Performance Standards in 40 CFR 60 Subpart IIII. During the nine years of operation, facility has never lost power or required the generators to run for an extended period.

Markley will conduct air quality and noise analyses to show that the Facility's operations will not cause or contribute harm to public health or the environment. These analyses will confirm that the facility will not create a condition of air pollution and will not violate the National Ambient Air Quality Standards (NAAQS).

Markley - Current Emission Controls

Since 2015, Markley has attended community meetings and has cooperatively addressed abutters concerns regarding the generators at the Lowell Facility. Some steps the facility has taken to limit the impact for surrounding abutters include:

- Added sound barriers to property lines and changed the surrounding landscape to dampen the sound while the generators are running.
- Extended the height of the generator stacks to assist in dispersing the generator exhaust and sound away from property abutters.
- Changed the hours of generator maintenance and limited the hours of Load Bank testing per abutters requests.
- Provided funding to perform multiple environmental tests for sound and exhaust particulate ensuring the changes made have kept the facility within the standards set by DEP.

Markley will continue to engage with the public and address any concerns related to the proposed project.

Public Notice and Involvement

MassDEP is currently reviewing this permit application. After completing its review, MassDEP will issue a proposed decision to approve or deny the permit application and will provide a 30-day public comment period on its proposed decision. The permit application is currently available for public review via the EEA ePLACE Public Access Portal: https://eeaonline.eea.state.ma.us/EEA/PublicApp/

If you would like to provide a comment when the public comment period is open, please see the following instructions: Open the main EEA ePLACE Portal page listed above. To search for the specific application, click on the **orange** "Search and/or Comment" button, then click on the name of the applicant/facility on the resulting page. If you would like to be notified of the proposed decision and the public comment period, please contact the MassDEP Northeast Region's Air Quality Permit Chief at Edward.Braczyk@Mass.gov.

• Site Location

Environmental Justice (EJ) Community

The facility will be considered a "minor source" within one mile of Environmental Justice populations in Lowell. The one-mile radius extends within Lowell only and does not encroach on other communities. The nearby EJ populations are presented in the map.

EJ Communities were located using the Massachusetts Executive Office of Energy and Environmental Affairs (EEA) interactive mapping system: Environmental Justice Populations in Massachusetts (arcgis.com).

For more information on EJ, please see the MassDEP EJ Overview Fact Sheet (attached in this email).

Contact information for questions pertaining to EJ involvement:

Kayla Clarke, Program Coordinator, Environmental Justice at Kayla.Clarke@mass.gov



Contact information for questions pertaining to the plan application:

Mir Waez, Environmental Engineer, Bureau of Air and Waste at Mir.S.Waez@mass.gov