



# Maryland

## Department of the Environment

**Wes Moore**, Governor  
**Aruna Miller**, Lt. Governor

**Serena McIlwain**, Secretary  
**Suzanne E. Dorsey**, Deputy Secretary  
**Adam Ortiz**, Deputy Secretary

December 31, 2025

Mr. Jordan Crandall  
Head of Engineering, Construction and Operations Legal  
Rowan Digital  
1400 16th Street, Suite 330  
Denver, CO 80202

Re: Emissions Unit Construction Activity Prior to Issuance of Air Permit  
Bauxite I Data Center Construction Site  
3250 Digital Drive  
Frederick, MD 21703  
AI# 185075

Dear Mr. Crandall:

The Air and Radiation Administration (“ARA”) of the Maryland Department of the Environment (“Department”) is contacting you as the representative of the owner of the above referenced Bauxite I Data Center Property at 3250 Digital Drive in Frederick, Maryland (“the Property”).

A final air quality permit is required prior to commencement of any construction on an air pollution emissions unit such as the emergency generators that are proposed to be installed at the Property. The Department has received an application for such a permit from Amazon Data Services, but has not made a final determination on that application, nor has the Department received an application from Rowan Digital.

While some construction activities for elements of a data center do not require an air quality permit, including construction of the core and shell of the building that will house the data center, other activities more directly associated with the emissions unit cannot be performed before the issuance of such a permit. Activities that constitute construction on an emissions unit include, but are not limited to, installation of building supports and foundations, laying underground pipework, and construction of permanent storage structures.

The Department has confirmed through our latest site visits that physical construction on emissions units commenced at the Property prior to the issuance of a final air permit to construct those emissions units. Specifically, the Department observed the construction of concrete foundations to support the proposed diesel-fired emergency generators, as well as the installation of associated electrical conduit and transformers.

The Department requires that all construction relating to emissions units cease immediately, until and unless a final air permit has been issued and a construction notification has been received by the Department. Please acknowledge receipt of this request within five (5) business days of the date of this letter. Failure to comply with the requirements set forth in this letter will result in a violation pursuant to COMAR 26.11.02.10A.

If you have any questions, please contact Mr. Steven Lang at 410-537-3944 or by email at [steven.lang@maryland.gov](mailto:steven.lang@maryland.gov).

Sincerely,



Christopher R. Hoagland, Director  
Air and Radiation Administration

cc: Angelo Bianca, ARA Deputy Director  
Suna Sariscak, Air Quality Permits Program Manager  
Steven Lang, Air Quality Compliance Program Manager  
Michael Strande, Office of the Attorney General