BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

Sustainable Newton, Sara and Randall ("Randy") Vinson, and Theodosia and William ("Billy") Wade, Petitioners, v. VoltaGrid, LLC, Respondent.	Docket No. 57243

Exhibit MC-3

SOUTHERN ENVIRONMENTAL LAW CENTER

Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Telephone 404-521-9900
Facsimile 404-521-9909

March 13, 2026

VIA ELECTRONIC MAIL: *Air-Permits.Comments@dnr.ga.gov*
Mr. Steve Allison
Permitting Program Manager
Air Protection Branch
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, GA 30354

RE: Public Comments on Draft Air Permit No. 4911-217-0080-S-01-0 for VoltaGrid Atl-1 EGU.

Dear Mr. Allison:

On behalf of itself, Sustainable Newton, and the Altamaha Riverkeeper, the Southern Environmental Law Center respectfully submits the following comments on the draft air permit for VoltaGrid's electric generating unit in Covington, Georgia (Draft Air Permit No. 4911-217-0080-S-01-0 for VoltaGrid Atl-1 EGU). VoltaGrid seeks a permit to operate a behind-the-meter power generation unit for the sole purpose of powering the co-located Serverfarm datacenter. The VoltaGrid units consists of thirty-three Jenbacher J620 natural gas-fired engines and ancillary equipment while the Serverfarm facility will operate 37 backup diesel engines.

Most critically, per Georgia Environmental Protection Division's ("EPD") draft permit Narrative, air pollution from this facility will cause ambient levels of formaldehyde that equal EPD's maximum allowable concentration.[1] Formaldehyde is both toxic and "carcinogenic to humans by the inhalation route of exposure;"[2] EPD's ambient standard is thus set to limit cancer risks to those surrounding facilities like VoltaGrid, yet despite VoltaGrid's modeling showing it will equal the maximum allowable levels of carcinogenic formaldehyde, EPD is not taking any further steps to address cancer risks.

Moreover, as EPD is aware, Covington is also home to a medical sterilizing facility (BD Covington) using carcinogenic ethylene oxide along with other industrial emitters, and a recent study found that "[p]eople who live in the 30014 ZIP code [home to both BD Covington and the VoltaGrid site] are diagnosed with more cancers than residents in Newton County overall and in the state as a whole," and that "[t]he difference between the cancer rate in 30014 and the state is statistically significant, meaning that the increase is not likely due to chance alone."[3] Further, EPA has also singled out Covington as a place "where risks of cancer were potentially

[1] EPD, SIP Application Review for VoltaGrid ATL-1 EGU, Application No. 29947, at 11 (undated) (hereafter, "Draft Narrative").
[2] EPA, IRIS Toxicological Review of Formaldehyde (Inhalation), at 7 (Aug. 2024), https://iris.epa.gov/static/pdfs/0419_summary.pdf.
[3] WebMD, "Residents Unaware of Cancer-Causing Toxin in Air" (July 19, 2019), https://www.webmd.com/cancer/ethylene-oxide-special-report/20190719/residents-unaware-of-cancer-causing-toxin-in-air.

elevated."[4] Given the foregoing, before EPD can even consider issuing this permit, it must take additional protective steps to reduce or mitigate the cancer risks presented by VoltaGrid's engines.

Finally, we believe EPD must permit VoltaGrid and the co-located Serverfarm datacenter as a single source; in particular, it appears that the proposed arrangement between the two entities violates Georgia's electric utility laws and raises significant doubts that the two entities will operate independently.

I. EPD Must Require Mitigation or Additional Air Toxics Demonstrations to Address Cancer Risks from Formaldehyde.

According to EPD's draft Narrative, VoltaGrid's engines and associated equipment will emit up to 11,554 pounds of formaldehyde, or 5.78 tons, per year.[5] This appears to include emissions from the temporary engines (and we appreciate that EPD required VoltaGrid to include these emissions in the permit), while the permanent engines will emit 2.6 tons of formaldehyde per year.[6]

Based on these emission rates (which we believe may not represent maximum potential emissions from the permanent engines, as discussed below), VoltaGrid modeled the ambient impacts on both a short-term (15-minute exposure) and long-term (annual exposure) basis. The results of this modeling are set out in EPD's draft permit narrative, and they show that VoltaGrid's formaldehyde emissions will cause ambient concentrations that *equal* EPD's 'Allowable Ambient Concentration,' or AAC. The following is an excerpt from the draft narrative:

[4] EPA, Ethylene Oxide: Technical Reviews and Outreach to Potentially Affected Communities; Status Report – BD Covington, Georgia (First Quarter 2021 Update), https://www.epa.gov/sites/default/files/2021-05/documents/bd_covington_status_report_1st_quarter_update_2021.pdf.
[5] Draft Narrative at 11.
[6] *Id.* at 4.

The table below presents the result of this analysis. The short-term and long-term impacts for all TAPs were determined to be equal to or below their allowable ambident concentration (AAC). No further analysis was conducted.

	Short-term (15-min)			Long-term (annual)		
Pollutant	Impact	AAC	Exceeds?	Impact	AAC	Exceeds?
	µg/m^3	µg/m^3	--	µg/m^3	µg/m^3	--
1,3-Butadiene	0.02	1100	no	0.00	0.03	no
Acetaldehyde	1.73	4500	no	0.04	4.55	no
Acrolein	1.42	23	no	0.02	0.35	no
Ammonia	14.55	2400	no	0.88	100.0	no
Benzene	0.65	1600	no	0.00	0.13	no
Ethylene Dibromide	0.01	23050	no	0.00	0.02	no
Formaldehyde	9.36	245	no	0.09	0.09	no

Under EPD's Air Toxics Modeling Guideline, the above analysis is merely a screening step utilizing the SCREEN3 modeling software,[7] which is described as such: "SCREEN3 is the screening version of the ISC3 model . . . [p]reliminary modeling with SCREEN View can remove the need for more complicated modeling, saving you time and resources."[8] In other words, this modeling tool is limited in many ways compared to more rigorous modeling tools—not least that it is intended primarily to model only single sources; EPA documentation for SCREEN3 notes that it "can not explicitly determine maximum impacts from multiple sources."[9] Indeed, it appears that VoltaGrid modeled all 33 engines as a single point source.[10]

As the table above shows, the result of this screening modeling for annual formaldehyde is exactly at the AAC. In other words, had the SCREEN3 results shown even one-tenth of an additional microgram of formaldehyde, EPD's Guideline would have required more rigorous modeling using, for instance, EPA's AERMOD tool.[11]

Given the elevated cancer risk in this zip code, as discussed above, it is imperative that EPD require mitigating measures, such as emissions reductions or stack modifications, to reduce ambient formaldehyde concentrations. At a bare minimum, however, EPD must at least require more rigorous modeling under the Guideline to more fully assess cancer risks near this facility.

---

[7] EPD, Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions, at 4 (May 2017) (hereafter, the "EPD Toxics Guideline"), https://epd.georgia.gov/document/document/toxic-impact-assessment-guideline/download.

[8] Lakes Software, **S**CREEN View - Version 4.0.1, https://www.weblakes.com/software/freeware/screen-view/.

[9] EPA, Screen3 Model User's Guide, at 2 (Sep. 1995), https://gaftp.epa.gov/aqmg/SCRAM/models/screening/screen3/screen3d.pdf.

[10] VoltaGrid, SIP PERMIT Application for a 90 MW Power Plant in Covington, GA, Vol. 2, Appendix D (Nov. 2025) (hereafter, "VoltaGrid Application").

[11] EPD Toxics Guideline at 4.

Finally, given the proximity to the BD Covington sterilizer, EPD must also assess cancer risks cumulatively; in particular, we note that EDP's Guideline gives EPD discretion to "request the applicant to evaluate additive/synergistic effects from multiple pollutant exposure."[12] Here, EPD should conduct or require modeling that evaluates cancer risks from both ethylene oxide from the sterilizer and formaldehyde from VoltaGrid, and then only issue the VoltaGrid permit if cancer risk thresholds are met.

II. EPD Must Require More Stringent Control Efficiency and Monitoring Requirements for Formaldehyde Emissions

As discussed above, the preliminary air toxics screening modeling for formaldehyde showed annual concentrations at exactly the AAC. Thus any increase in emissions beyond those permitted and modeled would almost certainly cause exceedances of the AAC. As set out in our comments on VoltaGrid's application and below, VoltaGrid's emissions estimates for formaldehyde are dubious and must be accompanied by more stringent control and monitoring requirements.

A. VoltaGrid's Formaldehyde Estimates Rely on Overly Optimistic Control Efficiencies

VoltaGrid estimates the 33 permanent engines will emit 2.6 tons of formaldehyde per year. This estimate appears to be overly reliant on assumed control efficiencies. In particular, to estimate formaldehyde emissions, VoltaGrid cites to a manufacturer emission rate and then assumes that the relevant controls, oxidation catalyst, will reduce emissions by 95%.[13] To support these assumptions, VoltaGrid further cites to testing on comparable engines in Texas.[14] That testing showed that the oxidation catalyst was achieving an average emission reduction of 98.2%—considerably higher than the 95% assumed in this permit application.[15]

Critically, the Texas testing also included pre-control emission rates (i.e., they tested the "inlet" of the control devices);[16] utilizing this emission rate and the 95% control efficiency claimed by VoltaGrid for the Georgia engines results in an emission rate for the 33 engines of about 5.3 tons per year, more than twice the rate (2.6 tons) calculated by VoltaGrid.[17]

---

[12] *Id.* at 5.
[13] VoltaGrid Application Vol. 1, Appendix B, Table 4.
[14] Air Hygiene, Inc., Stack Emission Study for VoltaGrid (Nov. 13, 2025).
[15] Excel Spreadsheet titled "CO and Formaldehyde SAT-1 Summary" (undated, provided by EPD to the undersigned on Feb. 25, 2026).
[16] *Id.*, listing inlet formaldehyde concentrations ranging from 0.024 lb/MMBtu to 0.033 lb/MMBtu, with an average 0.0288 lb/MMBtu.
[17] *See Id.*, showing that the average inlet (i.e. uncontrolled) formaldehyde rate was 0.028 lb/MMBtu. We therefore calculate a controlled emission assuming 95% control efficiency at 0.0014 lb/MMBtu. Per VoltaGrid's application each engine is rated at 26.028 MMBtu/hr (*See* Application at 80, listing the power input at 100% load as 26,028 MMBtu per hour). From here we calculate a total PTE of 5.266 tpy for all 33 engines.

Stated differently, based on the Texas testing (which, again, achieved an average destruction efficiency of 98.2%), VoltaGrid proposes an emission limit of 0.022 lb/hr for each engine. However, if the Geogia engines only meet 95% destruction efficiency (as claimed in VoltaGrid's application), they will emit formaldehyde at a rate of 0.039 lb/hr, nearly twice the proposed permit limit.[18] We further calculate that any control efficiency lower than 97.2% will mean VoltaGrid is violating the 0.022 lb/hr limit.[19]

We note further that the Texas testing was not compliance testing, but rather voluntary engineering testing. As far as we know, no regulators were present, and VoltaGrid would have been free to conduct unlimited tuning and adjustments prior to the testing. As such, the Texas testing may represent a best-case scenario for emissions and destruction efficiency.

Given that these heightened control efficiencies are critical to VoltaGrid's permit compliance and to ensure emissions remain below the rates modeled, EPD must incorporate permit conditions adequate to ensure continuous compliance set out below.

B. EPD Must Require More Stringent Monitoring Conditions for Formaldehyde

Despite the foregoing—the screening results showing formaldehyde at levels equal to the maximum allowable ambient concentration and the heavy reliance on very efficient control technology—the permit only contains one provision related to monitoring for formaldehyde emissions: EPD has required initial (i.e., one-time-only) stack testing.[20]

Although the permit does contain certain parametric monitoring provisions related to the selective catalytic reduction ("SCR") controls, each of these monitoring provisions arises from ensuring the SCR achieves adequate NOx emissions reductions; none of these are related to ensuring the oxidation catalyst achieves adequate control of organics like formaldehyde or the surrogate carbon monoxide.[21] In short, nothing in the permit ensures that the controls are operated in a manner to continuously achieve the rigorous control efficiencies needed to maintain compliance with the formaldehyde emission limit (and, as set out above, this means the oxidation catalyst must achieve around 97 to 98% destruction efficiency to keep emissions within limits). The permit must be amended to included adequate parametric monitoring to ensure the catalyst and the overall control technology remain effective continuously.

The best way to address these issues would be to require Continuous Emissions Monitoring Systems ("CEMS"). We note that the relevant NESHAP standards include CEMS as one monitoring requirement for RICE engines, in particular CEMS for CO, CO_2, and O_2, which the

---

[18] *Id.* We calculate an hourly emission rate at 95% control efficiency by multiplying the average uncontrolled (inlet) emission rate of 0.0288 lb/MMBtu by 0.05, then multiplied by the 26.028 MMBtu/hr capacity of each engine.

[19] *Id.*

[20] Draft Permit Condition 6.2.

[21] The Draft Permit Conditions 5.2 to 5.4 cite to EPD's PTM 2.120.3, and these conditions are explicitly related to NOx. *See* https://epd.georgia.gov/documents/part-ii-source-categories-section-2120-stationary-gas-turbines-and-stationary-engines-used.

NESHAP standard uses as surrogates for HAP emissions like formaldehyde.[22] In fact, VoltaGrid itself touts that its engines utilize continuous emissions monitoring for CO and other pollutants, with the company's website stating that "we continuously monitor our equipment's actual emissions of key criterion pollutants, including CO_2, CH_4, CO, and NOx."[23]

Although we believe CEMS would be the most appropriate method to demonstrate continuous compliance, EPD must in either case require periodic stack testing for formaldehyde itself. A one-time test, lasting just three hours, is simply not adequate to ensure that formaldehyde emissions remain in compliance for years to come.

Additionally, we note that this once-off testing provision itself is dubious because it requires testing at "maximum operating load point."[24] Formaldehyde emissions may be higher at lower load operations; for instance, AP-42's emission factors for carbon monoxide (a common surrogate for formaldehyde emissions) show emission rates are nearly double at loads below 90% compared to loads above 90%.[25] A more appropriate testing requirement might consider testing at worst-case load conditions for formaldehyde emissions.

III. EPD Must Permit VoltaGrid and the Adjacent Serverfarm Operation as a Single Source.

VoltaGrid intends to sell power exclusively to the adjacent Serverfarm datacenter, and Serverfarm will be solely reliant on VoltaGrid's power; the two entities will likewise share the same piece of undivided property, owned by Serverfarm. Despite the foregoing, EPD is proposing to permit the two entities as separate sources, allowing both sources to escape more rigorous Title V permitting requirements, amongst other issues. This appears to be improper—especially because this arrangement would violate the Georgia Territorial Act, as discussed below.

A. Under EPA's Source Aggregation Guidance, VoltaGrid and Server Farm Are a Single Source.

EPA's source aggregation test—used to determine when two entities should be considered one source for permitting—boils down to three elements, namely do the entities: (1) belong to the same industrial grouping: (2) are located on one or more contiguous or adjacent properties: and (3) are under the control of the same person (or persons under common control).

Under the first prong, EPD dismisses these two facilities as being one source because they do not share the same industrial SIC code. Yet even VoltaGrid's application acknowledges that there are relevant exceptions to this prong, in particular when one facility serves as a "support facility" for the primary establishment. EPA has explained that a facility may qualify as a support facility,

---

[22] 40 CFR 63, Subpart ZZZZ, Table 5.
[23] VoltaGrid, "Real Emissions & Analytics," https://voltagrid.com/emissions-monitoring.
[24] Draft Permit Condition 6.2.
[25] AP-42, Section 3.2, Table 3.2-2 (showing CO emissions at 3.17E-01 lb/MMBtu above 90% load and at 5.57E-01 lb/MMBtu below 90% load).

despite having a different SIC code, when it is "primarily engaged in performing supporting services for other establishments."[26] Here that test is satisfied: VoltaGrid will exist solely to provide the power for the datacenter; it will not produce any products or sell electricity to any other entity. As such, the fact that the two entities could be overly parsed into different SIC codes is irrelevant. It would be absurd, for instance, to classify the numerous backup engines at a typical datacenter as falling under a different SIC code than the datacenter itself, and the fact that VoltaGrid proposes to use full-time generators does not change this analysis.

EPD further proposes to consider these two entities as separate sources under EPA's 2018 Meadowbrook letter,[27] which explains that where two entities are not under sufficient common corporate control, they should not be considered one source. As such, according to EPD, the fact that VoltaGrid and Serverfarm will have different corporate ownership trumps all the other factors indicating that this datacenter, powered solely by VoltaGrid's engines, should not be considered a single source.

As an initial matter, VoltaGrid LLC is not currently registered to do business in Georgia, and it's not clear that VoltaGrid is complying with Georgia's business laws by applying for an air permit here without registering to do business in the state. But more critically for EPD's analysis, it is impossible to ascertain whether Serverfarm and VoltaGrid will actually operate the two facilities in accordance with the descriptions provided in the application if VoltaGrid is not even a legal entity in Georgia—and, as set out below, this arrangement would not be lawful under Georgia's electric utility laws.

Moreover, the Meadowbrook Letter was a non-binding, non-regulatory letter specific to single set of facts regarding a landfill-to-gas operation in Pennsylvania. The Memo moreover explains that it "is not a rule or regulation, and the statements herein are not binding on state or local permitting authorities." EPA further stressed that "consistent with EPA's longstanding practice and view, determinations of common control are fact-specific and should continue to be made by permitting authorities on a case-by-case basis."[28]

Further, The Meadowbrook Letter states that it would "not be appropriate to rely on EPA's current approach [in the Meadowbrook Letter] to artificially separate a source into multiple sources in order to evade major source status or otherwise circumvent title V or NSR requirements."[29] Finally, the Meadowbrook Letter reiterates the ultimate guiding principle for this analysis, which is that for permitting purposes, a single "source" should comport with the "common sense notion of a plant."[30]

---

[26] Application at 1-2.
[27] Letter from William L. Wehrum, EPA, to Patrick McDonnell, Pennsylvania Department of Environmental Protection (Apr. 30, 2018), https://www.epa.gov/sites/default/files/2018-05/documents/meadowbrook_2018.pdf. (Hereafter, the "Meadowbrook Letter").
[28] Meadowbrook Letter at 6.
[29] *Id.* at 8-9, Footnote 21.
[30] *Id.* at 3; *see also* 45 Fed. Reg. 52676, 52694 (Aug. 7, 1980) (citing Alabama Power Co. v. Costle, 636 F.2d 323 (D.C. Cir. 1979)).

Under these factors, EPD should view the VoltaGrid engines and the Serverfarm as one source meeting the "common sense notion of a plant." For instance, many other datacenters are being constructed or proposed using full-time, onsite power without demarcating the two operations as different sources; moreover, VoltaGrid's sole purpose for seeking a permit is to power the adjoining datacenter, and the datacenter could not operate without the power from VoltaGrid; this in contrast to the scenario under the Meadowbrook Letter, wherein biogas processing facility would process waste-gas from an existing and unrelated landfill.

Finally, even under the Meadowbrook Letter, where the analysis hinges primarily on whether one entity could influence the environmental compliance of the other entity, that prong appears to satisfied here. Because Serverfarm will rely on VoltaGrid exclusively for primary power—but will also utilize hour-limited emergency backup engines—downtime or outages at VoltaGrid could force Serverfarm to utilize its backup engines in ways that lead to permit violations. Moreover, Serverfarm is taking synthetic minor limits, and additional run-time on its engines, even if not a violation of federal hour limits, could cause exceedances of the synthetic minor limits.

For the foregoing reasons, EPD should consider VoltaGrid and Serverfarm as a single source either under the "common sense notion of a plant" standard or even under the non-binding Meadowbrook guidance. We note that, as a practical matter, permitting the two sources as a single source would ultimately necessitate the facility to obtain Title V federal operating permit, which would implement more protective monitoring, recordkeeping, and reporting requirements.

B. VoltaGrid and Serverfarm's Proposed Operations Violate Georgia's Territorial Act.

Under Georgia laws, in particular the Georgia Territorial Electric Service Act ("Territorial Act") and the Georgia Cogeneration and Small Power Production Act ("CoGen Act"), one entity may sell electricity to another entity only in limited, highly-regulated circumstances—circumstances not met here. Although we understand that EPD does not regulate electricity sales, the fact that VoltaGrid and Serverfarm are attempting to be permitted as separate entities is highly relevant: either these operations are not actually two separate legal entities (or may not intend to be separate entities once electricity is flowing), or the arrangement violates other Georgia law. As such, even if EPD disagrees with the analysis above showing that EPD must permit them as a single source, EPD must further scrutinize the VoltaGrid/Serverfarm relationship to ascertain whether they really are two distinct entities operating at arms-length and intend to remain as such in the future.

In Georgia, an individual may not furnish retail electric service to a third party without implicating two main statutes – the Georgia Territorial Electric Service Act ("Territorial Act") and the Georgia Cogeneration and Small Power Production Act ("CoGen Act"). In particular, Under Section 46-3-3(1) of the Territorial Act, an electric supplier has "the exclusive right to extend and continue furnishing service to [any] new premises" within its assigned area. Section (b)(1) also states that each assigned area is "an enclosed geographic area assigned to only one

electric supplier by the [Georgia Public Service Commission ("Commission").]"[31] Moreover, an "electric supplier" is "any electric light and power company subject to regulation by the [C]ommission, any electric membership corporation furnishing retail service in this state, and any municipality which furnishes such service within this state."[32]

VoltaGrid does not qualify as an electric supplier because it is not an electric light and power company subject to regulation by the Commission, an electric membership corporation, or a municipality. On the other hand, Georgia Power Company ("Georgia Power") qualifies as an electric supplier because it is an electric light and power company subject to regulation by the Commission. VoltaGrid aims to sell electricity to a retail customer, Serverfarm, in Georgia Power's assigned area. As such, VoltaGrid's sales of electricity to Severfarm would violate the Territorial Act by infringing upon Georgia Power's assigned area through selling electricity to a retail customer, Serverfarm.

Further, under § 46-3-53(a) of the CoGen Act, a person may operate a cogeneration facility without being subject to the Commission's jurisdiction or regulation if that person uses *all* of the electric energy produced at the facility. However, while subsection (b) provides for a limited exception that allows excess electric energy to be sold to an *electric supplier* without being subject to the Commission's regulation or jurisdiction,[33] this exception found in (b) only allows VoltaGrid to sell excess electricity to an electric supplier, such as Georgia Power, not an adjacent datacenter.

In sum, if VoltaGrid's representations in its application are correct, it appears that the sale of electricity to Serverfarm violates the Territorial Act by infringing upon Georgia Power's assigned area through selling electricity to a retail customer, Serverfarm, and does not meet the limited exception found in the CoGen Act.

Conclusion

As set out above, VoltaGrid's 33 gas-fired engines will emit toxic and carcinogenic formaldehyde at a magnitude causing cancer risks to exactly match EPD's acceptable ambient concentration—yet this analysis relied only on initial screening modeling and EPD is not requiring any additional analysis or risk-mitigation. Moreover, Newton County and this zip code in particular have already been exposed to elevated cancer risks from the nearby ethylene oxide

---

[31] O.C.G.A. § 46-3-3(1) states "'Assigned area' means an enclosed geographic area assigned to only one electric supplier by the commission or by this part, and inside which the assignee electric supplier shall have the exclusive right to extend and continue furnishing service to new premises, except as otherwise provided in this part."

[32] O.C.G.A. § 46-3-3(3).

[33] O.C.G.A. § 46-3-53(a) states "(a) Any person may operate a cogeneration facility without being subject to the jurisdiction or regulation of the commission if such person uses all of the electric energy, steam, or other form of useful energy produced at such cogeneration facility. The electric energy shall not be sold to any other person except as provided in subsection (b) of this Code section." Meanwhile, O.C.G.A. § 46-3-53(b) states (b) "Any person may operate a cogeneration facility and sell any excess electric energy to an electric supplier without being subject to the jurisdiction or regulation of the commission; provided, however, that nothing in this article shall except a person from compliance with federal law."

sterilizer for years. As such, EPD must take real, concrete steps to address and reduce the cancer risk presented by VoltaGrid before issuing this construction permit. Moreover, it appears that VoltaGrid and the adjacent Serverfarm datacenter ought to be permitted as a single source, especially given the apparent violations of Georgia's electric utility laws under the proposed corporate arrangement.

Respectfully submitted,

/s/ Patrick Anderson

Patrick J. Anderson
Southern Environmental Law Center
Ten 10th Street, NW, Suite 1050
Atlanta, Georgia 30309
404-521-9900
panderson@selc.org