

Amber Hanley

I am a 15 year old resident of Washington state and I am asking that you deny Yucca Growth Infrastructure's air quality permit. I live here with many generations of my family and this is our home. I want to raise my future children here knowing they have a safe and secure future. That future is under threat with this proposed air quality permit. A change to fuel cells has minimal impacts on the suffering we will endure as a result of the gas plant's air pollution. To add 10 million tons of carbon dioxide pollution and a vague estimate of toxic emissions to our active and long-time nonattainment zone would be nothing short of blatant environmental racism. Our metro area is currently 16th worst in the nation for ozone pollution and we have received a failing grade on this air quality standard every single year since 2000. We are already breathing some of the most compromised air in the country. It is unacceptable to invite a new source of hyperscale air pollution into our communities.

The carbon dioxide pollution alone will heat our atmosphere at a much faster pace and promote the formation of even more ground-level ozone. Last year, a 14 year old suffered a grand mal seizure while on the courtyard at school because the extreme heat led to electrolyte imbalances. My uncle works outside everyday without shade or rest breaks and has nowhere to keep his insulin cool. Families can barely pay electricity bills in the summer as it is. We cannot afford more intense heat. The other toxic air pollutants are extremely dangerous—many of them at very low levels. How is anyone supposed to send their kids to school knowing what they are breathing in? Knowing it can cause permanent brain damage or breathing complications before they have had a chance to grow up.

Fuel cells also create hazardous waste and the fuel cell provider for this project has a history of illegally dumping this waste and hiding it for several years. This company will likely repeat its bad habits, illegally dumping dangerous and undisclosed chemicals into our public landfills, and we will just have to wait until somebody notices? Our county has and continues to face an illegal dumping epidemic so how can I be sure that these systemic oversight failures we have locally won't continue and expand to include this dangerous and experimental fuel cell operation. A fine for illegal dumping does not undo damage or its spread once our aquifer and soils are contaminated. It also will not re-capture the volatile chemicals that are released into the air when hazardous waste is improperly stored and disposed of.

My family's health and safety should be worth more than the profits of out-of-state corporations. The only defensible options moving forward are to deny this air permit or you must hold a public hearing in-person in Santa Teresa with a component for virtual participation. Materials and the hearing itself must be translated into Spanish and meet any other accessibility needs requested by community members.

The proposed design has an individual exhaust stack on each fuel cell, of which there will be 2,275. It would be inefficient to place monitors and controls on each individual stack and there are NO proposed pollution controls on any of these stacks. How, then, will this project show evidence of their compliance with emissions limit requirements under Title V? Has there been or will there ever be upstream fuel testing of methane gas to anticipate the composition of these fuel cells' emissions? How exactly will NMED enforce emissions standards without direct, long-term, continuous monitoring? Or isolate their deleterious impact on air quality without an accurate assessment of

localized pollution?

A fuel cell can continue to generate electricity or maintain operating temperatures while experiencing catalyst degradation which causes a massive spike in the release of carbon monoxide or Volatile Organic Compounds (VOCs). This project would need to centralize the 2,275 individual stack emissions into an exponentially smaller number of exhaust systems so that Continuous Emissions Monitoring Systems (CEMS) installed on these central exhaust systems can provide real-time, accurate data about operational compliance. As it is, this design plan completely fails to provide monitoring conditions that are "practically enforceable" under 20.2.70.302.B NMAC.

A proposal, such as this one, that relies on computer simulation modeling instead of actual, measured air pollution at scale is invalid, untrustworthy, and far from what residents of Doña Ana County and New Mexico deserve. What data was used to train these models? When and where was this data collected? What proportion of those involved in the development of this model have, at any time, received money from the corporations involved? How much? If NMED allows group testing for this project, 99% of the exhaust stacks at this facility will never be physically tested during the entire life of the Title V permit. This creates an unmonitored loophole that violates the Clean Air Act's mandate for continuous compliance.

We know the pollution approximations provided are based on an extremely lazy testing methodology and while we were not told whether these 4 tests were even done on-site or during peak temperatures, we can safely assume the applicants cut corners here as well in an attempt to fast track this approval. As I write this, Project Jupiter is draining an undisclosed amount of water from our shared aquifer on a daily basis. Given the statistical invalidity of their pollution estimates, approving this air permit under any circumstance would be to allow this project to introduce unmitigated and undisclosed hazards into our air without consequence.

Children attending Santa Teresa Elementary School will sit innocently, every day, LESS THAN ONE MILE from this pollution. Three other schools, an elder care center, and three public parks sit within around 4 miles of this project. Deny this air permit. Gambling with the fragile health of our children and elders would be a complete defilment of the authority vested in you.

Sincerely,
Amber Hanley