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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.