

Anonymous Anonymous

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? 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. 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. Given the statistical invalidity of their pollution estimates, approving this air permit under any circumstance would allow this project to introduce unmitigated and undisclosed hazards into our air. Deny this air permit. Gambling with the fragile health of our children and elders would be a complete defilement of the authority vested in you.