

abby anonymous

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.

The public should be given an additional 60 days to review and comment on the air quality permit so community members can participate equitably.

The air quality permit application should be denied outright given Bloom Energy's history of illegal dumping hazardous waste. Approving this permit would be government-sponsored environmental racism directed at residents of Doña Ana County.

If the permit is not denied outright, a public hearing needs to be held in Santa Teresa, in both English and Spanish, with an option to participate virtually.