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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 project will inarguably have massive, potentially devastating climate impact. Without accurate ways of measuring this impact it effectively washes its hands of accountability. If we keep treating our planet like an industrial playground many will die firsthand from droughts, climate events and pollution, others will be taken by the war or disease stemming from it. Not to mention that land ownership is a human concept, other beings that lack this capability have no way to combat what occurs on their shared land. If we create superhuman AI that thinks freely and with alien goals and problem solving methods and capable of sidestepping human safeguards by its very nature, frankly, we will all die. The perpetuation of datacentres is incompatible with life and the window to intervene is closing. I ask that the following be considered: 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 given Bloom Energy's history of illegal dumping hazardous waste. If the permit is not denied, a public hearing needs to be held in Santa Teresa, in both English and Spanish, with an option to participate virtually. Approving this permit would be government-sponsored environmental racism as residents of Doña Ana County are already disproportionately impacted by environmental pollution.