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I oppose issuance of the air permit for the Yucca Growth Infrastructure fuel cell construction. Based on a review of the application, it only addresses emissions from the fuel cells used to power the data center. The application does not include emergency generators, which are typically diesel fired, which are almost always installed at data centers to maintain constant supply of electricity to the facility. Section 1, page 3 of the application states the proposed output of the fuel cells requested to be installed is 2,462 MW per hour. A large diesel generator manufactured by Generac (Model SDMD3250) has an output of 3.25 MW. To support the full capacity of the facility, over 750 generators would be required. Under 40 CFR 60, Subpart IIII, a diesel fired emergency generator is allowed 100 hours per year for non-emergency usage, and 50 hours for testing and maintenance. In the unlikely scenario where the facility only covers 50% of its total fuel cell output with emergency generators, this would be the equivalent of over 16,250 operating hours of diesel generators for testing and maintenance alone. Based on the emission factors in AP-42 (the same source used by the consultant for some calculations), Table 3.4-1, for testing/maintenance alone, the potential to emit is over 500 tons per year of NO_x and 27 tpy of particulate matter. Due to the climate in the area, hot and dry, these two pollutants are of particular concern, NO_x due to its contribution to ozone formation and PM because of the ambient particulate from the natural environment.

As a chemical and environmental engineer with more than 25 years of experience in air permitting and compliance, I know it is a common permitting strategy to submit an application for some emission units then later subsequent applications for additional emission units. This can be effective in bypassing regulations, and it can help reduce public involvement in public comment process by making it more complex and thus less transparent to the general public. This extremely basic review of the permit application and likely potential emissions from the project supports only one aspect of my opposition to construction of the operations.