Eva 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? 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 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.

Children attending Santa Teresa Elementary School will sit innocently, every day, LESS THAN ONE MILE from this pollution. Three other schools, an elder care center, and three public parks sit within around 4 miles of this project. 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.