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I am writing to express concern regarding Bloom Energy's air quality permit application. It should be denied. Bloom Energy has a history of illegally dumping hazardous waste. Furthermore, Bloom Energy's proposed design has an individual exhaust stack on each fuel cell, of which there will be 2,275. 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? Likewise, there are no provisions to monitor upstream methane gas nor enforce emissions standards.

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, What proportion of those involved in the development of this model have, at any time, received money from the corporations involved? 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.

At the very least, the public should be given an additional 60 days to review and comment on the air quality permit so community members can participate.

New Mexico Environment Department's (NMED) mission is "to protect and restore the environment and to foster a HEALTHY and prosperous NM for present and future generations." NMED's Air Quality Bureau "protects the public health of New Mexicans and the natural beauty of the state by preventing the deterioration of air quality."

Bloom Energy's project and specifically their application for an air quality permit does not meet these standards.

A fuel cell plant of this size has NEVER been constructed before. Project Jupiter's power plant would be 1,000 times larger than the biggest fuel cell plant Bloom Energy has ever built. This fuel cell gas plant will release toxic chemical pollutants and 10 million tons of carbon dioxide into our air. Project Jupiter will produce more air pollution than the two consumer electrical grids that power all NM families and businesses.

Developers did not propose adequate pollution controls. They estimated the plant's pollution based on tests from a very small unit (only 65 kW) but the power plant they want to build is 37,000 times bigger. A 15% "safety margin" was added to the numbers. Safety margins are NOT usually added if a company is confident their pollution estimates are accurate.

Estimated pollution from the plant's gas pipelines is not included and Project Jupiter's fuel cell plant will generate enormous amounts of hazardous waste containing:

Cancer-causing chemicals (benzene)

Heavy metals (lead, arsenic, chromium)

Toxic compounds (sulfur and others)

All of these poison the human body causing irreversible disease and persist long term in the water and soil.

Bloom Energy has been fined a total of \$1.4 million dollars for illegally storing, transporting, and dumping this hazardous waste in several states AND falsifying records over many years to cover it up.

Deny this permit application and give the community a right to defend their access to clean air.
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.
Thank you.