

anonymous anonymous

The proposed design includes an individual exhaust stack for each of the facility's 2,275 fuel cells. According to the application, there are no pollution controls on these individual stacks, nor is continuous emissions monitoring proposed for each one. Given this design, it is unclear how the applicant intends to demonstrate continuous compliance with the emissions limits required under the Title V operating permit program. Has upstream methane fuel characterization been conducted, or will it be required, to establish the expected composition of emissions from these fuel cells? Without direct, continuous monitoring, how will NMED verify compliance, detect equipment degradation, or determine whether localized air quality impacts remain within allowable levels? Fuel cells can continue operating while catalyst performance deteriorates. Catalyst degradation can substantially increase carbon monoxide and volatile organic compound (VOC) emissions without interrupting electricity generation. If emissions are not continuously monitored, these increases could go undetected. To provide meaningful compliance assurance, emissions from the 2,275 individual exhaust stacks should be consolidated into a much smaller number of centralized exhaust systems equipped with Continuous Emissions Monitoring Systems (CEMS). As proposed, the monitoring approach does not appear to satisfy the requirement that permit conditions be "practically enforceable" under 20.2.70.302.B NMAC. The application also relies heavily on computer modeling and limited emissions testing rather than direct measurements from a facility operating at full commercial scale. Modeling is only as reliable as the data and assumptions used to develop it.