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Office of the Chief Clerk, MC 105
TCEQ
PO Box 13087
Austin, TX 78711-3087
Via online comment portal.

December 3, 2025

Re: Public Citizen Comments on Proposed Air Quality Permit No. 181009, PSDTX1670, and GHGPSDTX254

Public Citizen appreciates the opportunity to provide these comments. We would welcome the opportunity to discuss our recommendations further. Please contact Kamil Cook at kcook@citizen.org, 512-477-1155.

This plant is projected to release an unprecedented amount of pollution.

This draft permit would allow for the release of thousands of tons of noxious emissions per year and would exceed the NAAQS significance threshold of VOC, NO_x, CO, PM, and SO₂.

Even though Carson County is currently in attainment, Hutchinson County, just 34 kilometers north of the proposed facility, is in nonattainment for SO₂. This draft permit provides no evidence for how this proposed facility will mitigate its massive emissions of SO₂, as raised by the October 1st, 2025 Air Quality Analysis Protocol.¹

A facility of this scale requires greater administrative oversight.

The unprecedented size of this facility should require the most robust oversight and scrutiny to both ensure the safety of this facility as well as show the public that this facility will be built with proper government oversight. This draft proposal would create the largest natural gas facility in the country—there should be rigorous scrutiny of this facility to ensure that this facility will not endanger public health and welfare or cause or contribute to a violation of the NAAQS.

The sheer volume of emissions coming from 93 turbines may not even be measurable by existing AERMOD standards, as argued by a previous commenter, Michael Ford, with Panhandle Taxpayers for Transparency. There is no project in existence in the United States of this size that has used AERMOD to project its emissions. It's unclear if this modeling software is capable of accurately modeling the emissions coming from this facility. The burden is on the applicant to prove that AERMOD remains a valid model for this draft permit. It is questionable whether the modeling contained provides a proper assessment of plumes, downwind chemistry, or how it would interact with existing sources in the Panhandle.

¹ "Second Fermi Equipment Holdco, LLC Air Quality Analysis Protocol," TCEQ. 1 October 2025.



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Approving this permit as is would raise troubling questions about equity and health

A facility of this size being built solely to power an AI hyperscale data center is troubling for two reasons. First, it raises questions of equity. The people of Amarillo and the people of Texas will be paying for this plant with their health and air quality. According to Oil and Gas Watch, the projected climate-related social costs from emissions from this plant will cost upwards of \$4 billion and almost 5,000 climate change related deaths.² While Fermi America’s shareholders and executive suite will likely generate record profits, the people of Texas will suffer under the strain of emissions roughly equivalent to an additional 1.2 million Texas homes being added to the ERCOT grid. Lastly, it is unclear if these turbines will be connected to the ERCOT grid. If there is another grid emergency like that of Winter Storm Uri, it is unclear whether this project could provide relief to the grid and the people of Texas.

Conclusion

Based on the applicant’s submission, the draft permit, and the MAERT, the record fails to establish that the proposed permit will protect air quality or public health. Public Citizen urges the commission to reject these permits until a proper air modeling analysis is conducted.

Again, we appreciate the opportunity to provide these comments. If you wish to discuss the issues raised, please contact Kamil Cook at kcook@citizen.org, 512-477-1155.

Respectfully,

Kamil Cook

Clean Energy Associate, Public Citizen

² These values were calculated based on EPA’s Greenhouse Gas Equivalencies Calculator, the social cost of carbon, and the mortality cost of carbon, on Oil and Gas Watch’s website. “Fermi America Project Matador,” *Oil & Gas Watch: Environmental Integrity Project*. 2024.
https://oilandgaswatch.org/facility/rec_d3dtq3o7l7g4fps53bb0