



LEE HARRIS
MAYOR

SHELBY COUNTY HEALTH DEPARTMENT



Public Health
Prevent. Promote. Protect.
Shelby County Health Department

MICHELLE A. TAYLOR, MD DRPH, MPA
DIRECTOR-HEALTH OFFICER

August 16, 2024

Denisse Diaz, Director
Air and Radiation Division
U.S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Dear Director Diaz:

The Shelby County Health Department has received inquiries regarding xAI's temporary gas-burning turbines in use at 3231 Paul R. Lowry Road, Memphis, TN, 38109, the site of the xAI supercomputer currently under construction. According to guidance provided by the Environmental Protection Agency (EPA) Region 4 staff, temporary gas-burning turbines only require Title V local air permits (Shelby County Health Department) once and unless the turbines remain in operation in the same location for more than 364 days.

To address constituent concerns and to offer relevant information, I am urgently requesting the following assistance from the EPA to provide clarity and address environmental health and justice concerns raised by community members:

- An Environmental Protection Agency-led study or review of the gas-powered turbines and the surrounding area, focusing on the potential health impacts of emissions from the gas-powered turbines.
- A written response to the question of whose regulatory authority governs temporary and mobile gas-powered turbines used as a power source and if the temporary and mobile gas-powered turbines require a local Title V permit, and at what time is a permit required? Specifically, a statement acknowledging mobile source gas-powered turbines do not require a local Title V permit until they have remained in the same location for more than 364 days, would be advantageous to all parties concerned.

This assistance will provide the Shelby County Health Department and other local authorities with the information needed to address residents' and other stakeholders' environmental health concerns regarding the gas-powered turbines.

Sincerely,

Michelle Taylor, MD, DrPH, MPA
Director-Health Officer

Mission

To promote, protect and improve the health of ALL in Shelby County.

814 Jefferson Avenue ♦ Memphis, TN 38105 ♦ 901 222-9000 ♦ www.shelbytnhealth.com



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MICHELLE A. TAYLOR, MD DRPH, MPA
DIRECTOR-HEALTH OFFICER

August 30, 2024

Denisse Diaz, Director
Air and Radiation Division
U.S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

VIA ELECTRONIC MAIL

Dear Ms. Diaz:

Per our earlier correspondence, the Shelby County Health Department (SCHD) has received numerous inquiries regarding temporary gas-burning turbines operating at 3231 Paul R. Lowry Road, Memphis, TN, 38109. According to guidance provided by the Environmental Protection Agency (EPA) Region 4 staff, temporary gas-burning turbines only require Title V local air permits once and unless the turbines remain in operation in the same location for more than 364 days.

SCHD has continued to receive inquiries about the turbines, including the attached letter from the Southern Environmental Law Center (SELC) questioning the regulatory status of the gas-burning turbines. I ask that SELC's inquiry be given careful attention and a response.

It is our understanding that the turbines are under the EPA's regulatory control unless and until they remain in operation for more than 364 days. I request your assistance and guidance to clarify this regulatory matter so that SCHD can better address our residents' environmental health concerns.

Sincerely,

Michelle Taylor, MD, DrPH, MPA
Director-Health Officer

CC: Mayor Lee Harris

Enclosure: Southern Environmental Law Center Letter

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