

Alamo, Austin, and Lone Star chapters of the Sierra Club

Bexar Audubon Society

Austin, Bexar and Travis Green Parties

Bexar Grotto

Boerne Together

Bulverde Neighborhood Alliance

Bulverde Neighbors for Clean Water

Cibolo Center for Conservation

Citizens for the Protection of Cibolo Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of SA

Friends of Canyon Lake

Friends of Dry Comal Creek

Friends of Government Canyon

Fuerza Unida

Green Society of UTSA

Guadalupe River Road Alliance

Guardians of Lick Creek

Headwaters at Incarnate Word

Helotes Heritage Association

Hill Country Alliance

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Native Plant Society of Texas – SA

Northwest Interstate Coalition of Neighborhoods

Pedernales River Alliance – Gillespie Co.

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

RiverAid San Antonio

San Antonio Audubon Society

San Antonio Conservation Society

San Geronimo Valley Alliance

San Marcos Greenbelt Alliance

San Marcos River Foundation

Save Barton Creek Association

Save Our Springs Alliance

Scenic Loop/Boerne Stage Alliance

Securing a Future Environment

SEED Coalition

Signal Hill Area Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Assoc.

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

May 28, 2026

Ms. Laurie Gharis

Chief Clerk, MC-105

Texas Commission on Environmental Quality

P.O. Box 13087

Austin, Texas 78711-3087

Submitted online via <https://tceq.commentinput.com/> and by email to laurie.gharis@TCEQ.texas.gov.

Re: Vantage Data Centers TX 21, LLC, Draft Permit No. 04790

The [Greater Edwards Aquifer Alliance](#) (GEAA) appreciates the opportunity to submit these comments on behalf of the San Antonio and Bexar County members of the 59 member groups of GEAA that are allied to advocate for the preservation of our ground and surface water resources in 21 counties within Central and South Texas. We submit these comments on Draft Title V Permit No. 04790 (Draft Permit) authorizing operation of Vantage Data Centers TX 21, LLC's Vantage Data Center (Data Center), located at 5207 Rogers Road, San Antonio, Bexar County, Texas.

San Antonio is already in violation of U.S. EPA air quality standards. At full build-out, the Data Center's operations will include 65 stationary reciprocating internal combustion engines, which serve as diesel emergency generators, and their associated diesel belly storage tanks. The regular operation of the generators for maintenance and readiness checks results in combustion emissions, including volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than 10 microns in diameter (PM₁₀), particulate matter less than 2.5 microns in diameter (PM_{2.5}), and hazardous air pollutants (HAPs). The diesel belly storage tanks will also be periodically refueled, resulting in VOC emissions.

Emissions from diesel generators are linked to a multitude of adverse health impacts, including heart and lung disease, respiratory mortality, developmental problems, and cancer.¹ The Data Center abuts various sensitive areas, including residential, healthcare, and secondary education areas in San Antonio. The planned facility is adjacent to or within ¼ of a mile of, at minimum, three healthcare facilities, a major hospital, an assisted living community, Northwest Vista College, two large apartment complexes, portions of two residential neighborhoods, and two hotels. As such, we are highly concerned about the number of diesel emergency generators that will be present and routinely tested at the facility. Even limited testing can release significant amounts of harmful air pollutants.

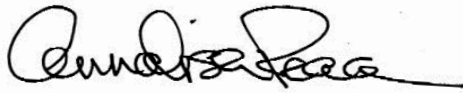
We recognize that there appear to be existing data centers within the vicinity of this proposed Data Center. However, this does not mean that this Data Center should be

¹ [Data Centers' Use of Diesel Generators for Backup Power Is Commonplace—and Problematic - Inside Climate News: False emergencies, real pollution](#)

able to release emissions in this location. Before permitting the Data Center, the TCEQ should take into account the cumulative impacts of the emissions from this proposed facility *and* the existing facilities nearby on the air quality of the region and the health of the surrounding residents, patients, students, and others.²

We recommend and prefer Vantage avoid diesel generators in their entirety and instead invest in on-site solar and battery storage for backup and emergencies. We do request, however, that at minimum, the TCEQ ensure the diesel emergency generators are just that – emergency. These generators should only be used to facilitate the Data Center’s safe shutdown under emergency conditions and should not be used to ensure continuous operation in the face of a power shortfall or as a secondary source of power.

Thank you for your consideration. Please consider GEAA as a resource that is at your disposal. We look forward to working with you on this issue.



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Greater Edwards Aquifer Alliance



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Greater Edwards Aquifer Alliance

² <https://www.washingtonpost.com/business/2026/05/28/data-centers-boom-virginians-breathe-exhaust-10000-diesel-generators/>