November 2nd, 2026

The Honorable Ed Potosnak
Commissioner
New Jersey Department of Environmental Protection
401 East State Street
Trenton, NJ 08625

Dear Commissioner Potosnak:

We appreciate the Department honoring our request to extend the public comment period. Data centers have supported communications, research, and business for decades, and play an important role in the modern digital economy. What is changing is the scale and speed of development: the newer facilities, including those built for intensive computing, require far more electricity and backup power than traditional data centers. Not every new facility is a hyperscale data center, but as new, bigger facilities are proposed, each proposal affects its community differently. The growing size of these projects makes careful review of their equipment and emissions especially important, to ensure that the needs of these facilities can be safely accommodated by the host communities

We submit these joint comments on the draft Preconstruction Permit and Certificate to Operate (draft permit) for the Sentinel Data Center in South Brunswick. Residents of South Brunswick, Princeton, and neighboring communities have raised serious questions about the facility's diesel generators, their potential effects on public health, and how the State will oversee their operation. Those questions deserve answers, and in several respects the draft permit must change before the Department of Environmental Protection (DEP or Department) makes a final decision.

The Department's $1.07 million penalty against DataOne in Vineland for operating 62 unpermitted generators, and the notice of intent to sue under the Clean Air Act that followed, show what happens when generator fleets escape full review. The diesel spill at an Equinix data center in Secaucus in September is a reminder that backup power systems carry real risks for the communities around them. The Department's action in Vineland shows it takes these risks seriously. The same rigor must apply before a permit is issued for the Sentinel Data Center, not after.

Public health and air quality

The draft permit covers 12 diesel-powered emergency generators, each rated at 3,620 kilowatts. DEP has reported that its health risk assessment found negligible risk under its technical standards. That conclusion must rest on a complete, publicly reviewable analysis before any permit is issued. We ask DEP to explain the finding in plain language, including how it accounted for nearby homes, schools, existing pollution, weather conditions, and the possibility that several generators run at once. The analysis must address all neighboring communities because emissions do not stop at municipal borders.

We also ask the DEP to explain how the assessment to determine total air contaminant impacts accounted for use of the facilities beyond the 28 hours permitted for routine testing and maintenance, and whether the assessment considered the facilities' full potential to emit. According to the department's administrative

code (N.J.A.C. 7:27-8.1) regarding applications for preconstruction permits, the "potential to emit" is defined to mean the "maximum aggregate capacity of a source operation or of a facility to emit an air contaminant under its physical and operational design." The definition further clarifies that any restriction on hours of operation is to be treated as a part of the facility's design.

Given the nature and purpose of the installation of emergency generators, we do not find that an analysis only accounting for the operation of these 12 emergency generators for testing and maintenance is reflective of total potential emissions and associated impacts to surrounding communities. We ask the DEP to provide a description of how potential uses, such as in the event of extended power outages, requests for operational flexibility that may be required of the data center facility by PJM or the electric utilities, or other permitted emergency operations, in addition to the permitted 28 hours of routine testing and maintenance, will be factored in the DEP's analysis.

If the analysis was prepared by the applicant or its consultants, DEP must describe how it reviewed that work and whether it independently verified the factors above. If pollutants or exposure pathways relevant to residents are not included in the current assessment, DEP must model them.

Emergency operation and potential to emit

The draft permit limits routine testing and maintenance to 28 hours per year for each generator but places no limit on hours of emergency operation, except in the event that power is disrupted for the purpose of repair or construction at the facility. We ask DEP to confirm whether its health risk assessment, the emission limits in the draft permit, and its classification of the facility as a minor source rest only on those 28 hours. If they do, the analysis understates the facility's potential to emit. A limit on hours of operation reduces potential to emit only when it is enforceable. The 28-hour limit is enforceable; nothing comparable limits emergency operation.

We ask DEP to recalculate potential to emit, the health risk assessment, and the facility's classification using at least 500 hours of operation per generator, or to justify any lower figure with an enforceable limit on emergency operation written into the permit.

Total number of generators and permit classification

The draft permit covers 12 generators, but public statements and reports refer to plans for as many as 20 at the site. We ask DEP to confirm the total number planned and whether a separate application covers the remaining eight. Classification depends on the aggregate potential to emit of all equipment belonging to the same facility, not on the equipment in a single application. DEP must evaluate the full project and ensure that separate applications or phases do not avoid requirements that apply to it.

DEP must publish pollutant-by-pollutant calculations for the 12-generator proposal and the reported 20-generator buildout, using the emergency-operation assumptions described above. It must identify the major-source thresholds and disclose every operating limit or exemption it relied upon, with its legal basis.

If those calculations meet a major-source threshold, DEP must require major-source permitting. If DEP retains the minor-source classification, it must explain in writing why major-source requirements do not apply.

When generators may run and how DEP will enforce the permit

The draft permit allows the generators to run during a power outage, a failure of the primary energy source, an interruption for construction or repair at the facility, or a PJM voltage reduction. DEP must state in plain language which events qualify, including whether planned interruptions or grid-demand events do. Residents must not have to interpret technical permit provisions to learn when these engines may operate.

The permit must also provide a practical way to verify compliance. DEP must explain how operating hours, reasons for use, simultaneous operation, and emissions will be documented and reviewed, and how the draft permit's emission limits apply when emergency operation would push emissions above them. The draft establishes no process for prolonged emergency operation. DEP must add reporting and notification requirements that take effect when generators run beyond a defined period.

Cleaner backup power options

DEP must require the applicant to provide a documented comparison of lower-emission generators, add-on controls, battery storage, and other backup-power configurations, including combinations that reduce diesel runtime while maintaining emergency reliability. The comparison must address emissions, technical feasibility, and reliability. We urge DEP to require the lowest-emission feasible equipment and operating practices within its legal authority. If DEP determines that it cannot require a particular alternative or control, it must identify the specific legal or technical constraint and explain what reductions it can require.

Public access to information

Residents must be able to see the analyses behind DEP's decision. We request that DEP publish its modeling inputs and assumptions, its review of any analysis prepared by the applicant or its consultants, its classification calculations, and its responses to substantive comments.

Conclusion

We respectfully request that DEP not issue the permit in its current form. Before any final decision, DEP must independently recalculate the Sentinel Data Center facility's potential to emit and properly classify the facility to account for emergency operation and the full planned buildout; publish its health risk assessment inputs and its review of them; add enforceable limits on non-emergency use; and give the public an opportunity to review and comment on that information. We are not asking DEP to prejudge the application. We are asking for a complete, transparent review that protects public health and gives residents confidence that the law will be enforced.

New Jersey can support technological development while protecting the communities that host it. Thank you for considering these comments and the concerns of our constituents.

Sincerely,

Andrew Zwicker
New Jersey State Senator
16th Legislative District



Bonnie Watson Coleman
Member of Congress
New Jersey's 12th Congressional District

