



Asthma and Allergy
Foundation of America

April 28, 2025

Shelby County Health Department
814 Jefferson Avenue
Memphis, TN 38105

Submitted at <https://shelbytnhealth.commentinput.com/?id=9eS6hsWJP>

Re: Comment re: CTC Property LLC – Colossus Data Center construction permit

To Whom It May Concern:

I am writing to you on behalf of The Asthma and Allergy Foundation of America (AAFA), the leading patient organization for people with asthma and allergies and the oldest asthma and allergy patient group in the world. AAFA is deeply concerned about reports regarding excessive and previously undisclosed use of gas turbine generators at the Colossus Data Center.¹ We are writing to urge the Department to deny the Center's request for an air construction permit, pending a thorough investigation of the plant's operations and of the impact of the turbines on air quality for people in the surrounding communities.

The turbines risk imposing further negative health impacts in a region already overburdened by asthma and other health challenges. Gas turbines release nitrogen oxides (NOx), particulates, and hazardous air pollutants, which are documented to exacerbate asthma and are associated with higher rates of asthma development in children.^{2,3} In AAFA's [2024 Asthma Capitals report](#), an analysis of the most

¹ CNBC, "Elon Musk's xAI is polluting air in Memphis, using more gas turbines than permitted, advocacy group says" (April 10). Available at <https://www.cnbc.com/2025/04/10/elon-musks-xai-accused-polluting-air-in-memphis-selc-says-in-letter.html>

² Environmental Protection Agency (EPA). (Jan. 2016). Integrated Science Assessment (ISA) for Oxides of Nitrogen – Health Criteria, Final Report – EPA/600/R-15/068.

³ U.S. EPA. (May 2023). Regulatory Impact Analysis for the Proposed New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Fossil Fuel-



challenging places to live in the U.S. based on asthma prevalence, asthma ER visits, and asthma-related fatalities, Memphis ranked 15th out of the whole nation.⁴ Memphis had the second highest rate of emergency room visits for asthma in the country, and ranked 7th for asthma-related deaths.⁵

Meanwhile, the burden of asthma falls disproportionately on Black, Hispanic, and American Indian/Alaska Native people in the United States.⁶ These groups have disproportionately high rates of poor asthma outcomes, including hospitalizations and deaths, and are the same populations that confront higher exposure to poor air quality and air pollution. In Tennessee, Black children have higher rates of asthma prevalence, hospitalizations, and ER visits than white children.⁷ Polluting sources like the proposed turbines at Colossus have been placed in marginalized communities for far too long and significantly contribute to the stark health disparities in America.

AAFA strongly urges the Department of Health to prioritize the wellbeing of the people of Shelby County by pausing the operations of all gas turbines at the Colossus facility pending a full health impact review and clear disclosures by the plant's operators. Shelby County can serve as a nationwide model for prioritizing health and turning the tide on asthma and other diseases worsened by air pollution.

Fired EGUs; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired EGUs; EPA-452/R-23-006.

⁴ Asthma and Allergy Foundation of America (2024). 2024 Asthma Capitals. Available at <https://aafa.org/wp-content/uploads/2024/09/aafa-2024-asthma-capitals-report.pdf>

⁵ *Id.*

⁶ Asthma and Allergy Foundation of American (2020). Asthma Disparities in America: A Roadmap to Reducing Burden on Racial and Ethnic Minorities. Available at aafa.org/disparities.

⁷ Wang Y and Kakoti G. (2019). Childhood Asthma in Tennessee, 2007–2016. Division of Population Health Assessment, Tennessee Department of Health, Nashville, Tennessee. Available at https://www.tn.gov/content/dam/tn/health/documents/statistics/Childhood_Asthma_in_Tennessee_2007-2016.pdf



Asthma and Allergy
Foundation of America

Thank you very much for your time and attention. If you would like additional information about AAFA, our Asthma Capitals report, or other ways in which we can be helpful, please reach out to Jenna Riemenschneider at jennar@aafa.org.

Sincerely,

Kenneth Mendez
President & CEO
Asthma and Allergy Foundation of America