Rise Up Hilliard Executive Summary

Giving the children of Ohio a safe place to live, learn, and play

PURPOSE

To employ common sense measures around data centers and their on-site power generation facilities prioritizing and ensuring the safety of children and residents in close proximity to these facilities. Of specific concern is the data center being built at Scioto Darby Creek in Hilliard, Ohio (and by extension all children residing in proximity to all other data centers across Ohio).

SUMMARY

In 2022, Hilliard's City Council approved Amazon to build a data center at Scioto Darby Creek Road adjacent to Darby Glen Neighborhood, Darby Glen Park, and Hilliard's **Beacon Elementary School**. Then in 2025, Amazon decided to change how the data center would be powered. It wants to install solid oxide fuel cell systems capable of 72.9 megawatts of electricity output which is enough electricity to power 2,531 homes. The fuel cell systems will convert natural gas into electricity without combustion through induction of a chemical reaction to generate electricity. To be clear, this fuel cell system is a power plant. While touted as "cleaner" than traditional natural gas or coal power plants, this power plant still consumes a nonrenewable fossil fuel and produces a considerable volume of greenhouse gas and other emissions.

It should be emphasized that this fuel cell power plant will be the largest of its kind in North America by several factors. It will be the **second largest globally** behind an 80 MW South Korean fuel cell power plant (originally projected to go online in 2025). Therefore, there is **no experiential data available** to ensure the safety of residents.

Additionally, we believe the dirt used to elevate I-270 was taken from the parcel where the AWS campus now sits, which creates a kind of bowl as the whole site is lower than its surrounding area. Therefore, I-270 may be an impediment to air flow given our prevailing winds from the west. If the CO₂ discharged from the top of the Bloom Energy fuel cells tends to stay close to the ground, it could conceivably pool behind this I-270 barrier. This could create a bubble of harmful if not **lethal concentrations**.

After resident pushback, Amazon rescinded its application from the Hilliard Planning and Zoning Board. Amazon stated that they did not need Hilliard's approval because Ohio Revised Code 4906.13(B) states that the Ohio Power Siting Board has sole approval of such a project, and Amazon received OPSB approval on Sept. 22, 2025. The Hilliard City Council has voted to fight these measures. While the Hilliard City Council has appealed this decision, this is currently a state-level issue.

CONCERNS

- **Authority:** A private entity (Amazon), not Ohio residents or government officials, are able to make decisions regarding the health and safety of Ohio's citizens.
- Emission Levels:

- Carbon Dioxide (CO₂): The proposed facility is expected to emit up to 241,000 tons of carbon dioxide every year. That's more than double what all homes in Hilliard produce simultaneously.
- Other Emissions: This power plant will pump nitrogen oxides, particulate matter, and greenhouse gases — known contributors to asthma and lung disease — into the air our children breathe.
- **Fire Safety:** What fire safety controls are in place? What is the radius of a potential explosion given the size and PSI for this pipe? Will it hit the adjacent elementary school? Amazon is requesting an 8-inch natural gas pipeline which is huge.
- **Cost:** Data centers are already pushing our electrical rates up. Will natural gas be next? The cost of emergency services is also rising due to data centers.

FACTS & FIGURES

- High concentrations of CO₂ have negative consequences on people's health. For example, 2,000-5,000 ppm (0.2-0.5%) of CO₂ causes headaches, fatigue, stuffiness, poor concentration, loss of focus, increased heart rate, and nausea in adults. More than 50,000 ppm (>5%) of CO₂ causes toxicity due to oxygen deprivation. More than 100,000 ppm (> 10%) causes death. A number of studies have shown cognitive impacts at 1,000 ppm. **The numbers are of course much lower for children.**
- As of September 29, 2025, two Amazon data centers under construction in Jerome Township, Ohio, have made 84 calls to firefighters since the projects were approved in 2021. Because of this Jerome Township then put a moratorium on future data center development due to safety concerns.
- CO₂ emissions are not a component of Ohio EPA review for air permits to install and operate, and the OPSB staff report entirely **excludes the topic of CO₂ emissions**.
- Under Ohio law, affected landowners and local officials must be notified and given the opportunity to intervene in proceedings like this, yet that never happened.
- HB 15 requires PUCO to issue administrative rules for accelerated review of certain energy construction cases, including fuel cells. The OPSB recommended automatic approval of the Scioto Darby Creek fuel cell project before the rules were finalized.
 - Additionally, the 7-day comment period was too short to be meaningful.
- Oregon said no to fuel cells, so why is Ohio saying yes? Amazon proposed the same technology to the state of Oregon, but Oregon pushed back against natural gas fuel cells.

REQUESTS FOR GOVERNOR DEWINE

I am writing to request the following from the Governor's office:

- Have PUCO pause their approval of Case No. 25-0649-EL-BLN until there is a proper investigation into the safety of the fuel cells that convert natural gas into electricity approved for use at the Amazon data center on Scioto Darby Creek Road.
- Revise the proposed administrative rules for the Ohio Power Siting Board to require review consideration of the following before approving any project:
 - A site-specific study (by an independent researcher chosen by the locality) that quantifies, models, and maps how the level of emissions (CO₂, FPM, NOx, SOx, CO, and VOCs) would behave under various atmospheric conditions (wind

- direction, temperature, humidity, etc.) and its impact on the surrounding neighborhoods and schools. (Note: CO₂ isn't part of the Ohio EPA numbers.)
- A safety plan approved by the local fire department including the radius of the impact of a potential explosion.
- o A model showing the effect of the anticipated noise (decibels, etc.).
- o A list of any other safety concerns.
- A safe set-back distance for residents and schools for each type of power source determined by the state that must be adhered to.
- Add a longer, more appropriate comment window to the OPSB with proper notification given to all affected parties within the potential impact radius for emissions or possible explosion.
- Write a new bill or amend legislation to address the unintended consequences of HB 15.

CONCLUSION

Common sense dictates that it's unwise to place a power plant near elementary schools, residential neighborhoods, and parks where children live, learn, and play. Streamlining and simplifying the regulatory environment for business cannot be at the expense of residents and children. Regulations should be transparent and responsive not just to the business communities but to Ohio citizens as well. Additionally, regulations should be fair and consistent and prioritize the health, wellbeing and safety of Ohio citizens. We ask that Governor DeWine allows common sense to prevail and places official guardrails around these types of projects to protect Ohio citizens and children.

REFERENCES

- 25-0649-EL-BLN SciotoDarbyCrRdFuelCellSystem LON.pdf
- cppBAERcomments.pdf
- Amazon data centers in Jerome Township, Ohio, called emergency services 84 times since 2021 - DCD
- Hilliard to appeal EPA fuel cell permit for Amazon site City of Hilliard
- https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A25I15B55845G00809
- Comprehensive review of health impacts of the exposure to nitrogen oxides (NOx), carbon dioxide (CO2), and particulate matter (PM) ScienceDirect
- Carbon Dioxide Levels Chart CO2 Meter