



Dedicated to protecting and improving the health and environment of the people of Colorado

September 18, 2015

Shaun McGrath
Regional Administrator
USEPA Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

RE: 2015 Colorado Designation Recommendations for 1-hour Sulfur Dioxide NAAQS

Dear Mr. McGrath:

Pursuant to the provisions of section 107(d)(1) of the Clean Air Act, the state of Colorado submits to the Environmental Protection Agency the attached area designation recommendations for the 1-Hour Sulfur Dioxide National Ambient Air Quality Standard (NAAQS), as revised on June 22, 2010. The Consent Decree (CD) ordered on March 2, 2015 requires EPA to promulgate source specific designations on certain SO₂ sources no later than July 2, 2016 (termed "Round 2" designations). This CD affects two sources in Colorado - the Pawnee Power Plant and Martin Drake Power Plant. The Colorado Department of Public Health and Environment must submit source specific designation recommendations, to assist EPA in promulgating "Round 2" designations, by September 18, 2015.

The enclosed technical support document provides an overview of the designation process and supporting analyses for each recommendation. The technical support document makes a strong case that these designation recommendations are accurate and supportable for EPA approval. The unclassifiable designation for the area surrounding the Pawnee Power Plant is based on the need to develop appropriate short-term emission rates so that air quality model results properly characterize ambient SO₂ levels surrounding the facility. The unclassifiable designation for the area surrounding the Drake Power Plant is based on disparate monitoring and modeling information. Historical ambient monitoring in the Colorado Springs metropolitan area and current ambient SO₂ monitoring near the Drake Power Plant shows that the 1-hour SO₂ NAAQS has not been violated.





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Conversely, third-party air quality modeling submitted to the Air Pollution Control Division (APCD) illustrates potential NAAQS violations. These disparities make it appropriate to designate the area as unclassifiable. An unclassifiable designation is further supported by APCD's determination that the available meteorological data is not sufficiently representative of conditions at the facility to conduct accurate modeling. APCD is working with the facility operator, Colorado Springs Utilities, to gather representative meteorological data.

The enclosed area classification recommendations for the area surrounding Pawnee Power Plant and the area surrounding Drake Power Plant were adopted by the Colorado Air Quality Control Commission following a public hearing held on August 20, 2015. If you have any questions regarding this submittal, please contact Mike Silverstein, Administrator for the Air Quality Control Commission, at (303) 692-3478 or Will Allison, Director of the Air Pollution Control Division, at (303) 692-3114.

Sincerely,

Larry Wolk, MD, MSPH
Executive Director and Chief Medical Officer
Colorado Department of Public Health and Environment

cc. Martha Rudolph, CDPHE
Mike Silverstein, CDPHE-AQCC
Will Allison, CDPHE-APCD
Abby Fulton, EPA Region 8

Enclosure

State of Colorado, Technical Support Document for 1-Hour Sulfur Dioxide National Ambient Air Quality Standard Recommended Air Quality Designations for Specific Sources

