



April 19, 2016

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

RE: Addendum to 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) entered 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). On September 18, 2015, Colorado recommended "unclassifiable" designations for two "Round 2" sources in Colorado, the Pawnee Power Plant and Martin Drake Power Plant. EPA requested in a February 18, 2016 letter that Colorado submit additional information regarding these source specific designation recommendations by April 19, 2016.

The unclassifiable area designation 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. The enclosed technical support document provides detailed information for specific designation boundary recommendations for these two facilities. The technical support document shows that these designation boundary recommendations are accurate and supportable for EPA approval. Colorado recommends a radius of 10 kilometers (6.2 miles) around the Pawnee Power Plant as the boundary for the unclassifiable designation. This recommendation is based on guidelines in EPA's Modeling Technical Assistance Document (TAD) and an EPA memo issued March 1, 2011 as well as other factors. Regarding the boundaries for the Drake Power Plant, Colorado recommends a boundary around a portion of the city of Colorado Springs, including enclosed unincorporated county areas, bounded to the north by East Woodmen Road, North Academy Boulevard, and city limits, to the east by North/South Powers Boulevard, and to the south and west by city limits, with the addition of the census designated place termed "Stratmoor" bounded by South Academy Boulevard. This recommendation takes





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into account current and historical ambient monitoring data, meteorological influences, sensitive populations (including minorities, poverty, and asthma-related hospitalization rates), and jurisdictional boundaries.

If you have any questions regarding this submittal, please contact me at (303) 692-3114 or Lisa Devore of my staff at (303) 692-3117.

Sincerely,

William Allison, Director
Air Pollution Control Division
Colorado Department of Public Health and Environment

cc: Monica Morales, EPA Region 8
Adam Clark, EPA Region 8

Enclosure

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

