



July 1, 2016

Monica Morales  
Acting Air Program Director  
USEPA Region VIII  
1595 Wynkoop Street  
Denver, CO 80202-1129

Data Requirements Rule (DRR) Source Area Air Quality Characterization Approaches

Dear Ms. Morales:

As detailed in the Data Requirements Rule (DRR), the Colorado Air Pollution Control Division (Division) submits the following source list as well as attached supporting protocols and documentation regarding whether it will characterize air quality through ambient monitoring or through air quality modeling, or whether it will subject any of these sources to an emission limit below the specified threshold. This source list, originally submitted to EPA on January 15, 2016, identifies those sources within our jurisdiction that have SO<sub>2</sub> emissions exceeding the 2,000 tons per year (tpy) annual threshold during the most recent year for which emissions data are available (2014), plus an additional source identified by the Division that warrants air quality characterization. The list and characterization method is as follows:

1. Public Service Company of Colorado (PSCo) - Cherokee Power Plant  
Characterization method: Existing ambient air quality monitoring network
2. PSCo - Comanche Power Plant  
Characterization method: Air quality modeling
3. PSCo - Hayden Power Plant  
Characterization method: Air quality modeling
4. PSCo - Pawnee Power Plant  
Characterization method: Air quality modeling
5. Tri-State Generation and Transmission Association, Inc. - Craig Power Plant  
Characterization method: Air quality modeling
6. Colorado Springs Utilities (CSU) - Drake Power Plant  
Characterization method: Emission limitation
7. CSU - Nixon Power Plant  
Characterization method: Emission limitation
8. Colorado Energy Nations Company (CENC) - Golden\*  
Characterization method: Emission limitation

\*CENC is the additional source identified as warranting air quality characterization





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The Division anticipates continued discussions with EPA in 2016 to resolve any questions regarding supporting protocols and/or documentation. The Division will submit associated modeling analyses as well as adopted and effective emission limits by January 13, 2017. 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: Adam Clark, EPA Region 8

Enclosures

- State of Colorado, Technical Support Document for Analysis of Proposed Existing 1-hour SO<sub>2</sub> Air Monitor Network for Characterizing Ambient Air Quality Surrounding the Cherokee Power Station
- State of Colorado, Transmittal Letter for Comanche Generating Station 1-hour SO<sub>2</sub> Air Dispersion Modeling Protocol
- Trinity Consultants, Prepared for Xcel Energy (Public Service Company of Colorado), 1-hour SO<sub>2</sub> Air Dispersion Modeling Protocol for Comanche Generating Station
- State of Colorado, Transmittal Letter for Hayden Generating Station 1-hour SO<sub>2</sub> Air Dispersion Modeling Protocol
- Trinity Consultants, Prepared for Xcel Energy (Public Service Company of Colorado), 1-hour SO<sub>2</sub> Air Dispersion Modeling Protocol for Hayden Generating Station
- State of Colorado, 1-hour SO<sub>2</sub> Air Quality Modeling Protocol for Pawnee Power Plant
- State of Colorado, Transmittal Letter for Hayden Generating Station 1-hour SO<sub>2</sub> Air Dispersion Modeling Protocol
- CB&I Environmental and Infrastructure, Prepared for Colorado Department of Public Health and Environment Air Pollution Control Division, Modeling Protocol Craig Station 1-hr So<sub>2</sub> Dispersion Modeling
- State of Colorado, Description of Planned Federally Enforceable Emission Limitations taken by Colorado Energy Nations Company (CENC), Nixon Power Plant and Drake Power Plant to Comply with the Data Requirement Rule (DRR)

