

Air Quality Management Plan

For

Williams Creek Generating Station

WATTBRIDGE

Air Quality Management Plan

Colorado 1041 Permit Application

FACILITY	Williams Creek Generating Station
LOCATION	38 deg 37 min 55.33 sec N, 104 deg 37 min 49.96 sec W
JURISDICTION	El Paso County, Colorado
APPLICANT	WattBridge / Project Applicant
FACILITY TYPE	Nominal 400 MW natural gas-fired simple-cycle generating facility
DATE	October 2, 2026
STATUS	Draft for application support and regulatory review

Prepared to describe construction and operational air-quality controls, compliance monitoring, and implementation commitments for the proposed facility.

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DOCUMENT CONTROL NOTE

This plan is a management-plan draft for the El Paso County 1041 application. Final emission limits, equipment ratings, operating-hour limits, modeling results, permit conditions, and regulatory citations should be conformed to the final CDPHE/APCD air permit application and issued construction permit before filing or approval.

Executive Summary

The Project is a nominal 400 MW natural gas-fired generating facility consisting of ten ProEnergy PE6000 simple-cycle combustion turbines. Each turbine will use selective catalytic reduction (SCR) for nitrogen oxides control, and an oxidation catalyst for carbon monoxide and volatile organic compound control. ~~, and c~~Continuous emissions monitoring systems (CEMS) wil be installed on each stack for NOx and CO. The facility will also include the following ancillary sources: a 1,000 kW diesel-fired black-start generator, a 440 HP~~n~~ emergency fire-pump engine, a 460 HP pump house emergency generator, a 460 HP control room emergency generator, two 4.62 MMBtu/hr meter station line heaters, a 100 HP meter station emergency generator, and a 7.85 MMBtu/hr auxiliary boiler. ~~and an emergency wastewater pump engine.~~

This Air Quality Management Plan identifies potential construction and operating emissions, measures to avoid and minimize those emissions, monitoring and corrective-action procedures, recordkeeping commitments, and coordination with applicable county, regional, state, and federal air-quality requirements. Construction impacts will be temporary and managed primarily through fugitive-dust controls, equipment maintenance, anti-idling practices, and traffic coordination. Operational emissions will be managed through clean fuel, post-combustion controls, CEMS, preventive maintenance, permit limits, testing, and compliance reporting.

1. Purpose and Applicability

This plan is intended to support the Project's application under El Paso County's areas and activities of state interest review process and to demonstrate that the Project will be designed, constructed, operated, and maintained to protect air quality and minimize impacts to nearby land uses and communities.

The Applicant will comply with applicable requirements of the El Paso County Land Development Code, El Paso County Public Health requirements, Colorado Air Quality Control Commission regulations, Colorado Department of Public Health and Environment Air Pollution Control Division (CDPHE/APCD) permits, the federal Clean Air Act, and applicable National Ambient Air Quality Standards (NAAQS). Where a final air permit establishes a more specific or stringent requirement than this plan, the permit requirements will ~~control~~supercede.

2. Project and Emission-Source Description

Source	Fuel / Activity	Potential Pollutants	Primary Management Measures
10 PE6000 combustion turbines	Pipeline-quality natural gas	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	SCR; oxidation catalyst; clean fuel; CEMS; permit limits
Black-start generator, 1,000 kW	Ultra-low sulfur diesel	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	Emergency-only use; hour limits; maintenance and operating log

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Emergency fire-pump engine, 440 HP	Ultra-low sulfur d~~D~~iesel	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	Emergency-only use; required testing; maintenance and operating log
Pump House emergency generator, 460 HP~~Emergency wastewater pump engine~~	Ultra-low sulfur diesel ~~Diesel~~	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs~~PM, SO2~~	Emergency-only use; required testing; maintenance and operating log
Control Room emergency generator, 460 HP	Ultra-low sulfur diesel	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	Emergency-only use; required testing; maintenance and operating log
2 Meter Station line heaters, 4.62 MMBtu/hr per unit	Pipeline-quality natural gas	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	Clean fuel
Meter Station emergency generator, 100 HP	Pipeline-quality natural gas	NOx, CO, VOC, PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	Emergency-only use; required testing; maintenance and operating log
ZLD auxiliary boiler, 7.85 MMBtu/hr	Pipeline-quality natural gas	NOx, CO, VOC,PM/PM10/PM2.5, SO2, greenhouse gases, trace HAPs	Clean fuel
Construction equipment and vehicles	Diesel/gasoline	NOx, CO, VOC, PM, SO2 and fugitive dust	Dust suppression; track-out control; anti-idling; maintenance; traffic coordination

3. Existing Air-Quality Setting and Planning Consistency

The Applicant will use the air-quality designation, background concentrations, nearby-source inventory, and meteorological data accepted by CDPHE/APCD for the Project air-permit analysis. The final 1041 record should incorporate or cross-reference the approved air-dispersion-modeling report and the final air-permit application.

The Project will coordinate with the Pikes Peak Area Council of Governments, El Paso County, El Paso County Public Health, and CDPHE/APCD as applicable. Project design and operating commitments will be maintained in a manner consistent with applicable regional air-quality plans and state implementation requirements.

4. Construction-Phase Air Quality Management

4.1 Fugitive Dust Control

- Apply water or another approved dust suppressant to active disturbed surfaces, haul roads, staging areas, and stockpiles as needed to prevent visible emissions and off-site transport.
- Phase clearing and grading to limit the amount of exposed soil at any one time.
- Stabilize inactive disturbed areas and completed grades using gravel, vegetation, mulch, surface treatment, or another appropriate method.
- Establish stabilized construction entrances and promptly remove track-out from paved public roads.
- Cover, wet, or otherwise control loose material during hauling and stockpile storage.
- Reduce vehicle speeds on unpaved roads and suspend or modify dust-generating work when

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controls are ineffective during high-wind conditions.

4.2 Mobile-Source and Equipment Controls

- Maintain construction equipment in accordance with manufacturer recommendations and repair visible exhaust or malfunctioning equipment promptly.
- Prohibit unnecessary idling and encourage shutdown of equipment when not in use.
- Coordinate deliveries, worker access, laydown areas, and haul routes to reduce congestion, queuing, and unnecessary trips.
- Use lower-emitting or newer equipment where practicable and commercially available.

4.3 Inspection and Response

- The construction environmental manager or designee will inspect active work areas routinely and after complaints or material changes in weather.
- Observed track-out, visible dust crossing the property boundary, or ineffective controls will trigger prompt corrective action.
- Corrective actions may include additional watering, revised traffic routes, temporary work stoppage, stockpile stabilization, or increased street cleaning.

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5. Operational Emission Controls

5.1 Selective Catalytic Reduction

Each PE6000 turbine will be equipped with SCR to reduce NOx emissions. The facility will operate and maintain SCR systems, reagent delivery equipment, instrumentation, and associated controls in accordance with permit conditions, approved operating procedures, and manufacturer recommendations.

5.2 Oxidation Catalysts

Each turbine will be equipped with an oxidation catalyst to control CO, VOC, and applicable organic air toxics. Catalyst inspection, cleaning, replacement, and performance verification will be performed as required to sustain permitted performance.

5.3 Clean Fuel

The turbines, meter station line heaters, meter station emergency engine, and auxiliary boiler will combust pipeline-quality natural gas. Sulfur dioxide and particulate emissions will be minimized through use of clean gaseous fuel and compliance with fuel-quality and recordkeeping requirements.

5.4 Continuous Emissions Monitoring

CEMS and associated data-acquisition systems will be installed, certified, calibrated, operated, and maintained as required by the air permit and applicable federal monitoring provisions. Monitoring data will be used to demonstrate compliance, identify control –system degradation, support reporting, and initiate corrective action.

5.5 Emergency Engines

The black-start generator, fire-pump engine, ~~and~~ pump house emergency generator, and control room emergency generator~~wastewater pump engine~~ will operate only for emergencies, readiness testing, maintenance, or other permit-authorized purposes. The facility will track operating hours, fuel use where required, maintenance, and the reason for each non-emergency operating event.

6. Monitoring, Inspection, and Corrective Action

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Frequency / Trigger	Required Management Action
Continuous / each operating period	Review CEMS and operating parameters; respond to alarms, invalid data, or indications of control-system underperformance.
Routine operator rounds	Inspect visible condition of stacks, reagent systems, catalysts, emergency engines, and potential fugitive-emission areas.
Scheduled preventive maintenance	Maintain turbines, SCR, oxidation catalysts, CEMS, engines, and associated instruments in accordance with written maintenance schedules.
Following a deviation or malfunction	Stabilize the unit, minimize emissions, document the event, complete repairs, evaluate reporting obligations, and verify return to compliant operation.
Periodic management review	Review trends, repeat deviations, complaints, corrective actions, and upcoming testing or reporting deadlines.

Corrective actions will be proportional to the event and may include operational adjustment, increased reagent flow consistent with approved limits, instrument calibration, catalyst inspection, maintenance, temporary load reduction, or shutdown when required to prevent

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7. Air Permitting, Modeling, and Demonstration of Compliance

- Submit applicable Air Pollutant Emission Notices (APENs) and CDPHE/APCD construction-permit forms.
- Obtain required construction and operating authorizations before commencing regulated construction or operation.
- Complete air-dispersion modeling using the methodology accepted by CDPHE/APCD and document compliance with applicable standards and increments.
- Incorporate enforceable emission limits, operating-hour limits, startup and shutdown provisions, fuel restrictions, monitoring, testing, recordkeeping, and reporting requirements into facility procedures.
- Complete required initial and periodic performance testing and certification of monitoring systems.
- Evaluate applicability of federal New Source Performance Standards, hazardous-air-pollutant requirements, Acid Rain Program requirements, Title V, and other state and federal programs as part of the air-permit application.

8. Recordkeeping and Reporting

The Applicant will maintain records for the period and in the form required by applicable permits and regulations. Records will be made available to authorized agencies upon request.

- CEMS data, calibrations, quality-assurance activities, downtime, and data substitution;
- Turbine operating hours, startups, shutdowns, fuel use, load, and other permit parameters;
- SCR reagent use and operating parameters;
- Catalyst inspections, maintenance, replacements, and performance testing;
- Emergency-engine hours, reason for operation, testing, maintenance, and fuel records;
- Construction dust-control inspections, water or suppressant application, track-out response, and complaints;
- Deviation, malfunction, excess-emission, corrective-action, and agency-notification records; and
- Required periodic reports and compliance certifications.

9. Complaint Response and Community Coordination

The Applicant will maintain a process to receive, document, investigate, and respond to air-quality complaints. Each substantiated complaint will be evaluated for source, weather conditions, operating status, and appropriate corrective action. Complaint records will include the date and time, nature of concern, investigation findings, actions taken, and follow-up communication where contact information is provided.

10. Roles and Responsibilities

Role	Primary Responsibility
Project Manager	Overall implementation during construction; contractor coordination; resources and escalation.
Construction Environmental Manager	Dust-control program, inspections, complaint response, records, and corrective actions.
Plant Manager	Operational compliance, staffing, maintenance priorities, and management review.

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Environmental Compliance Manager	Permit interpretation, monitoring oversight, reporting, agency coordination, training, and compliance assurance.
Operations and Maintenance Personnel	Follow operating procedures, respond to alarms, perform inspections, document events, and promptly report deviations.
Contractors	Comply with site air-quality requirements, anti-idling rules, dust controls, and direction from Project environmental personnel.

11. Training and Plan Maintenance

Personnel with air-quality responsibilities will receive role-appropriate training before performing assigned duties and refresher training when procedures or permit requirements materially change. This plan will be reviewed before construction, before initial operation, after issuance or material revision of the air permit, and following significant compliance events. Revisions will be documented and communicated to affected personnel.

12. Implementation Commitments

Milestone	Commitment
Before land disturbance	Designate the construction environmental manager; finalize dust-control resources, inspection forms, complaint contacts, and contractor requirements.
Before regulated construction	Obtain required CDPHE/APCD authorization and complete applicable APEN submissions.
Before turbine commissioning	Complete control-system readiness checks, monitoring installation and certification planning, operating procedures, and staff training.
During operation	Operate within permit limits; maintain SCR, oxidation catalysts, CEMS, and engines; complete testing, reporting, and corrective actions.
Throughout Project life	Review this plan and update it when equipment, permits, operating scenarios, or regulatory requirements materially change.

13. Conclusion

The Project will use modern combustion and post-combustion controls, continuous monitoring, clean fuel, preventive maintenance, construction dust controls, and a structured compliance-management program to avoid and minimize air-quality impacts. The Applicant will obtain required permits and will construct and operate the facility in accordance with applicable county, regional, state, and federal requirements. Final quantitative emission limits and modeling conclusions will be incorporated by reference or appended after completion of the CDPHE/APCD permitting process.

Appendix A - Final-Submittal Completion Checklist

☐ Insert final Applicant legal name and Project ownership structure.

☐ Confirm final equipment list and ratings, including all auxiliary boilers, heaters, tanks, generators, and engines.

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☐ Insert final permitted emission rates and annual limits for NOx, CO, VOC, PM, PM10, PM2.5, SO2, greenhouse gases, ammonia slip, and applicable hazardous air pollutants.

☐ Attach or cross-reference final air-dispersion-modeling report and receptor results.

☐ Confirm final emergency-engine operating-hour limits and testing restrictions.

☐ Confirm CEMS pollutants, applicable averaging periods, data-validity requirements, and reporting frequency.

☐ Include final CDPHE/APCD construction permit and APEN identifiers when available.

☐ Confirm consistency references to the adopted PPACG air-quality plan and current El Paso County 1041 approval criteria.

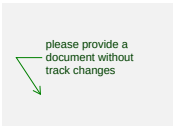
☐ Add construction water source, estimated dust-control water demand, and backup dust-control method.

☐ Add agency and public complaint contact information.

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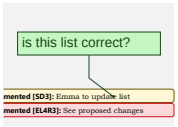
V1_Air Quality Management Plan.pdf Markup Summary

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