



1041 Documents Related to 3.202 Review Criteria

For

Williams Creek Generating Station

Application Submittal Requirements of El Paso County Guidelines and Regulations for Areas and Activities of State Interest Article 3.202

3.202 Review Criteria

A Permit to conduct the designated activity of a municipal or industrial water project shall be approved if the Permit Authority, or in the case of an Administratively Approved Permit, the Director, finds the application complies with the following criteria and the relevant criteria at Section 2.405. If the Permit Authority finds the application does not comply with any one or more of these criteria, the application shall be denied or may be approved with conditions.

3.202(1) The Project shall emphasize the most efficient use of water, including the recycling, reuse and conservation of water. The determination of whether the Project emphasizes the most efficient use of water may include but is not limited to the following considerations:

3.202(1)(a) Whether the Project uses readily available conservation techniques

The facility will use simple-cycle combustion turbines, which avoid the continuous steam-cycle cooling demand associated with conventional combined-cycle generation. Water will be supplied through Colorado Springs Utilities infrastructure, metered at the facility and treated only to the quality required for the applicable plant use. Treated-water and demineralized-water storage will allow production to be matched to operating demand. Process wastewater, turbine-wash water and oily drains will be segregated and managed through dedicated collection systems, and water will be reused where technically practicable, compatible with equipment requirements and allowed by law. Delivery through the Utilities system does not demonstrate absence of incremental stream-transit or reservoir-evaporation losses. In addition, A-1 identifies future owner-provided zero-liquid-discharge ponds, so pond evaporation and downstream wastewater management must be included in the full water balance. Hydraulic power augmentation, inlet fogging and NO_x-control water injection also require operational water; simple-cycle configuration alone does not quantify consumption. The project's electrical and pumping

requirements for water treatment will be included in the facility auxiliary-load and water-balance design. The selected simple-cycle configuration reduces water demand relative to steam-cycle alternatives while providing dispatchable generation.

3.202(1)(b) *Whether the Project recycles water to the extent allowed by law*

The project will recycle or reuse water to the extent technically practicable and allowed by applicable law, while maintaining required water quality for turbine washing, emissions-control equipment, potable use, fire protection and other plant systems. Water streams will be segregated so that potentially oily or chemically affected water does not contaminate clean stormwater or prevent feasible reuse. Metering and the final water balance will be used to identify reuse opportunities and verify water performance. Streams that cannot be safely or legally reused because of water-quality, equipment-warranty or permit limitations will be conveyed to the Utilities-designated wastewater connection or managed through an approved disposal method. The final treatment design and operating procedures will document the specific recycled or reused streams and the applicable legal and technical limitations.