

State Health / PPACG Application

For

Williams Creek Generating Station

is there a copy of the receipt from the agencies and or correspondence to attach

Williams Creek Generating Station - 1041 - State Health/PPACG Application

Water Quality Regulations / Requirements

The Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division (WQCD) administers Colorado's potable water and domestic wastewater regulations under Water Quality Control Commission (WQCC) Regulations No. 11- Colorado Primary Drinking Water Regulations (Regulation 11), No. 22 - Site Location and Design Regulations for Domestic Wastewater Treatment Works (Regulation 22), and No. 43 - On-site Wastewater Treatment System Regulation (Regulation 43).

The following sections detail the applicability of these regulations to the Williams Creek Generating Station (WCGS) potable and wastewater treatment systems.

Potable Water System

The WCGS potable water system will only serve WCGS personnel, have fewer than fifteen service connections, and will not regularly serve an average of at least 25 individuals per day for 60 or more days per year. Therefore, the system does not meet the definition of a Public Water System under Regulation 11 and is not subject to the CDPHE Drinking Water Program design approval requirements.

Wastewater Treatment System

The WCGS will process industrial wastewater using a Zero Liquid Discharge (ZLD) facility and sanitary wastewater through an On-site Wastewater Treatment System (OWTS).

Industrial wastewater will be managed entirely on-site through the ZLD facility and will not be discharged to a Domestic Wastewater Treatment Works. Therefore, the project is not subject to Regulation 22 or the Regional 208 Plan and does not require site location approval from CDPHE or PPACG.

The WCGS OWTS will only manage sanitary wastewater generated on-site and will have a design flow not exceeding 2,000 gallon per day. Accordingly, the system does not meet the definition of a Domestic Wastewater Treatment Works under Regulation 22 and is regulated as an OWTS under Regulation 43, which is administered by local public health agencies. The OWTS will be designed, permitted, constructed, and operated in accordance with

Regulation 43 and subject to El Paso County Public Health Department permitting requirements.

Air Quality Regulations / Requirements

The WCGS stationary emission sources are subject to the CDPHE Air Pollution Control Division (APCD) Air Quality Control Commission (AQCC) Regulation No. 1 – Emission Control for Particulate Matter, Smoke, Carbon Monoxide, and Sulfur Oxides (Regulation 1), No. 2 – Odor Emission (Regulation 2), No. 3 – Stationary Source Permitting and Air Pollutant Emission Notice Requirements (Regulation 3), No. 15 – Control of Emissions of Ozone-Depleting Compounds (Regulation 15), and No. 26 – Control of Emissions from Engines and Major Stationary Sources (Regulation 26). PPACG does not regulate air emission sources.

The following sections detail the applicability of air quality regulations to the Williams Creek Generating Station (WCGS) as of August 2026.

AQCC Regulation 1

The emission sources at the WCGS will comply with the requirements provided in Section II.A.1 and 2, as follows:

- Compliance with Regulation 1 is presumed for the ten combustion turbines based on use of natural gas as fuel; and
- Utilities proposes to conduct an annual Method 9 observation for the ULSD-fired black start emergency engine if it operates within the calendar year.

AQCC Regulation 2

The facility is subject to facilities located in areas not used predominantly for residential or commercial purposes, whereas it is a violation if odors are detected after the odorous air has been diluted with fifteen (15) or more volumes of odor free air. Consistent with Regulation 2 Section I. C. 1, the facility is required to have an affirmative defense to violations of Section I. B. of the regulation.

AQCC Regulation 3

The State of Colorado has been granted authority to implement and enforce the permitting requirements specified by the federal Clean Air Act. The general requirements for permits and permit revisions are codified under Regulation 3. The proposed facility has Potential to Emit (PTE) for each regulated pollutant below the major source thresholds of 250 tons per year (tpy) each. As such, the facility will be a minor source as defined in 40 CFR Part 52.21(b)(4) incorporated in Regulation 3. Review under Prevention of Significant Deterioration (PSD) regulations is not required.

As provided in 40 CFR Part 70.3, the WCGS will be subject to the Title V Operating Permits program as implemented in Regulation 3, Part C and Part D.

complete date and attach letter

As required by Regulation 3, Part B III. B. 5, Colorado Springs Utilities submitted an Environmental Justice (EJ) Analysis and received a letter of concurrence on September xx, 2026. As of August 2026, the facility will be located in a Disproportionately Impacted Community that meets the definition of a Socioeconomically Vulnerable (SV) Community. Table 2 of Regulation 3, Part B III. J. 3 outlines the Community Monitoring fees that will be applicable to the facility as it is in a SV Community and will emit affected pollutants at a rate greater than or equal to the affected construction source threshold. This fee will be a one-time fee of $200 per affected pollutant above the affected construction source threshold. The facility's emissions are expected to be above the significant emission threshold for VOC, NOX and PM2.5. A $600 Community Monitoring Fee will be paid to the Stationary Source Control Fund.

Air dispersion modeling is being performed to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) and the Colorado Ambient Air Quality Standards (CAAQS). Air dispersion modeling determinations and corresponding files are submitted directly to the APCD Dispersion Modeling Unit (DMU).

The EJ analysis, CDPHE EJ letter of concurrence, APCD Construction Permit application, and DMU modeling determination will be provided to El Paso County Planning Department upon completion.

AQCC Regulation 15

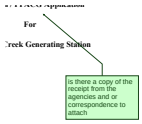
The facility will comply, if and as applicable, with the requirements stipulated in Regulation 15, including the standards, criteria, and requirements set forth in 40 CFR Part 82, Subpart F.

AQCC Regulation 26

The WCGS is located in an attainment/unclassifiable area, is not a major stationary source of HAPs, and the diesel-fired emergency black start engine's annual operation will be limited to 249 hours/year. Therefore, the stationary sources located at the WCGS are not subject to requirements of Regulation 26.

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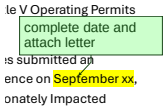
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