



State Air Quality Permit

For

Williams Creek Generating Station

State Air Quality Permit

Colorado Springs Utilities (Utilities) will be obtaining a Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD) Construction Permit for the Williams Creek Generating Station (WCGS) stationary emission sources. The construction permit will be obtained prior to construction activities related to the installation of permanent infrastructure associated with the WCGS.

Utilities held pre-application meetings with the APCD on the following dates:

- July 8th, 2026 – Meeting with APCD leadership
- August 5th, 2026 – Meeting with APCD staff
- August 24th, 2026 – Meeting with APCD EJ group
- September 21st, 2026 – Meeting with APCD Title V Unit and Permit Engineer
- September 29th, 2026 – Meeting with APCD Dispersion Modeling Unit (DMU)

Components of the APCD construction permit include the following:

- Environmental Justice (EJ) Review
 - Submit EJ Report + EJ Summary in APCD Portal
 - Obtain APCD Letter of Concurrence to include in permit application
- Air Quality Modeling
 - Elect to model all pollutants / averaging periods or APCD 114 Form
 - Modeling protocol not required for minor source permitting
- Construction Permit Application
 - APCD 100 Form
 - EJ Report + EJ Summary and Letter of Concurrence from APCD
 - Applicable APEN(s)
 - Technical Narrative
 - Emission Calculations
 - Regulatory Applicability
 - Dispersion Modeling

Environmental Justice Review

The facility is located in a Disproportionately Impacted Community (DIC) that meets the definition of a Socioeconomically Vulnerable (SV) Community. The Community Monitoring Fee will be paid to the Stationary Source Control Fund per Air Quality Control Commission (AQCC) Regulation No. 3, Part B III.J.3, Table 2.

An EJ summary was conducted in accordance with the APCD's EJ guidance and AQCC Regulation No. 3. The EJ summary was submitted to the APCD on September 3, 2026, and the APCD issued a concurrence letter on September 15, 2026. Utilities will provide the APCD updates relating to community outreach, coordination, and communication throughout the project.

Air Quality Modeling

Modeling will be performed in accordance with the Colorado Minor New Source Review (NSR) Source Modeling Guideline for Air Quality Permits (March 2025), using AERMOD version 26135. Significant impact level (SIL) modeling will be performed for all pollutants over 27 steady state turbine operating scenarios in addition to startup/shutdown operations. Cumulative modeling will be performed for pollutants with project impacts greater than the SIL. The DMU provided concurrence on the proposed modeling approach on September 14th, 2026. Modeling results will be included in a report and submitted with the permit application package and submitted directly to the DMU.

Construction Permit Application

The permit application will include all applicable APCD application forms, technical narrative, regulatory applicability, the EJ Report and APCD letter of concurrence, the dispersion modeling report, applicable Air Pollutant Emission Notice APEN forms, and emission calculations. The construction permit application is anticipated to be submitted by the end of December 2026. The final issuance of the construction permit is anticipated by January 2028.