

History

- EPA Promulgated a new SO2 NAAQS in June 2010
 - Primary Standard based on 1-hour daily maximum SO2 concentrations set at 75 ppb
 - EPA determined that this standard is requisite to protect public health with adequate margin of safety
 - 3-year average of the 99th percentile of the yearly distribution of 1hour daily maximum
 - Replaces previous annual (30 ppb) and daily (140 ppb) standards dating back to the 1970s
 - Colorado submitted recommendations on SO2 area designations to EPA in May 2011
 - Referenced as "Round 1" designations
 - Based on two SO2 monitors in Adams and Denver Counties
 - State recommended attainment or attainment/unclassifiable for all areas in Colorado

Background

- Federal Consent Decree in March 2015
 - Applies to any stationary source emitting (in 2012) more than
 - 16,000 tpy of SO2, or
 - 2,600 tpy of SO2 w/annual emission rate of 0.45 lbs/MMBtu or higher
 - Affects 68 Power Plants nationwide including 2 in Colorado
 - Public Service Company of Colorado -Pawnee Power Plant
 - Colorado Springs Utilities Martin Drake Power Plant
 - States submit information and recommendations to EPA by September 18, 2015
 - Referenced as "Round 2" designations
 - EPA must promulgate final source specific designations by July 2, 2016
 - Colorado submitted "unclassifiable" recommendations



Pawnee Power Plant



Martin Drake Power Plant



Future requirements

- Court order directs EPA to complete additional round ("Round 3") by December 31, 2017 through SO2 Data Requirements Rule
 - By January 15, 2016, states must submit a list of SO2 sources ≥ 2,000 tpy (based on most recent year of data)
 - Colorado has seven sources based on 2014 data
 - State has two options to characterize SO2 NAAQS compliance at each source
 - Monitoring or Modeling
 - Requirement may be avoided through enforceable limit (<2,000 tpy)
- EPA must designate all remaining areas by December 31, 2020 ("Round 4")

Colorado Status

- Submitted designation recommendations to EPA for "Round 2":
 - Unclassifiable for the areas around the Pawnee and Martin Drake Power Plants
- Coordinating with EPA and stakeholders on Round 3 designations

New Mexico Status

- No violating monitors or sources meet the criteria for "Round 2" designations.
- One source with $SO_2 \ge 2,000$ tpy.



Questions





