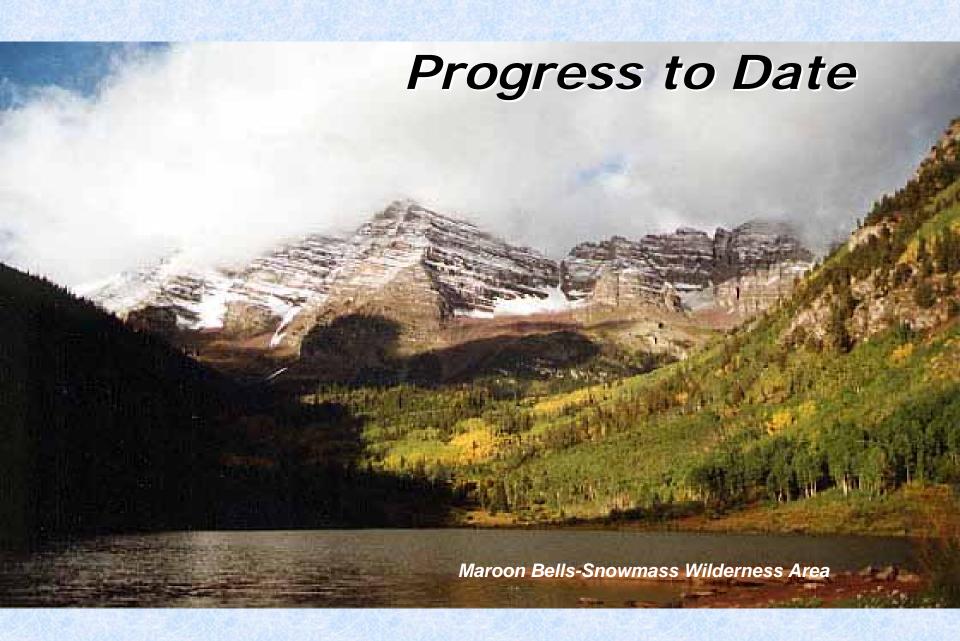
Regional Haze Planning

January 2009

Colorado Air Pollution Control Division

Rocky Mountain National Park





Division and Commission Actions

- Developed/adopted a rule for BART in 2006
- Assessed BART sources
- Conducted significant stakeholder outreach and consultation
- BART requirements and a partial Regional Haze plan adopted in 2007
- Reasonable Progress stakeholder work and additional BART determinations made in 2008

Achievements: BART NOX and SO2 Reductions

- Expected NOx Reductions:
 ~7,000 10,000 tons per year
- Expected SO2 Reductions:
 ~17,000 tons per year
- Timing: implemented after EPA approval of RH SIP
- Reductions from several sources are in close proximity to Park
- These reductions will have a positive benefit for RH, ozone and RMNP



Additional NOx Reductions

- Shutdown of Arapahoe Units 3&4 and Cameo Units 1&2
 - Expected NOx Reductions: ~ 3,590 tons per year
- Retrofit of Existing Natural Gas-Fired Reciprocating Internal Combustion Engines (RICE) ≥500 HP Statewide
 - Expected NOx Reduction: ~ 5,800 tons per year
- North Front Range I/M Program
 - Expected NOx Reductions: ~ 390 tons per year
- Denver I/M cut points tightening, high emitter program
 - Expected NOx Reductions: ~ 1,095 tons per year
- Statewide phase-in of federal motor vehicle standards through fleet turnover
 - Expected NOx Reductions (by 2018):
 - On-road: 60,396 tons per year (82%)
 - Off-road: 13,527 tons per year (18%)

Total 2018 Projected NOx Reductions

| Statewide Reduction Strategies | Estimated NOx |
|--|-----------------|
| Statewide Reduction Strategies | Reduction [TPY] |
| BART (by 2018) | 6,177 |
| Shutdown of Arapahoe 3&4, Cameo 1&2 (~2011 to 2013) | 3,590 |
| Proposed Retrofit RICE >500 HP (~2010) | 5,800 |
| Proposed North Front Range I&M (~ 2012) | 390 |
| Denver I/M Cutpoint Tightening & High Emitter (2010) | 1,095 |
| Phase-In of Federal On/Off Road Vehicle Standards (2008 to 2018) | 74,000 |
| Total: | 91,052 |



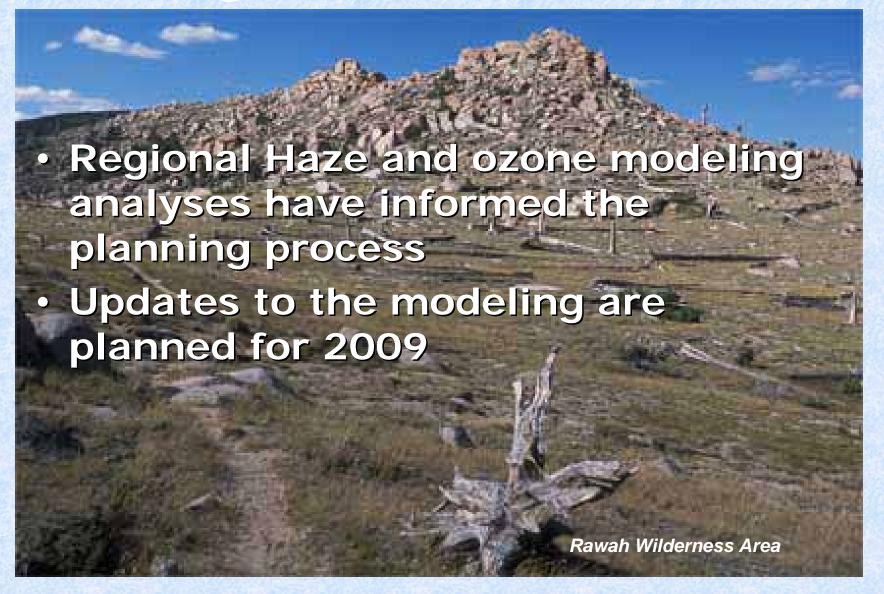
Additional SO2 Reductions

- Significant SO2 reductions have occurred at most large facilities in the State
 - ~40,000 tpy between 2002 and 2018
- By 2018, Colorado C1A's are close to or are meeting uniform rates of progress for sulfates
- After BART and the closures of the PSCo facilities, there is one remaining uncontrolled facility in the State
 - Nixon EGU south of Colorado Springs
 - $\sim 4,000 \text{ tpy}$
- Other facilities may also be evaluated to determine if current SO2 control can be improved

Upcoming Efforts Page 9

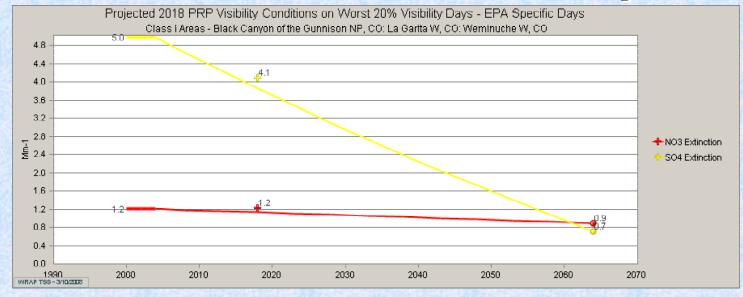


Modeling Analyses for 10 Regional Haze and Ozone

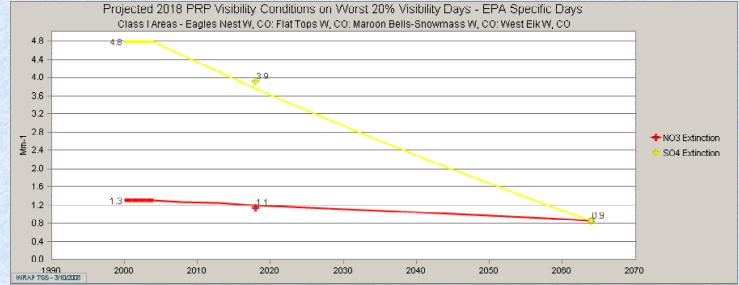


Visibility Modeling Compared to Sulfate & Nitrate Glideslopes

WEMI

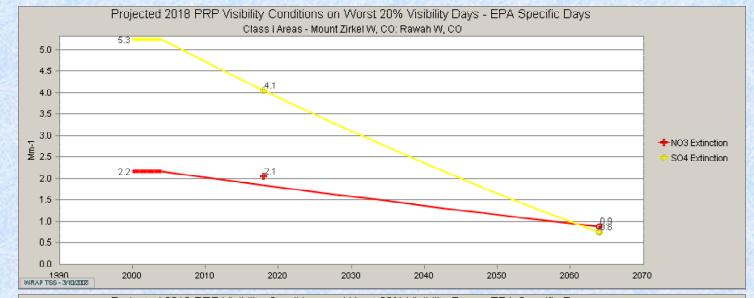


WHRI

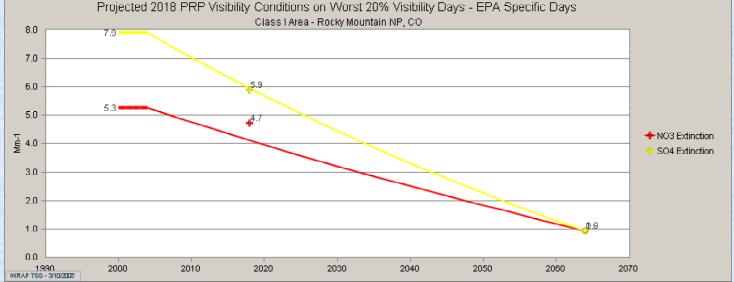


Visibility Modeling Compared to Sulfate & Nitrate Glideslopes

MOZI

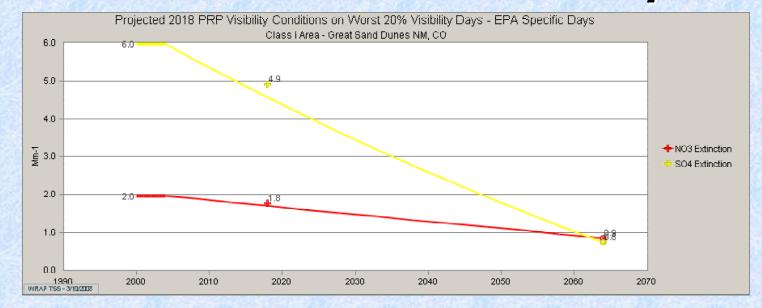


ROMO

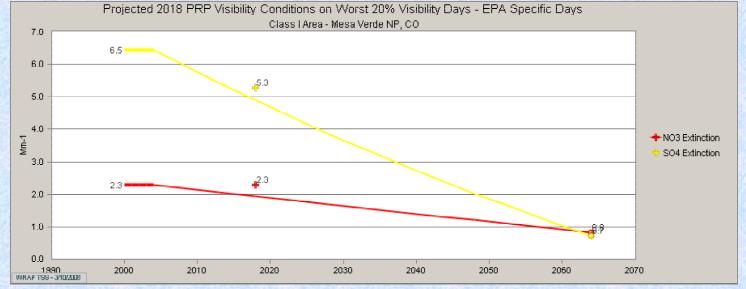


Visibility Modeling Compared to Sulfate & Nitrate Glideslopes

• GRSA



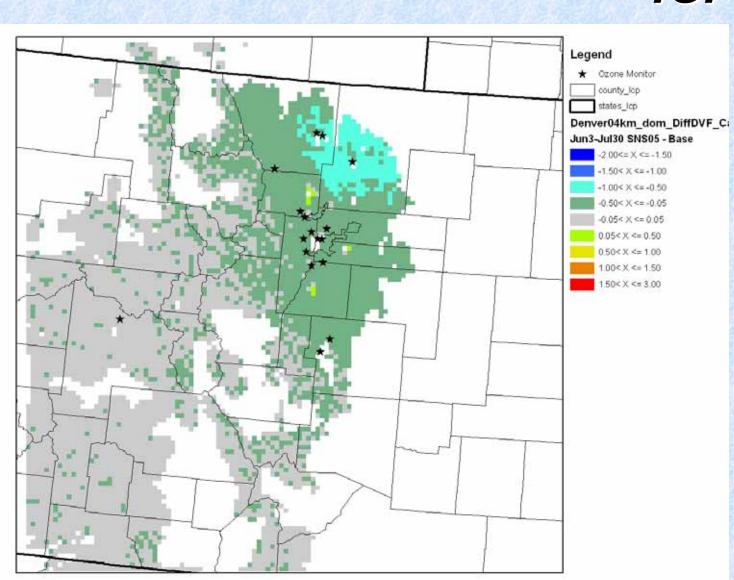
MEVE



NOx Modeling for Ozone

- NOx reductions appear to be generally beneficial for both ozone and RH throughout the State
- NOx reductions can result in localized ozone increases
 - The ozone impacts from NOx reductions must be carefully evaluated and considered

Ozone Sensitivity Modeling for 2010



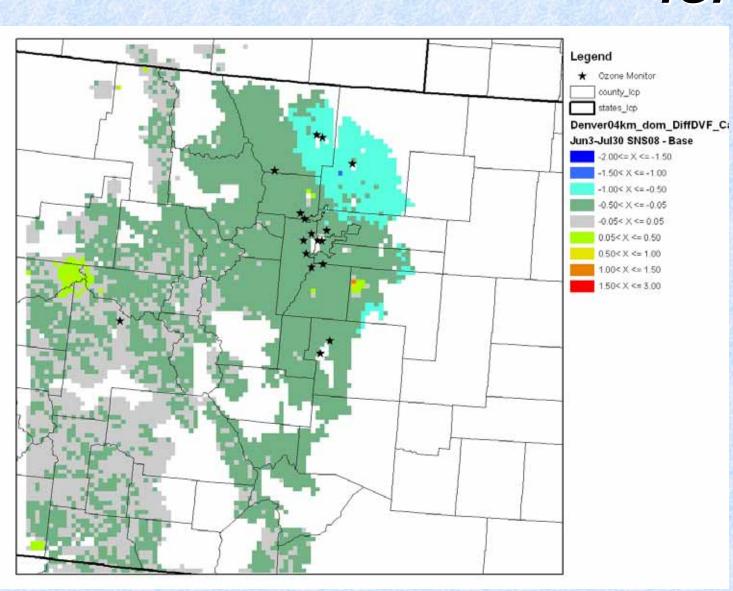
20% NOx Reduction from Point and O&G in the NAA

• Ozone reductions occur throughout most of the NAA and especially Weld County. However, ozone may increase near large point source

Statewide 4-km Grid
•Max increase 0.3 ppb
•Max decrease 0.8 ppb

- •Max decrease 0.8 ppb
- Rocky Flats North DV decreases by 0.2 ppb.
 Fort Collins West DV decreases by 0.5 ppb.

Ozone Sensitivity Modeling for 2010



20% Statewide
NOx Reduction
from Point and
O&G Sources

- Small ozone reductions occur throughout the NAA.
- Ozone Dis-benefit near large point sources
- Decent benefit at RFN and FTCW

Statewide 4-km Grid

- •Max increase 1.1 ppb
- •Max decrease 1.0 ppb
- •Rocky Flats North DV decreases by 0.2 ppb.
- •Fort Collins West DV decreases by 0.6 ppb.

Reasonable Progress Process

- Goal: Establish a Reasonable Progress Goal for each Colorado Class I area
 - Evaluate significant sources/source categories for reasonable emission reduction controls using 4 factors:
 - Cost of compliance, time needed, energy and non-air impacts, and useful life of facilities
 - NOx reductions that benefit both RH and ozone, along with RMNP nitrogen deposition, will be explored throughout 2009
 - Document visibility improvement at each
 Class I area as a result of all
 Great Sand Dunes
 State/regional controls
 National Park & Prese

How Much Visibility Improvement Can We Expect From The RP Process?

- Focus for RP is SO2 and NOx reductions
- Reducing SO2 and NOx in Colorado will help but won't solve the visibility problems
 - Removing all Colorado SO2 & NOx emissions yields, at most, ~1 deciview of improvement
 - Greatest improvement at RMNP, much less at other C1A's
 - Transport into Colorado is important

RP Eligible Stationary Sources

| Potential Sources Identified for Reasonable Progress Process | | | | |
|--|--|---------------|-----------------|--|
| 2018 PRP Emission Inventory - Criteria Thresholds (Revised): | | SO2 > 380 tpy | | |
| | | | NOX ≥ 1,546 tpy | |
| | Source | SO2 [tpy] | NOx [tpy] | |
| 1 | PUBLIC SERVICE CO CHEROKEE PLT | 6,964 | 10,315 | |
| 2 | PUBLIC SERVICE CO COMANCHE PLT | 6,478 | 7,138 | |
| 3 | COLORADO SPRINGS UTILITIES - NIXON PLT | 4,073 | 2,331 | |
| 4 | TRI STATE GENERATION CRAIG | 3,940 | 16,799 | |
| 5 | PUBLIC SERVICE CO - ARAPAHOE | 3,119 | 3,340 | |
| 6 | PUBLIC SERVICE CO CAMEO PLT | 3,070 | 1,409 | |
| 7 | COLORADO SPRINGS UTILITIES-DRAKE PLT | 2,971 | 4,508 | |
| 8 | PUBLIC SERVICE CO HAYDEN PLT | 2,898 | 7,307 | |
| 9 | TRIGEN - COLORADO ENERGY CORPORATION | 2,624 | 1,185 | |
| 10 | SUNCOR ENERGY - DENVER REFINERY | 2,253 | 524 | |
| 11 | PUBLIC SERVICE CO PAWNEE PLT | 2,225 | 3,942 | |
| 12 | TRI STATE GENERATION NUCLA | 1,325 | 1,753 | |
| 13 | AQUILA, INC W.N. CLARK STATION | 1,322 | 1,090 | |
| 14 | PLATTE RIVER POWER AUTHORITY - RAWHIDE | 927 | 3,912 | |
| 15 | PUBLIC SERVICE CO - VALMONT | 879 | 2,279 | |
| 16 | ROCKY MOUNTAIN BOTTLE CO | 542 | 524 | |
| 17 | HOLCIM (US) INC. PORTLAND PLANT | 393 | 1,859 | |
| | CEMEX, INC LYONS CEMENT PLANT | 84 | 2,903 | |
| | Highlighted Totals: | 46,002 | 68,385 | |

Schedule of Activities 20

- NOx emission control discussions will kick-off on January 21st
- Sources to submit controls assessments in late January - technologies, costs, feasibility
 - Review will occur in Feb/March
- Modeling work has commenced and will be discussed with stakeholders in early February
 - Regional Haze by the WRAP; ozone by the RAQC/APCD
 - Fuels assessment will also begin with the ozone modeling

- Division is evaluating and formulating an approach for advancing emission controls that benefit ozone, RH and RMNP
 - Rigorous ozone modeling will inform critical benefits and directions
 - Source control evaluations will inform benefits, feasibility and costs
 - Combined, this data will inform future steps and a proposal
- When fully developed, we will discuss proposal(s) in future Commission meetings and with stakeholders
 - Key to any Department proposal is a quality, well informed strategy so that a proposal is complimentary and consistent for ozone, RH and RMNP

West Elk Wilderness Area

Questions/Comments

