

April 24, 2026

Jason Bouwman  
Northwest Clean Air Agency  
1600 South Second Street  
Mount Vernon, WA 98273-5202

**SUBJECT: Title V Air Operating Permit Renewal Application  
Air Operating Permit 003R4M2  
PSE Fredonia Generating Station**

Dear Mr. Bouwman,

Please find enclosed the Title V Air Operating Permit (AOP) renewal application package for the Puget Sound Energy Fredonia Generating Station. This comprehensive submittal includes the Title V Air Operating Permit Renewal Application, 2025 Annual Emission Inventory (Appendix B), and 2025 annual compliance certification (Appendix C).

As part of this renewal application, Puget Sound Energy requests that the newly installed emergency generator be incorporated into the permit and the previous generator removed. Engine details are outlined in Appendix A.

Should you have any questions or concerns regarding this application, please do not hesitate to contact me at (425) 591-2741.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Parker', is positioned above the typed name.

Lauren Parker  
Senior Environmental Scientist



1600 S 2nd Street  
Mount Vernon, WA 98273  
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[nwcleanairwa.gov](http://nwcleanairwa.gov)

# Title V Air Operating Permit Renewal Application

The information requested in this document must be provided for a complete application. The application may be submitted either electronically (as a signed pdf) or in paper.

If submitting electronically, email to: [facilityreports@nwcleanairwa.gov](mailto:facilityreports@nwcleanairwa.gov).

If submitting in paper, mail to: 1600 South 2<sup>nd</sup> St, Mount Vernon, WA, 98273.

The certification at the end of this document applies to the entire submittal. It must be signed.

If additional room to reply is needed on any question, please attach pages.

In some cases, a prior submittal to the NWCAA (e.g., the annual emissions inventory) may include information requested below. If you'd like to refer to that information instead of providing it here, please note this below. Any submittal to which the NWCAA is referred will become part of your renewal application. It is also acceptable to attach relevant portions of your current Air Operating Permit if the information therein provides an adequate response to a question below.

## **Part 1: General Information**

- 1) Company name:  
Facility address:  
Mailing address:
- 2) Current Air Operating Permit number and expiration date
- 3) Owner's name and agent
- 4) Responsible Official name and address
- 5) Name and telephone number of plant site manager/contact
- 6) Were there any changes to the facility impacting air emissions since receiving the current Air Operating Permit? [if yes, please describe changes]

## **Part 2: Process and Emissions Information**

- 7) Will there be any changes to the operating scenario(s) identified in the current AOP?
- 8) Provide a description of process and products by Standard Industrial Classification (SIC) Code. Please list the applicable SIC Code. Please repeat the list of processes and products for each alternative operating scenario.
- 9) Please list any and all pollutants that would cause the facility to be classified as a "major source" as defined in WAC 173-401.
- 10) Please identify and describe all points of emissions at the facility except those that qualify as insignificant emission units or activities as defined in WAC 173-401-530. Are these emissions units correctly identified and defined in the current AOP? If not, please note the requested changes below.
- 11) Please list and quantify all emissions of regulated air pollutants from the emission points identified in item 10 above. Please include calculations. If the most recent annual emissions inventory accurately describes these emissions, it is not necessary to repeat the same information here. Please refer the NWCAA to the most recent annual emissions inventory.
- 12) List the fuels used and their respective usage rates at design capacity for the emission points identified in item 10 above.
- 13) List the raw materials used and their respective usage rates at design capacity for the emission points identified in item 10 above.
- 14) List the production rate at design capacity for the emission points identified in item 10 above.
- 15) Identify the facility operating schedule (anticipated operating hours per day, days per week, weeks per year)

- 16) Please identify all air pollution control equipment at the facility. Is this air pollution control equipment correctly identified and defined in the current AOP? If not, please provide information necessary to correct.
  
- 17) Please identify and describe all compliance monitoring devices or activities at the facility.
  
- 18) Identify any limitations on source operation that affect emissions of a regulated pollutant. Similarly, list any work practice standards that affect emissions of a regulated pollutant at this facility.

**Part 3: Applicable Requirements**

- 19) Cite and describe all applicable requirements. An updated copy of the applicable requirements in the current AOP for the facility may be sufficient.
  
- 20) Please list any applicable test method(s) for determining compliance with each applicable requirement listed in item 19 above. An updated copy of the current AOP for the facility may be sufficient.
  
- 21) Does the applicant propose any exemptions from an otherwise applicable requirement? If so, please explain.
  
- 22) Does the CAM rule (40 CFR part 64) apply to any of the emissions units?
  
- 23) Does the accidental release prevention regulation (40 CFR part 68) apply to the facility?
  
- 24) Do the federal Acid Rain rules (40 CFR parts 72-78) apply to any of the emissions units?

- 25) Are there any requested changes to any condition in the current Air Operating Permit? [if yes, identify the condition, the requested change, and the reason]
- 26) If the applicant would like to request that the permit shield be extended to cover certain requirements that the applicant believes are inapplicable, please list those requirements, below. Please include a brief narrative description of each requirement and the basis for the belief that each is inapplicable.

**Part 4: Compliance Status and Certification**


- 27) Describe the compliance status of the facility with regard to all applicable requirements. Compliance status for each applicable requirement shall be described as “continuous” or “intermittent”. Please include the method used for determining compliance. If an annual compliance certification has been recently submitted to the NWCAA, the applicant may reference this report. However, if the applicable requirements or compliance status have changed since that submittal, an updated submittal is required.
- 28) Provide the following:
- a) For applicable requirements with which the source is in compliance, provide a statement that the source will continue to comply with such requirements;
  - b) For applicable requirements that become effective during the permit term, provide a statement that the source will meet such requirements on a timely basis;
  - c) For applicable requirements with which the source is not in compliance at the time of permit issuance, provide a narrative description and provide a schedule of compliance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based;

- d) For sources required to have a schedule of compliance to remedy a violation, provide a schedule for submission of certified progress reports every six months or at a more frequent period if specified in an applicable requirement; and

**Statement of Certification:** *Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.*

\_\_\_\_\_  
Name of responsible official

\_\_\_\_\_  
Title of responsible official

  
\_\_\_\_\_  
Signature of responsible official

\_\_\_\_\_  
Date

# Appendix A: Emergency Generator Information

On February 21, 2025, PSE notified NWCAA that Fredonia Generating Station was replacing the existing emergency generator. The 7.5 kW emergency generator listed within the current AOP has been disconnected from the natural gas pipeline and is considered decommissioned.

Applicable information for the new emergency generator is outlined below:

	<b>Engine Specifications</b>
Make/Model	Power Solutions International / 5.7L NA
Serial Number	5710025069
Engine Build Date	11/13/2024
Engine Family	RPSIB5.702ED
Rated Output	50 kW
Rated Fuel Consumption	818 ft <sup>3</sup> /hr @ 100% power – fired on natural gas only

The new emergency generator is a stationary spark ignition (SI) internal combustion engine (ICE) that was manufactured on or after January 1, 2009 for emergency engines with a maximum engine power greater than 19 kW (25 HP). Therefore, this emergency generator is subject to the provisions of 40 CFR 60 Subpart JJJJ. Since Fredonia is an area source for HAPs, the emergency engine is not subject to any requirements in 40 CFR 63 Subpart ZZZZ.

Below, please find the applicable requirements to the new emergency engine that should be incorporated into section 5.5 of the AOP. 40 CFR 60 Subpart JJJJ was last updated 8/30/2024.

Regulatory Citation	Regulatory Language
40 CFR 60.4237(c)	If you are an owner or operator of an emergency stationary SI internal combustion engine that is less than 130 HP, was built on or after July 1, 2008, and does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter upon startup of your emergency engine.
40 CFR 60.4243(a)	If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required.
40 CFR 60.4243(d)	<p>If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (d)(1) through (3) of this section.</p> <ol style="list-style-type: none"> <li>1) There is no time limit on the use of emergency stationary ICE in emergency situations.</li> <li>2) You may operate your emergency stationary ICE for the purpose of maintenance checks and readiness testing for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph 3 counts as part of the 100 hours per calendar year.</li> <li>3) Emergency stationary ICE may be operated for up to 50 hours per year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph 2.</li> </ol>
40 CFR 60.4243(e)	Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations but must keep records of such use.
40 CFR 60.4245(a)	<p>Owners and operators of all stationary SI ICE must keep records of the following:</p> <ol style="list-style-type: none"> <li>1) All notifications submitted to comply with this subpart and all documentation supporting any notification.</li> <li>2) Maintenance conducted on the engine.</li> <li>3) Documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 1048, 1054, and 1060, as applicable.</li> </ol>

# Appendix B: 2025 Annual Emissions Inventory

# Facility Summary eFORM

Northwest Clean Air Agency

D-057-60040

PSE FREDONIA

2025

## FACILITY OPERATIONS

**Facility Category:** CAP Major  
**NAICS Code:** 221112  
**Facility Comments:**

**Operating Status:** Operating

## FACILITY LOCATION

**Coordinates:** Latitude: 48.45625 Longitude: -122.43797  
**Reference Point:** Entrance Point  
**Comments:**

**Facility Address:** 13085 Ball Road  
Mount Vernon, WA 98273-8201  
Skagit County

**Contact:** Lauren Parker, Senior Environmental Scientist  
P.O. Box 97034, BEL10W  
Bellevue, WA 98009  
(425) 591-2741  
lauren.parker@pse.com

## RESPONSIBLE OFFICIAL CERTIFICATION OF DATA ACCURACY

I do hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

**Release Point for Unit 01 - FREDONIA TURBINES UNIT 1**

Release Point Type		Status
Vertical		Operating
Stack	Fugitive	Comments
Height: 50 ft Diameter: 37 ft Temperature: 958°F Flow Rate: 9,583 ACFS Velocity: 8.9 FPS Water Vapor: not provided Oxygen: 15.0000 %	Height: not provided Length: not provided Width: not provided Angle: not provided	
Stack and Fugitive		Release Point Coordinates
Fence Line Distance: not provided EPA Release Point ID: not provided		Reference Point: Substance Release Point Latitude: 48.45439 Longitude: -122.43580

**Release Point for Unit 02 - FREDONIA TURBINES UNIT 2**

Release Point Type		Status
Vertical		Operating
Stack	Fugitive	Comments
Height: 50 ft Diameter: 37 ft Temperature: 958°F Flow Rate: 10,366 ACFS Velocity: 9.6 FPS Water Vapor: not provided Oxygen: 15.0000 %	Height: not provided Length: not provided Width: not provided Angle: not provided	
Stack and Fugitive		Release Point Coordinates
Fence Line Distance: not provided EPA Release Point ID: not provided		Reference Point: Substance Release Point Latitude: 48.45470 Longitude: -122.43580

Release Point for Unit 03 - FREDONIA TURBINES UNIT 3		
Release Point Type	Status	
Vertical	Operating	
Stack	Fugitive	Comments
Height: 65 ft Diameter: 13 ft Temperature: 764°F Flow Rate: 4,818 ACFS Velocity: 36.3 FPS Water Vapor: not provided Oxygen: 15.0000 %	Height: not provided Length: not provided Width: not provided Angle: not provided	
Stack and Fugitive		Release Point Coordinates
Fence Line Distance: not provided EPA Release Point ID: not provided		Reference Point: Substance Release Point Latitude: 48.45500 Longitude: -122.43412

Release Point for Unit 04 - FREDONIA TURBINES UNIT 4		
Release Point Type	Status	
Vertical	Operating	
Stack	Fugitive	Comments
Height: 65 ft Diameter: 13 ft Temperature: 764°F Flow Rate: 5,865 ACFS Velocity: 44.2 FPS Water Vapor: not provided Oxygen: 15.0000 %	Height: not provided Length: not provided Width: not provided Angle: not provided	
Stack and Fugitive		Release Point Coordinates
Fence Line Distance: not provided EPA Release Point ID: not provided		Reference Point: Substance Release Point Latitude: 48.45527 Longitude: -122.43369

**PSE FREDONIA CONTROL APPROACHES**

Control Approach: Controlled		
Release Point: 01 Release Point for Unit 01 - FREDONIA TURBINES UNIT 1		
Control Effectiveness (%):		Capture Efficiency (%):
Pollutant	Control Efficiency	
Nitrogen Oxides	60.00%	
Measure Type	Measure	
Device	213 - Water Injection	
Control Approach: Controlled		
Release Point: 01 Release Point for Unit 01 - FREDONIA TURBINES UNIT 1		
Control Effectiveness (%):		Capture Efficiency (%):



Measure Type	Measure
Device	139 - Selective Catalytic Reduction (SCR)
Device	213 - Water Injection

### PSE FREDONIA UNITS

<b>Unit ID: 01</b> FREDONIA TURBINES UNIT 1		
Unit Type	Status	Capacity
120 - Turbine	Operating	1,119 Million BTU Per Hour
<b>Unit ID: 02</b> FREDONIA TURBINES UNIT 2		
Unit Type	Status	Capacity
120 - Turbine	Operating	1,119 Million BTU Per Hour
<b>Unit ID: 03</b> FREDONIA TURBINES UNIT 3		
Unit Type	Status	Capacity
120 - Turbine	Operating	516 Million BTU Per Hour
<b>Unit ID: 04</b> FREDONIA TURBINES UNIT 4		
Unit Type	Status	Capacity
120 - Turbine	Operating	516 Million BTU Per Hour

**PSE FREDONIA PROCESSES**

Unit ID: 01 Process ID: 01

Process Description: Diesel Fuel

SCC CODE: 20100101 - Int Comb /Electric Gen /Distillate Oil (Diesel) /Turbine

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
057 - Distillate Oil (Diesel)	Input
<b>Throughput and Units:</b>	
55.62 1000 GALLONS	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	81.9 %	Hours/Day	24.0	Comments: The turbine had a total of 500 operating hours during 2025 with 8 hours on diesel fuel
Spring %	4.3 %	Days/Week	7.0	
Summer %	%	Weeks/Year	0	
Fall %	13.8 %	Hours/Year	8	

*sum of quarters must be 100%***RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
01	Release Point for Unit 01 - FREDONIA TURBINES UNIT 1	100%

**EMISSIONS**

PSE FREDONIA D-057-60040

Unit ID: 01 Process ID: 01

<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds      0.00    TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>SO2 - Sulfur Dioxide      0.01    TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond)      0.05    TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond)      0.05    TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM10-PRI - PM10 Primary (Filt + Cond)      0.05    TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia      0.00    TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides      0.96    TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide      0.42    TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde      3.86    LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>7439965 - Manganese 0.56 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.12 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7782492 - Selenium 0.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440473 - Chromium 0.02 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440439 - Cadmium 0.02 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440382 - Arsenic 0.01 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440020 - Nickel 2.67 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439921 - Lead 0.03 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 0.62 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 0.30 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 0.59 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7647010 - Hydrogen Chloride 4.43 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE FREDONIA PROCESSES**

Unit ID: 01 Process ID: 02

Process Description: Natural Gas

SCC CODE: 20100201 - Int Comb /Electric Gen /Natural Gas /Turbine

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
209 - Natural Gas	Input
<b>Throughput and Units:</b>	
485.25 MILLION STANDARD CUBIC FEET	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	50.5 %	Hours/Day	24.0	Comments: The turbine had a total of 500 operating hours during 2025 with 492 hours on natural gas
Spring %	1 %	Days/Week	7.0	
Summer %	46.8 %	Weeks/Year	0	
Fall %	1.7 %	Hours/Year	492	

*sum of quarters must be 100%***RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
01	Release Point for Unit 01 - FREDONIA TURBINES UNIT 1	100%

**EMISSIONS**

PSE FREDONIA D-057-60040

Unit ID: 01 Process ID: 02

<b>SO2 - Sulfur Dioxide 0.54 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 1.77 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 1.77 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM10-PRI - PM10 Primary (Filt + Cond) 1.77 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.00 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 5.35 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 67.64 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.56 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>108883 - Toluene 37.42 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>106990 - 1,3-Butadiene 0.07 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>100414 - Ethylbenzene 9.43 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75569 - Propylene Oxide 25.19 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75070 - Acetaldehyde 72.21 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>1330207 - Xylenes (Mixed Isomers) 13.76 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 483.31 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 0.87 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 1.18 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>107028 - Acrolein 9.96 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 7.01 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE FREDONIA PROCESSES**  
**Unit ID: 02 Process ID: 01 Process Description: Diesel Fuel Combustion**  
**SCC CODE: 20100101 - Int Comb /Electric Gen /Distillate Oil (Diesel) /Turbine**

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
057 - Distillate Oil (Diesel)	Input
<b>Throughput and Units:</b>	
72.97 1000 GALLONS	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	87 %	Hours/Day	24.0	Comments: The turbine had a total of 691 operating hours during 2025 with 9 hours on diesel fuel
Spring %	%	Days/Week	7.0	
Summer %	%	Weeks/Year	0	
Fall %	13 %	Hours/Year	9	

sum of quarters must be 100%

**RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
02	Release Point for Unit 02 - FREDONIA TURBINES UNIT 2	100%

**EMISSIONS**

**PSE FREDONIA D-057-60040**  
**Unit ID: 02 Process ID: 01**

<b>CO - Carbon Monoxide 0.39 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.00 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM10-PRI - PM10 Primary (Filt + Cond) 0.06 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 0.06 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 0.06 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>SO2 - Sulfur Dioxide 0.01 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.00 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 1.58 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439965 - Manganese 0.74 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>7440020 - Nickel 3.51 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 5.07 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.16 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7782492 - Selenium 0.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440473 - Chromium 0.03 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440382 - Arsenic 0.01 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439921 - Lead 0.04 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 0.81 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 0.40 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 0.78 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440439 - Cadmium 0.02 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>127184 - Perchloroethylene 0.32 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7647010 - Hydrogen Chloride 5.81 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>79016 - Trichloroethylene 0.27 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE FREDONIA PROCESSES**

Unit ID: 02 Process ID: 02

Process Description: Natural Gas Fuel

SCC CODE: 20100201 - Int Comb /Electric Gen /Natural Gas /Turbine

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
209 - Natural Gas	Input
<b>Throughput and Units:</b>	
699.40 MILLION STANDARD CUBIC FEET	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	36.2 %	Hours/Day	24.0	Comments: The turbine had a total of 691 operating hours during 2025 with 682 hours on natural gas
Spring %	17.2 %	Days/Week	7.0	
Summer %	45.4 %	Weeks/Year	0	
Fall %	1.2 %	Hours/Year	682	

*sum of quarters must be 100%***RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
02	Release Point for Unit 02 - FREDONIA TURBINES UNIT 2	100%

**EMISSIONS**

PSE FREDONIA D-057-60040

Unit ID: 02 Process ID: 02

<b>CO - Carbon Monoxide 1.78 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>SO2 - Sulfur Dioxide 0.78 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.81 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 122.29 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 2.56 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM10-PRI - PM10 Primary (Filt + Cond) 2.56 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.00 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 2.56 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 1.26 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>71432 - Benzene 10.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 1.70 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>107028 - Acrolein 14.35 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>1330207 - Xylenes (Mixed Isomers) 19.81 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 696.17 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>100414 - Ethylbenzene 13.59 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75070 - Acetaldehyde 104.01 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>108883 - Toluene 53.90 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75569 - Propylene Oxide 36.29 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE FREDONIA PROCESSES**  
**Unit ID: 03 Process ID: 01 Process Description: Diesel Fuel Combustion**  
**SCC CODE: 20100101 - Int Comb /Electric Gen /Distillate Oil (Diesel) /Turbine**

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
057 - Distillate Oil (Diesel)	Input
<b>Throughput and Units:</b>	
52.60 1000 GALLONS	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	%	Hours/Day	24.0	Comments: The turbine had a total of 172 operating hours during 2025 with 14 hours on diesel fuel
Spring %	%	Days/Week	7.0	
Summer %	8.6 %	Weeks/Year	0	
Fall %	91.4 %	Hours/Year	14	

sum of quarters must be 100%

**RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
03	Release Point for Unit 03 - FREDONIA TURBINES UNIT 3	100%

**EMISSIONS**

**PSE FREDONIA D-057-60040**  
**Unit ID: 03 Process ID: 01**

<b>PM10-PRI - PM10 Primary (Filt + Cond) 0.15 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 0.15 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 0.15 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>SO2 - Sulfur Dioxide 0.01 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.01 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 0.06 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.01 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 0.03 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7664939 - Sulfuric Acid 6.91 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>7440417 - Beryllium 0.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7782492 - Selenium 0.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7647010 - Hydrogen Chloride 4.19 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439965 - Manganese 0.53 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 0.56 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440473 - Chromium 0.02 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440439 - Cadmium 0.02 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440382 - Arsenic 0.01 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439921 - Lead 0.03 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 0.25 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.01 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 0.59 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440020 - Nickel 0.02 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 0.29 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE FREDONIA PROCESSES**

Unit ID: 03 Process ID: 02

Process Description: Natural Gas Combustion

SCC CODE: 20100201 - Int Comb /Electric Gen /Natural Gas /Turbine

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
209 - Natural Gas	Input
<b>Throughput and Units:</b>	
69.06 MILLION STANDARD CUBIC FEET	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	2.5 %	Hours/Day	24.0	Comments: The turbine had a total of 172 operating hours during 2025 with 158 hours on natural gas
Spring %	1.4 %	Days/Week	7.0	
Summer %	82.6 %	Weeks/Year	0	
Fall %	13.5 %	Hours/Year	158	

*sum of quarters must be 100%***RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
03	Release Point for Unit 03 - FREDONIA TURBINES UNIT 3	100%

**EMISSIONS**

PSE FREDONIA D-057-60040

Unit ID: 03 Process ID: 02

<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 0.24 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 0.63 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.35 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 0.37 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM10-PRI - PM10 Primary (Filt + Cond) 0.24 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.26 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>SO2 - Sulfur Dioxide 0.07 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 0.24 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>107028 - Acrolein 1.42 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>50000 - Formaldehyde 8.41 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>108883 - Toluene 5.32 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>1330207 - Xylenes (Mixed Isomers) 1.96 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 1.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>100414 - Ethylbenzene 1.34 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 0.12 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7664939 - Sulfuric Acid 33.65 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75569 - Propylene Oxide 0.14 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75070 - Acetaldehyde 0.51 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 0.17 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.14 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>PSE FREDONIA PROCESSES</b>		
<b>Unit ID: 04</b>	<b>Process ID: 01</b>	<b>Process Description: Diesel Fuel Combustion</b>
<b>SCC CODE: 20100101 - Int Comb /Electric Gen /Distillate Oil (Diesel) /Turbine</b>		

Insignificant Emissions Unit? No

Status:Operating

### ANNUAL THROUGHPUT

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
057 - Distillate Oil (Diesel)	Input
<b>Throughput and Units:</b>	
52.07 1000 GALLONS	

### FUEL PARAMETERS

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

### OPERATING SCHEDULE

Winter %	%	Hours/Day	24.0	Comments: The turbine had a total of 111 operating hours during 2025 with 14 hours on diesel fuel
Spring %	%	Days/Week	7.0	
Summer %	5 %	Weeks/Year	0	
Fall %	95 %	Hours/Year	14	

sum of quarters must be 100%

### RELEASE POINT APPORTIONMENT

RP ID	Description	Ave Emissions (%)
04	Release Point for Unit 04 - FREDONIA TURBINES UNIT 4	100%

### EMISSIONS

<b>PSE FREDONIA D-057-60040</b>
<b>Unit ID: 04 Process ID: 01</b>

<b>SO2 - Sulfur Dioxide 0.01 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.01 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 0.04 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM10-PRI - PM10 Primary (Filt + Cond) 0.04 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 0.06 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 0.03 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 0.04 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.01 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439921 - Lead 0.03 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>7440020 - Nickel 0.02 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.01 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 0.25 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440382 - Arsenic 0.01 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7647010 - Hydrogen Chloride 4.15 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7782492 - Selenium 0.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440473 - Chromium 0.02 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440439 - Cadmium 0.02 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439965 - Manganese 0.53 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7664939 - Sulfuric Acid 8.27 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 0.58 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 0.55 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 0.29 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE FREDONIA PROCESSES**

Unit ID: 04 Process ID: 02

Process Description: Natural Gas Combustion

SCC CODE: 20100201 - Int Comb /Electric Gen /Natural Gas /Turbine

Insignificant Emissions Unit? No

Status:Operating

**ANNUAL THROUGHPUT**

<b>Operating Type:</b>	
Routine	
<b>Material:</b>	<b>Material State:</b>
209 - Natural Gas	Input
<b>Throughput and Units:</b>	
40.69 MILLION STANDARD CUBIC FEET	

**FUEL PARAMETERS**

Fuel Parameter Content	
<b>Sulfur:</b>	0%
<b>Ash:</b>	no entry
<b>Heat:</b>	no entry

**OPERATING SCHEDULE**

Winter %	2 %	Hours/Day	24.0	Comments: The turbine had a total of 111 operating hours during 2025 with 97 hours on natural gas
Spring %	11.8 %	Days/Week	7.0	
Summer %	66.9 %	Weeks/Year	0	
Fall %	19.3 %	Hours/Year	97	

*sum of quarters must be 100%***RELEASE POINT APPORTIONMENT**

RP ID	Description	Ave Emissions (%)
04	Release Point for Unit 04 - FREDONIA TURBINES UNIT 4	100%

**EMISSIONS**

PSE FREDONIA D-057-60040

Unit ID: 04 Process ID: 02

<b>PM10-PRI - PM10 Primary (Filt + Cond) 0.16 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM25-PRI - PM2.5 Primary (Filt + Cond) 0.16 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 0.16 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>SO2 - Sulfur Dioxide 0.04 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds</b>	
<b>VOC Expression: Sum of Volatile Organic Compounds 0.10 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 0.21 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NH3 - Ammonia 0.12 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>NOX - Nitrogen Oxides 0.35 TON</b>	
Calculation Method: Continuous Emission Monitoring System	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>106990 - 1,3-Butadiene 0.08 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>91203 - Naphthalene 0.07 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>107028 - Acrolein 0.83 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75569 - Propylene Oxide 0.08 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75070 - Acetaldehyde 0.30 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 0.59 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 0.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>100414 - Ethylbenzene 0.79 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>1330207 - Xylenes (Mixed Isomers) 1.15 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 4.96 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7664939 - Sulfuric Acid 9.91 LB</b>	
Calculation Method: Stack Test (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>108883 - Toluene 3.14 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**END**

# Appendix C: 2025 Annual Compliance Certification

# Annual Compliance Certification Statement

Facility Name	Permit Number
Puget Sound Energy Fredonia Generating Station	003R4M2


Based upon the specific test methods, monitoring recordkeeping and/or reporting required under the facility's Air Operating Permit and any other information reasonably available, I, the undersigned certify to the following for the reporting period beginning January 1, 2025, and ending December 31, 2025:

The facility has been in continuous compliance with all terms and conditions of the facility's Air Operating Permit, except to the extent that Column 4 of Table 1 states that the compliance status is "Intermittent" for the identified permit term or condition.

I am the responsible official as defined in WAC 173-401-200, for this source.

*Based upon information and belief formed after reasonable inquiry, I certify that the statements and information in this document and all referenced documents and attachments are true, accurate and complete.*

Responsible Official:

<b>Name:</b> Mark Carlson	<b>Title:</b> Director of Generation & Natural Gas Storage
<b>Signature:</b> 	<b>Date:</b> 02/23/2026

Permit Number: 003R4M2

Name of Facility: Puget Sound Energy Fredonia Generating Station

**Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1**

Complete this table for all terms and conditions under the permittee's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (optional)	During the reporting period, was compliance continuous or intermittent?
<b>Section 1 – Emission Unit Identification</b>			
	No active compliance requirement.	No action required	Continuous
<b>Section 2 – Standard Terms and Conditions</b>			
2.1 Compliance Requirements	2.1.4 – Duty to Provide Information. All information and records requests were furnished to NWCAA. 2.1.6 – Inspection and Entry. NWCAA inspection conducted August 27, 2025; all requested records provided. 2.1.8 – Source Testing. All source tests performed using 40 CFR 60 Appendix A methods as specified in permit and approved by NWCAA. Test plans submitted 30+ days prior to testing, results submitted within 60 days of completion, and all plan changes pre-approved. 2.1.9 – Testing and Sampling. All testing and sampling work was performed using appropriate procedures and maintained equipment. 2.1.10 – Ambient Air and Continuous Emission Monitoring. CEMS QA Manual and station logbook maintained onsite. CEMS operated per NWCAA 367 & Appendix A, 40 CFR Parts 60 & 75, and manufacturer procedures. Records retained 5+ years and available upon request. Quarterly data submitted to NWCAA with >90% monthly data availability maintained.		Continuous
	No active compliance requirements for 2.1.1, 2.1.2, 2.1.3, 2.1.5, 2.1.7 & 2.1.11.	No action required	Continuous
2.2 Permit Terms	2.2.14 – Permit Fees. All permit fees were paid in a timely manner.		Continuous
	No active compliance requirements for 2.2.1 to 2.2.13 & 2.2.15.	No action required	Continuous
2.3 Permit Shield	No active compliance requirements.	No action required	Continuous
2.4 Recordkeeping and Reporting	2.4.1 – Compliance Certification. 2024 certification submitted February 26, 2024; 2025 semi-annual monitoring reports submitted July 15, 2025 and January 27, 2026. 2.4.2 – False and Misleading Oral Statement. Complied. 2.4.3 – Required Recordkeeping. All required records were maintained on-site for 5+ years. 2.4.4 – Pollutant Disclosure. The annual emissions inventory for 2024 was submitted to NWCAA on April 15, 2025. 2.4.5 – Greenhouse Gas (GHG) Reporting. GHG reporting for 2024 was submitted to EPA and Ecology. 2.4.6 – Reporting to Verify Emissions from Potential PSD Sources. No applicable activities. 2.4.7 – Reporting of Deviations from Permit Conditions. All deviations were reported as required. 2.4.8 – Report of Breakdown or Upset. All breakdown/upsets were reported as required. 2.4.9 – Report of Shutdown or Startup. All emission exceedances that occurred due to startup were	Term 2.4.9 requires reporting startup/shutdown of control equipment per NWCAA Regulation 341 that may temporarily exceed emission standards. Fredonia's peaker operations are generally unscheduled and do not expect to exceed emission standards. PSE submitted a February 2, 2012 letter to NWCAA outlining emission control employment and operational steps with advanced	Continuous

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (optional)	During the reporting period, was compliance continuous or intermittent?
	reported as required. 2.4.10 – Operation and Maintenance. All operations and maintenance were in accordance with good practices and appropriate manuals.	notification procedures. PSE continues to notify NWCAA per AOP requirements for all excursions or emissions exceedances when water injection compliance curves are not met, with follow-up reports as necessary.	
2.5 Excess Emissions	2.5.1 – Excess Emissions. All excess emissions were reported as required. 2.5.2 – Excess Emissions Due to Breakdowns, Upsets, Startup, or Shutdown. All excess due to breakdowns, upsets, startup, or shutdown emissions were reported as required.		Continuous
2.6 Duty to Supplement or Correct Information	No active compliance requirements.	No action required	Continuous
2.7 Prohibitions	No active compliance requirements.	No action required	Continuous
2.8 NOC & Application for Approval/NSR	No active compliance requirements.	No action required	Continuous
2.9 Greenhouse Gas Regulation	2024 GHG reports submitted to EPA and Ecology as required.		Continuous
<b>Section 3 – Standard Terms and Conditions for NSPS and NESHAPS</b>			
3.1 Part 60 – New Source Performance Standard Requirements	No active compliance requirements for 3.1.1, 3.1.7, 3.1.10, 3.1.11, and 3.1.14.	No action required	Continuous
	3.1.2 – Notification. No physical or operational changes made that could increase emission rates. All initial notifications, startup, and testing completed prior to this period. 3.1.3 – Startup, Shutdown, and Malfunction Records. All startups, shutdowns, and breakdowns/upsets recorded and maintained. 3.1.4 – Excess Emission Records. All excess emission events initially reported to NWCAA and summarized in quarterly (Units 3 & 4) or semi-annual (Units 1 & 2) reports. 3.1.5 – Maintenance of Records. All measurement records maintained on-site for 5+ years. 3.1.6 – Performance Tests. All initial startup notifications and performance tests were completed prior to this monitoring period. 3.1.8 – Compliance with Opacity Standards. Compliance demonstrated using applicable test methods. 3.1.9 – Operation and Maintenance. Facility was maintained and operated per procedures and good air pollution control practices. 3.1.12 – Monitoring Requirements. Continuous Monitoring System maintained per section provisions. 3.1.13 – Modification. No physical or operational changes made that could increase emission rates.		Continuous

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (optional)	During the reporting period, was compliance continuous or intermittent?
	All initial notifications, startup, and testing completed prior to this period.		
3.2 Part 63 - National Emission Standard for Hazardous Air Pollutant Requirements	No active compliance requirements for 3.2.1 to 3.2.5. 3.2.7 – Recordkeeping. Records maintained including time, date, location, occurrence, measurement, maintenance, corrective action, and reports. Records retained for 5+ years. 3.2.8 – General Compliance Requirements for 40 CFR 63 Subpart ZZZZ. Facility complied with applicable emission and operating limitations. Equipment maintained and operated per facility procedures and good air pollution control practices. All maintenance and operations performed per facility schedule and procedures with records maintained.	No action required	Continuous
<b>Section 4 – Generally Applicable Requirements</b>			
4.1 General	All monitoring reports submitted within 30 days of period close as required.		Continuous
4.2 General	All maintenance and operations performed per facility schedule and procedures with records maintained. All equipment, including pollution control equipment, maintained in good condition and operated per good operating procedures.		Continuous
4.3 & 4.4 Nuisance 4.5 & 4.6 Odor	No nuisance or odor complaints received. Facility took appropriate measures to prevent nuisance conditions.		Continuous
4.7, 4.8, 4.9, 4.10 & 4.11 PM	No fugitive complaints received. Facility took appropriate measures to prevent fugitive emissions.		
4.12, 4.13, & 4.14 VE 4.15, 4.16, & 4.17 PM	Visual observations conducted daily when combustion units operated and monthly on emergency generators. No exceedances of 20% opacity standard (EPA Method 9). Records maintained on-site.		Continuous
4.18, 4.19, 4.20, 4.21, 4.22, & 4.23 SO <sub>2</sub>	Records maintained for fuel type, quantity, and sulfur content with fuel specifications and purchase records retained. All fuel sulfur content below applicable limits.		Continuous
4.24 & 4.25 HAP	Facility complied with applicable emission and operating limitations. Equipment maintained and operated per facility procedures and good air pollution control practices with maintenance and operations records maintained.		Continuous
<b>Section 5 – Specifically Applicable Requirements</b>			
<b>5.1 Applicable to each combustion turbine unit within the facility</b>			
5.1.1 General	No ice fog was noted during this time.		Continuous
5.1.2, 5.1.3 General	Monthly and consecutive 12-month rolling facility-wide total HAP and formaldehyde emissions reported quarterly to NWCAA as required. During this monitoring period, total facility-wide HAP emissions remained below 25 tons per year and formaldehyde emissions below 10 tons per year on a 12-month rolling basis. Since formaldehyde emissions remained below 7.5 tons per year on a 12-month rolling basis, no source testing was required for Units 1 and 2.		Continuous
<b>5.2 Specifically Applicable Requirements for Unit 1</b>			
5.2.1 NOx	Monitoring, recordkeeping, and reporting requirements followed. NOx emissions remained below		Continuous

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (optional)	During the reporting period, was compliance continuous or intermittent?
5.2.2 NOx 5.2.3 NOx	limits of 2,061 tons per year (12-month rolling) and 480 pounds per hour. Water-to-fuel ratio maintained at or above control curve during operation. Per operating procedures, water injection was not used during startup, shutdown, full speed no load, and fuel transfers. Water injection, fuel use, and MW output monitored at 15-minute intervals and reduced to one-hour averages. NOx emissions calculated and reported semiannually.		
5.2.4 NOx	Monitoring, recordkeeping, and reporting requirements followed. CEMS not required as operating hours remained below 3,000 hours per year (12-month rolling). NOx emissions below 688.3 tons per year limit (12-month rolling). NOx emissions from Unit 1 on diesel last measured January 14, 2025; natural gas testing conducted August 7, 2024 (diesel testing deferred due to equipment issues). Test results demonstrate NOx emissions within specified limits.		Continuous
5.2.5 SO2 5.2.6 SO2 5.2.7 SO2	Monitoring, recordkeeping, and reporting requirements followed. Natural gas sulfur content monitored by supplier and distillate fuel sampled upon receipt, both below applicable limits. Records of fuel type, quantity, and sulfur content maintained on-site. Fuel sulfur content below 0.5% by weight per sampling. SO2 emissions below limits of 154 tons per year (12-month rolling), 47.1 tons per year (12-month rolling), and 640 pounds per hour. Operating hours by fuel type recorded monthly. Semi-annual reports submitted with monthly and 12-month rolling SO2 totals.		Continuous
5.2.8 CO	Monitoring, recordkeeping, and reporting requirements followed. Good combustion practices maintained. CO emissions from Unit 1 on diesel last measured January 14, 2025; natural gas testing conducted August 7, 2024. Test results demonstrate CO emissions within specified limits. CO emissions below limits of 645.0 tons per year (12-month rolling) and 185 pounds per hour.		Continuous
5.2.9 Particulate	Fuel use records maintained and good combustion practices followed. Combined particulate emissions for Units 1 and 2 below limits of 207 tons per year (12-month rolling) and 104 pounds per hour.		Continuous
<b>5.3 Specifically Applicable Requirements for Unit 2</b>			
5.3.1 NOx 5.3.2 NOx 5.3.3 NOx	Monitoring, recordkeeping, and reporting requirements followed. NOx emissions remained below limits of 2,061 tons per year (12-month rolling) and 480 pounds per hour. Water-to-fuel ratio maintained at or above control curve during operation. Per operating procedures, water injection not used during startup, shutdown, full speed no load, and fuel transfers. Water injection, fuel use, and MW output monitored at 15-minute intervals and reduced to one-hour averages. NOx emissions calculated and reported semiannually. NOx emissions from Unit 2 on diesel last measured January 16, 2025; natural gas testing conducted February 16, 2024. Test results demonstrate NOx emissions within specified limits.		Continuous
5.3.4 SO2 5.3.5 SO2	Monitoring, recordkeeping, and reporting requirements followed. Natural gas sulfur content monitored by supplier and diesel fuel sampled upon receipt, both below applicable limits. Records of fuel type, quantity, and sulfur content maintained on-site. Fuel sulfur content below 0.5% by weight per sampling. SO2 emissions below limits of 154 tons per year (12-month rolling) and 640 pounds per hour. Operating hours by fuel type recorded monthly. Semi-annual reports submitted with monthly and 12-month rolling SO2 totals.		Continuous
5.3.6 CO	Monitoring, recordkeeping, and reporting requirements followed. Good combustion practices		Continuous

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (optional)	During the reporting period, was compliance continuous or intermittent?
	maintained. CO emissions below limits of 645.0 tons per year (12-month rolling) and 185 pounds per hour. CO emissions from Unit 2 on diesel last measured January 16, 2025; natural gas testing conducted February 16, 2024. Test results demonstrate CO emissions within specified limits.		
5.3.7 Particulate	Fuel use records maintained and good combustion practices followed. Combined particulate emissions for Units 1 and 2 below limits of 207 tons per year (12-month rolling) and 104 pounds per hour.		Continuous
<b>5.4 Specifically Applicable Requirements for Unit 3 and 4</b>			
5.4.1 General	All quarterly monitoring reports submitted within 30 days of period close as required, including information specified by NWCAA. Records maintained on-site for 5+ years.		Continuous
5.4.2 General	Units 3 and 4 operated and maintained per Pratt & Whitney FT-8 Operating and Maintenance Manual and facility schedule/procedures using good management practices. O&M manual copies maintained onsite and available for inspection.		Continuous
5.4.3 General	Per 2.1.6, access granted upon request.		Continuous
5.4.4 General	Equipment maintained per facility procedures and schedules.		Continuous
5.4.5 NOx	NOx and O2 emissions monitored with CEMS operated per 40 CFR Part 60 Subpart GG. NOx emissions for both units remained below subpart limits.		Continuous
5.4.6 NOx	NOx and O2 emissions monitored with CEMS operated per 40 CFR Part 75 with records maintained for 5+ years. NOx emissions for both units within permit limits for pounds per day and 12-month rolling tons per year. Both units within 3-hour average corrected NOx ppm limits except for unavoidable excess emissions from Unit 3 (October 15, 2025). NWCAA notified within 12 hours of exceedance. Excess Emissions Report submitted using NWCAA Form II. Quarterly reports submitted with required information.	The Unit 3 exceedance on October 15, 2025, resulting in unavoidable excess NOx emissions.	Intermittent
5.4.7 SO2 5.4.8 SO2 5.4.9 SO2	Natural gas sulfur content monitored by supplier and diesel fuel sampled upon delivery, both below applicable limits. Records of fuel type, quantity, and sulfur content maintained on-site for 5+ years. Fuel usage reported quarterly to NWCAA as required.		Continuous
5.4.10 H <sub>2</sub> SO <sub>4</sub>	H <sub>2</sub> SO <sub>4</sub> emissions demonstrated compliance for 3 consecutive annual source tests, reducing test frequency to once every 3 years per NWCAA approval February 4, 2016. Most recent H <sub>2</sub> SO <sub>4</sub> test results using diesel and natural gas demonstrate emissions within specified limits.		Continuous
5.4.11 PM <sub>10</sub>	Particulate matter emissions demonstrated compliance for 3 consecutive annual source tests, reducing test frequency to once every 3 years per NWCAA approval February 4, 2016. Most recent particulate matter test results using diesel and natural gas demonstrate emissions within specified limits.		Continuous
5.4.12 Opacity	Daily stack observations conducted during operation. Opacity monitoring recorded per EPA Method 9 if visible emissions observed. No exceedances of 10% opacity standard (EPA Method 9). Visual observation records maintained on-site.		Continuous
5.4.13 NH <sub>3</sub>	Ammonia emissions tested annually with diesel testing every 36 months. Most recent ammonia test results using diesel and natural gas demonstrate emissions within specified limits.		Continuous
5.4.14 CO	CO emissions monitored with CEMS operated per 40 CFR Part 60 with records maintained for 5+ years. CO emissions for both units within permit limits for 12-month rolling tons per year. Both		Continuous

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (optional)	During the reporting period, was compliance continuous or intermittent?
	units within 1-hour average corrected CO ppm limits. Quarterly reports submitted with required information.		
5.4.15 VOC	VOC emissions tested every three years. Most recent VOC test results using diesel and natural gas demonstrate emissions within specified limits. VOC emissions for both units within permit limits for 12-month rolling tons per year and startup/shutdown time. Quarterly reports submitted with required information.		Continuous
<b>5.5 Specifically Applicable Requirements for the Emergency Generator</b>			
5.5.1	Annual maintenance requirements completed with records maintained on-site.		Continuous
5.5.2	Generator operated and maintained per manufacturer's instructions with records maintained on-site.		Continuous
5.5.3	Generator operating hours recorded for emergency and non-emergency operations.		Continuous
5.5.4	Generator complied with applicable 40 CFR 63 Subpart A requirements per 40 CFR 63 Subpart ZZZZ Table 8.		Continuous
5.5.5	Generator complied with emission and operating limitations. Generator operated and maintained per good air pollution control practices with maintenance and inspection records maintained on-site.		Continuous
<b>Section 6 – Units 3 and 4 Acid Rain Permit</b>			
6.1 & 6.2	Facility in compliance with provisions set forth in the application and in WAC 173-406.		Continuous

Permit Number: 003R4M2

Name of Facility: Puget Sound Energy Fredonia Generating Station

**Washington Air Operating Permit Deviation Report Summary Table 2<sup>1</sup>**

**For each deviation from any term or condition, complete the following:**

<b>Permit Term or Condition (#and/or Title)</b>	<b>Date the report was submitted</b>	<b>Report description (Did the previously reported deviation come to the agency as a CEM report, NESHAP report, etc.?)</b>	<b>Additional information such as: Has the agency evaluated this deviation; Is the status still pending? Has the agency decided to pursue enforcement?</b>
5.4.6	November 26, 2025	Excess Emission Report: Unit 3 experienced an exceedance due to an ammonia injection system malfunction during diesel fuel operation which resulted in unavoidable excess NOx emissions on October 15, 2025.	This exceedance resulted in unavoidable excess emissions.

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<sup>1</sup> Table 2 must be submitted with the compliance certification. If no deviations have occurred, write "Not Applicable" in the table.