

January 9, 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 012R4M1  
PSE Whitehorn Generating Station**

Dear Mr. Bouwman,

Please find enclosed the Title V Air Operating Permit (AOP) renewal application package for the Puget Sound Energy (PSE) Whitehorn Generating Station. This comprehensive submittal includes the Title V Air Operating Permit Renewal Application, requested AOP term modifications (Appendix A), 2024 annual emissions inventory (Appendix B), and 2024 annual compliance certification (Appendix C).

As part of this renewal application, PSE proposes the following modifications to the existing AOP. These include:

- Delete Term 5.1.8 – Compliance obligation completed with purchase of 3.4 million gallons of low sulfur diesel fuel, exceeding EPA Administrative Order requirements
- Revise Term 5.2.1 – Update maintenance inspection timeframe from "annually" to "within 1 year + 30 days" per recent EPA amendments to 40 CFR Part 63 Subpart ZZZZ
- Revise Term 5.2.3 – Increase allowable demand response hours from 15 to 50 hours per year and update regulatory reference per EPA amendments to 40 CFR Part 63 Subpart ZZZZ

Should you have any questions or concerns regarding this application, please do not hesitate to contact Dustin Cornidez-Pittman at (425) 213-6638.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dustin Cornidez-Pittman', written in a cursive style.

Dustin Cornidez-Pittman  
Manager, Environmental Services



1600 S 2nd Street  
Mount Vernon, WA 98273  
Main: 360-428-1617  
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[info@nwcleanairwa.gov](mailto:info@nwcleanairwa.gov)  
[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: Requested AOP Term Changes

Table 1 Question 25 – Are there any requested changes to any conditions in the current AOP?

Permit Term(s)	Requested Change
5.1.8	PSE requests deletion of this permit term. As of November 2024, PSE has fulfilled the requirement specified in EPA Administrative Order CAA-10-2001-0107 Condition 9b by purchasing a total of 3,406,127 gallons of low sulfur distillate fuel (less than 0.05% sulfur by weight) to offset SO <sub>2</sub> and particulate emissions from Fredonia Generating Station Units 3 and 4. This total exceeds the required 3,000,000 gallons, completing the compliance obligation and rendering this permit term obsolete.
5.2.1	In accordance with recent EPA amendments to 40 CFR Part 63 Subpart ZZZZ regulations, the compliance timeframe for changing oil and filters, inspecting air cleaners, and inspecting hoses and belts has been modified from "annually" to "within 1 year + 30 days." PSE requests that this permit term be revised to align with the updated federal regulatory requirements.
5.2.3	In accordance with recent EPA amendments to 40 CFR Part 63 Subpart ZZZZ regulations, the allowable hours for demand response have increased from 15 to 50 hours per year. PSE requests that this permit term be revised to reflect the updated federal regulatory allowance and update the reference to 40 CFR 63.6640(f)(4)(ii).

# Appendix B: 2024 Annual Emissions Inventory

# Facility Summary eFORM

Northwest Clean Air Agency

D-073-60028

PSE WHITEHORN

2024

## FACILITY OPERATIONS

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

**Operating Status:** Operating

## FACILITY LOCATION

**Coordinates:** Latitude: 48.88530 Longitude: -122.75116  
**Reference Point:** Entrance Point  
**Comments:**

**Facility Address:** 4930 Brown Road  
Blaine, WA 98230-9063  
Whatcom County

**Contact:** Mr. Steve Feller  
1660 Park Lane  
Burlington, WA 98233  
(360) 766-5512  
Steven.Feller@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 - PEAK LOAD TURBINE UNIT #2**

Release Point Type		Status
Vertical		Operating
Stack	Fugitive	Comments
Height: 32 ft Diameter: 18 ft Temperature: 900°F Flow Rate: 522,300 ACFM Velocity: 2,052.5 FPM 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: 48.88617 Longitude: -122.75203

**Release Point for Unit 02 - PEAK LOAD TURBINE UNIT #3**

Release Point Type		Status
Vertical		Operating
Stack	Fugitive	Comments
Height: 32 ft Diameter: 18 ft Temperature: 900°F Flow Rate: 515,043 ACFM Velocity: 2,024 FPM 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: 48.88617 Longitude: -122.75203

**PSE WHITEHORN CONTROL APPROACHES**

**Control Approach: controlled  
Release Point: 01 Release Point for Unit 01 - PEAK LOAD TURBINE UNIT #2**

Control Effectiveness (%):		Capture Efficiency (%):	
<b>Pollutant</b>	<b>Control Efficiency</b>		
Nitrogen Oxides	60.00%		
<b>Measure Type</b>	<b>Measure</b>		
Device	213 - Water Injection		

**Control Approach: Controlled  
Release Point: 01 Release Point for Unit 01 - PEAK LOAD TURBINE UNIT #2**

Control Effectiveness (%):		Capture Efficiency (%):	
<b>Pollutant</b>	<b>Control Efficiency</b>		
Nitrogen Oxides	40.00%		
<b>Measure Type</b>	<b>Measure</b>		
Device	213 - Water Injection		

**Control Approach: Controlled  
Release Point: 02 Release Point for Unit 02 - PEAK LOAD TURBINE UNIT #3**

Control Effectiveness (%):		Capture Efficiency (%):	
<b>Pollutant</b>	<b>Control Efficiency</b>		
Nitrogen Oxides	60.00%		
<b>Measure Type</b>	<b>Measure</b>		
Device	213 - Water Injection		

**Control Approach: Controlled  
Release Point: 02 Release Point for Unit 02 - PEAK LOAD TURBINE UNIT #3**

Control Effectiveness (%):		Capture Efficiency (%):	
<b>Pollutant</b>	<b>Control Efficiency</b>		
Nitrogen Oxides	40.00%		
<b>Measure Type</b>	<b>Measure</b>		
Device	213 - Water Injection		

**PSE WHITEHORN UNITS**

<b>Unit ID: 02</b> PEAK LOAD TURBINE UNIT #2		
<b>Unit Type</b>	<b>Status</b>	<b>Capacity</b>
120 - Turbine	Operating	794 Million BTU Per Hour
<b>Unit ID: 03</b> PEAK LOAD TURBINE UNIT #3		
<b>Unit Type</b>	<b>Status</b>	<b>Capacity</b>
120 - Turbine	Operating	794 Million BTU Per Hour

<b>PSE WHITEHORN PROCESSES</b>		
<b>Unit ID: 02</b>	<b>Process ID: 01</b>	<b>Process Description:</b> not provided
<b>SCC CODE:</b> 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>	
237.70 1000 GALLONS	

**FUEL PARAMETERS**

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

**OPERATING SCHEDULE**

Winter %	54.9 %	Hours/Day	24.0	Comments: Operating Schedule data is combined for both fuels. The turbine had a total of 2,204 operating hours during 2024 with 43 hours on diesel fuel.
Spring %	18.8 %	Days/Week	7.0	
Summer %	13.1 %	Weeks/Year	0	
Fall %	13.2 %	Hours/Year	43	

sum of quarters must be 100%

**RELEASE POINT APPORTIONMENT**

<b>RP ID</b>	<b>Description</b>	<b>Ave Emissions (%)</b>
01	Release Point for Unit 01 - PEAK LOAD TURBINE UNIT #2	100%

## EMISSIONS

PSE WHITEHORN D-073-60028  
Unit ID: 02 Process ID: 01

### CO - Carbon Monoxide 1.20 TON

Calculation Method: USEPA Emission Factor (no Control Efficiency used)

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

### NH3 - Ammonia 0.00 TON

Calculation Method: USEPA Emission Factor (no Control Efficiency used)

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

### NOX - Nitrogen Oxides 5.20 TON

Calculation Method: Stack Test (no Control Efficiency used)

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

### VOC - Volatile Organic Compounds

#### VOC Expression: Sum of Volatile Organic Compounds 0.00 TON

Calculation Method: USEPA Emission Factor (no Control Efficiency used)

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

### SO2 - Sulfur Dioxide 0.00 TON

Calculation Method: Engineering Judgment

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

### PM-PRI - PM Primary (Filt + Cond) 0.20 TON

Calculation Method: USEPA Emission Factor (no Control Efficiency used)

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

### PM25-PRI - PM2.5 Primary (Filt + Cond) 0.20 TON

Calculation Method: USEPA Emission Factor (no Control Efficiency used)

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

### PM10-PRI - PM10 Primary (Filt + Cond) 0.20 TON

Calculation Method: USEPA Emission Factor (no Control Efficiency used)

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

<b>CO2 - Carbon Dioxide 2555.50 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>N2O - Nitrous Oxide 0.00 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CH4 - Methane 0.00 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>130498292 - PAH, Total 1.30 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439921 - Lead 0.50 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440020 - Nickel 0.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440382 - Arsenic 0.40 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440439 - Cadmium 0.20 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440473 - Chromium 0.40 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>7782492 - Selenium 0.80 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 0.50 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 1.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439965 - Manganese 25.70 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 1.80 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 9.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE WHITEHORN PROCESSES**

Unit ID: 02 Process ID: 02

Process Description: not provided

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>	
1469.70 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 %	54.9 %	Hours/Day	24.0	Comments: Operating Schedule data is combined for both fuels. The turbine had a total of 2,204 operating hours during 2024 with 2,161 hours on natural gas fuel.
Spring %	18.8 %	Days/Week	7.0	
Summer %	13.1 %	Weeks/Year	0	
Fall %	13.2 %	Hours/Year	2,161	

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

RP ID	Description	Ave Emissions (%)
01	Release Point for Unit 01 - PEAK LOAD TURBINE UNIT #2	100%

**EMISSIONS**

PSE WHITEHORN D-073-60028

Unit ID: 02 Process ID: 02

<b>NH3 - Ammonia 0.00 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 24.30 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) 5.30 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) 5.30 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 256.50 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 1.70 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 1.80 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 5.30 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>CO2 - Carbon Dioxide      89129.90    TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>N2O - Nitrous Oxide      2.40    TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CH4 - Methane      7.00    TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>100414 - Ethylbenzene      51.90    LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde      1150.60    LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>108883 - Toluene      210.70    LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75070 - Acetaldehyde      64.80    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)      103.70    LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene      2.10    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      47.00   LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene      19.40   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      3.60   LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>107028 - Acrolein      10.40   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      0.70   LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE WHITEHORN PROCESSES**

Unit ID: 03 Process ID: 01

Process Description: not provided

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>	
315.00 1000 GALLONS	

**FUEL PARAMETERS**

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

**OPERATING SCHEDULE**

Winter %	29.8 %	Hours/Day	24.0	Comments: Operating Schedule data is combined for both fuels. The turbine had a total of 2,007 operating hours during 2024 with 60 hours on diesel fuel.
Spring %	37.7 %	Days/Week	7.0	
Summer %	19.8 %	Weeks/Year	0	
Fall %	12.7 %	Hours/Year	60	

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

RP ID	Description	Ave Emissions (%)
02	Release Point for Unit 02 - PEAK LOAD TURBINE UNIT #3	100%

**EMISSIONS**

PSE WHITEHORN D-073-60028

Unit ID: 03 Process ID: 01

<b>PM10-PRI - PM10 Primary (Filt + Cond) 0.30 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) 0.30 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 0.30 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 0.00 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - 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>NOX - Nitrogen Oxides 6.50 TON</b>	
Calculation Method: Stack Test (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 1.60 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: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO2 - Carbon Dioxide 3386.00 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>7439965 - Manganese 34.10 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 0.70 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 1.50 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>7439921 - Lead 0.60 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7439976 - Mercury 0.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440020 - Nickel 0.20 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440382 - Arsenic 0.50 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440439 - Cadmium 0.20 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7782492 - Selenium 1.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	

Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 2.40 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 12.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>7440473 - Chromium 0.50 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**PSE WHITEHORN PROCESSES**

Unit ID: 03 Process ID: 02

Process Description: not provided

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>	
1223.10 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 %	29.8 %	Hours/Day	24.0	Comments: Operating Schedule data is combined for both fuels. The turbine had a total of 2,007 operating hours during 2024 with 1,947 hours on natural gas fuel.
Spring %	37.7 %	Days/Week	7.0	
Summer %	19.8 %	Weeks/Year	0	
Fall %	12.7 %	Hours/Year	1,947	

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

RP ID	Description	Ave Emissions (%)
02	Release Point for Unit 02 - PEAK LOAD TURBINE UNIT #3	100%

**EMISSIONS**

PSE WHITEHORN D-073-60028

Unit ID: 03 Process ID: 02

<b>NOX - Nitrogen Oxides 204.20 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) 4.50 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>VOC - Volatile Organic Compounds 1.40 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>PM-PRI - PM Primary (Filt + Cond) 4.50 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) 4.50 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: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CO - Carbon Monoxide 20.20 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 1.50 TON</b>	
Calculation Method: Engineering Judgment	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

<b>CO2 - Carbon Dioxide 74220.20 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>CH4 - Methane 5.80 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>N2O - Nitrous Oxide 2.00 TON</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>91203 - Naphthalene 1.80 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>71432 - Benzene 16.20 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>107028 - Acrolein 8.60 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 0.60 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>50000 - Formaldehyde 958.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>108883 - Toluene 175.40 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) 86.40 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 39.10 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>75070 - Acetaldehyde 54.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	
<b>100414 - Ethylbenzene 43.20 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 3.00 LB</b>	
Calculation Method: USEPA Emission Factor (no Control Efficiency used)	
Emission Factor:	Emission Factor Desc: none entered
Comments: none entered	

**END**

# Appendix C: 2024 Annual Compliance Certification

# Washington Annual Compliance Certification Statement

	Permit Number:
Name of Permittee / Source: <b>Puget Sound Energy Whitehorn Generating Station</b>	AOP 012R4M1, issued February 28, 2023
Permitting Agency: Northwest Clean Air Agency	

Based upon the specific test methods, monitoring recordkeeping and/or reporting required under the permittee's Air Operating Permit and any other information reasonably available, I, the undersigned certify to the following for the reporting period beginning, January 1, 2024, and ending December 31, 2024:

The permittee has been in continuous compliance with all terms and conditions of the permittee'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:

Name: Mark Carlson	Title: Director of Generation & Natural Gas Storage
Signature: 	Date: 02/25/25

Permit Number: AOP 012R4M1  
 Name of Permittee: Puget Sound Energy  
 Name of Facility: Whitehorn 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 compliance statement necessary. Puget Sound Energy owned and operated the facility listed in this section during the specified period.	No action required	Continuous
<b>Section 2 – Standard Terms and Conditions</b>			
2.1 Compliance Requirements	The active compliance requirements under this section, during this period were 2.1.4, 2.1.6, 2.1.8 & 2.1.9 2.1.4 – <i>Duty to Provide Information</i> . All information and records requests were furnished to NWCAA. 2.1.6 – <i>Inspection and Entry</i> . NWCAA was granted access for inspection on April 23, 2024. 2.1.8 – <i>Source Testing</i> . All source tests were performed by applicable methods in 40 CFR 60, Appendix A. The results of all required source tests were submitted within 60 days of test completion and all source test plans were submitted to NWCAA for approval at least 30-days prior to the scheduled testing. Any changes to the source test plans were approved prior to testing and all tests were completed according to the approved plan. 2.1.9 – <i>Testing and Sampling</i> . All testing and sampling work was performed using appropriate procedures and maintained equipment, as specified in 2.1.9		Continuous
	The inactive compliance requirements under this section, during this period were 2.1.1, 2.1.2, 2.1.3, 2.1.5, 2.1.7, 2.1.10 & 2.1.11.	No action required	Continuous
2.2 Permit Terms	The active compliance requirements under this section, during this period were 2.2.14. The permit fees were paid in a timely manner as required under 2.2.14.		Continuous
2.3 Permit Shield	There were no active compliance requirements for this term during this period.	No action required	Continuous
2.4 Recordkeeping and Reporting	2.4.1 <i>Compliance Certification</i> – The compliance certification for 2023 was submitted on February 27, 2024. Semi-annual certification of monitoring reports were submitted on July 30, 2024 and January 27, 2025. 2.4.2 <i>False or Misleading Oral Statement</i> – This is not an active compliance requirement. 2.4.3 <i>Required Recordkeeping</i> – Records included time, date, location, operating conditions, and analyses will be retained for a period of at least five years as required.	2.4.9 - Whitehorn’s startup/shutdown peaker operations are generally not scheduled and do not expect to exceed any emission standards. PSE submitted a letter to NWCAA	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?
	<p>2.4.4 <i>Pollutant Disclosure</i> – The annual emissions inventory for 2023 was submitted to NWCAA on April 15, 2024 as required.</p> <p>2.4.5 <i>Greenhouse Gas Reporting</i> – GHG reporting for 2023 was submitted to EPA and Ecology as required.</p> <p>2.4.6 <i>Reporting to Verify Emissions from Potential PSD Sources</i> – No new sources subject to PSD reporting were added during this monitoring period.</p> <p>2.4.7 <i>Reporting of Deviations from Permit Conditions</i> – All deviations were reported as required.</p> <p>2.4.8 <i>Report of Breakdown and Upset</i> – All breakdowns and upsets that would have resulted in an emission and/or ambient air quality standard being exceeded, were reported as required.</p> <p>2.4.9 <i>Report of Shutdown or Startup</i> – There were no startups or shutdowns other than normal startups and shutdowns that would have required reporting under this section.</p> <p>2.4.10 <i>Operation and Maintenance</i> – There were no breakdowns or violations due to improper operation or maintenance of equipment during this period.</p>	on Feb. 2, 2012, which outlines how and why the facility's emission controls are employed as well as a general schedule of steps taken when operating the emission controls and to provide advanced notification.	
2.5 Excess Emissions	<p>2.5.1 <i>Excess Emissions</i> – All excess emissions were reported as required.</p> <p>2.5.2 <i>Excess Emissions Due to Breakdowns, Upsets, Startup, or Shutdown</i> - All excess emissions due to breakdowns, upsets, startup, or shutdown were reported as required to NWCAA during this reporting period.</p>		Continuous
2.6 Duty to Supplement or Correct Information	There were no active compliance requirements during this monitoring period.	No action required	Continuous
2.7 Prohibitions	There were no active compliance requirements related to this section during this monitoring period.	No action required	Continuous
2.8 Notice of Construction and Application for Approval/NSR	No new sources were added during this period. The emission controls were neither replaced nor were they substantially altered.		Continuous
2.9 Greenhouse Gas Regulation	<i>Greenhouse Gas Regulation</i> – GHG reporting for 2023 was submitted to EPA and Ecology as required.		Continuous
<b>Section 3 – Standard Terms and Conditions for NSPS and NESHAP</b>			
3.1 New Source Performance Standard Requirements	<p>3.1.1 <i>Address for Reports, Notifications, and Submittals</i> - There are no active compliance requirements related to this term.</p> <p>3.1.2 <i>Notification</i> - There were no physical or operational changes made to the facility that could increase the emission rate of any air pollutant during this period. All initial notifications, startup, and testing were completed prior to this monitoring period.</p>		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?
	<p><i>3.1.3 Startup, Shutdown, and Malfunction Records</i> - All startups and shutdowns were recorded and records maintained. Records were maintained for breakdowns/upsets.</p> <p><i>3.1.4 Excess Emission Records</i> - Reports of excess emissions and monitoring systems performance were submitted semi-annually as required.</p> <p><i>3.1.5 Maintenance of Records</i> - Records of all measurements were maintained on site for at least five years.</p> <p><i>3.1.6 Performance Tests</i> - All initial startup notifications and performance tests were completed prior to this monitoring period.</p> <p><i>3.1.7 Test Method Performance Audit</i> – There were no active compliance requirements related to this term during this monitoring period.</p> <p><i>3.1.8 Compliance with Opacity Standards</i> - Compliance with opacity standards was demonstrated using the applicable test methods.</p> <p><i>3.1.9 Operation and Maintenance</i> - The Whitehorn Generating Station was maintained and operated in accordance with the facility procedures and good air pollution control practices for minimizing emissions.</p> <p><i>3.1.10 Credible Evidence</i> - There were no active compliance requirements related to this term.</p> <p><i>3.1.11 Circumvention</i> - There were no active compliance requirements related to this term.</p> <p><i>3.1.12 Monitoring Requirements</i> – The Continuous Monitoring System was maintained according to the provisions of this section during this period.</p> <p><i>3.1.13 Modification</i> – There were no physical or operational changes made to the facility that could increase the emission rate of any air pollutant during this period. All initial notifications, startup, and testing were completed prior to this monitoring period.</p>		
3.2 National Emission Standard for Hazardous Air Pollutant Requirements	<p><i>3.2.1 Prohibited Activities and Circumvention</i> – There were no active compliance requirements related to this term during this monitoring period.</p> <p><i>3.2.2 Requirements for Existing, Newly Constructed, and Reconstructed 40 CFR Part 63 NESHAP Sources</i> – There were no active compliance requirements related to this term during this monitoring period.</p> <p><i>3.2.3 Extension of Compliance for Early Reductions and Other Reductions</i> – There were no active compliance requirements related to this term during this monitoring period.</p> <p><i>3.2.4 Address for Reports, Notifications and Submittals</i> – There were no active compliance requirements related to this term during this monitoring period.</p> <p><i>3.2.5 Recordkeeping</i> – Records included time, date, location, occurrence, measurement, maintenance, corrective action, report or record were maintained. Records have been retained and will be retained for a period of at least five years.</p>		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?
	3.2.6 General Compliance Requirements for 40 CFR 63 Subpart ZZZZ - The Whitehorn Generating Station complied with the applicable emission and operating limitations in this subpart. The applicable equipment was maintained and operated in accordance with the facility procedures and good air pollution control practices for minimizing emissions. All maintenance and operations were performed in accordance with the facility schedule and procedures. Records were kept of operations and maintenance work on the applicable equipment.		
<b>Section 4 – Generally Applicable Requirements</b>			
4.1 Reports	All monitoring reports were submitted as required and were within 30-days after the close of the period that they covered.		Continuous
4.2 General	All maintenance and operations were performed in accordance with the facility schedule and procedures. Records were kept of maintenance and repair work on process and air pollution control equipment. All facility equipment, including pollution control equipment, was maintained in good condition and operated in accordance with good operating procedures.		Continuous
4.3 & 4.4 Nuisance 4.5 & 4.6 Odor	No complaints were received from NWCAA or the public. All operations and maintenance were performed in accordance with facility procedures and best practices.		Continuous
4.7, 4.8, 4.9, 4.10 & 4.11 PM	No complaints of fugitive emissions were received. Particulate emissions and visual observations were in compliance with the relevant limits.		Continuous
4.12, 4.13, 4.14 VE 4.15, 4.16 & 4.17 PM	Visual observations were made of the combustion turbine stacks for each day in which either unit operated and at least once per month on the emergency generators. There were no exceedances of the applicable standard during this period. Records of the visual observations were taken and are maintained on-site.		Continuous
4.18, 4.19, 4.20, 4.21, 4.22 & 4.23 - SO <sub>2</sub>	Records were maintained for the type, quantity and sulfur content of all fuel combusted and were available for inspection upon request. Fuel specifications and purchase records were also retained. The sulfur content of all fuel combusted was less than the applicable limits during this period.		Continuous
4.24 & 4.25 - HAP	The Whitehorn Generating Station complied with the applicable emission and operating limitations in this subpart. The applicable equipment, including the associated air pollution control equipment, was maintained and operated in accordance with the facility procedures and good air pollution control practices for minimizing emissions. All maintenance and operations were performed in accordance with the facility schedule and procedures. Records were kept of operations and maintenance work on the applicable equipment.		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?
<b>Section 5 – Specifically Applicable Requirements</b>			
<i>Specifically Applicable Requirements for Combustion Turbine Units 2 &amp; 3</i>			
5.1.1 General	No ice fog was noted during this monitoring period.		Continuous
5.1.2 NOx 5.1.3 NOx 5.1.4 NOx	The monitoring, recordkeeping and reporting requirements of this term were followed during this period. NOx emissions were below the limit of 500 pounds per hour. The one-hour average water-to-fuel ratio was maintained at or above the control curve for each unit during this time period. Consistent with the unit operating procedures, water was not injected during periods of startup, shutdown and full speed no load. Water injection, fuel use, and MW output were monitored in at least 15-minute intervals during unit operation, and reduced to one-hour averages. NOx emissions were calculated and reported semiannually on July 26, 2024 and January 24, 2025. NOx emissions were last measured by source testing on June 4, 2024 for Unit 2 and on June 6, 2024 for Unit 3. The data from these tests demonstrate that the NOx emissions from both units are within the limits specified by this term. During 2024, Unit 2 and Unit 3 were run at times at loads below the point that water injection is required to maintain compliance with emission limits in order to meet our reserve requirements for quickly dispatchable generation. While no emission limit was exceeded during these runs, these time periods are defined as excess emissions since no water was injected into the turbine. Excess emissions summaries were submitted to NWCAA as part of the semi-annual reports. The water and fuel flow measurement devices were operated, maintained and calibrated in accordance with the manufacturer’s specifications.		Continuous
5.1.5 SO2 5.1.6 SO2	Permit terms related to SO <sub>2</sub> emissions have been followed. No new sources were established during this time period. Sulfur content of natural gas fuel was monitored by the supplier and was below the applicable limits. Sulfur content of distillate fuel is monitored by collection of fuel samples whenever fuel was received and was below the applicable limits. Records of type, quantity and sulfur content of fuels used were maintained on-site. Following the completion of a fuel delivery, the tank was sampled on December 3, 2024 for sulfur and the resulting content was 0.0056% by weight.		Continuous
5.1.7 Particulate	Visual observations were made of the stacks each day on which either unit operated. There were no exceedances of the applicable standard during this period. Records of the visual observations were taken and are maintained on-site.		Continuous
5.1.8 Particulate	607,694 gallons of ultra-low-sulfur distillate fuel were added to the fuel tanks at Whitehorn from November 19 to 26, 2024. To date, PSE has purchased a total of 3,406,127 gallons of low sulfur (less than 0.05%w) distillate fuel to offset SO <sub>2</sub> and particulate emissions at Fredonia from Units 3 and 4 and fulfilled the 3,000,000 gallons specified by this condition in 5.1.8.		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?
<i>Specifically Applicable Requirements for the Emergency Generators</i>			
5.2.1	The annual maintenance requirements were completed and the records are maintained on-site.		Continuous
5.2.2	The generators were each operated and maintained according to the manufacturer's instructions and the records are maintained on-site.		Continuous
5.2.3	The hours of operation for each generator were recorded including emergency and non-emergency operations.		Continuous
5.2.4	Both of the generators complied with the applicable requirements in 40 CFR 63 Subpart A as listed in 40 CFR 63 Subpart ZZZZ Table 8.		Continuous
5.2.5	Both of the generators complied with the emission and operating limitations listed in this subpart. The generators were operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions and the maintenance and inspection records are maintained on-site.		Continuous

Permit Number: AOP 012R4M1  
Name of Permittee: Puget Sound Energy  
Name of Facility: Whitehorn 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>
NA	NA	Not Applicable	

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