



Puget Sound Energy
P.O. Box 90868
Bellevue, WA 98009-0868
PSE.com

April 19, 2011

Puget Sound Clean Air Agency
Attn.: Operating Permit Certification
1904 3rd Avenue, Suite 105
Seattle, Washington 98101

EPA Region 10, Mail Stop OAQ-107
Attn.: Air Operating Permits
1200 Sixth Avenue
Seattle, Washington 98101

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

**RE: Frederickson Generating Station - Puget Sound Energy
Air Operating Permit #10028
Annual Compliance Certification Report, March 21, 2009 - March 20, 2010**

Please find Puget Sound Energy's (PSE) Frederickson Generating Station (Frederickson) Annual Compliance Certification Report for March 21, 2010 through March 20, 2011, as required by Section V.M *Compliance Certifications* of the Frederickson Generating Station (Frederickson) Air Operating Permit (AOP) # 10028.

The following certification is a summary of Frederickson's AOP compliance with the permit with items listed by the corresponding permit section and subject:

I. EMISSION LIMITS AND PERFORMANCE STANDARDS

This Section is a listing of regulatory requirements and provides a basis for AOP Section II "Monitoring, Maintenance & Record keeping Procedures". Frederickson's compliance with Section I is demonstrated by adherence to Section II of the AOP.

II. MONITORING, MAINTENANCE AND RECORD KEEPING PROCEDURES

A. Minimum Monitoring and Maintenance Requirements

1. Facility-Wide Monitoring

(a) Opacity Monitoring

During the year, Frederickson personnel conducted periodic site inspections, usually weekly or more often. No violations of the visible emissions standards were observed during the year. Observations of the turbine emissions were recorded in the unit log or run sheet.

- (b) Complaint Response
No complaints were received during the year.
 - (c) Facility-Wide Inspections
During the year, Frederickson personnel conducted periodic site inspections, usually weekly or more often. Equipment was properly operated and no prohibited activities were observed.
 - (d) Maintenance and Repair of Insignificant Emission Units
Good industrial practices were followed during the year in the maintenance and repair of insignificant emission units.
2. Emission Unit Specific Monitoring, Recordkeeping and Reporting
- (a) Fuels, trace compound and flashpoint
Test samples are collected and analyzed for sulfur when distillate fuel is added to the storage tanks. The distillate oil sulfur content of the fuel in the tank is less than 0.05% sulfur by weight.
 - (b) Combustion turbine monitoring
 - (i) Puget Sound Clean Air Agency requirements
Frederickson met all PSCAA requirements in regards to testing, monitoring and recordkeeping for the combustion turbine units at the site.
 - (ii) New Source Performance Standards requirements
Notification and recordkeeping requirements were met during the reporting period.
Monitoring of Operations were completed as required.
 - (c)(1) Nitrogen Oxides
Periods of excess emissions were reported as required for: low load runs not requiring water injection that occurred on November 21, 22, 23, 24, 25, December 30, 31, 2010, January 1, 2, February 24, 25, 26 and 27, 2011.
Test Methods and Procedures were followed as required.
 - (c) Demister Monitoring
Inspections of the demisters were conducted at least once each month that the facility operated and if any problems were observed, corrections were made as required.

B. *Operation and Maintenance (O&M) Plan Requirements*

Operating records were maintained. Station and unit logs, inspection and run records, and maintenance and repair work records were maintained. Operating instruction and schedules were available. Good industrial practices were followed during year in the maintenance and repair of insignificant emission items.

C. *Compliance Assurance Monitoring*

- 1. Applicability
The Units were in compliance as required.

2. Monitoring Approach
Monitoring of the Units was conducted as required.
3. Quality Assurance and control procedures
Quality assurance and control procedures were in continuous compliance.
4. Obligation to monitor and data availability requirement
The Units were monitored as required.
5. Definition of an excursion
Excursion definitions were used as required.
6. Response to an excursion
Excursions were responded to in accordance with good air pollution control practices.
7. Quality Improvement Plan
There were not more than six reportable excursions during this reporting period.
8. Reporting
Deviation reports were submitted as required.
9. Recordkeeping
Recordkeeping of monitoring data was completed as required.

III. PROHIBITED ACTIVITIES

The facility was in compliance with all requirements of this section during the permit year, including but not limited to, adjustments for atmospheric conditions, open burning, refuse burning, concealment, masking, circumvention, tampering, and false statements.

IV. ACTIVITIES REQUIRING ADDITIONAL APPROVAL

There were no activities requiring additional approval during this time period, March 21, 2010 through March 20, 2011.

V. STANDARD TERMS AND CONDITIONS

Frederickson has been in compliance with all sections, which includes the following:

A. Duty to comply

Frederickson was in compliance with all conditions of this permit.

B. Permit actions

This section is part of the agency's administrative requirements and has no active compliance monitoring requirements.

C. Property rights

This section is part of the agency's administrative requirements and has no ongoing compliance monitoring requirements.

D. Duty to provide information

PSCAA was furnished all information requested.

E. Permit fees

Permit fees were paid by PSE.

F. Emissions trading

There was no trading of emissions.

G. Severability

This section is part of the agency's administrative requirements and does not directly bear on Frederickson's operation.

H. Permit Appeals

This section is part of the agency's administrative requirements and has no active compliance monitoring requirements.

I. Permit Continuation

This section is part of the agency's administrative requirements and has no active compliance monitoring requirements.

J. Federal enforceability

This section is part of the agency's administrative requirements and has no active compliance monitoring requirements.

K. Inspection and entry

A PSCAA request for entry and records was accommodated during a site inspection that occurred on October 8, 2010.

L. Compliance requirements

Frederickson met the applicable compliance requirements.

M. Compliance certifications

This report is to serve as Frederickson's Annual Compliance Certification.

N. Emissions Testing

Frederickson was in compliance with emission testing requirements during the reporting period.

O. Compliance Determination

Frederickson was in compliance with this section during the reporting period.

P. Recordkeeping

The required records were maintained and are available.

Q. Data Recovery

The facility was in compliance during the reporting period.

R. Reporting

1. Deviation Report

There were no deviations detected during the reporting period.

2. Certification of Reports (Semiannual)

Frederickson submitted Semi-Annual Monitoring Reports on October 15, 2010 and April 19, 2011 as required.

3. Certification by Responsible Official

All submittals included certification by a responsible official as required.

4. Emission Reporting

Frederickson did not emit contaminants listed above the reportable quantities as stated in this permit term during the reporting period.

5. NSPS Excess Emissions Reporting

Any excess emissions were reported as required during the reporting period.

6. Summary of "Routine" required reports

All reports were submitted as required during the reporting period.

S. Emergencies

There were no air quality emergencies at Frederickson during the year.

T. Unavoidable excess emissions

Unavoidable excess emissions reports were submitted as required.

U. Need to halt or reduce activity not a defense

This defense was not used during the year.

V. Stratospheric ozone and climate protection

The facility was in compliance during the reporting period.

W. RACT satisfied

This is an agency statement.

X. Risk management programs

This requirement was not active during the year.

Y. Definitions

This is an agency statement.

Z. Duty to supplement or correct application

This requirement was not active during the year.

AA. Insignificant emission units and activities

Insignificant emission units and activities were in compliance during the year.

VI. PERMIT ACTIONS

There were no permit actions during the reporting period.

VII. PERMIT SHIELD

This section was not active during the year.

VIII. INAPPLICABLE REQUIREMENTS


This section is an agency administrative statement.

IX. APPENDIXES

The appendixes are copies of PSCAA regulations dealing with particulate sampling and opacity observations.

Compliance for the reporting period has been continuous except as noted above. Puget Sound Energy is currently in compliance with all items listed as the basis of certification. I certify that based on information and belief formed after reasonable inquiry, the statements and information in this certification are true, accurate, and complete.

Sincerely,



Wayne R. Gould
Director of Thermal and Wind
Resources

19 APRIL 2011

Date

Enclosures

cc: Region 10 EPA
Air Operating Permits, AT-084
1200 Sixth Avenue
Seattle, Washington 98101

Tony Ostlund – PSE
File - PSE