



SEP 27 2010

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1372
Project # S-1073184**

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Plains Exploration & Production Company by incorporating Authority to Construct S-1372-376-4. This modification is being done to remove the dormant status of a 62.5 MMBtu/hr natural gas-fired steam generator, to relocate the unit, and to retrofit with a PCL burner plate for compliance with Rule 4306.

Please note that after the implementation of the current ATC S-1372-376-4, another ATC S-1372-376-7 was implemented that was issued with certificate of conformity to authorize the replacement of the burner and PCL burner plate on the steam generator with low NOx burner, and other changes for Rule 4320 compliance. Since both ATCs S-1372-376-4 and -376-7 have been implemented, the enclosed modified Title V permit reflects the changes made after the implementation of ATC S-1372-376-7 only.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on August 27, 2007. No comments were received following the District's preliminary decision on this project.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

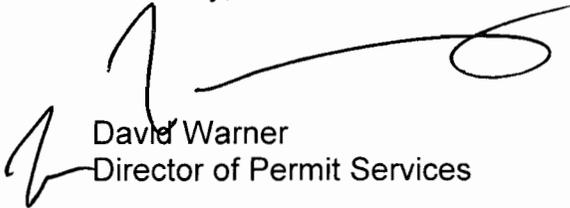
Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Mr. Gerardo C. Rios
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

DW:sa

Enclosures



SEP 27 2010

Kenneth Bork
Plains Exploration & Production Company
1200 Discovery Drive, Suite 500
Bakersfield, CA 93309-7038

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1372
Project # S-1073184**

Dear Mr. Bork:

The Air Pollution Control Officer has modified the Title V permit for Plains Exploration & Production Company by incorporating Authority to Construct S-1372-376-4. This modification is being done to remove the dormant status of a 62.5 MMBtu/hr natural gas-fired steam generator, to relocate the unit, and to retrofit with a PCL burner plate for compliance with Rule 4306.

Please note that after the implementation of the current ATC S-1372-376-4, another ATC S-1372-376-7 was implemented that was issued with certificate of conformity to authorize the replacement of the burner and PCL burner plate on the steam generator with low NOx burner, and other changes for Rule 4320 compliance. Since both ATCs S-1372-376-4 and -376-7 have been implemented, the enclosed modified Title V permit reflects the changes made after the implementation of ATC S-1372-376-7 only.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on August 27, 2007. No comments were received following the District's preliminary decision on this project.

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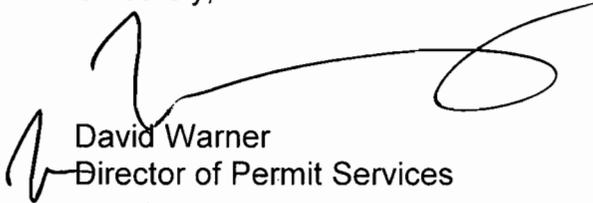
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Mr. Kenneth Bork
Page 2

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Sincerely,



David Warner
Director of Permit Services

DW:sa

Enclosures

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1372-376-7

EXPIRATION DATE: 05/31/2007

SECTION: SW10 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS FIRED STEAM GENERATOR #59 WITH A NORTH AMERICAN GLE ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
4. This unit shall be fired exclusively on natural gas, which may consist of one or a mixture of fuels including treated produced gas and purchased gas. The total sulfur content of the fuel gas shall not exceed 1.1 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. If the steam generator is fired exclusively on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit
6. If the steam generator is not fired exclusively on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 1070] Federally Enforceable Through Title V Permit
7. If the unit is not fired exclusively on PUC-regulated natural gas, compliance with SO_x emission limits shall be demonstrated through fuel sulfur content analysis using ASTM D1072, D3246, D4084, D4468, D6667, or double GC for H₂S and Mercaptans. [District Rule 1070] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Emissions shall not exceed any of the following: 27 lb NO_x/day, 4,380 lb NO_x/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Permittee shall maintain records of duration of each start-up and shutdown, for a period of five years and make such records readily available for District inspection upon request. [District Rule 1070 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Except during startup and shutdown emissions shall not exceed any of the following: NOx: 7 ppmv @ 3% O₂ or 0.008 lb/MMBtu, CO: 26 ppmv @ 3 % O₂ or 0.019 lb/MMBtu, SOx: 0.00285 lb/MMBtu, PM₁₀: 0.008 lb/MMBtu, and VOC 0.003 lb/MMBtu. [District Rules 2201, 4301, 4305, 4306, 4320, 4406, and 4801] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. This unit shall be tested for compliance with the NOx and CO emissions limits within 60 days of startup and at least once every 12 months thereafter. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NOx emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. If either the NOx or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NOx and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. Particulate matter emissions shall not exceed 0.1 grain/dscf, calculated to 12% CO₂, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
24. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
25. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO_x and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO_x or CO emissions limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit
26. The following conditions must be met for representative unit(s) to be used to test for NO_x and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit
27. All units in a group for which representative units are source tested for NO_x and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). Records shall be maintained for each unit of the group including all preventative and corrective maintenance work done. [District Rules 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit
28. All units in a group for which representative units are source tested to for NO_x and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit
29. The number of representative units source tested for NO_x and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.