

Dennis Roberts

From: Glen A Mears [GAMears@paalp.com]
Sent: Wednesday, March 03, 2010 10:51 AM
To: Dennis Roberts
Subject: BPS heaters

Dennis,

In going forward with development of BPS for process heaters it is important to recognize that in certain facilities plant off gas is accountable for a large quantity of the fuel. The Plains LPG frac and isom facility in Shafter is currently under the refinery regulated portion of rule 4306 and 4320 for the heaters on site. It may be important to distinguish between PUC gas and plant off gas in future BPS requirements. I would advocate that the strict prohibitory rules recently placed on this division of heaters through [4320, 4623 and 4455](#) would already have satisfactory BPS in place.

Thank you,

Glen Mears
Plains All American
Environmental RC Specialist
19430 Beech Ave.
Shafter, CA 93263
(661) 589-5377 ex.328
(661) 204-8749 cell