



Occidental Permian Ltd.

PO Box 1000
Denver City, TX 79323

Willard CO₂ Separation Plant
HCR 1, Box 1650
Denver City, Texas 79323

November 11, 2012

Mr. Gary Ship
Texas Commission on Environmental Quality
Field Operations Division
5012 50th Street, Suite 100
Lubbock, Texas 79414-3421

Dear Mr. Ship

This letter is to verify the submittal of a copy of the Occidental Permian's Relative Accuracy Test Audit (RATA) on the Willard CO₂ Recovery Plant's Sulfur Dioxide Continuous Emission Rate Monitoring System (CERMS) on October 2011. Testing was conducted in order to:

- (1) determine the CERMS relative accuracy compared to EPA Reference Methods and/or applicable standards, (2) satisfy the permit requirements stipulated by Special Condition 13 of this plant's last permit amendment (Permit No. 9649 and PSD-TX-683), and (3) satisfy the regulatory requirement set forth by 40 CFR 60, App. F, 5.1.1.

This year we used Air Hygiene, Inc. to conduct the RATA.

If you have any questions, requests, or comments, please feel free to contact me at (806) 592-7310 at your convenience.

Ronnie Popejoy
HES Technician
Wasson PMT

cc: Peggy Waisanen

.cc Office of Permitting, Remediation, & Registration – MC161
P O Box 13087
Austin, Texas 78711-3087

.cc Air Branch Chief, MC6EN-A
Office of Compliance & Enforcement
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Dallas, Texas 75202

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