

Mr. Joe M. Kupper, P.E.
JDC Consulting, L.P.
3006 Bee Caves Road, Suite B200
Austin, Texas 78746

Re: Permit by Rule Registration
Transmix Storage, Loading, and Tank Change of Service
Alon USA
Orla, Culberson County
Account ID No. CZ-0020-M

Dear Mr. Kupper:

This is in response to your registration letter dated December 7, 2000, concerning changes at Alon's pipeline breakout station located near Orla in Culberson County. This facility was previously registered in March 1998, under the company name of Fina. We understand Alon is registering a new storage tank , associated piping components and loading of trans-mix. We further understand Alon will use the existing trans-mix storage tank as a "swing" tank to store gasoline, diesel or trans-mix. Total facility-wide emissions now are represented as 19.0 tons per year volatile organic compounds.

After evaluation of the information which you have furnished, we have determined that your proposal is exempt from permitting procedures under 30 Texas Administrative Code (TAC) Sections 106.473 and 106.478 if constructed and operated as described in your registration request. These permits by rule were authorized by the Executive Director of the Texas Natural Resource Conservation Commission (TNRCC) pursuant to 30 TAC Chapter 106.

Copies of the permits by rule in effect at the time of this registration are enclosed. You must construct, install, or modify facilities in accordance with the version of the permits by rule in effect when construction, installation or modification actually begins (see 30 TAC §106.4[a][5]). After completion of construction, installation or modification, the facility shall be operated in compliance with the all applicable conditions of the claimed permits by rule and 30 TAC §106.4.

Mr. Joe M. Kupper, P.E.
Page 2

Re: Transmix Storage, Loading, and Tank Change of Service

You are reminded that regardless of whether a permit is required, these facilities must be in compliance with all air quality rules and regulations of the TNRCC and of the U.S. Environmental Protection Agency at all times.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please call Ms. Cindy Swor at (361) 825-3423 or write to her at Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Duncan F. Stewart, P.E., Manager
Permit By Rule/General Operating Permits Section
Air Permits Division
Texas Natural Resource Conservation Commission

DS/CS/jo

Enclosures

cc: Mr. B. Estes, Air Program Manager, El Paso, Texas
Mr. Jesus J. Reynoso, Program Supervisor, El Paso City-County Health and
Environmental
District, El Paso

Record No. 77635

Air Permits Division MC-162
MR JOE M KUPPER PE
JDC CONSULTING LP
STE B200
3006 BEE CAVES RD
AUSTIN TX 78746