



December 11, 2023

Mr. Matthew Jalali
Alon Bakersfield Refining
6451 Rosedale Hwy
Bakersfield, CA 93308

Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)
Facility Number: S-34
Project Number: S-1230708

Dear Mr. Jalali:

The Air Pollution Control Officer has issued Authority to Construct (ATC) S-34-53-0 with a Certificate of Conformity to Alon Bakersfield Refining at 3663 Gibson St, Bakersfield. This project is for the installation of a new railcar organic liquid loading operation. Enclosed are the ATC and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the ATC was posted on October 17, 2023. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on October 17, 2023. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Prior to operating with the modifications authorized by the ATC, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms are found on the District's website at www.valleyair.org/permits/TVforms.

Samir Sheikh
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. Matthew Jalali
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Clements". The signature is stylized with a large "B" and "C".

Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: EPA Region 9 Air Permitting Manager (w/enclosure) via EPS



Facility # S-34
ALON BAKERSFIELD REFINING
P O BOX 152 (AREA 3)
BAKERSFIELD, CA 93302-0152

AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Modify Your Title V Permit.** Prior to operating the equipment authorized under this ATC, submit an application to modify your Title V permit. See application forms at <http://www.valleyair.org/permits/TVforms>.
3. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
4. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
5. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
6. **Source Test:** Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source_testing.htm for source testing resources.
7. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at
any of the telephone numbers listed below.**

Samir Sheikh

Executive Director/Air Pollution Control Officer

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Modesto, CA 95356-8718
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AUTHORITY TO CONSTRUCT

PERMIT NO: S-34-53-0

ISSUANCE DATE: 12/11/2023

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING

MAILING ADDRESS: P O BOX 152 (AREA 3)
BAKERSFIELD, CA 93302-0152

LOCATION: 3663 GIBSON ST (AREA 3)
BAKERSFIELD, CA 93302

EQUIPMENT DESCRIPTION:

ORGANIC LIQUID TRANSLOADING OPERATION FROM TRUCK TO RAILCAR SERVED BY VAPOR BALANCE SYSTEM

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 515 lb, 2nd quarter - 515 lb, 3rd quarter - 515 lb, and fourth quarter - 516 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. VOC ERCs used to satisfy the offset quantity required under District Rule 2201 must be surplus at the time of issuance of this ATC and the total quantity of ERCs surrendered shall be calculated based on the ERC surplus value percent discount of each ERC certificate used. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-5178-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-34-53-0 : Dec 11 2023 1:25PM -- GARCIAJ : Joint Inspection NOT Required

5. No more than 151,704 gallons (3,612 barrels) of organic liquid shall be transferred in any one day. No more than 18,507,888 gallons (440,664 barrels) of organic liquid shall be transferred per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The number of disconnections shall not exceed either of the following limits: 42 liquid line disconnections/day and 5,124 liquid line disconnections/year. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Vapor recovery hoses shall be connected to the railcar's tank whenever organic liquid is being transferred into the railcar. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Railcars shall be bottom loaded and all vapors displaced from the railcar during loading shall be returned to the delivery truck through a balanced vapor recovery system. [District Rule 2201] Federally Enforceable Through Title V Permit
9. No delivery vessel shall be used or operated unless it is vapor tight. The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be EPA Method 27. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All delivery trucks shall be loaded at a loading rack equipped with vapor recovery. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
11. The transfer and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 1,000 ppm as methane measured at the surface of the component interface from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 3.2 mL, per average of 3 consecutive disconnects. If 3 disconnects cannot be achieved during the inspection period, then an average of all disconnects during the inspection period will be used to show compliance. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
12. Operation shall include truck unloading and railcar loading operation with disconnect, dry-break couplers, top loading with drop tubes, or bottom loading. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
13. Organic liquid transfer shall be with vapor control such that VOC emissions do not exceed 0.0688 lb per 1000 gallons of liquid loaded. [District Rules 2201 and 4624, 5.1] Federally Enforceable Through Title V Permit
14. True vapor pressure (TVP) of all transferred organic liquid shall be less than 2.8 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC emissions from fugitive components associated with this emissions unit shall not exceed 0.21 lb/day. VOC emissions from disconnects shall not exceed 0.20 lb/day. VOC emissions from railcar loading shall not exceed 10.44 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. In accordance with the approved Operator Management Plan (OMP), the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
18. The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. This requirement shall not apply to the transfer of liquid petroleum gas. [District Rule 4624, 5.4]

19. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded. [District Rule 4624, 5.5] Federally Enforceable Through Title V Permit
20. A component shall be considered in violation if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
21. Permittee shall maintain accurate records of number of railcars loaded/unloaded per day, of the number of disconnects per day, liquid types, liquid throughput, the quantity of excess liquid collected each week, and the calculated average liquid loss per disconnect. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
22. The permittee shall keep records of daily liquid throughput and maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit