

Vaughn, Lorena

From: Douglas Wallace <Douglas.Wallace@Trecora.com>
Sent: Wednesday, March 11, 2026 8:55 AM
To: Knodl, Sydney; Vaughn, Lorena
Subject: Trecora Hydrocarbons LLC - Submittal of Required Documentation – Consent Agreement and Final Order (CAFO) Docket No. CAA-06-2025-3431
Attachments: 3rd Quarter March OGI Inspection Letter.pdf

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Sydney,

Attached is the Submittal of Required Documentation – Consent Agreement and Final Order (CAFO), Docket No. CAA-06-2025-3431. You will also find this document, along with the required video clips, in the EPA electronic folder.

Please let me know if you need any additional information or materials.

Douglas Wallace | EHS Director - Trecora | Trecora
12500 Bay Area Blvd, Pasadena, TX 77507
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From: Douglas Wallace
Sent: Tuesday, December 16, 2025 7:14 AM
To: Knodl, Sydney <knodl.sydney@epa.gov>; Vaughn, Lorena <vaughn.loreana@epa.gov>
Subject: Trecora Hydrocarbons LLC - Submittal of Required Documentation – Consent Agreement and Final Order (CAFO) Docket No. CAA-06-2025-3431

Sydney,

Attached is the Submittal of Required Documentation – Consent Agreement and Final Order (CAFO), Docket No. CAA-06-2025-3431. You will also find this document, along with the required video clips, in the EPA electronic folder.

Please let me know if you need any additional information or materials.

U.S. Environmental Protection Agency, Region 6
Attn: Sydney Knodl, Enforcement Officer
Knodl.Sydney@epa.gov
Vaughn.Lorena@epa.gov

Re: Quarterly Inspections-3rd Quarter
Trecora Hydrocarbons, LLC – Silsbee Facility
Docket No. CAA-06-2025-3431

Dear Ms. Knodl and Ms. Vaughn,

Trecora Hydrocarbons, LLC submits this correspondence in accordance with the Consent Agreement and Final Order (CAFO), Docket No. CAA-06-2025-3431, to provide notification of the March 2026 quarterly Optical Gas Imaging (OGI) survey conducted at the Silsbee facility.

The quarterly OGI survey was conducted on March 5, 2026, on all External Floating Roof Tanks (EFRTs) at the Silsbee facility in accordance with the requirements of Appendix A of the CAFO. Prior to conducting the survey, a daily OGI camera verification was completed using a FLIR GFx320 camera. Weather conditions, camera settings, and verification procedures were documented in accordance with the CAFO quality assurance and quality control requirements.

The OGI survey was performed during normal operating conditions. External floating roof tanks, including Tank 57 and Tank 61, were inspected from the tank platforms using OGI technology. During the survey, no visible hydrocarbon or VOC emissions were observed from any EFRT components.

Supporting documentation, including OGI survey logs, camera verification records, photographic documentation, and OGI video files, has been uploaded to the EPA-designated electronic folder in accordance with CAFO reporting requirements.

Please let me know if you require any additional information regarding this submittal.

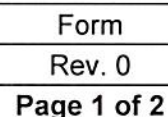
Sincerely,

Jessica Burrell
Environmental Engineer
Trecora Hydrocarbons, LLC

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1. Quarterly Optical Gas Imaging (OGI) Data – 3RD Quarter
2. OGI Picture Proof
3. Corrective Actions Letter

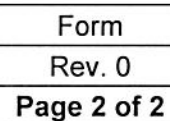
3RD QUARTER OGI DATA



OGI CAMERA FIELD OGISPOT LOG FORM

<i>Company</i>	Trecora				<i>Facility Name</i>	Silsbee Site				
<i>Latitude</i>	N 30.3925973		<i>Longitude</i>	W 94.2275454			<i>Facility Operating?</i>	☒ Yes ☐ No		
<i>Date</i>	03.05.2026		<i>Start Time</i>	08:00 am		<i>End Time</i>	09:30 am		<i>Site Pic Id#</i>	DC_0002
<i>Temp. (°F)</i>	71		<i>Max Wind (mph)</i>	7 Mph		<i>Barometric (inHg)</i>	30.04		<i>Cloud Cover</i>	Overcast
<i>Camera Model and Serial #</i>			GFX 320 74900851			<i>Picture/Video ID# Range</i>			0002 - 0008	

[illegible]



OGI CAMERA FIELD OGISPOT LOG FORM

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[illegible]

	Emission Control Services (ECS) Procedure Supplement Corporate	Form
		Rev. 0
		Page 3 of 2
OGI CAMERA FIELD OGISPOT LOG FORM		

	Emission Control Services (ECS) Procedure Supplement Corporate	Form
		Rev. 3
		Page 1 of 1
OGI CAMERA FIELD SURVEILLANCE FORM		

Company	Trecora		Facility Name	Silsbee Site	
Latitude	N 30.3925973	Longitude	W 94.2275454	Is the facility in operation?	☒ Yes ☐ No
Name of Person(s) Performing Inspection	Paul Langley				
Training / Experience of Inspector	☒ Completed Certified Level I Infrared Thermography OGI course ☐ Received on-site training from certified employee				

Date of Surveillance	03.05.2026	Start Time	08:00 am	End Time	09:30 am	Site Pic Id#	DC_0002
Temperature (°F)	71	Max Wind Speed (mph)	7 Mph	Barometric Pressure (inHg)	30.04	Cloud Cover	Overcast
Camera Model and Serial #	Flir Gfx 320 74900851		Picture/Video ID# Range (Need at least one pic during survey)			0002 - 0008	
Deviations from monitoring plan?	☒ No Deviations ☐ Deviations (Explain)						

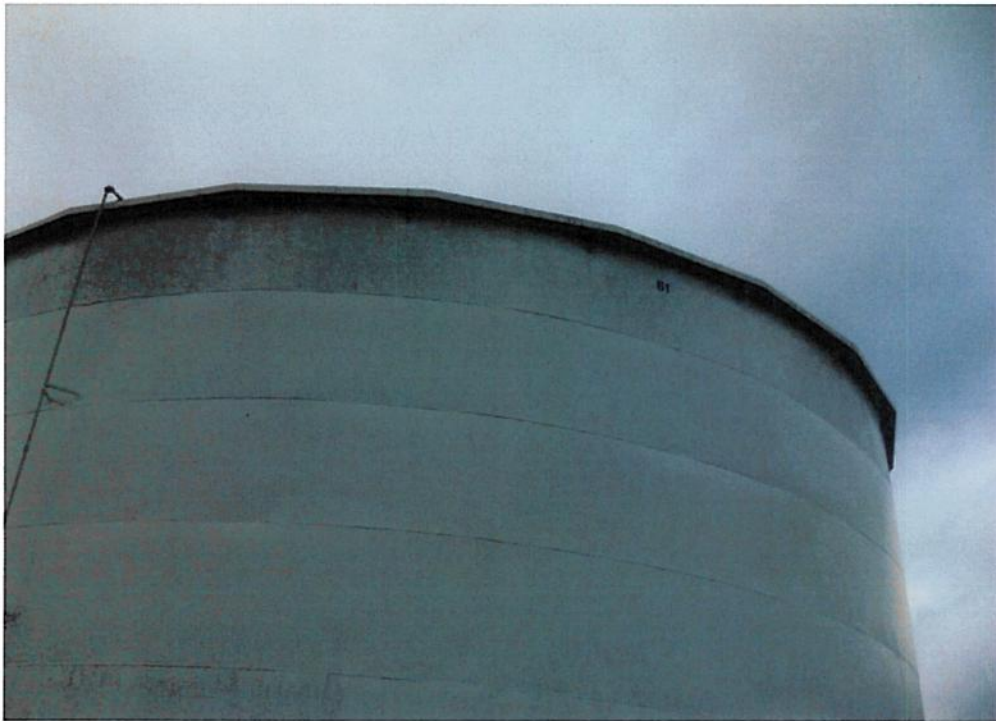
Leak Tag ID	Equipment Type (description of component leaking)	Leak Description (include component description, location, and if DTM or UTM)	Picture/Video ID (if applicable)	Detection Method	First Repair Attempted?	Repair Attempt Successful?
		No Leaks	Leak Pic ID Leak Vid ID Repair Pic ID Repair Vid ID	IR Camera ☐ Method 21 ☐ AVO ☐	Yes ☐ No ☐ ⁽¹⁾ Repair Method:	Yes ☐ No ☐ ⁽²⁾
			Leak Pic ID Leak Vid ID Repair Pic ID Repair Vid ID	IR Camera ☐ Method 21 ☐ AVO ☐	Yes ☐ No ☐ ⁽¹⁾ Repair Method:	Yes ☐ No ☐ ⁽²⁾
			Leak Pic ID Leak Vid ID Repair Pic ID Repair Vid ID	IR Camera ☐ Method 21 ☐ AVO ☐	Yes ☐ No ☐ ⁽¹⁾ Repair Method:	Yes ☐ No ☐ ⁽²⁾
			Leak Pic ID Leak Vid ID Repair Pic ID Repair Vid ID	IR Camera ☒ Method 21 ☐ AVO ☐	Yes ☐ No ☐ ⁽¹⁾ Repair Method:	Yes ☐ No ☐ ⁽²⁾

(1) If first repair is not attempted immediately, a physical numbered tag must be attached to the leaking component, and the LDAR Leak Repair Tag Tracking Form must be completed.

First repair must be attempted within 30 days of leak identification.

(2) If repair is not successful a physical numbered tag must be attached to the leaking component and the LDAR Leak Repair Tracking form must be completed.

3RD QUARTER PICTURES



DC_0002



DC_0004

Corrective Action Letter

U.S. Environmental Protection Agency, Region 6
Attn: Sydney Knodl, Enforcement Officer
Knodl.Sydney@epa.gov
Vaughn.Lorena@epa.gov

Re: 3rd Quarter Corrective Action Determination – OGI Survey Findings
Trecora Hydrocarbons, LLC – Silsbee Facility
Docket No. CAA-06-2025-3431

Dear Ms. Knodl and Ms. Vaughn,

Trecora Hydrocarbons, LLC submits this correspondence in accordance with the Consent Agreement and Final Order (CAFO), Docket No. CAA-06-2025-3431, to document corrective action determinations associated with the March 5, 2026, quarterly Optical Gas Imaging (OGI) survey conducted at the Silsbee facility.

The quarterly OGI survey was conducted on all External Floating Roof Tanks (EFRTs) at the Silsbee facility in accordance with the requirements of Appendix A of the CAFO. Prior to the survey, a daily OGI camera verification was completed using a FLIR GFx320 camera, and all required quality assurance and quality control procedures were followed.

During the March 2026 OGI survey, no visible hydrocarbon or volatile organic compound (VOC) emissions were observed from any EFRT components, including Tank 57 and Tank 61. External floating roof conditions were visually inspected and confirmed to be operating as designed, and no abnormal operating conditions were identified.

Because no emissions or equipment deficiencies were identified during the survey, no corrective actions were required or implemented for this reporting period. Routine inspection, monitoring, and maintenance practices remain in place to ensure continued compliance with applicable regulatory requirements and the CAFO.

All supporting documentation, including survey logs, OGI video files, photographic records, and camera verification documentation, has been uploaded to the EPA-designated electronic folder in accordance with CAFO reporting requirements.

If any additional information is needed, please contact me at Jessica.Burrell@trecora.com.

Sincerely,

Jessica Burrell
Environmental Engineer
Trecora Hydrocarbons, LLC