

Vaughn, Lorena

From: Jessica Burrell <Jessica.Burrell@Trecora.com>
Sent: Thursday, November 20, 2025 3:30 PM
To: Knodl, Sydney; Vaughn, Lorena
Cc: Douglas Wallace; Patrick Sayles
Subject: SUBJECT: Trecora Hydrocarbons, LLC – CAFO Submission & Upload Issues DOCKET NO.: CAA-06-2025-3431
Attachments: Tank 61 OGI submittal.pdf; MOV_0079.mp4; MOV_0082.mp4

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Dear Mrs. Knodl and Mrs. Vaughn,

Trecora Hydrocarbons, LLC is submitting the required documentation for the CAFO (Docket No. CAA-06-2025-3431). Please find the materials attached to this email for your review.

We attempted to upload the documents through the EPA electronic folder; however, we experienced technical issues that prevented a successful upload. We will continue working to resolve the issue and will reattempt the upload as soon as possible.

In the meantime, we want to ensure EPA receives the required information by the applicable deadlines. Please confirm receipt of this email and the attached files.

If any additional information is needed, or if there is an alternative method you recommend for file transfer, please let us know.

Thank you for your time and assistance.

Jessica Burrell | Environmental Engineer | Trecora
Address: 7752 W FM 418, Silsbee, TX 77656
Office: 409-385-8380 | Cell: 409-466-4373 | Jessica.Burrell@trecora.com | www.trecora.com



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

**Re: Corrective Action Completion – OGI Survey Findings
Trecora Hydrocarbons, LLC – Silsbee Facility
Docket No. CAA-06-2025-3431**

Dear Ms. Knodl and Ms. Vaughn,

Trecora Hydrocarbons, LLC is providing this letter to confirm completion of all corrective actions associated with the OGI inspections conducted in accordance with Appendix A of the Consent Agreement and Final Order (CAFO), Docket No. CAA-06-2025-3431.

The inspection and corrective-action timeline are as follows:

- **October 8, 2025:** Visual Inspection of the secondary and Primary seal to generate a repair plan
- **September 13, 2025:** Initial OGI camera verification completed.
- **September 26, 2025:** Follow-up OGI re-camera confirmation performed.
- **November 3–6, 2025:** All identified leaks on **Tank 61** were repaired.
- **November 14, 2025:** Final OGI verification performed, confirming that all previous leak points were fully sealed, and no emissions were observed.

All repairs have been completed, and the November 14 verification demonstrates that the tank is operating with no visible emissions. The corresponding survey logs, videos, and repair documentation have been included in this submission.

Trecora confirms the following:

- All leaks identified on Tank 61 during the OGI inspections have been repaired.
- Post-repair OGI verification was completed and showed no visible emissions.
- No corrective actions remain open for Tank 61 at this time.
- Quarterly OGI inspections of all External Floating Roof Tanks will continue as required by the CAFO.

The next quarterly OGI inspection on both tanks is scheduled for **December 2025**, consistent with the CAFO requirement that surveys be conducted at least 45 days apart.

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

Sincerely,
Jessica Burrell
Environmental Engineer
Trecora Hydrocarbons, LLC

Table of Contents

1. Tank 61 Optical Gas Imaging (OGI) Data
2. Tank 61 OGI Picture Proof
3. Tank 61 Video Attachments

Tank 61 Follow-up OGI Data



Emission Control Services (ECS) Procedure
Supplement Corporate

Form

Rev. 0

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**OGI CAMERA
FIELD OGISPOT LOG FORM**



Emission Control Services (ECS) Procedure Supplement Corporate

Form

Rev. 3

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OGI CAMERA FIELD SURVEILLANCE FORM

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

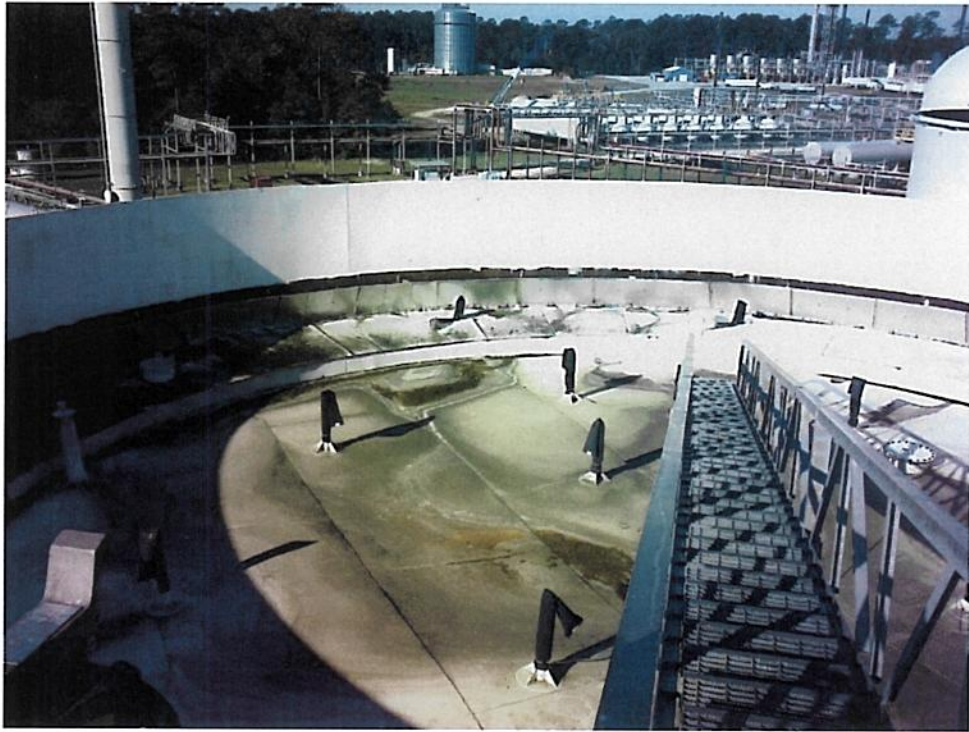
Date of Surveillance	11.14.2025	Start Time	8:30 am	End Time	9:30 am	Site Pic ID#	DC_0082
Temperature (°F)	68	Max Wind Speed (mph)	2 Mph	Barometric Pressure (inHg)	30.19	Cloud Cover	Sunny/Clear
Camera Model and Serial #	Flir GFx 320 74900851		Picture/Video ID# Range (Need at least one pic during survey)			0077 - 0082	
Deviations from monitoring plan?	<input checked="" type="checkbox"/> No Deviations <input type="checkbox"/> 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?
Leak A	Tank 61 Seal	6 o'clock Straight out from Ladder Left side of Ladder Handrail	Leak Pic ID 0012	IR Camera <input checked="" type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽¹⁾ Repair Method: Retention & Straps	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽²⁾
			Leak Vid ID 0011			
			Repair Pic ID 0079			
			Repair Vid ID 0080			
Leak B	Tank 61 Seal	6 o'clock Straight out from Ladder Right Side of Handrail	Leak Pic ID 0012	IR Camera <input checked="" type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽¹⁾ Repair Method: Retention & Straps	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽²⁾
			Leak Vid ID 0011			
			Repair Pic ID 0079			
			Repair Vid ID 0080			
Leak C	Tank 61 Seal	7 o'clock looking from Top Platform	Leak Pic ID 0010	IR Camera <input checked="" type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽¹⁾ Repair Method: Retention & Straps	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽²⁾
			Leak Vid ID 0009			
			Repair Pic ID 0079			
			Repair Vid ID 0080			
Leak D	Tank 61 Seal	10 o'clock looking from Top Platform	Leak Pic ID 0015	IR Camera <input checked="" type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽¹⁾ Repair Method: Retention & Straps	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ⁽²⁾
			Leak Vid ID 0014			
			Repair Pic ID 0079			
			Repair Vid ID 0080			

(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.

Tank 61 Follow-Up OGI Pictures



DC_0080



DC_0081