

## 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

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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  
Office: 281-694-2059 | Cell: 832-576-6264 | [douglas.wallace@trecora.com](mailto:douglas.wallace@trecora.com) | [www.trecora.com](http://www.trecora.com)



CONFIDENTIALITY WARNING: This email and its contents and attachments may be confidential and/or privileged, and are for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. All email users on the trecora.com account are employed by Trecora LLC or one of its affiliates, and may be using the Trecora name pursuant to a "doing business as" authorization and/or by license. If you believe you have received this message in error, please notify the sender immediately and delete it from your system. Thank you.

**From:** Douglas Wallace  
**Sent:** Tuesday, December 16, 2025 7:14 AM  
**To:** Knodl, Sydney <knodl.sydney@epa.gov>; Vaughn, Lorena <vaughn.lorena@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.

**Douglas Wallace | EHS Director - Trecora | Trecora**  
Specialty Wax Plant: 12500 Bay Area Blvd, Pasadena, TX 77507  
Office: 281-694-2059 | Cell: 832-576-6264 | [douglas.wallace@trecora.com](mailto:douglas.wallace@trecora.com) | [www.trecora.com](http://www.trecora.com)



CONFIDENTIALITY WARNING: This email and its contents and attachments may be confidential and/or privileged, and are for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. All email users on the trecora.com account are employed by Trecora LLC or one of its affiliates, and may be using the Trecora name pursuant to a "doing business as" authorization and/or by license. If you believe you have received this message in error, please notify the sender immediately and delete it from your system. Thank you.

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

Re: Quarterly Inspections-3<sup>rd</sup> 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

## **Table of Contents**

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

**3RD QUARTER OGI DATA**








Emission Control Services (ECS) Procedure  
Supplement Corporate

Form

Rev. 0

Page 3 of 2

**OGI CAMERA  
FIELD OGISPOT LOG FORM**


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

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

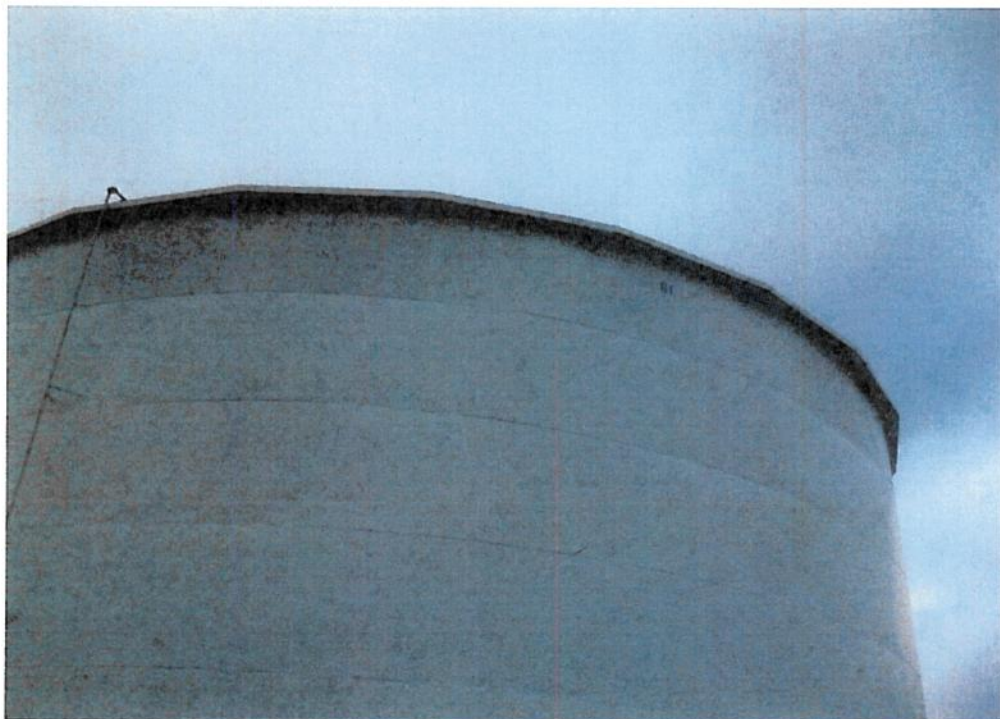
<b>Date of Surveillance</b>	03.05.2026	<b>Start Time</b>	08:00 am	<b>End Time</b>	09:30 am	<b>Site Pic Id#</b>	DC_0002
<b>Temperature (°F)</b>	71	<b>Max Wind Speed (mph)</b>	7 Mph	<b>Barometric Pressure (inHg)</b>	30.04	<b>Cloud Cover</b>	Overcast
<b>Camera Model and Serial #</b>	Flir GFx 320 74900851		<b>Picture/Video ID# Range (Need at least one pic during survey)</b>			0002 - 0008	
<b>Deviations from monitoring plan?</b>	<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 Pic ID	Leak Vid ID	Repair Pic ID			
		No Leaks	Leak Pic ID			IR Camera <input type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(1)</sup> Repair Method:	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(2)</sup>
			Leak Pic ID			IR Camera <input type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(1)</sup> Repair Method:	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(2)</sup>
			Leak Pic ID			IR Camera <input type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(1)</sup> Repair Method:	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(2)</sup>
			Leak Pic ID			IR Camera <input checked="" type="checkbox"/> Method 21 <input type="checkbox"/> AVO <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(1)</sup> Repair Method:	Yes <input type="checkbox"/> No <input type="checkbox"/> <sup>(2)</sup>

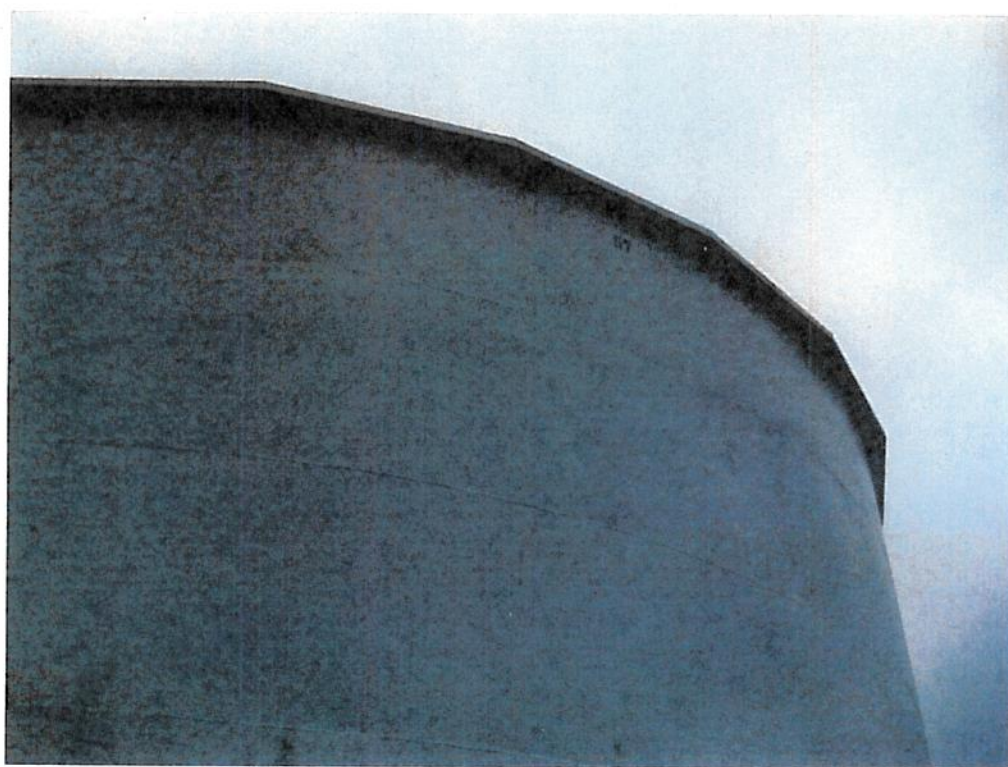
(1) If first repair is not attempted immediately, a physical numbered tag must be attached to the leaking component, and the LDAR Leak Repair Tag Tracking Form must be completed. First repair must be attempted within 30 days of leak identification.

(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](mailto:Knodl.Sydney@epa.gov)  
[Vaughn.Lorena@epa.gov](mailto: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](mailto:Jessica.Burrell@trecora.com).

Sincerely,

Jessica Burrell  
Environmental Engineer  
Trecora Hydrocarbons, LLC