

**Vaughn, Lorena**

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**From:** Douglas Wallace <Douglas.Wallace@Trecora.com>  
**Sent:** Tuesday, December 16, 2025 7:14 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:** 2nd quarter December OGI submittal.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  
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)



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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-2<sup>nd</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 December quarterly Optical Gas Imaging (OGI) survey.

The December 2025 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 conducting the survey, a daily OGI camera verification was completed using a FLIR GFx320 camera. Weather conditions, verification gas, flow rate calculations, and camera settings were documented in accordance with the CAFO quality assurance and quality control requirements.

The OGI survey was performed during normal operating conditions. Internal floating roof conditions were visually inspected and confirmed to be properly seated and in the floating position. No visible VOC emissions were observed during the survey. Photographic documentation, OGI video files, survey logs, and camera verification records have been uploaded to the EPA-designated electronic folder in accordance with the CAFO reporting requirements.

Please let us know if you have any questions or require additional information regarding this submittal.

Sincerely,

**Jessica Burrell**  
Environmental Engineer  
Trecora Hydrocarbons, LLC

## **Table of Contents**

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

2nd Quarter OGI Data



OGI CAMERA DAILY INSTRUMENT CHECK FORM

Table with 6 columns: Date & Time, Camera Make, Camera Serial #, Camera Model, Camera Lens, Temperature, Barometric Pressure, Wind Speed, Cloud Cover, DIC Pic #, DIC Video #.

Calculate Required Flow Rate for Actual Conditions:

Va = (Ps \* Vs \* (459.67 + Ta)) / (Pa \* (459.67 + Ts))

Example Actual Temperature: 80 F Actual Pressure: 14.49 psia Required Flow Rate: 0.51 L/min

Where

- Pa = actual pressure (psia) Ta = actual temperature (deg. F) Va = required flow rate for actual conditions (liters per minute) Ps = standard pressure (14.7 psia) Ts = standard temperature (deg. F) Vs = required flow rate at standard conditions (0.508 liters per minute)^1

Camera Thermal Settings Check:

- Auto Black Hot HSM White Hot

Table with 6 columns: Natural Gas Emission Source Observed, Gas Cylinder Type, Distance from Emission Source (ft.), Contents, Calculated Flow Rate (L/min).

Paul Langley Name of OGI Technician - 1 (Print)

Paul Langley 4946 Signature

Name of OGI Technician - 2 (Print)

Signature







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

<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>	12.02.2025	<b>Start Time</b>	08:20 am	<b>End Time</b>	09:00 am	<b>Site Pic ID#</b>	DC_0003
<b>Temperature (°F)</b>	39	<b>Max Wind Speed (mph)</b>	7 Mph	<b>Barometric Pressure (inHg)</b>	30.19	<b>Cloud Cover</b>	Partly Cloudy
<b>Camera Model and Serial #</b>	Flir GFx 320 74900851		<b>Picture/Video ID# Range (Need at least one pic during survey)</b>			0001 - 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?
		<b>No Leaks</b>	Leak Pic ID	IR Camera <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
			Leak Vid ID	Method 21 <input type="checkbox"/>	No <input type="checkbox"/> (1)	No <input type="checkbox"/> (2)
			Repair Pic ID	AVO <input type="checkbox"/>	Repair Method:	
			Repair Vid ID			
			Leak Pic ID	IR Camera <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
			Leak Vid ID	Method 21 <input type="checkbox"/>	No <input type="checkbox"/> (1)	No <input type="checkbox"/> (2)
			Repair Pic ID	AVO <input type="checkbox"/>	Repair Method:	
			Repair Vid ID			
			Leak Pic ID	IR Camera <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
			Leak Vid ID	Method 21 <input type="checkbox"/>	No <input type="checkbox"/> (1)	No <input type="checkbox"/> (2)
			Repair Pic ID	AVO <input type="checkbox"/>	Repair Method:	
			Repair Vid ID			
			Leak Pic ID	IR Camera <input checked="" type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
			Leak Vid ID	Method 21 <input type="checkbox"/>	No <input type="checkbox"/> (1)	No <input type="checkbox"/> (2)
			Repair Pic ID	AVO <input type="checkbox"/>	Repair Method:	
			Repair Vid ID			

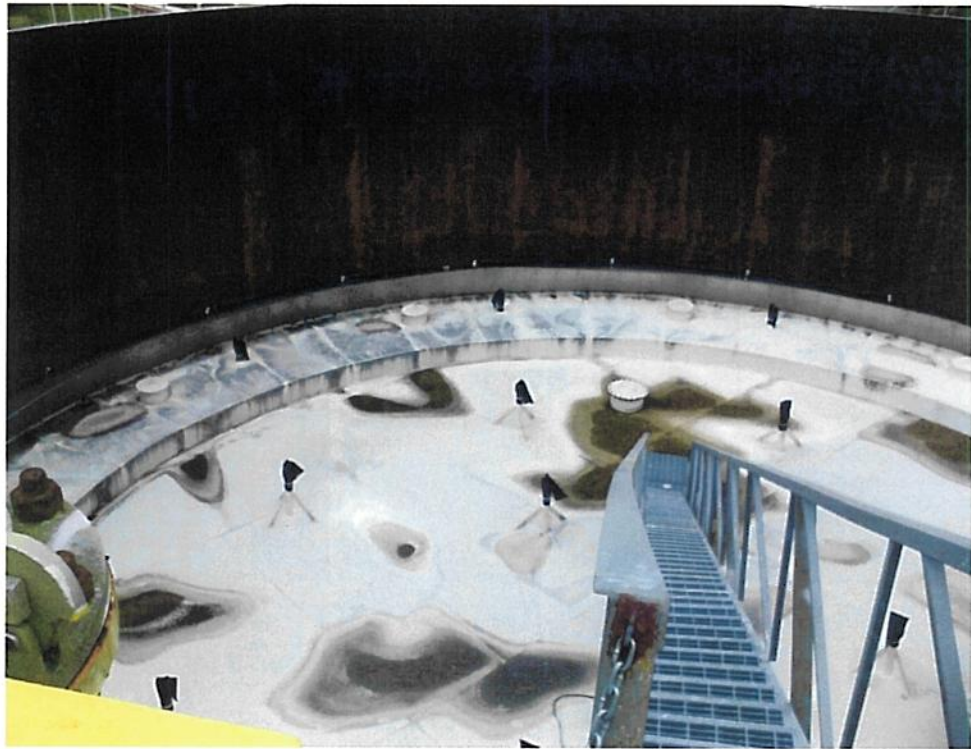
(1) If first repair is not attempted immediately, a physical numbered tag must be attached to the leaking component, and the LDAR Leak Repair Tag Tracking Form must be completed. First repair must be attempted within 30 days of leak identification.

(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.

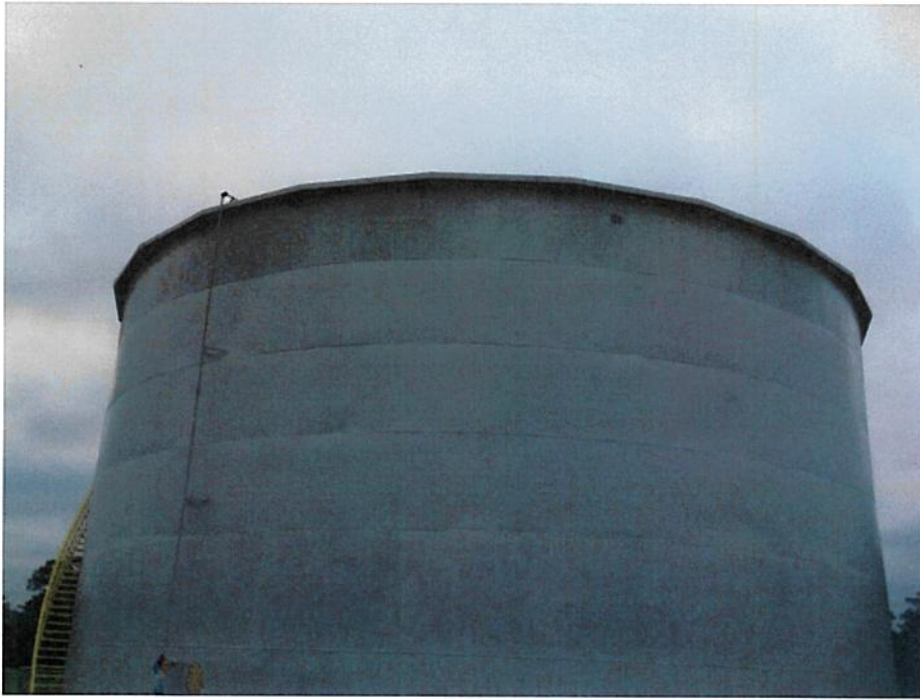
2nd Quarter OGI Pictures



DC\_0003



DC\_0005



DC\_0006



DC\_0008

**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: 2<sup>nd</sup> Quarter 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 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 December 2025 quarterly Optical Gas Imaging (OGI) survey.

The December 2025 quarterly OGI survey was conducted on all External Floating Roof Tanks (EFRTs) at the Silsbee facility in accordance with 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 December 2025 OGI survey, no visible hydrocarbon or VOC emissions were observed from any EFRT components. Internal floating roof conditions were visually inspected and confirmed to be properly seated and in the floating position. Automatic bleeder vents were observed to be functioning 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. Continued operation and maintenance practices remain in place to ensure ongoing 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