



REGION 6

DALLAS, TX 75270

May 16, 2024

James Daniel Roberts
Plant Manager, High Purity Solvents Plant
Trecora Hydrocarbons, LLC
7752 FM 418
Silsbee, Texas 77656-8943

Sent via email: dan.roberts@trecora.com

Re: Notice of Violation and Opportunity to Confer

Dear Mr. Roberts:

The United States Environmental Protection Agency, Region 6 ("EPA") has identified Trecora Hydrocarbons LLC ("Trecora") as having violated the Clean Air Act ("CAA"). This Notice of Violation and Opportunity to Confer ("NOVOC") is issued to Trecora¹ for violations of the CAA, 42 U.S.C. § 7401 *et seq.*, at Trecora's High Purity Solvents Plant located at 7752 FM 418, Silsbee, TX 77656 (the "Facility"). Based on information currently available, EPA finds that Trecora has committed a violation of the federally-approved Texas State Implementation Plan (SIP). By this letter, EPA is extending to you an opportunity to advise the Agency, via a conference call or in writing, of any further information EPA should consider with respect to the alleged violations.

This NOVOC is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1). Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1) requires the Administrator of the EPA to notify any person in violation of a SIP or permit of the violation, and this NOVOC serves as such notice. The authority to issue this NOVOC has been delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

EPA contracted helicopter flyovers in the Beaumont-Port Arthur, Texas area from November 7 through November 9, 2023 to assess emission sources using Optical Gas Imaging ("OGI") technology.

¹ Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). The U.S. Small Business Administration has established a Table of Small Business Size Standards, which can be found at: <https://www.sba.gov/document/support-table-size-standards>. The SBREFA Information Sheet provides information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: <https://www.epa.gov/compliance/small-business-resources-information-sheet>.

On December 1, 2023, EPA sent a letter informing Trecora of potentially unauthorized emissions from a facility that EPA believed was owned/operated by Trecora, along with OGI video captures for the facility. EPA asked Trecora to verify facility ownership, provide current site-specific permit information, and take any necessary corrective action to address unauthorized hydrocarbon emissions. EPA considered information provided by Trecora to determine whether violations occurred at the facility.

CAA Violations

We are sending this NOVOC to inform Trecora of the following violations at the Facility:

Texas SIP Violations

1. Failure to implement the required volatile organic compounds (VOC) controls on a storage tank operating at equal to or greater than 11 pounds per square inch absolute (psia) in which VOC are placed, stored, or held, in violation of 30 Tex. Admin. Code § 115.112(a)(1); and
2. Failure to properly close automatic bleeder vents for an external floating roof, in violation of 30 Tex. Admin. Code § 115.112(a)(2)(B).

Please review the specific violations and information we have provided in the Enclosure regarding the facility at issue.

Opportunity to Confer

This NOVOC provides you with the opportunity to confer with EPA. We request Trecora contact Justin Lannen, Assistant Regional Counsel, at lannen.justin@epa.gov or (214) 665-8130 within ten (10) business days to discuss this pending matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure

cc: Michael De La Cruz, TCEQ (michael.delacruz@tceq.texas.gov)
Michael Miller, TCEQ (michael.miller@tceq.texas.gov)
Patrick Sayles, Trecora Hydrocarbons, LLC (patrick.sayles@trecora.com)
Douglas Wallace, Trecora Hydrocarbons, LLC (douglas.wallace@trecora.com)

Enclosure

TRECORA HYDROCARBONS, LLC – HIGH PURITY SOLVENTS PLANT, SILSBEE, TEXAS

Unit	Flyover Date	Flyover Video ID	Permit	EPA Team Observations of Flyover Video Capture	Violation
Tank 61	11/9/2023	Pin096_F2	NSR Permit No. 3295; Title V Permit No. 2776	Emissions from the tank's external floating roof. Information later obtained indicates the tank's size is larger than 25,000 gallons with a psia equal to or greater than 11	Failure to utilize required VOC storage tank controls
Tank 61	11/9/2023	Pin096_F2	NSR Permit No. 3295; Title V Permit No. 2776	Emissions from the north bleeder vent on the tank's external floating roof	Failure to properly close automatic bleeder vents