

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	December 3, 2025	
Media Program:	RCRA	
Regulatory Program(s)	RCRA Used Oil Transporters	
Company Name:	Elite Oil Service	
Facility Name:	Elite Oil Service	
Facility Physical Location:	7940 Munn St.	
(city, state, zip code)	Houston, TX 77029	
Mailing address:	7940 Munn St.	
(city, state, zip code)	Houston, TX 77029	
County/Parish:	Harris County	
Facility Phone Number	832-329-6564	
Facility Contact:	Juan Reyes	Owner
	Juanreyes202020@icloud.com	
FRS Number:	110071248947	
Identification/Permit Number:	Texas Solid Waste Registration #A86479	
Media Identifier Number:	TXR000085749	
NAICS:	562219	
SIC:	NA	
Personnel participating in inspection:		
Juan Reyes	Elite Oil Service	Owner
Elizabeth Pham	EPA R6	Inspector
Sandesh Thapa	EPA R6	Inspector
EPA Lead Inspector Signature/Date	ELIZABETH PHAM Digitally signed by ELIZABETH PHAM Date: 2026.01.30 13:33:41 -06'00'	
	Elizabeth Pham	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2026.01.30 13:46:41 -06'00'	
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors (“we”), Elizabeth Pham (“I”) and Sandesh Thapa, arrived at the Elite Oil Service facility (“Elite Oil”) at 10:30AM on December 3, 2025, for an unannounced inspection. When we arrived on site, there was not anyone available to speak to in person. We contacted the facility’s owner, Mr. Juan Reyes, over the phone. He gave us verbal approval to conduct the inspection and granted permission for us to enter his site. We also immediately notified the EPA supervisor and received approval to conduct the inspection over the phone as well. I briefed Mr. Reyes about our credentials and our authority under the RCRA Statute 3007 and the right to claim confidential business information (CBI). I informed him that this was an EPA RCRA Compliance Evaluation Inspection (CEI) to determine compliance with 40 CFR 279 Subpart E regarding RCRA Standards for Used Oil Transporter and Transfer Facilities.

This report serves as documentation of all onsite activities and observations during the inspection of the Elite Oil Service facility. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection. Photographs taken during the inspection to document onsite observations are included as Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The facility is located in a residential neighborhood in Houston, TX and the owner has been renting out this property since 2020. Elite Oil Service registered with the EPA under the EPAID TXR000085749 as a Used Oil Transporter on September 8, 2021. According to Mr. Reyes, Elite Oil operates with 3 employees that report for duty based on work demands. The general service that Elite Oil provides is receiving and/or picking up used motor oil from local automotive facilities. The used motor oil is mostly brought onto site in 5-quart motor oil jugs by customers, but occasionally Elite Oil will take their box truck with a forklift to a facility to take the used oil back to Elite Oil’s facility. When Elite Oil receives or takes used oil, they store it in frac tanks for a couple days to a week and then empties it into tanker trucks before they send it off with a third party for disposal.

Section II – OBSERVATIONS

The EPA inspectors conducted a walkthrough of the facility which was estimated to be about 10,000-20,000 square-feet. We observed the facility in poor condition with container management issues and evidence of spills and staining on the ground. Mr. Reyes stated that the facility coordinates with third parties such as Safety Kleen and Harbor Freights to pick up the used oil in their tanker trucks but does not have any documentation about these shipments. The coordination for pick-up of the used oil takes a couple days to a week after receiving the used oil, so it appears that used oil is held on-site for more than 24 hours as part of their normal operations. If used oil is held for more than 24 hours during the normal course of transportation and not longer than 35 days, then the facility is applicable to the

requirements for used oil storage at transfer facilities. Elite Oil must register as a transfer facility **[Area Of Concern (AOC) #1- 40 CFR §279.45(a)]**. Mr. Reyes also stated he does not know what these third-party facilities do with the used oil after it is taken off his site. During the inspection, he mentioned that he does not maintain any logbook or documentation related to the collection and shipment of the used oil wastes he manages on site **[AOC #2 – 40 CFR § 279.46]**. He indicates that he mentally keeps track of the quantity of the used oil he has on-site while also using the gauge on the frac tanks.

The facility has a trailer that serves as an office on the northwest side of the property. Along the fence on the south side, there were many 55-gallon drums piled with no aisle spacing and were difficult to access (See Photo #15-19, 44). There were trees and branches that had fallen on top of some of the drums, so we were unable to adequately inspect the drums. Mr. Reyes stated that all the drums along the fence line were empty, and it is a storage area for empty drums that he bought for a cheap price. However, we identified multiple sealed drums that appeared full. Additional evaluations are needed to verify their contents. Mr. Reyes was unsure of the contents and claimed if it was full that it was due to rainwater. Of the drums that were able to be accessed and inspected, we identified an open drum that was unlabeled with oily water and a used oil filter (See Photo #18) **[AOC #3 – 40 CFR §279.45(g)(1)]**. We requested Mr. Reyes to follow-up on the contents of all the drums along the fence line that were closed and unable to be inspected. We identified two box trucks on the east side of the trailer (See Photo #1-2) and in one of the box trucks, it was full of drums with metal scraps and a tote of used aerosol cans overflowing with no label (See Photo #3-4) **[AOC #4 – 40 CFR § 273 Subpart B]**. Mr. Reyes claimed that this box truck was not his and was already on-site when he rented out the area. The other box truck had scrap metal along with a broken 250-gallon tote and 500-gallon tank (See Photo #5). Mr. Reyes stated that the tote and tank were empty and that this truck was his property that he bought to keep on-site in case he needed to use it.

In the middle of the property, there were three frac tanks and two 275-gallon totes (See Photo #6). Mr. Reyes stated that one tote was empty and the other had motor oil. Of the three frac tanks, Mr. Reyes said that two were empty and the one labeled 'F01003' had about 1,500 gallons of used oil stored in it, however the frac tanks were not labeled **[AOC #3]**. There was a tarp placed under the frac tank in-use as secondary containment, but it was in poor condition. This tarp did not appear to meet the requirements for berms, dike or wall. **[AOC #5 – 40 CFR §279.45(f)]**. Around the frac tank, there were five 10-gallon buckets. One of the buckets had used oil with no label and the other buckets were closed and empty (See Photo #7-9). Mr. Reyes stated these were used to hold the tarp to form a wall for the secondary containment. During a follow-up meeting on December 11, 2025, to go over photos taken during the inspection, Mr. Reyes told the EPA inspectors that the contents in the F01003 frac tank had been removed a couple days after the inspection but could not remember the exact date since he does not keep documentation when he receives and sends off the used oil. We also identified one 10-gallon bucket along the fence line facing the street with used oil and an oily rag not labeled (See Photo #10-11) **[AOC #3]**. Mr. Reyes stated that he was unsure why this bucket was there.

Along the south side of the property, we identified two black tanker trucks with one 3,000-gallon truck with the company's label and the other labeled "JRO Enterprise" (See Photo #12). Mr. Reyes stated that he only uses the truck with their company label to collect used oil from customers and the last time it was used was about 4-5 months ago. The other black tanker truck is empty and has never been used. In between these trucks, there are two totes in poor condition (See Photo #13-14). One tote was full of used oil filters spilling out of the container and was not labeled **[AOC #3, AOC #6 – 40 CFR §279.45(c)]**. Mr. Reyes stated he did not know where these totes came from and that they had been on-site for about 8 months.

We identified a 55-gallon drum labeled "Used Antifreeze" and Mr. Reyes claimed it to be empty (See Photo #16). However, during the inspection the drum had some contents inside, so Mr. Reyes said it could be due to rainwater and would send a follow-up confirmation. We identified a loading truck with seven (7) drums of used oil filters and none of the drums were labeled (See Photo #21-22) **[AOC #3]**. Mr. Reyes said that he had picked them up 2 weeks prior and had no plans for disposal currently **[AOC #1]**. Next to the loading truck, we identified an orange 55-gallon drum full of used oil not labeled and Mr. Reyes stated that it has been there for about 4-5 months (See Photo #20) **[AOC #1, AOC #3]**.

On the east side of the facility, we identified a shed storage area and two frac tanks (See Photo #23). Mr. Reyes stated that these frac tanks were empty and were purchased about 3-4 months prior, so they have not been used yet. Inside the shed, there were piles of drums, buckets, and containers and the condition of the shed was in poor condition with oil staining all over the ground **[AOC #7 – 40 CFR §279.45(h)]**. We were unable to conduct a thorough walkthrough of this area since there was insufficient aisle spacing that restricted our access to the back side of the shed or between each container. We identified many unlabeled 5-quart jugs of used oil (See Photo #32) next to a 275-gallon red tank full of liquid that looked glossy (See Photo #24-26) **[AOC #3]**. Mr. Reyes said that the liquid in the red tank was rainwater and that the jugs of motor oil were the used oil brought onto site by the customers from automotive facilities wanting to dispose of their used oil. Behind the red tank was a tote with the top cut out full of used oil with a hose coming out and unlabeled buckets of used oil nearby (See Photo #27-28) **[AOC #3]**. Mr. Reyes says he will use a Clor-D-Tect test on the used oil in the jugs brought onto his site and then empty the jugs into the tote with the cut-out top and then pump it into one of the 3 frac tanks, such as the 'F01003' frac tank. He does not maintain documentation of the testing. Throughout the shed storage area, we identified large quantities of containers full of liquid that looked glossy. However, Mr. Reyes claimed that all of this was rainwater. We also identified two 350-gallon vertical tanks in this area. Mr. Reyes said one was empty, and the other was full of rainwater (See Photo #30). Additional review is needed to verify the content in the closed vertical tank. From the drums we were able to inspect, we identified multiple open drums and totes with used oil filters that did not have a label (See Photo #36-37) **[AOC #3]**. We also identified many tubs and pans of oily water and 5-gallon buckets full of used oil laying around (See Photo #29, 31, 33, 34, 39, 42, 43) **[AOC #3]**.

Although, according to Mr. Reyes, the normal procedure is to remove the used oil brought by customers within a week, he does not keep any documentation on managing the used oil wastes on-site. Based on

the condition of the facility and statements made by Mr. Reyes on some specific containers, the EPA inspectors observed that used oil may be held on site for more than 35 days and have concerns that Elite Oil Service may actually be subject to regulations under Subpart F (Standards of Used Oil Processors and Re-Refiners) [**AOC#1**]. Further investigation may be necessary to determine if Elite Oil is required to comply with Subpart F.

We conducted a closing conference of the on-site inspection and departed from the facility at 1:30PM. Following the on-site inspection, we conducted a meeting on Microsoft Teams with Mr. Reyes on December 11, 2025, to review the photos taken during the on-site inspection and addressed our initial areas of concern.

Section III – AREAS OF CONCERN (AOC)

AOC #1 – 40 C.F.R. § 279.45(a) Failure to Store Used Oil On-Site Within 24 Hours and not longer than 35 days

Used oil transfer facilities are transportation related facilities including loading docks, parking areas, storage areas, and other areas where shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days. Transfer facilities that store used oil for more than 35 days are subject to regulation under subpart F of this part.

Elite Oil Service is registered as a used oil transporter but is not registered as a used oil transfer facility or used oil processor but is storing used oil for more than 24 hours and in some instances, more than 35 days.

AOC #2 – 40 C.F.R. § 279.46 Failure to Track and Maintain Records of Used Oil

Used oil transporters must keep a record of each used oil shipment accepted, delivered, or exported for at least three years.

Elite Oil Service does not maintain any records or documents.

AOC #3 – 40 C.F.R. § 279.45(g) Failure to Label Containers and Aboveground Tanks of Used Oil

Containers and aboveground tanks used to store used oil at transfer facilities must be labeled or marked clearly with the words “Used Oil.”

Throughout the facility, the EPA inspectors identified many containers and an aboveground tank used to store used oil not labeled.

AOC #4 – 40 C.F.R. § 273 Subpart B Failure to Meet the Standards for Small Quantity Handlers of Universal Waste

§ 273.13(e) Failure to Prevent Release of Waste Aerosol Cans

A small quantity handler of universal waste must manage universal waste aerosol cans in a way that prevents releases of any universal waste or component of a universal waste to the environment.

The EPA inspectors identified a box truck with a tote of waste aerosol cans overflowing. The container was not structurally sound and could not prevent leakage.

§ 273.14(f) Failure to Label Container of Waste Aerosol Cans

A small quantity handler of universal waste must label or mark the universal waste aerosol cans or a container in which the aerosol cans are contained with any of the following phrases: "Universal Waste—Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)".

The EPA inspectors identified a tote of waste aerosol cans overflowing and not labeled.

§ 273.15(a) Failure to Accumulate Waste Aerosol Cans Within Time Limits

A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated or received from another handler.

The EPA inspectors identified a tote of waste aerosol cans inside a box truck overflowing and Mr. Reyes stated the tote was already on-site when he began his lease in 2020.

AOC #5 – 40 C.F.R. § 279.45(f) Failure to Equip an Adequate Secondary Containment System

New aboveground tanks used to store used oil at transfer facilities must be equipped with a secondary containment system.

The EPA inspectors identified a tarp being used as a secondary containment system for the frac tank in use storing used oil. However, this tarp was in poor condition, did not include an observable dike, berm, or retaining wall, and was not sufficiently impervious to prevent any used oil from being released to surrounding soil.

AOC #6 – 40 C.F.R. § 279.45(c) Failure to Maintain Containers of Used Oil in Good Condition

Containers and aboveground tanks used to store used oil at transfer facilities must be in good condition and not leaking.

The EPA inspectors identified an unlabeled tote of used oil filters in poor condition with the contents spilling onto the ground.

AOC #7 – 40 C.F.R. § 279.45(h) Failure to Respond to Releases of Used Oil

Upon detection of a release of used oil to the environment, the owner/operator of a transfer facility must perform cleanup steps.

The EPA inspectors observed staining of used oil in the shed storage area, secondary containment system tarp, and surrounding soil.

Closing Conference

EPA Region 6 inspectors, Elizabeth Pham and Sandesh Thapa, conducted a closing conference at Elite Oil Service at 1:03PM on December 3, 2025, for the inspection. During the closing conference, the EPA inspectors reviewed the immediate Areas of Concern noted during the inspection, fielded questions from Mr. Reyes, and provided information about the next steps in the inspection process. Additional AOCs were determined after the conclusion of the inspection and were not included in the closing conference.

Section IV – FOLLOW UP

EPA is awaiting additional information from the facility related to sample/testing results.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 44 photos taken 12/3/25

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0120.JPG
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Two (2) red 500-gallon tanks and two (2) red 800-gallon tanks all empty and two (2) box trucks with scraps and aerosol cans in yard area to the right of office trailer.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0121.JPG
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Two (2) red 500-gallon tanks and two (2) red 800-gallon tanks all empty and two (2) box trucks with scraps and aerosol cans in yard area to the right of office trailer.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0122.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Box truck with drums in poor condition overflowing with aerosol cans. Mr. Reyes stated this truck belongs to previous owner.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0123.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Close-up of box truck containing aerosol cans open, unlabeled, and in poor condition.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0124.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Box truck containing scrap metal, empty 250-gallon tote, and empty 500-gallon tank.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 6

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0125.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Three (3) frank tanks, two empty tanks and one tank labeled 'F01003' storing 1500 gallons of used oil with secondary containment tarp in poor condition. Two (2) 275-gallon totes, one empty tote and Mr. Reyes claimed full of motor oil.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0126.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Open 10-gallon bucket with no label with used oil in front of 'F01003' frac tank.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0127.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Open 10-gallon bucket with no label with used oil in front of 'F01003' frac tank.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0128.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Four (4) closed and empty 10-gallon buckets. Mr. Reyes said these buckets are used to form a wall and hold up secondary containment tarp. This tarp did not appear to meet the requirements for berms, dike or wall.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0129.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: One (1) 10-gallon bucket along fence line facing the street with used oil and oily rag not labeled.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0130.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: One (1) 10-gallon bucket along fence line facing the street with used oil and oily rag not labeled.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0131.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of two (2) black tanker trucks, one (1) box truck, and two (2) totes along back fence line. One tanker truck with company logo is in use while the other without company logo is empty and has never been used.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0132.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Front side of two (2) totes in poor condition with no labels.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0133.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Back side of two (2) totes in poor condition with no labels. One tote full of used oil filters spilling out of container.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0134.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of many 55-gallon drums along back fence line. Mr. Reyes claimed they were all empty. However, inspectors found some to be full but could not verify contents because drums were sealed. Mr. Reyes stated if they were full, it was due to rainwater.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0135.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of drum labeled "Used Antifreeze". Mr. Reyes claimed this drum to be empty. However, the inspectors determined it had content inside but could not verify content because drum was sealed. Mr. Reyes stated if it was full, it was due to rainwater.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0136.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Close-up of drums along fence line. Many containers were unable to be assessed due to trees and branches that had fallen on top.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0137.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Open drum along back fence line with no label containing used oil and used oil filter.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0138.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of many drums along back fence line unable to be properly assessed due to trees and branches that had fallen on top and poor spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0139.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: 55-gallon orange drum full of used oil not labeled.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0140.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Box truck with seven (7) drums of used oil filters not labeled.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0141.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of box truck storing drums of used oil filters.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0142.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of two (2) frac tanks next to shed storage area. Mr. Reyes stated these were empty.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0143.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of shed storage area.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0144.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: 275-gallon red tank full of oily water and tote with top cut up full of used oil that was unlabeled in shed storage area.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0163.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: View of back side of 275-gallon red tank with cutout showing tank full of oily substance in shed storage area. Mr. Reyes claimed this liquid in the tank is rainwater, however the inspectors identified the liquid as dark and glossy.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0145.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Tote with top cut out full of used oil unlabeled with no secondary containment and open bucket of used oil unlabeled in shed storage area.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0146.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Tote with top cut out full of used oil unlabeled with no secondary containment in shed storage area.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0147.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of 150-gallon metal container with top open, empty tank, and empty buckets crowded in shed storage area. Secondary containment in shed area flooded with rainwater at the backside. Mr. Reyes stated the liquid in the metal container is rainwater.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0148.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of two (2) 350-gallon vertical tanks. Mr. Reyes stated one was empty, and the other was full of rainwater.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0164.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Buckets of used oil in shed storage area with no labels.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0149.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many 5-quart jugs of used motor oil brought in by customers for disposal at Elite Oil in shed storage area. The used oil will be emptied into the tote identified in Photo #28.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0150.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0151.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0152.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0153.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing. Containers with used oil filters not labeled.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0154.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing. Containers with used oil filters not labeled.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 38

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0155.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 39

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0156.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Many containers accumulated in shed storage area were unable to be properly assessed due to poor aisle spacing. Identified tub of oily water in foreground of picture.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 40

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0157.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of shed storage area showing containers in poor condition, staining on ground, unlabeled containers, and poor aisle spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 41

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0158.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of shed storage area showing containers in poor condition, staining on ground, unlabeled containers, and poor aisle spacing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 42

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0159.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Overview of two (2) 10-gallon buckets of used oil unlabeled in shed storage area. Secondary containment in shed area flooded with rainwater at the backside. Used oil filters not contained, on the ground with staining.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 43

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0160.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Secondary containment in shed area flooded with rainwater at the backside in shed storage area. Used oil filters not contained, on the ground with staining.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 44

Location: Elite Oil Service		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	IMG_0161.HEIC
Date:	12/3/2025
Camera:	iPad
Photographer:	Elizabeth Pham
Witness:	Sandesh Thapa
Description: Close-up of drums along fence line beside shed storage area. Many containers were unable to be assessed due to trees and branches that had fallen on top.	