

INSPECTION REPORT

|                                                 |                                                                                                                              |                              |                                                                          |                |
|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------|----------------|
| Inspection Entry Date/Time                      | 11/7/2024 11:40 (CT)                                                                                                         |                              | Announced: No                                                            |                |
| Inspection Exit Date/Time                       | 11/7/2024 12:45 (CT)                                                                                                         |                              | Access: Granted                                                          |                |
| Regulatory Program                              | RCRA                                                                                                                         |                              |                                                                          |                |
| Type of Inspection                              | Focused Compliance Inspection (FCI)                                                                                          |                              |                                                                          |                |
|                                                 |                                                                                                                              |                              |                                                                          |                |
| Facility or Site Name                           | Action Oil Services, Inc.                                                                                                    |                              |                                                                          |                |
| Facility/Site Identifier                        | TXR000085911                                                                                                                 |                              |                                                                          |                |
| Facility/Site Physical Address                  | 650 Canary St.                                                                                                               |                              |                                                                          |                |
| City, State, Zip Code                           | Vidor, TX 77662                                                                                                              |                              |                                                                          |                |
| County/Borough                                  | Orange County                                                                                                                |                              |                                                                          |                |
| Generator Status                                | Non-generator                                                                                                                |                              |                                                                          |                |
| NAICS                                           | 562211                                                                                                                       |                              |                                                                          |                |
| Type of Operation                               | Action Oil Services, Inc.is a used oil transporter and transfer facility that picks up used oil waste from other facilities. |                              |                                                                          |                |
| Geographic Coordinates                          | 30.10595, -94.0518                                                                                                           |                              |                                                                          |                |
|                                                 |                                                                                                                              |                              |                                                                          |                |
| Additional Persons Participating in Inspection: |                                                                                                                              |                              |                                                                          |                |
| Name                                            | Title                                                                                                                        | Organization                 | Email                                                                    | Phone          |
| Angela Hays                                     | Inspector                                                                                                                    | EPA REGION 6                 | Hays.Angela@epa.gov                                                      | (214) 665-2285 |
| Sandesh Thapa                                   | Inspector                                                                                                                    | EPA REGION 6                 | Thapa.Sandesh@epa.gov                                                    | (214) 665-2265 |
| Jon Herbay                                      | Contractor                                                                                                                   | Eastern Research Group (ERG) | Jon.Herbay@erg.com                                                       | (412) 780-9931 |
|                                                 |                                                                                                                              |                              |                                                                          |                |
| Lead Inspector:                                 |                                                                                                                              |                              |                                                                          |                |
| Vince Damiano                                   | Chemical Engineer                                                                                                            | Vincent Damiano              | Digitally signed by Vincent Damiano<br>Date: 2025.02.06 10:09:05 -05'00' | 02/06/2025     |
|                                                 | ERG                                                                                                                          | Vince.Damiano@erg.com        |                                                                          | (703) 633-1732 |
|                                                 |                                                                                                                              |                              |                                                                          |                |

**SECTION I – INTRODUCTION****Site Entry and Purpose of the Inspection**

The Port of Beaumont and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the Environmental Protection Agency (EPA) during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

**Attendees**

| Title/Organization                            | Name                  | Phone          | Email                  | Opening Conf. | Closing Conf. |
|-----------------------------------------------|-----------------------|----------------|------------------------|---------------|---------------|
| Lead Inspector/<br>Contractor/ERG             | Vince Damiano         | (703) 633-1732 | Vince.Damiano@erg.com  | Yes           | Yes           |
| Inspector/Enforcement<br>Officer/EPA Region 6 | Angela Hays           | (214) 665-2285 | Hays.Angela@epa.gov    | Yes           | Yes           |
| Inspector/Enforcement<br>Officer/EPA Region 6 | Sandesh Thapa         | (214) 665-2265 | Thapa.Sandesh@epa.gov  | Yes           | Yes           |
| RCRA Inspector/<br>Contractor/ERG             | Jon Herbay            | (412) 780-9931 | Jon.Herbay@erg.com     | Yes           | Yes           |
| Action Oil Services                           | Landon Tannehill      | (409) 781-3743 | actionoilsvc@yahoo.com | Yes           | Yes           |
| Action Oil Services                           | Luther E<br>Tannehill | (409) 781-3711 | actionoilsvc@yahoo.com | Yes           | Yes           |

**Facility General Description**

| Tenant/Area         | Inspection Date | Process Description                                                                                                                                                                                            | Area of Concern |
|---------------------|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Action Oil Services | 11/07/24        | Action Oil Services, Inc. (Action Oil) is a used oil transporter and transfer facility that collects used oil waste from customers. Action Oil Services is land-based and does not operate under a MARPOL COA. | Yes             |

**SECTION II – OBSERVATIONS**

| Tenant: Action Oil Services                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                 |                   |                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|-------------------|------------------|
| Section: 2.1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Date: 11/07/24, 11:40 AM                                                        | Contains AOC: Yes | Contains CBI: No |
| Lead Inspector: Vince Damiano                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Attendees: Landon Tannehill (Manager) and Luther E. Tannehill (Manager / Owner) |                   |                  |
| <p>Action Oil is located in Vidor, TX, and operates as a used oil transporter and transfer facility. It picks up used oil from local customers, consolidates it, and ships it out to be recycled. Action Oil services customers by picking up used oil, used oily fuels, and oil-contaminated debris and absorbents using a flatbed truck or a vacuum truck. Action Oil has two 70-barrel and two 50-barrel vacuum trucks for servicing customers and two 190-barrel vacuum trucks for transporting collected used oil to Blue Tide Environmental (TXR000084220) to be recycled. Most of Action Oil’s customers are facilities that conduct oil changes on vehicles, but a small part is picked up from used oil generators along the port and vessels docked at the port. Action Oil is certified to do over-the-water transfers of used oil and oily water. Action Oil processes solids containing used oil and oil filters through a filter press; collecting the used oil drained from the solids and recycling the empty oil filters. Used Oil that is collected in containers is transferred into a used oil tank before being shipped to Blue Tide Environmental. Action Oil has been at this location for approximately one year after relocating. At the time of the inspection, Action Oil had a total of twenty storage tanks, with only eleven in use. Action Oil had installed ten new used oil tanks that were storing used oil. However, ten older used oil tanks were in the process of being decommissioned with only one of the older tanks being used as an oil/water separator.</p> <p>Following the opening conference, the inspection team conducted a visual inspection of the used oil process area and tank farm. Upon entering the process pad in the process area, the inspection team observed approximately thirty 55-gallon drums and several 5-gallon containers of used oil waiting to be consolidated into the hopper and filter. Throughout the process pad, the inspection team observed five 55-gallon drums and three 5-gallon containers storing used oil, all approximately one-quarter full to full, that were not marked or labeled as “Used Oil” (see Appendix 1 – Photos 1-7 and 10) <b>[AOC#1 – Action Oil did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.45(g)(1)]</b>. Next to the hopper, the inspection team observed two spills of used oil onto the concrete pad that were not properly cleaned up (see Appendix 1 – Photos 8 and 9) <b>[AOC#2 – Action Oil did not clean up and properly manage the released used oil and other materials - 40 CFR 279.45(h)]</b>. The process pad was made of concrete and drained to two closed sumps found in the middle of the building stretching from the north wall to the south wall; the pad also had a slight berm built along the perimeter of approximately two inches (see Appendix 1 – Photos 18 to 20).</p> <p>Next, the inspection team observed the container storage building, where empty drums and totes were stored for exchange by Action Oil during its used oil collection process. The inspection team continued the inspection at the tank farm area. Mr. Luther Tannehill stated only one of the older original tanks out of ten is</p> |                                                                                 |                   |                  |

currently storing used oil and it is used as an oil/water separator (see Appendix 1 – Photo 12). The tank was not labeled as used oil at the time of the inspection (see **AOC#1**). The inspection team noted the concrete pad where the oil/water separator was sitting did not have a secondary containment system (see Appendix 1 – Photo 11) [**AOC#3** – *Action Oil did have a secondary containment system for an aboveground tank used to store oil at a transfer facility - 40 CFR 279.45(f)*]. Mr. Tannehill informed the inspection team that the water from the bottom of the oil/water separator is discharged into the county drainage canal located at the back of the property behind the tank farm (see Appendix 1 – Photos 13 to 15). Mr. Tannehill said they do not have an NPDES permit and they occasionally sample the water in the oil/water separator. Adjacent to the older ten tanks was a set of ten new used oil tanks that were actively storing used oil at the time of the inspection. However, the tanks did not contain a label or marking indicating they were storing used oil (see Appendix 1 – Photos 16 and 17, **AOC#1**).

The inspection team did not observe other areas of concern (AOCs) at the time of the inspection. However, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 1:00 PM with Action Oil personnel. The AOCs were communicated during the closing. Following the inspection on 11/18/2024, Mr. Landon Tannehill sent a follow-up email in response to the AOCs observed during the inspection including:

- Photos of labels placed on non-hazardous drums in the process pad and the spills next to the hopper cleaned up (Appendix 2).
- Statement that labels have been ordered for the used oil tanks.
- Sample test results for the water discharge from the oil/water separator were analyzed on 11/18/2024 (Appendix 3).
- An example of a used oil shipment ticket to Blue Tide with pre-shipment test results (Appendix 4).
- The cover page of their current SPCC plan which was last revised in 2005 (Appendix 5).
- Drawing of the facility and containment area (Appendix 5).
- Pictures of a secondary containment system installed on the concrete pad for the older ten tanks; sent on 11/25/2024 (Appendix 6).

See the full response in Appendix 7.

### SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

### SECTION IV – AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

| Tenant: Action Oil Services                                                                                   |                                      |              |
|---------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------|
| <b>AOC #1</b> – Action Oil did not clearly label containers used to store used oil with the words “Used Oil.” | <b>Citation:</b> 40 CFR 279.45(g)(1) | Section: 2.1 |
| <b>AOC #2</b> – Action Oil did not clean up and manage properly the released used oil and other materials.    | <b>Citation:</b> 40 CFR 279.45(h)    | Section: 2.1 |



|                                                                                                                                                   |                                   |              |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------|
| <b>AOC #3</b> – Action Oil did have a secondary containment system for an aboveground storage tank used to store used oil at a transfer facility. | <b>Citation:</b> 40 CFR 279.45(f) | Section: 2.1 |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------|

## SECTION V – FOLLOW UP

### Follow-Up

Any facility follow-up items are as discussed in the observations in Section II. Documents or files provided by the facility were transmitted via email and included responses to AOCs or provision of documents requested.

### Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 11/18/24 Action Oil email – Landon Tannehill provided the inspection team with photos of attempted corrections made towards AOCs observed and requested documentation from the inspection team.
2. 11/25/24 Action Oil email – Landon Tannehill provided the inspection team with photos of the secondary containment system installed on the tank farm.

## SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Photos from 11/18 Response

Appendix 3. Discharge Water Sample Results

Appendix 4. Blue Tide Used Oil Ticket and Sample Results

Appendix 5. SPCC Cover Sheet and Facility Drawing

Appendix 6. Secondary Containment System Installed on Tanks

Appendix 7. Action Oil Email Response from 11/18

APPENDIX 1.  
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 1

Photo File Name: DSCN7678

Date of Photo: 11/07/2024

Time of Photo: 12:15 hrs.

Photographer: Vince Damiano

Description: View of a half-full 5-gallon container storing used oil that was unlabeled observed on the process pad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



**Photo No. 2**

Photo File Name: DSCN7679

Date of Photo: 11/07/2024

Time of Photo: 12:16 hrs.

Photographer: Vince Damiano

Description: View of a quarter-full 55-gallon container storing used oil that was unlabeled observed on the process pad.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 3

Photo File Name: DSCN7680

Date of Photo: 11/07/2024

Time of Photo: 12:16 hrs.

Photographer: Vince Damiano

Description: View of a full 55-gallon container storing used oil that was unlabeled observed on the process pad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



**Photo No. 4**

Photo File Name: DSCN7681

Date of Photo: 11/07/2024

Time of Photo: 12:17 hrs.

Photographer: Vince Damiano

Description: View of a half-full 55-gallon container storing used oil that was unlabeled observed on the process pad.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 5

Photo File Name: DSCN7682

Date of Photo: 11/07/2024

Time of Photo: 12:17 hrs.

Photographer: Vince Damiano

Description: View of a quarter-full 5-gallon container storing used oil that was unlabeled observed on the process pad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 6

Photo File Name: DSCN7683

Date of Photo: 11/07/2024

Time of Photo: 12:17 hrs.

Photographer: Vince Damiano

Description: View of a full 55-gallon container storing used oil that was unlabeled observed on the process pad.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 7

Photo File Name: DSCN7684

Date of Photo: 11/07/2024

Time of Photo: 12:17 hrs.

Photographer: Vince Damiano

Description: View of a quarter-full 55-gallon container storing used oil that was unlabeled observed on the process pad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 8

Photo File Name: DSCN7685

Date of Photo: 11/07/2024

Time of Photo: 12:18 hrs.

Photographer: Vince Damiano

Description: A view of spilled oil that was not cleaned up was found on the concrete pad in the processing area next to the hopper.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 9

Photo File Name: DSCN7686

Date of Photo: 11/07/2024

Time of Photo: 12:29 hrs.

Photographer: Vince Damiano

Description: A view of another spill of oil that was not cleaned up was found on the concrete pad in the processing area next to the hopper.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 10

Photo File Name: DSCN7687

Date of Photo: 11/07/2024

Time of Photo: 12:20 hrs.

Photographer: Vince Damiano

Description: View of a full 5-gallon container storing used oil that was unlabeled observed on the process pad.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 11

Photo File Name: DSCN7688

Date of Photo: 11/07/2024

Time of Photo: 12:29 hrs.

Photographer: Vince Damiano

Description: Overview of the older tank farm found in the back of the facility in which there was no secondary containment system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 12

Photo File Name: DSCN7689

Date of Photo: 11/07/2024

Time of Photo: 12:29 hrs.

Photographer: Vince Damiano

Description: View of the tank used as an oil/water separator which was storing used oil and was not labeled "Used Oil."





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



**Photo No. 13**

Photo File Name: DSCN7690

Date of Photo: 11/07/2024

Time of Photo: 12:31 hrs.

Photographer: Vince Damiano

Description: View of the drain in which water from the oil/water separator is discharged behind the facility. Note the two totes seen to the left were empty.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



**Photo No. 14**

Photo File Name: DSCN7691

Date of Photo: 11/07/2024

Time of Photo: 12:31 hrs.

Photographer: Vince Damiano

Description: View of the drain in which water from the oil/water separator is discharged behind the facility.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 15

Photo File Name: DSCN7692

Date of Photo: 11/07/2024

Time of Photo: 12:31 hrs.

Photographer: Vince Damiano

Description: View of the drain in which water from the oil/water separator is discharged behind the facility.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 16

Photo File Name: DSCN7693

Date of Photo: 11/07/2024

Time of Photo: 12:33 hrs.

Photographer: Vince Damiano

Description: Overview of the newly built tank farm containing ten used oil tanks that were actively storing used oil. None of the tanks were labeled "Used Oil."





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 17

Photo File Name: DSCN7694

Date of Photo: 11/07/2024

Time of Photo: 12:33 hrs.

Photographer: Vince Damiano

Description: Overview of the newly built tank farm containing ten used oil tanks that were actively storing used oil; none of the tanks were labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 18

Photo File Name: DSCN7695

Date of Photo: 11/07/2024

Time of Photo: 12:33 hrs.

Photographer: Vince Damiano

Description: Overview of the process pad. A mixture of empty and non-empty 55-gallon drums with the filter press and hopper is seen in the top right corner. The blind sump runs horizontal across the middle of the process pad.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



Photo No. 19

Photo File Name: DSCN7696

Date of Photo: 11/07/2024

Time of Photo: 12:33 hrs.

Photographer: Vince Damiano

Description: Overview of the process pad, the roll-off boxes are used to store non-hazardous debris.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

|                                     |                       |              |
|-------------------------------------|-----------------------|--------------|
| Location: Action Oil Services, Inc. |                       |              |
| City: Vidor                         | County/Parish: Orange | State: Texas |



**Photo No. 20**

Photo File Name: DSCN7697

Date of Photo: 11/07/2024

Time of Photo: 12:34 hrs.

Photographer: Vince Damiano

Description: View of the concrete berm surrounding the perimeter of the process pad.



## APPENDIX 2. PHOTOS FROM 11/18 RESPONSE



Photograph provided by Action Oil on 11/18/2024 in response to AOCs





Photograph provided by Action Oil on 11/18/2024 in response to AOCs



Photograph provided by Action Oil on 11/18/2024 in response to AOCs





Photograph of oil spills cleaned up provided by Action Oil on 11/18/2024 in response to AOCs



### APPENDIX 3. DISCHARGE WATER SAMPLE RESULTS

Client: Action Oil Services, Inc  
P O Box 2428  
Beaumont, Texas 77704.

Reporting Date: 11/18/24  
Sample Matrix: GW  
Date Collected: 11/15/24  
Time Collected: 1530  
Collected by: Client  
Date Received: 11/15/24  
Time Received: 1630  
CHEMTEx File #: S24110153

Phone: 409-781-3711, 409-781-3743  
E-mail: actionoilsvc@yahoo.com

### RESULTS OF ANALYSIS

Project : 650 Canary Rose City, Texas 77642. Storm Water Discharge Water Sample  
Site/Location : Action Oil Services, Inc. 650 Canary City, Texas 77662  
P. O # Gene Tannehill

| CHEMTEx ID | Sample ID                       | Parameter | Units       | Results | MDL    | RL     |
|------------|---------------------------------|-----------|-------------|---------|--------|--------|
| S24110153  | Action Oil<br>1 Quart Glass Jar | Arsenic   | mg/L or ppm | <0.0015 | 0.0015 |        |
|            |                                 | Barium    | mg/L or ppm | 0.0647  | 0.0026 |        |
|            |                                 | Cadmium   | mg/L or ppm | <0.0005 | 0.0005 |        |
|            |                                 | Chromium  | mg/L or ppm | 0.0007  | 0.0006 |        |
|            |                                 | Copper    | mg/L or ppm | <0.0010 | 0.0010 |        |
|            |                                 | Lead      | mg/L or ppm | 0.0013  | 0.0004 |        |
|            |                                 | Manganese | mg/L or ppm | 0.0467  | 0.0006 |        |
|            |                                 | Nickel    | mg/L or ppm | 0.0011  | 0.0005 |        |
|            |                                 | Selenium  | mg/L or ppm | <0.0013 | 0.0013 |        |
|            |                                 | Silver    | mg/L or ppm | <0.0016 | 0.0016 |        |
|            |                                 | Zinc      | mg/L or ppm | 0.0043  | 0.0006 |        |
|            |                                 | Mercury   | mg/L or ppm | <0.0002 |        | 0.0002 |

RL(Reporting Limit) values in our report are our lowest analyses limits, not the Reporting Limits to report to any Governmental Agencies.

Analysis is performed and report generated at Chemtex (NELAP Cert # 04046), Sulphur, LA.

MDL=Method Detection Limit.

| Parameter | Method Reference | Date Analyzed/Analyst |     |
|-----------|------------------|-----------------------|-----|
| Metals    | EPA 200.7        | 11/18/24              | BRK |
| Mercury   | EPA 245.1        | 11/18/24              | BRK |

NOTICE / DISCLAIMER: The analytical results, opinions or interpretations contained in this report are based upon information and material supplied by the client for whose exclusive and confidential use this report has been made. No person or entity other than the client may rely on this report Any such reliance will be unjustified. Any person other than the client, that reads this reports does so at his or her own risk. The analytical results, oopinions and/or interpretations expressed herein represent the best judgement of CHEMTEx, bsed on the information and instructions received from the client. Chemtex makes no warranty or representation, express or implied, of any type, and expressly disclaims same. This report shall not be reporduced, in whole or in part, without the writted approval of CHEMTEx. In no event shall CHEMTEx be responsible for any damage greater than the amount it received for the analysis performed.

Client: Action Oil Services, Inc  
P O Box 2428  
Beaumont, Texas 77704.

Reporting Date: 11/18/24  
CHEMTEX File #: S24110153

#### LABORATORY QUALITY CONTROL DATA

| QC Batch ID | Parameter           | Method Blank (mg/L) |        | RL     |
|-------------|---------------------|---------------------|--------|--------|
|             |                     | Result              | MDL    |        |
| QbMA111824  | <b>Total Metals</b> |                     |        |        |
|             | Arsenic             | <0.0015             | 0.0015 |        |
|             | Barium              | <0.0026             | 0.0026 |        |
|             | Cadmium             | <0.0005             | 0.0005 |        |
|             | Chromium            | <0.0006             | 0.0006 |        |
|             | Copper              | <0.0010             | 0.0010 |        |
|             | Lead                | <0.0004             | 0.0004 |        |
|             | Manganese           | <0.0006             | 0.0006 |        |
|             | Nickel              | <0.0005             | 0.0005 |        |
|             | Selenium            | <0.0013             | 0.0013 |        |
|             | Silver              | <0.0016             | 0.0016 |        |
|             | Zinc                | <0.0006             | 0.0006 |        |
| QbHg111824  | Mercury             | < 0.0002            |        | 0.0002 |

| QC Batch ID | Parameter           | LCS (mg/L) |            |           |             |
|-------------|---------------------|------------|------------|-----------|-------------|
|             |                     | Spk Added  | LCS Result | LCS % Rec | % Rec Limit |
| QbMA111824  | <b>Total Metals</b> |            |            |           |             |
|             | Arsenic             | 1.000      | 1.0120     | 101       | 85-115      |
|             | Barium              | 1.000      | 0.9912     | 99        | 85-115      |
|             | Cadmium             | 1.000      | 1.0170     | 102       | 85-115      |
|             | Chromium            | 1.000      | 1.0040     | 100       | 85-115      |
|             | Copper              | 1.000      | 0.9899     | 99        | 85-115      |
|             | Lead                | 1.000      | 1.0100     | 101       | 85-115      |
|             | Manganese           | 1.000      | 1.0910     | 109       | 85-115      |
|             | Nickel              | 1.000      | 1.0130     | 101       | 85-115      |
|             | Selenium            | 1.000      | 1.0230     | 102       | 85-115      |
|             | Silver              | 1.000      | 1.0150     | 102       | 85-115      |
|             | Zinc                | 1.000      | 1.0160     | 102       | 85-115      |
| QbHg111824  | Mercury             | 0.0020     | 0.0023     | 113       | 85-115      |

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Client: Action Oil Services, Inc  
 P O Box 2428  
 Beaumont, Texas 77704.

Reporting Date: 11/18/24  
 CHEMTEx File #: S24110153

## LABORATORY QUALITY CONTROL DATA

### Sample Duplicate (mg/L)

| QC Batch ID | QC Sample ID | Parameter    | Sample Result | Sample Dup Result | RPD | RPD Limit |
|-------------|--------------|--------------|---------------|-------------------|-----|-----------|
| QbMA111824  | LCS & LCSD   | Total Metals |               |                   |     |           |
|             |              | Arsenic      | 1.0120        | 1.0090            | 0.3 | 20        |
|             |              | Barium       | 0.9912        | 0.9887            | 0.3 | 20        |
|             |              | Cadmium      | 1.0170        | 1.0150            | 0.2 | 20        |
|             |              | Chromium     | 1.0040        | 1.0010            | 0.3 | 20        |
|             |              | Copper       | 0.9899        | 0.9956            | 0.6 | 20        |
|             |              | Lead         | 1.0100        | 1.0120            | 0.2 | 20        |
|             |              | Manganese    | 1.0910        | 1.0120            | 7.5 | 20        |
|             |              | Nickel       | 1.0130        | 1.0150            | 0.2 | 20        |
|             |              | Selenium     | 1.0230        | 1.0210            | 0.2 | 20        |
|             |              | Silver       | 1.0150        | 1.0070            | 0.8 | 20        |
|             |              | Zinc         | 1.0160        | 1.0120            | 0.4 | 20        |
| QbHg111824  | S24110153    | Mercury      | <0.0002       | <0.0002           | --  | 20        |

### MS (mg/L)

| QC Batch ID | QC Sample ID | Parameter    | Sample Result | Spk Added | MS Result | % Rec | % Rec Limits |
|-------------|--------------|--------------|---------------|-----------|-----------|-------|--------------|
| QbMA111824  | S24110153    | Total Metals |               |           |           |       |              |
|             |              | Arsenic      | <0.0015       | 2.000     | 1.979     | 99    | 70-130       |
|             |              | Barium       | 0.0647        | 2.000     | 2.097     | 102   | 70-130       |
|             |              | Cadmium      | <0.0005       | 2.000     | 1.956     | 98    | 70-130       |
|             |              | Chromium     | 0.0007        | 2.000     | 1.966     | 98    | 70-130       |
|             |              | Copper       | <0.0010       | 2.000     | 1.927     | 96    | 70-130       |
|             |              | Lead         | 0.0013        | 2.000     | 1.954     | 98    | 70-130       |
|             |              | Manganese    | 0.0467        | 2.000     | 1.992     | 97    | 70-130       |
|             |              | Nickel       | 0.0011        | 2.000     | 1.952     | 98    | 70-130       |
|             |              | Selenium     | <0.0013       | 2.000     | 1.971     | 99    | 70-130       |
|             |              | Silver       | <0.0016       | 2.000     | 2.021     | 101   | 70-130       |
|             |              | Zinc         | 0.0043        | 2.000     | 1.972     | 98    | 70-130       |
| QbHg111824  | S24110153    | Mercury      | <0.0002       | 0.0020    | 0.0022    | 109   | 70-130       |

for B.A. Reddy  
 Dr. C. N. Reddy, Ph.D, CIH, ASP  
 Laboratory Director

brk/CNR

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| CLIENT: Action Oil<br>ATTN:                                                                                                                                                                                          | ADDRESS: 650 Canary St,<br>Groves City, TX -77662 |             | Phone : 409-781-3711, 409-781-3743<br>E-Mail: actionoilsvc@yahoo.com                         |               |                |                       |                   |            |                      |        |                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------|----------------------------------------------------------------------------------------------|---------------|----------------|-----------------------|-------------------|------------|----------------------|--------|----------------------------------------------------------------------------------------|
| BILLING CONTACT/ADDRESS: (If different from above)<br>Action Oil Services, Inc.,<br>PO Box 2428<br>Beaumont, Texas 77704                                                                                             | P. O. #:<br>Gene Tannehill                        | PROJECT NO: | PROJECT:<br>650 Canary<br>Rose City, Texas 77662<br>storm water<br>Discharge water<br>Sample |               |                |                       |                   |            |                      |        |                                                                                        |
| SAMPLE(S) COLLECTED BY (PRINT NAME):                                                                                                                                                                                 | 2-4 hr Rush 5-7 days                              |             | Expected Turnaround Time<br>24 hr Rush 48 hr Rush 3-5 day Rush                               |               |                |                       |                   |            |                      |        |                                                                                        |
| SAMPLE MATRIX CODES: Drinking Water: DW; Groundwater: GW; Liquid Waste: LW; Oil(s): O; Paint Chips: PC; Sand: Sn;<br>Sludge: SI; Soil/Solid: S; Solid Waste: SW; Trip Blank: TB; Water: W; Wipes: WP; Wastewater: WW |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
| CHEMTEX #                                                                                                                                                                                                            | Sample Identification                             | Collection  |                                                                                              | Sample Matrix | Composite/Grab | Chemical Preservative | Sample Containers |            |                      | Metals | REQUESTED ANALYSES                                                                     |
|                                                                                                                                                                                                                      |                                                   | Date        | Time                                                                                         |               |                |                       | No.               | Size (oz.) | Type (Glass/Plastic) |        |                                                                                        |
| S24110153                                                                                                                                                                                                            | Action Oil<br>1 Quart Glass Jar                   | 11-15       | 3:30pm                                                                                       | GW            |                | N/A                   | 01                | 32 oz      | Glass                | X      |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
|                                                                                                                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        |                                                                                        |
| Remarks: Samples must be preserved on ice after sample collection and transported in ice chest.                                                                                                                      |                                                   |             |                                                                                              |               |                |                       |                   |            |                      |        | <input checked="" type="checkbox"/> Regulatory <input type="checkbox"/> Non-Regulatory |

Facilities also available at: 5544 Leopard St., Corpus Christi, TX 78408; (361)299-9900 [cc@chemtexas.com](mailto:cc@chemtexas.com) and 138 S. Cities Service Hwy., Sulphur, LA 70663 (337) 626-2121 [lc@chemtexas.com](mailto:lc@chemtexas.com)

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|                                          |                           |                                    |                        |
|------------------------------------------|---------------------------|------------------------------------|------------------------|
| Relinquished By:<br><i>Gene Jannochi</i> | Date/Time:<br>4:30 PM     | Received By:<br><i>[Signature]</i> | Date/Time:<br>11/15/24 |
| Relinquished By:                         | Date/Time:<br>11-15-2024- | Received By:                       | Date/Time:<br>1630     |

Facilities also available at: 5544 Leopard St., Corpus Christi, TX 78408; (361)299-9900 [cc@chemtexas.com](mailto:cc@chemtexas.com) and 138 S. Cities Service Hwy., Sulphur, LA 70663 (337) 626-2121 [lc@chemtexas.com](mailto:lc@chemtexas.com)

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# SAMPLE CONDITION CHECKLIST

|                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |           |            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------|------------|
| CHEMTEX File#: <u>524110153</u>                                                                                                                                   | Infrared Thermometer ID: <u>S125-IRGUN-8</u>                                                                                                                                                                                                                                                                                                                                                                                            | pH paper ID: <u>S230047(2)</u> |           |            |
| Client Name: <u>Action oil</u>                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |           |            |
| Sample(s) pH: <u>N/A</u>                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                         | Temperature (°C): <u>21.9</u>  |           |            |
| <i>If more than one parameter requires pH check, write the parameter followed by its pH value.</i>                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |           |            |
| <b>Check Points</b>                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Yes</b>                     | <b>No</b> | <b>N/A</b> |
| 1.                                                                                                                                                                | Cooler seal present and signed.                                                                                                                                                                                                                                                                                                                                                                                                         |                                | X         |            |
| 2.                                                                                                                                                                | Sample(s) received with signed sample custody seal.                                                                                                                                                                                                                                                                                                                                                                                     |                                | X         |            |
| 3.                                                                                                                                                                | Sample(s) in a cooler.                                                                                                                                                                                                                                                                                                                                                                                                                  | X                              |           |            |
| 4.                                                                                                                                                                | If yes, ice in cooler.                                                                                                                                                                                                                                                                                                                                                                                                                  | X                              |           |            |
| 5.                                                                                                                                                                | Sample(s) received with chain-of-custody.                                                                                                                                                                                                                                                                                                                                                                                               | X                              |           |            |
| 6.                                                                                                                                                                | C-O-C signed and dated.                                                                                                                                                                                                                                                                                                                                                                                                                 | X                              |           |            |
| 7.                                                                                                                                                                | Sample containers arrived intact.                                                                                                                                                                                                                                                                                                                                                                                                       | X                              |           |            |
| 8.                                                                                                                                                                | Matrix: DW   NPW   S&CM   A&E bag   Bulk   Filter-Casette   Sor-Tube   OVM-Badge   Other-Specify<br><div style="display: flex; justify-content: space-around; align-items: center;"> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> |                                |           |            |
| 9.                                                                                                                                                                | Sample(s) were received in appropriate container(s).                                                                                                                                                                                                                                                                                                                                                                                    | X                              |           |            |
| 10.                                                                                                                                                               | Sample(s) were received with proper preservative.                                                                                                                                                                                                                                                                                                                                                                                       | X                              |           |            |
| 11.                                                                                                                                                               | All samples were labeled and logged in C-O-C.                                                                                                                                                                                                                                                                                                                                                                                           | X                              |           |            |
| 12.                                                                                                                                                               | Sample IDs on labels match IDs on C-O-C.                                                                                                                                                                                                                                                                                                                                                                                                | X                              |           |            |
| 13.                                                                                                                                                               | Bottle count on C-O-C matches bottles found.                                                                                                                                                                                                                                                                                                                                                                                            | X                              |           |            |
| 14.                                                                                                                                                               | Sample volume is sufficient for analyses requested.                                                                                                                                                                                                                                                                                                                                                                                     | X                              |           |            |
| 15.                                                                                                                                                               | Samples were received within the holding time.                                                                                                                                                                                                                                                                                                                                                                                          | X                              |           |            |
| 16.                                                                                                                                                               | VOA vials completely filled.                                                                                                                                                                                                                                                                                                                                                                                                            |                                |           | X          |
| 17.                                                                                                                                                               | Sample accepted.                                                                                                                                                                                                                                                                                                                                                                                                                        | X                              |           |            |
| <i>Comments: Discrepancies must be brought to the notice of the Quality Manager for resolution. Action taken to resolve the discrepancies must be noted here.</i> |                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |           |            |
| <u>Added Preservative at the time of logging the sample.</u>                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |           |            |

Checked in by: BB

Date: 11/15/24

#### APPENDIX 4. BLUE TIDE USED OIL TICKET AND SAMPLE RESULTS

## PRODUCT NAME

UMO: Pre-shipment

Sample ID

B022409017

Customer Company Name

Action Oil Service, Lnc

Sample Information

S9

Sample Receiving Date

09-09-2024

Report Date

9-9-2024

| Test                     | Test Method | Min    | Max  | Results | Unit   | Comment |
|--------------------------|-------------|--------|------|---------|--------|---------|
| Density at 60°F , lb/gal | D4052       | Report |      | 7.253   | lb/gal | --      |
| Density at 60°F, g/mL    | D4052       | Report |      | 0.8691  | g/ml   | --      |
| Flash Point, PMCC        | D93         | 140    | --   | >140    | °F     | --      |
| PCBs                     | Internal    | --     | 2    | ND      | ppmw   | --      |
| Water Analysis           | Internal    | Report |      | 4.19    | wt%    | --      |
| Aluminum                 | D5185       | Report |      | 8.96    | ppmw   | --      |
| Arsenic                  | D5185       | --     | 5    | 0.251   | ppmw   | --      |
| Cadmium                  | D5185       | --     | 2    | ND      | ppmw   | --      |
| Calcium                  | D5185       | Report |      | 996.0   | ppmw   | --      |
| Chlorine                 | D5185       | --     | 1000 | 38.7    | ppmw   | --      |
| Chromium                 | D5185       | --     | 10   | 0.807   | ppmw   | --      |
| Iron                     | D5185       | Report |      | 54.1    | ppmw   | --      |
| Lead                     | D5185       | --     | 100  | 3.71    | ppmw   | --      |
| Magnesium                | D5185       | Report |      | 281.0   | ppmw   | --      |
| Nickel                   | D5185       | Report |      | 0.722   | ppmw   | --      |
| Phosphorus               | D5185       | --     | 1500 | 593.0   | ppmw   | --      |
| Silicon                  | D5185       | --     | 100  | 31.7    | ppmw   | --      |
| Sodium                   | D5185       | Report |      | 61.1    | ppmw   | --      |
| Sulfur                   | D5185       | --     | 5500 | 2653.0  | ppmw   | --      |
| Titanium                 | D5185       | Report |      | ND      | ppmw   | --      |
| Vanadium                 | D5185       | Report |      | ND      | ppmw   | --      |
| Zinc                     | D5185       | Report |      | 655.0   | ppmw   | --      |

Note: Data result - ND : below limit of detection or non detected

Report reviewed by : Jody Cammack

Comment : All results are within specification



## APPENDIX 5. SPCC COVER SHEET AND FACILITY DRAWING

# Action Oil Services, Inc.

---

## SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN

---

(SPCC)

BEAUMONT FACILITY

40 CFR 112

September 2003

# **SPILL PREVENTION, CONTROL, and COUNTERMEASURES PLAN**

**(SPCC)**

**Action Oil Service, Inc.  
Beaumont Facility**

**Beaumont, Texas**

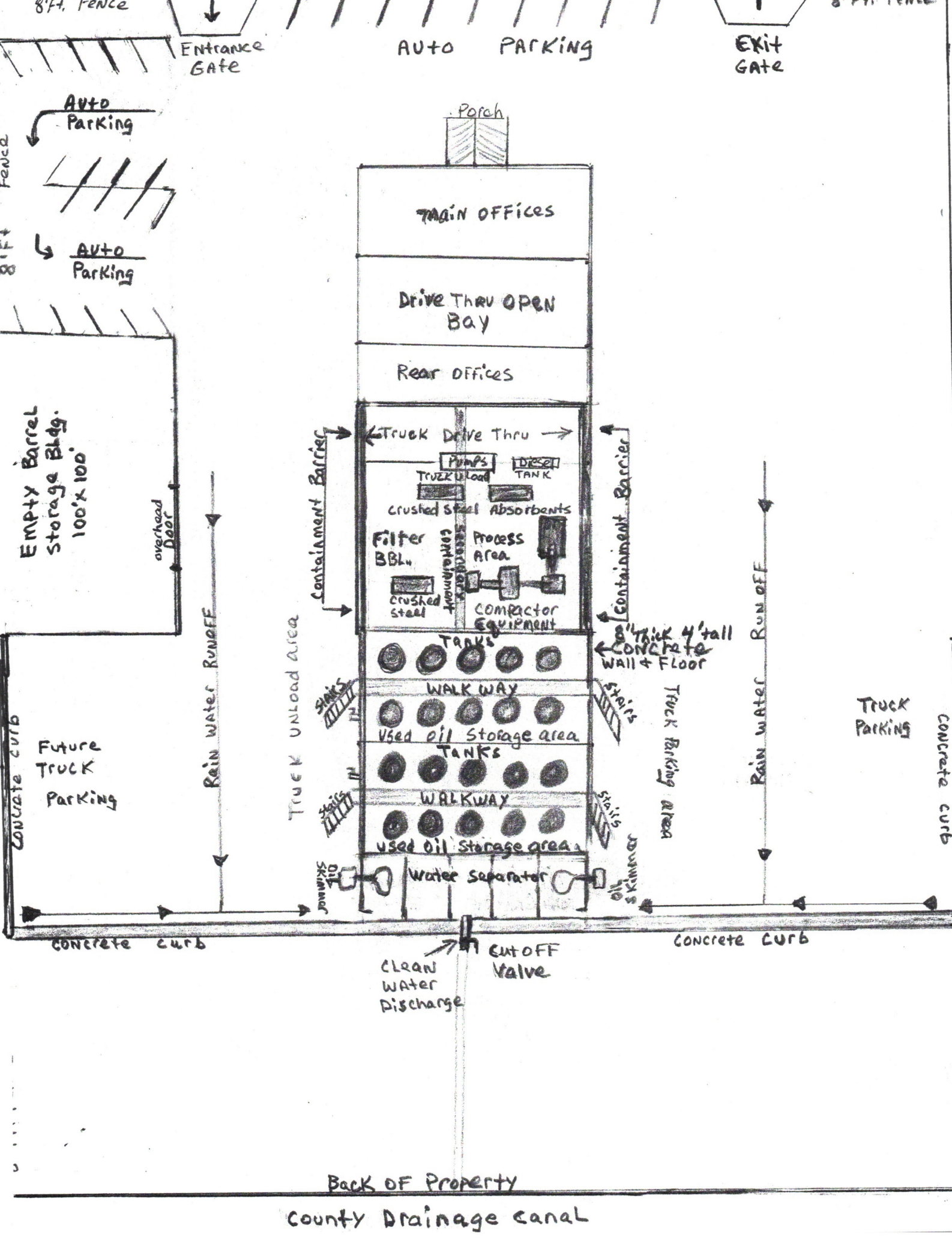
September 2003

(Revised 1/05)



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## REMITTANCE ADVICE

**Company**

Blue Tide Environmental Marketing, LLC  
Op Unit: BTE Supply Chain  
5840 Legacy Circle  
Ste D250  
Plano, TX 75024

**Counterparty**

Action Oil Services, Inc.  
650 Canary St  
Rose City, TX 77662

Landon Tannehill  
409-781-3743  
actionoilsvc@yahoo.com

**Remittance No.** P0003333PF**22-Nov-2024****Order No.** GTC-13688\_PHY-21659-P3**Invoice No.**

| DESCRIPTION OF GOODS            | GROSS        | WATER % | NET      | UNIT PRICE | TOTAL        |
|---------------------------------|--------------|---------|----------|------------|--------------|
| UMO                             | 7,081.00 GAL | 4.98%   | 6,728.37 | 1.11       | USD 7,468.49 |
| Cost Adjustment (if applicable) |              |         |          |            | -            |
| <b>Total</b>                    |              |         |          |            | USD 7,468.49 |

Delivered By  
Loading Point  
Discharging Point  
Delivery Term  
Payment Term  
BL Date  
Received Date  
Due Date  
Contract No.  
Order No.  
Your Ref.

Truck  
Action Oil Services - Rose City TX  
BTEBAYTOWN  
DAT  
10 days after Invoice Issued.  
  
13-Nov-2024  
22-Nov-2024  
GTC-13688\_PHY-21659  
GTC-13688\_PHY-21659-P3

**PAYMENT**

With value date 22-Nov-2024 by ACH payment:

Beneficiary: Action Oil Services, Inc.  
Beneficiary bank: Capital One Bank  
Beneficiary account #: 362-00-22429  
Beneficiary ACH Routing #: 111901014  
Exclusively without offset and counterclaim

5840 Legacy Circle, Ste D250, Plano, TX 75024  
Tel: (469) 956-3336 Email: CustomerService@bluetideenv.com



## BTE INTERNAL REPORT

**PRODUCT NAME****UMO: Pre-shipment****Sample ID**

B022409017

**Customer Company Name**

Action Oil Service, Lnc

**Sample Information**

S9

**Sample Receiving Date**

09-09-2024

**Report Date**

9-9-2024

| Test                     | Test Method | Min    | Max  | Results | Unit   | Comment |
|--------------------------|-------------|--------|------|---------|--------|---------|
| Density at 60°F , lb/gal | D4052       | Report |      | 7.253   | lb/gal | --      |
| Density at 60°F, g/mL    | D4052       | Report |      | 0.8691  | g/ml   | --      |
| Flash Point, PMCC        | D93         | 140    | --   | >140    | °F     | --      |
| PCBs                     | Internal    | --     | 2    | ND      | ppmw   | --      |
| Water Analysis           | Internal    | Report |      | 4.19    | wt%    | --      |
| Aluminum                 | D5185       | Report |      | 8.96    | ppmw   | --      |
| Arsenic                  | D5185       | --     | 5    | 0.251   | ppmw   | --      |
| Cadmium                  | D5185       | --     | 2    | ND      | ppmw   | --      |
| Calcium                  | D5185       | Report |      | 996.0   | ppmw   | --      |
| Chlorine                 | D5185       | --     | 1000 | 38.7    | ppmw   | --      |
| Chromium                 | D5185       | --     | 10   | 0.807   | ppmw   | --      |
| Iron                     | D5185       | Report |      | 54.1    | ppmw   | --      |
| Lead                     | D5185       | --     | 100  | 3.71    | ppmw   | --      |
| Magnesium                | D5185       | Report |      | 281.0   | ppmw   | --      |
| Nickel                   | D5185       | Report |      | 0.722   | ppmw   | --      |
| Phosphorus               | D5185       | --     | 1500 | 593.0   | ppmw   | --      |
| Silicon                  | D5185       | --     | 100  | 31.7    | ppmw   | --      |
| Sodium                   | D5185       | Report |      | 61.1    | ppmw   | --      |
| Sulfur                   | D5185       | --     | 5500 | 2653.0  | ppmw   | --      |
| Titanium                 | D5185       | Report |      | ND      | ppmw   | --      |
| Vanadium                 | D5185       | Report |      | ND      | ppmw   | --      |
| Zinc                     | D5185       | Report |      | 655.0   | ppmw   | --      |

Note: Data result - ND : below limit of detection or non detected

**Report reviewed by :** Jody Cammack**Comment :** All results are within specification

## APPENDIX 6. SECONDARY CONTAINMENT SYSTEM INSTALLED ON TANKS



## Action Oil Secondary containment pics

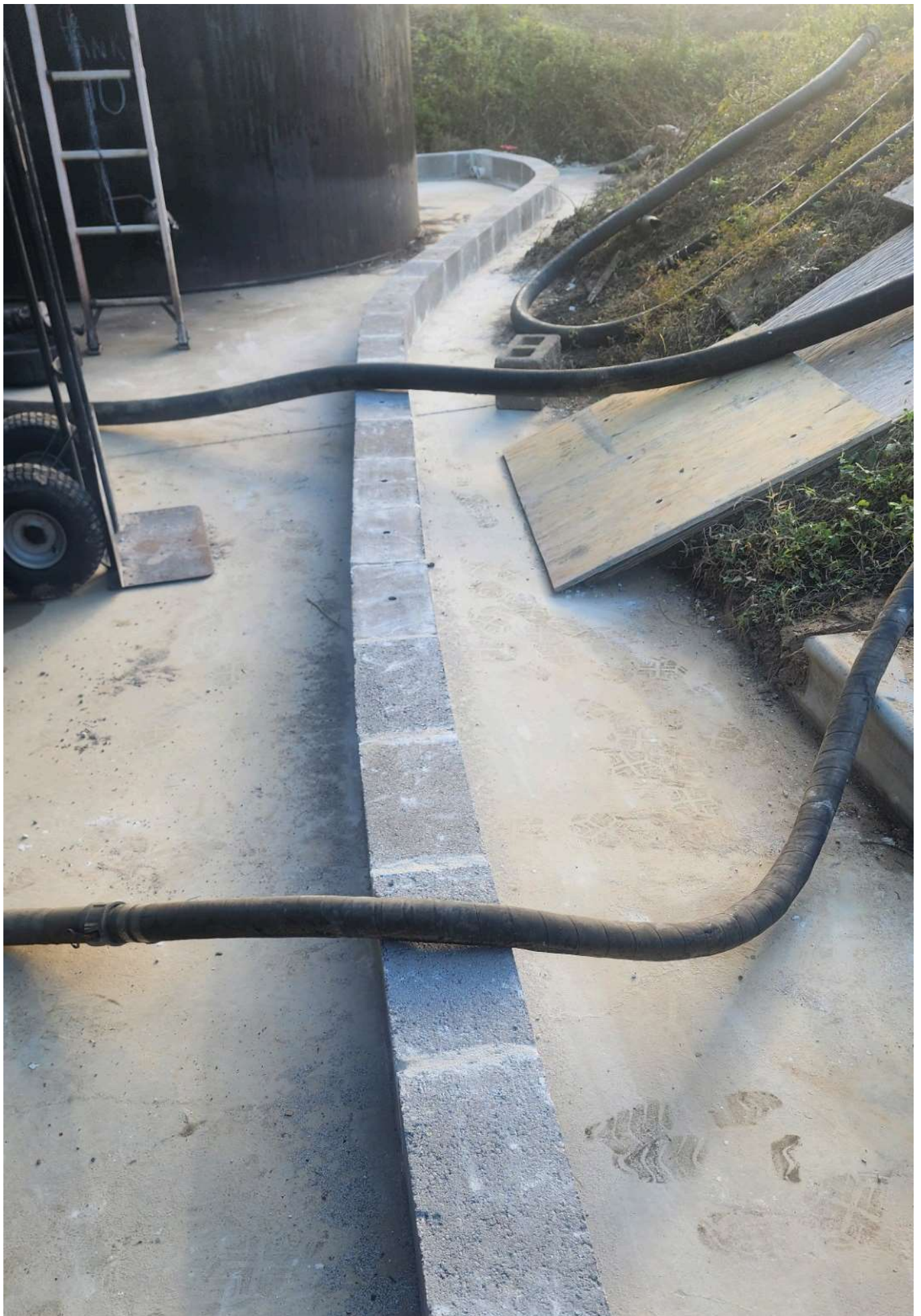
---

**From** actionoilsvc@yahoo.com <actionoilsvc@yahoo.com>

**Date** Mon 11/25/2024 9:43 AM

**To** Vince Damiano <Vince.Damiano@erg.com>

**CAUTION:** Don't open links or attachments unless you recognize the sender and know they are safe.



















Vince, please see attached photos of the newly installed secondary containment here at Action Oil. These are solid cinder blocks and are mortared beneath and in between to create an impenetrable barrier. Any questions please reach out.

[Yahoo Mail: Search, Organize, Conquer](#)

## APPENDIX 7. ACTION OIL EMAIL RESPONSE FROM 11/18

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## Action Oil requested info

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**From** Landon Tannehill <actionoilsvc@yahoo.com>

**Date** Mon 11/18/2024 6:15 PM

**To** Vince Damiano <Vince.Damiano@erg.com>

 8 attachments (22 MB)

EPA docs..pdf; S24110153.pdf; B022409017 Action Oil S9.pdf; Screenshot 2024-11-18 at 11.09.11 AM.pdf; 20241118\_115145.jpg; 20241118\_115159.jpg; 20241118\_115230.jpg; 20241118\_161400.jpg;

**CAUTION:** Don't open links or attachments unless you recognize the sender and know they are safe.

Vince, here is some of the documentation you requested.

1. All barrels/buckets and tanks will be labeled as shown on black barrels.
2. Ive ordered the labels last week for the used oil tanks and should be here shortly. (the ones pictured)
3. Spill next to hopper cleaned with oily dry and swept up. Placed pan under to catch any further drips.
4. Secondary container around older used oil tanks will be fixed this week. Going to use concrete cinder blocks and fill with cement surrounding them. Will send pics when done.
5. Please see attached sample results from water discharge.
6. Please see attached Bluetide load tickets and test results.
7. Please see cover page and table of contents from current SPCC plan.
8. Please see attached drawing of secondary containment in process area.

I will send updated pics of secondary containment and tanks once my new labels arrive and blocks are delivered.

***Landon Tannehill***  
***Operations Manager***

**Action Oil Services, Inc.**  
**650 Canary Street**  
**Vidor, TX 77662**

**409.832.2663 Office**  
**409.781.3743 Cell**

<http://www.actionoilservices.com>