



# **Task Force on Climate-Related Financial Disclosures (TCFD) Report**

**Published December 2025**

The following report was generated by USA DeBusk LLC (the Company and USAD) in accordance with the Task Force on Climate-related Financial Disclosures (“TCFD”) reporting guidance.

This report details USA DeBusk LLC’s Governance, Strategy, Risk Management, and Metrics and Targets as they relate to our climate-related risk and opportunity assessment and monitoring processes. This first-year report is a qualitative, good-faith description focusing on foundational elements and plans for future enhancement.

Andrew DeBusk  
Chief Executive Officer

Clark Brandt  
Chief Operating Officer

## **Governance**

### **Who oversees climate-related risks?**

The Board of Directors (BOD) has ultimate responsibility for reviewing all financial risks of the Company, including climate-related financial risks.

Day-to-day accountability of climate-related risks rests with the Chief Financial Officer (CFO), Chief Operating Officer (COO), General Counsel, and the Senior Vice President (EVP) of Health, Safety, and Environmental (HSE).

More specifically, the CFO directly manages insurance, vendor risk, and similar mitigation tools and practices. The COO / SVP HSE oversees operational risk mitigation and the safe execution of work for our customers. General Counsel provides legal and strategic advice to senior leadership and the BOD about legal risks associated with changing regulations for the Company, customers, and vendors.

Climate-related strategies and tactics are reviewed on an ad hoc basis at quarterly BOD meetings.

## Strategy

**What are the actual and potential impacts of climate-related risks and opportunities on the Company's businesses, strategy, and financial planning?**

## RISKS

*Short Term Risks (1-3 years)*

**Risk: Weather-related Exposure.** USA DeBusk employees routinely work outside in extreme weather conditions, sometimes in confined spaces, and always with Personal Protective Equipment (PPE) appropriate for the task, which may amplify the effects of temperature and exertion.

All operations involving high air temperatures, radiant heat sources, high humidity, direct physical contact with hot objects, or strenuous physical activities have a high potential for inducing heat stress. The Company has incorporated mitigation programs for quite some time, and we continually work to assess these conditions in an effort to prevent climate-related risks. We employ various engineering and administrative controls across all our work sites; however, we do not limit our approach to the weather conditions alone. Moreover, the Company takes into consideration several additional factors, regardless of the environmental conditions. These other contributory assessment and preventative items work to eliminate weather-related environmental exposure such as age, weight, degree of physical fitness, degree of acclimatization, metabolism, use of medications, and a variety of other medical conditions that can affect a person's sensitivity to heat.

**Mitigant: Robust Safety Program.** The health and safety of USA DeBusk employees is a core business value; where this value applies everywhere, to everyone, in every activity and decision, always. All incidents and injuries are viewed as preventable, and we are committed to providing all necessary resources to achieve an incident-free workplace.

We recognize that it is a leadership responsibility to implement actions necessary to achieve a healthy and injury-free workplace. We are committed to continual improvement of our company's health and safety management system and recognize the importance of employee participation.

Throughout the enterprise, we conduct operations well beyond simple compliance with applicable safety laws and regulations. More specifically, we utilize means and methods that not only meet safety regulations but go well

beyond them, and our programs rest squarely in the forefront of leading the industry. We are on a journey to also not accept today's performance, and we work to continually enhance our safety programs, thereby setting the standard by which our competitors are judged.

#### *Medium Term Risks (3-7 years)*

**Risk: Increased Reporting/Compliance Costs.** As climate-related regulatory reporting and compliance requirements increase, new direct and indirect costs are generated throughout the organization. These costs will impact profitability, operational complexity, and risks of penalties for noncompliance.

**Mitigant: Training & Systems Enhancement.** The Company is actively cross-training employees in compliance and cost management, implementing a more capable Enterprise Resource Planning (ERP) accounting system, and introducing streamlined reporting and information gathering. These efforts will not only enhance compliance but minimize associated costs.

#### *Long Term Risks (7+ Years)*

**Risk: The Energy Transition.** The global societal shift from predominantly fossil-fuel-based energy systems to low- or zero-emission systems will impact our business model. With the addition of renewable fuels, revenue streams will be impacted when petroleum refineries and petrochemical plants terminate operations and the customized services we provide for them are no longer needed.

**Mitigant: Transition Duration/New Market Adaptation.** Petroleum-based infrastructure is in various stages of maturity globally. As this infrastructure declines in the US and other early-adapting regions, significant opportunities will remain for our work internationally. Even in mature markets like the US, the infrastructure in place will take many years to change substantially, making this a very long-term risk.

Much of our equipment and labor force could be cross utilized in other industries, where the Company has already achieved inroads, such as cement production, pulp and paper, automotive manufacturing, steel, waste, and municipal infrastructure.

## OPPORTUNITIES

**Factor: Increased Regulation.** Compliance burdens are increasing for our customer base, driven by increasing concerns for climate change impacts, safety, environmental hazards, and supply chain transparency. Customers will be required to continuously audit and minimize carbon emissions, manage waste streams, and meet internal and external goals for Environmental, Social, and Governance (ESG) factors. The company's services and systems help clients achieve these objectives. Further expansion and improvement will continue to align with these objectives and lead to revenue growth.

**Factor: Biofuel Growth.** We anticipate accelerating turnover of petroleum refineries to renewable biofuel facilities. These transitions require significant changes to legacy equipment and coordination with complex regulatory processes. These projects create significant increased revenue opportunities for the Company's decontamination and cleaning services. Additionally, the Company has established a successful track record in these projects.

**Factor: Service Line Extension.** Regulatory requirements for industrial wastes and emissions continue to evolve. New requirements have historically created new applications for existing service lines or spurred the development of new services lines, both of which we anticipate to continue moving forward.

## Risk Management

### How do we currently identify and track risks?

Climate-related risks are tracked on an ad hoc, but consistent basis across the organization. All risks, including those specifically related to the climate, are evaluated at least quarterly with our Board of Directors. These include, but are not limited to, the following climate related risks:

1. EH&S – Safety risks of our employees operating in extreme weather environments, most notably extreme heat or cold temperatures.
2. Insurance – Climate-related risks are included as part of the consideration of our overall insurance risk exposure during our annual insurance renewal process.
3. Other – The Board of Directors of USA DeBusk LLC is intimately involved in the operations of the business. Along with the broader executive team of the Company, the Board evaluates any financial

risks that may be posed to the Company, including climate-related risks on a regular basis.

## **Metrics and Targets**

**What metrics and targets will we use to assess and manage relevant climate-related risks and opportunities?**

### **Metrics**

- **Energy Management**

- Diesel Consumed
- Gasoline Consumed
- Natural Gas Consumed
- Electricity Consumed
- Miles Driven
- Percentage of Renewable Energy Used in Operations

- **Water Usage**

- Freshwater Consumption
- Recycling Rates

- **Waste Stream Reduction**

- Solids (tons)
- Liquid (gallons or bbl)

- **Capital Deployment**

- Percent CapEx Invested in Low-carbon Equipment

### **Targets**

- Increase the percentage of customer-site nitrogen generation using Skid Mounted Vaporizer Units (SMVU) during projects.

*Note:* SMVU vaporize liquid nitrogen using steam, eliminating diesel fuel combustion and ensuring zero carbon emissions.

- Increase the percentage of pigging & decoking service operations performed using Tier 4F emissions-compliant pumper engines.

*Note:* USAD TriMax pumping units are equipped with Tier 4F engines, which meet strict U.S. EPA emission standards for non-road diesel engines,

incorporate advanced technology like DPF/SCR, and use Ultra-Low Sulfur Diesel (ULSD) fuel.

- Increase the percentage of tank cleaning service operations performed using non-entry (closed loop) methodologies.  
*Note: Non-entry tank cleaning uses automated systems to de-inventory and clean aboveground storage tanks in closed-loop processes that prevent venting of greenhouse gases to the atmosphere.*
- Increase the percentage of closed-loop waste processing methodologies used with tank cleaning service operations.  
*Note: Closed-loop treatment of solid and liquid materials removed from tanks, combined with emission controls, treats waste streams without venting of greenhouse gases to the atmosphere.*
- Increase the percentage of FCCU and inert catalyst service operations performed using robotic catalyst handling and removal.  
*Note: Robotic processes operate in closed systems, reducing the venting of VOCs during catalyst service operations.*

### Energy Management

- Increase the percentage of customer-site nitrogen generation using Skid Mounted Vaporizer Units (SMVU) during projects.  
*Note: SMVU vaporize liquid nitrogen using client-supplied steam, eliminating diesel fuel usage.*
- Increase the percentage of tank cleaning projects that include material processing for waste-to-energy providers.  
*Notes: Hydrocarbon-containing solids removed from tanks can be treated to meet the specifications of waste-to-energy providers, who use advanced processes to generate power from hydrocarbon waste that would otherwise be sent to landfills.*

### Water Usage

- Increase the percentage of pigging & decoking service operations using optional closed-loop filtration.  
*Note: Closed-loop filtration for pigging and decoking services removes and captures entrained particulates from effluent and provides a continuous supply of clean water for nonstop decoking.*

- Increase utilization of vapor blasting instead of hydro blasting for surface preparation during internal maintenance or external service operations.  
*Note: Vapor blasting uses comparatively low volumes of water.*

### Waste Stream Reduction

- Increase the percentage of tank cleaning projects that include material processing.  
*Note: Treatment of solid and liquid materials removed from tanks increases the recovery of clarified hydrocarbons for re-use, reduces the volume of wastewater sent to plant treatment systems, and reduces the volume of solids for overhaul and disposal.*
- Increase utilization of vapor blasting instead of dry abrasive blasting (sand blasting) for surface preparation during internal maintenance or external service operations.  
*Note: Sand blasting poses serious safety threats from exposure to hazardous airborne silica and generates high volumes of solid waste. Vapor blasting accomplishes the same outcome with a fraction of the solid waste and eliminates toxic silica dust.*
- Increase the percentage of closed-loop filtration used in conjunction with pigging & decoking service operations.  
*Note: Closed-loop filtration for pigging and decoking services substantially reduces the volume of wastewater generated during the decoking process.*
- Increase the percentage of catalyst recovery during catalyst handling services.  
*Note: Proper handling optimizes the recovery of process catalyst for reuse by the client, reducing landfill waste and conserving resources required for new catalyst manufacturing.*

### Capital Deployment

- Source 100% of new heavy duty tractor purchases from aerodynamic models with high fuel efficiency.
- Source 100% of new heavy-duty truck tire purchases from fuel-efficient tire designs.

## Legal Disclosure

This TCFD Report contains various forward-looking statements concerning potential future climate-related risks and opportunities based on the Company's current views and estimates. The Company cautions that assumptions and uncertainties inherent in such forward-looking statements in this TCFD Report make it difficult to assess whether actual results will be as projected. These forward-looking statements include measures of financial performance or potential future plans or events, strategies, objectives, beliefs, prospects, assumptions, expectations, and projected costs or savings or transactions of the Company that might or might not happen in the future, as contrasted with historical information. Forward looking statements are based on assumptions that we believe are reasonable, but by their very nature are subject to a wide range of risks. Potential risks and uncertainties include, but are not limited to, such factors as general economic conditions, regulatory developments, foreign exchange fluctuations, competitive product and pricing pressures and the impact of climate change itself. If our assumptions prove inaccurate or unknown risks and uncertainties materialize, actual results could vary materially from the Company's expectations and projections. Any number of factors, many of which are beyond our control, could cause our performance to differ significantly from what is described in the forward-looking statements. Nothing in this TCFD Report should be construed as a promise or representation of future performance, returns, or that profits will be realized.

This TCFD Report is provided for informational purposes only and should not be construed as investment advice or a direct or indirect offer or solicitation to buy or sell securities. This TCFD Report is not intended to be used as a general guide to investing or as a source of any specific investment recommendations. This TCFD Report should not be relied upon in whole or in part in making an investment decision or evaluating an investment in the Company. Views and opinions in this TCFD Report are current as of the date of this TCFD Report and may be subject to change.

This TCFD Report contains certain information that has been provided by third parties that the Company considers to be reliable, but the Company has not verified or validated such information and does not represent, warrant or guarantee the accuracy, quality, fitness for a particular purpose, completeness or non-infringement of such information. The Company shall have no liability for any errors or omissions in the information contained in this TCFD Report, whether or not such information has been obtained from third parties.