

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

6ENFORM-019-R8.2 (02/12/2020)

Inspection Date(s):	October 15, 2025	
Media:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Hazardous Waste Transporter	
Company Name:	Cactus Environmental Services	
Facility Name:	Cactus Environmental Services	
Facility Physical Location:	4960 Singleton Blvd	
(city, state, zip code)	Dallas, Texas 75212	
Mailing address:	4960 Singleton Blvd	
(city, state, zip code)	Dallas, Texas 75212	
County/Parish:	Dallas County	
Facility Contact:	James Voss	General Manager
	jvoss@cactusenviro.com	
FRS Number:	110005079743	
Identification/Permit Number:	Texas Solid Waste Registration #40041	
Media Number:	RCRA:TXD980796338	
NAICS:	484110 – General Freight Trucking Local	
SIC:		
Personnel participating in inspection:		
John Penland	EPA Region 6 (ECDSR)	Senior Inspector
Sandesh Thapa	EPA Region 6 (ECDSR)	Lead Inspector
James Voss	Cactus Environmental Services (Cactus)	General Manager
Jeremy Orr	Cactus	Managing Partner
EPA Lead Inspector Signature/Date	SANDESH THAPA Digitally signed by SANDESH THAPA Date: 2026.02.13 13:03:50 -06'00'	
	Sandesh Thapa – Lead Inspector	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2026.02.17 11:00:42 -06'00'	
	Debra Pandak – RCRA Section Supervisor	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of October 15, 2025, I, Sandesh Thapa, conducted an unannounced inspection of the Cactus Environmental Services (Cactus) facility located at 4960 Singleton Blvd, Dallas, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector John Penland. The inspection included a walkthrough of the facility's waste generation and management units, and a review of the facility records related to hazardous waste management.

We arrived at the Cactus facility at approximately 9:00 a.m. Central Time and began the inspection with an opening conference. During this conference, we presented our credentials to Mr. Jeremy Orr and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. During this conference, we also discussed the purpose and scope of the inspection and that the facility has the right to assert a claim for Confidential Business Information for records collected during this inspection.

This report serves as documentation of all onsite activities and observations during the inspection of the Cactus facility. Unless otherwise specified, the statements cited in this report reflect those claims made by facility personnel or documents reviewed during the inspection. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

Cactus provides waste management services, offering comprehensive clean-up and transportation services for both hazardous and non-hazardous waste. According to the company's website, Cactus offers specialized facility and tank cleaning services, functions as a transportation broker, and provides emergency response services. The cleaning activities are executed on-site at the clients' premises, with waste being either retained temporarily at the clients' location or directly transported to a designated disposal facility. In instances where the designated facility is closed after hours, the collected waste is transported to the Cactus facility and dispatched on the following business day. The facility's operational hours are 7:00 a.m. to 5:00 p.m., Monday through Friday.

Cactus is currently notified under RCRA as a transporter of hazardous waste and as a transporter and transfer facility for used oil.

A general map of the facility is included in Appendix 1. Facility communications are included in Appendix 2. Records related to the document review are included in Appendix 3. A copy of the EPA Daily Summary E-mail is included in Appendix 4.

Section II – OBSERVATIONS

October 15, 2025

Following the opening conference, we had a tabletop discussion about the facility's process with Mr. James Voss. This discussion was followed by a walkthrough of the facility's process and storage areas to

identify activities that could generate hazardous waste and evaluate its subsequent management including storage. Notably we observed the facility waste transportation process. The facility transports bulk flammable liquids, oily wastewater and Paint and Paint-Related Waste (PPRW).

Front Roll-off Storage Area:

During the inspection, I observed multiple roll-off boxes staged in the parking lot on the north side of the main office building. These roll-off boxes, designated for waste hauling, were empty at the time of observation.

Drum Storage Area:

The drum storage area is situated on the south side of the main office building, within the covered parking building. No waste drums were present in the drum storage area.

Rear Roll-off Storage Area:

On the south side of the office building, in front of the mechanic shop, I observed a roll-off box containing spent carbon. During the inspection, the facility was requested to submit shipment records related to spent carbon. As of the time of this inspection report, the shipment documents have not been submitted.

Wash Bay:

During the inspection, a wash bay was observed on the southeast side of the covered parking building that is designated for washing facility vehicles. At the time of the inspection, no vehicles were present at the wash bay.

Mechanic Shop:

The mechanic shop is located on the southwest side of the office building. Inside the mechanical bay, I observed a used oil tank clearly labeled with a used oil sign.

Records Review:

During the inspection, I requested the employees' training documents, which were promptly submitted on October 31, 2025. These documents included hazardous material training certificates for three employees.

I reviewed manifest records and requested final copies of manifest numbers 027592673JJK, 027592807JJK, and 027592850JJK. Cactus submitted these documents on October 31, 2025.

The post-inspection review of the manifests identified manifest numbers 027592951JJK, 027592803JJK, 028314263JJK and 027592951JJK, where Cactus is listed as the generator (Appendix 3). The waste codes documented in these manifests are F002, F003, F005, D007, and D008. Cactus is not registered as a generator of hazardous waste (40 CFR § 263.20).

Section III – AREAS OF CONCERN

The following is a list of potential areas of concern discussed with the facility representatives. See Appendix 4 for additional details of EPA's observations.

- The facility failed to meet the manifest requirement. Cactus is listed as the generator in manifest numbers 027592951JJJ, 027592803JJJ, 028314263JJJ and 027592951JJJ. However, it is not registered as a generator of hazardous waste (40 CFR § 263.20). These wastes were generated at Qarbon Aerospace Foundation and subsequently picked up by Cactus.

Closing Conference:

On October 15, 2025, EPA Region 6 inspectors, Sandesh Thapa and John Penland, conducted a closing conference for the inspection at 02:15 p.m. During the closing conference, we reviewed the Areas of Concern noted during the inspection, fielded questions from facility personnel, and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

Any information received from Cactus after the inspection was received via the secure online drive. Information regarding facility communication is detailed in Appendix 2, while manifest numbers 027592673JJJ, 027592807JJJ, and 027592850JJJ are listed in Appendix 3. EPA received these documents on October 31, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – Facility Diagram

Appendix 2 – Facility Communication

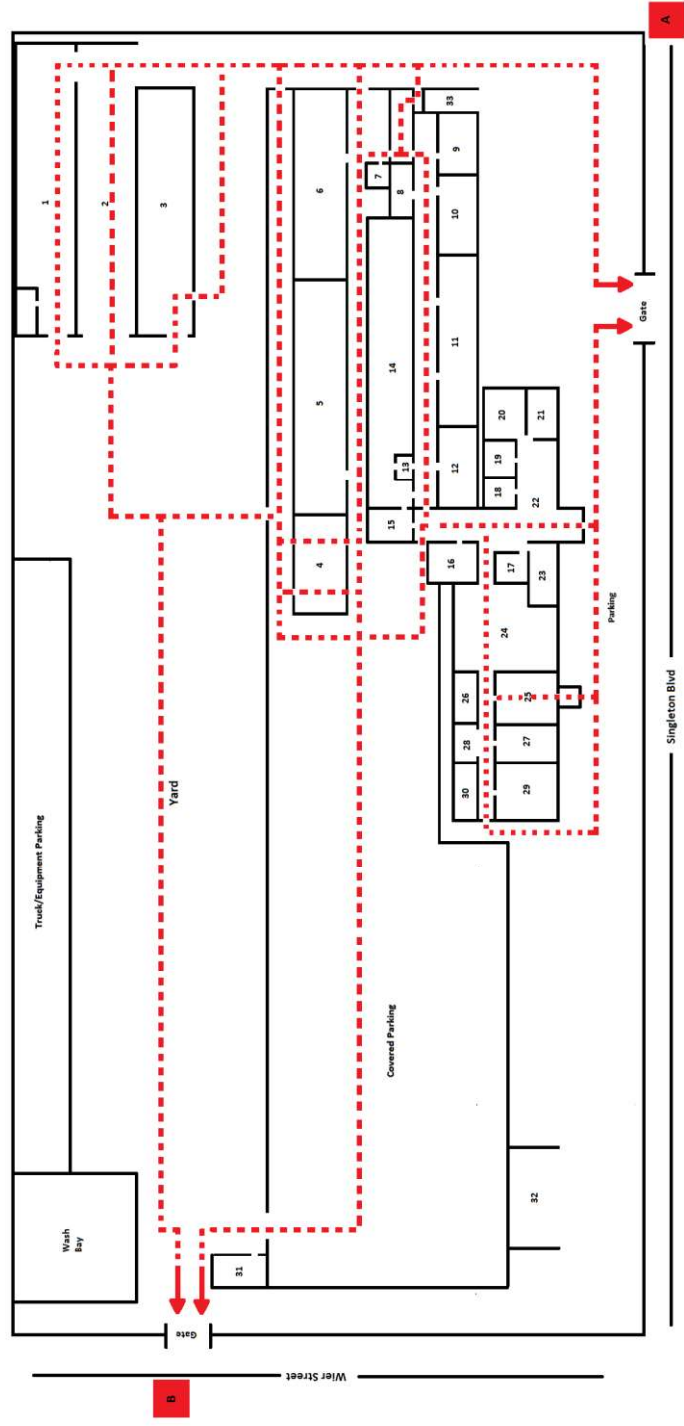
Appendix 3 – Documents Reviewed

Appendix 4 – EPA Daily Summary E-mails

Appendix 1

Facility Diagram

Facility Map: Evacuation Routes and Assembly Points



A

Primary Assembly Point

B

Secondary Assembly Point

Appendix 2

Facility Communication

From: [James Voss](#)
To: [Thapa, Sandesh](#)
Cc: jvoss@cactusenviro.com; [Pandak, Debra](#); [Penland, John](#)
Subject: Re: Daily Summary for 2025 RCRA inspection of Cactus Environmental Services - Dallas, TX - October 15, 2025
Date: Friday, October 31, 2025 10:42:17 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Morning Sandesh,

I have begun uploading some of the documents requested, however there appears to be an issue with one of the manifest records you are requesting;026777411JJJK. This doesn't appear to be a valid manifest number. All our manifests have a 9 digit sequence number, then JJK. The manifest you noted is 10 digits, so I am assuming 1 of the digits is extra, just not sure which one. Would you happen to have the correct manifest number in your field notes?

On Wed, Oct 15, 2025 at 5:56 PM Thapa, Sandesh <Thapa.Sandesh@epa.gov> wrote:

Hi All,

Here is a summary from today's inspection. If there are any error or omissions, please let me know.

Introduction

During the week of October 15, 2025, I, Sandesh Thapa, conducted an inspection of the Cactus Environmental Services(Cactus) facility located at 4960 Singleton Blvd, Dallas, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector John Penland. The inspection included walkthroughs of the facility's hazardous waste generation and management units; a review of the facility records related to hazardous waste management.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Sandesh Thapa	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-2265	thapa.sandesh@epa.gov
John Penland	Senior Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
James Voss	General Manager	Cactus Environmental Services	832-470-3996	jvoss@cactusenviro.com

Appendix 3

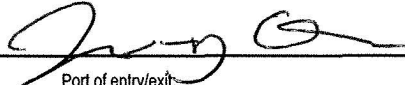
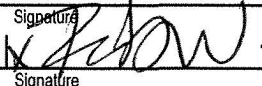
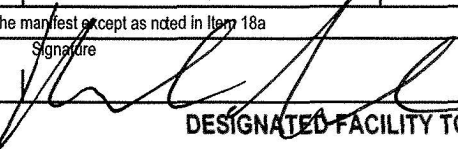
Documents Reviewed

Please print or type.

PO # QARBON 910

Box # 201

Form Approved. OMB No. 2050-0039

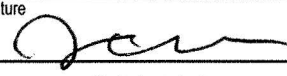
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXD980796338		2. Page 1 of 1	3. Emergency Response Phone 214-252-5000		4. Manifest Tracking Number 027592951 JJK				
5. Generator's Name and Mailing Address CACTUS ENVIRONMENTAL 4960 SINGLETON BLVD. DALLAS, TX 75212					Generator's Site Address (if different than mailing address)						
Generator's Phone: 214-252-5000											
6. Transporter 1 Company Name CACTUS ENVIRONMENTAL SERVICES					U.S. EPA ID Number TXD980796338						
7. Transporter 2 Company Name					U.S. EPA ID Number						
8. Designated Facility Name and Site Address ARCWOOD ENVIRONMENTAL 1007 VULCAN ROAD BENTON, AR 72015					U.S. EPA ID Number ARD9801057870						
Facility's Phone:											
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
					No.	Type					
	1. RQ, UN 3077 WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PG II, (CHROME XYLENE)(D007)ERG I/II				01	CM	42	Y	F002	F003	F005
									D007	D008	
14. Special Handling Instructions and Additional Information WS # 168712-2 ERI: CACTUS ENVIROMENTAL (18157426)											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offoror's Printed/Typed Name JEREMY ORR					Signature 			Month Day Year 9/10/25			
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:											
17. Transporter Acknowledgment of Receipt of Materials											
Transporter 1 Printed/Typed Name Robert Wilkinson					Signature 			Month Day Year 9/26/25			
Transporter 2 Printed/Typed Name					Signature			Month Day Year			
18. Discrepancy											
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection											
Manifest Reference Number:											
18b. Alternate Facility (or Generator) U.S. EPA ID Number											
Facility's Phone:											
18c. Signature of Alternate Facility (or Generator) Month Day Year											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. HCL		2.		3.		4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name Kumeshia Maxwell					Signature 			Month Day Year 9/26/25			

Please print or type.

PD# QARBON81

BOX 202

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXD980796338	2. Page 1 of 1	3. Emergency Response Phone 214-252-5000	4. Manifest Tracking Number 027592803 JJK		
5. Generator's Name and Mailing Address CACTUS ENVIRONMENTAL 4960 SINGLETON BLVD DALLAS, TX 75212		Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name CACTUS ENVIRONMENTAL SERVICES		U.S. EPA ID Number TXD980796338					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address ARCWOOD ENVIRONMENTAL 1002 VULCAN RD. BENTON, AR 72015		U.S. EPA ID Number ARD981057870					
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
1.	RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, NQS 9, PCT III (CHROME XYLENE) (D007) ERG 171	01	CM	42	Y	F002	F003
2.						D007	D008
3.							
4.							
14. Special Handling Instructions and Additional Information WS# 168712-2 ERI: CACTUS ENVIRONMENTAL (18157426)							
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Generator's/Offeror's Printed/Typed Name JEREMY ORR				Signature 		Month Day Year 8 1 25	
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name SEE ATTACHED				Signature SEE ATTACHED		Month Day Year 8 5 25	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)						U.S. EPA ID Number	
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. 14061		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Sally The				Signature 		Month Day Year 8 5 25	

Please print or type.

PO # QARBON 910

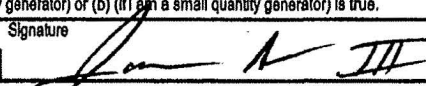
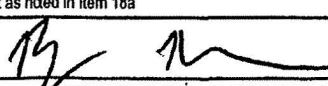
Box # 201

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXD980796338		2. Page 1 of 1		3. Emergency Response Phone 214-252-5000		4. Manifest Tracking Number 027592951 JJK				
5. Generator's Name and Mailing Address CACTUS ENVIRONMENTAL 4960 SINGLETON BLVD. DALLAS, TX 75212						Generator's Site Address (if different than mailing address)						
Generator's Phone: 214-252-5000												
6. Transporter 1 Company Name CACTUS ENVIRONMENTAL SERVICES						U.S. EPA ID Number TXD980796338						
7. Transporter 2 Company Name						U.S. EPA ID Number						
8. Designated Facility Name and Site Address ARCWOOD ENVIRONMENTAL 1007 VULCAN ROAD BENTON, AR 72015						U.S. EPA ID Number ARD9801057870						
Facility's Phone:												
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. RQ, UN 3077 WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PG II, (CHROME XYLENE)(D007)ERG I/II					10. Containers		11. Total Quantity 42	12. Unit Wt./Vol. Y	13. Waste Codes F002 F003 F005 D007 D008		
						No.	Type					
						01	CM					
14. Special Handling Instructions and Additional Information WS # 168712-2 ERI: CACTUS ENVIROMENTAL (18157426)												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offoror's Printed/Typed Name JEREMY ORR						Signature 		Month Day Year 9/10/25				
16. International Shipments ☐ Import to U.S. ☐ Export from U.S.						Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials												
Transporter 1 Printed/Typed Name Robert Wilkinson						Signature 		Month Day Year 9/26/25				
Transporter 2 Printed/Typed Name						Signature		Month Day Year				
18. Discrepancy												
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection												
Manifest Reference Number:												
18b. Alternate Facility (or Generator) U.S. EPA ID Number												
Facility's Phone:												
18c. Signature of Alternate Facility (or Generator) Month Day Year												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. LCL 2. 3. 4.												
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name Kumeshia Maxwell						Signature 		Month Day Year 9/26/25				

Please print or type.

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXD980796338		2. Page 1 of 1	3. Emergency Response Phone 214-252-5000		4. Manifest Tracking Number 028314263 JJK				
5. Generator's Name and Mailing Address Cactus Environmental 4960 Singleton Blvd Dallas TX 75212					Generator's Site Address (if different than mailing address)						
Generator's Phone: 214-252-5000											
6. Transporter 1 Company Name Cactus Environmental Services					U.S. EPA ID Number TXD980796338						
7. Transporter 2 Company Name					U.S. EPA ID Number						
8. Designated Facility Name and Site Address ARCWOOD Environmental 501-778-9089 1002 Vulcan Road Benton, AR 72015					U.S. EPA ID Number ARD981057870 ARD9801057870						
Facility's Phone:											
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	1. RR UN3077 Waste Environmental Hazardous substances, solid, N.O.S. 9, PGII, Chrome XYLENE (D007) ERG171			01	CM	42	Y	F002 D007	F003 D008	F005
		2.									
		3.									
		4.									
14. Special Handling Instructions and Additional Information WS #168712-2 ERI: CACTUS ENVIRONMENTAL (18157426)											
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Generator's/Offeror's Printed/Typed Name James Allen III					Signature 		Month Day Year 12/22/25				
TRANSPORTER INTL	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name Craig White					Signature 		Month Day Year 12/22/25			
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name					Signature		Month Day Year			
	18. Discrepancy										
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection										
	Manifest Reference Number:										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number										
Facility's Phone:											
18c. Signature of Alternate Facility (or Generator)								Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. H061			2.			3.			4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name Ray Moore					Signature 		Month Day Year 12/23/25				

ITASCA HANDFILL 254-687-2511
2559 FM 66-ITASCA, TX 76055

CUSTOMER003002

CACTUS ENVIRONMENTAL CONSULTING LLC
4960 SINGLETON BLVD
DALLAS, TX 75212
Contract:51102512172
Generator:NANOCURE PROTECTIVE COATINGS - NOBILIS G

SITE 01	TICKET # 595049	CELL
WEIGHMASTER Samantha H.		
DATE/TIME IN 8/14/25 10:20 am	DATE/TIME OUT 8/14/25 10:45 am	
VEHICLE BOX VAN	CONTAINER 20	
REFERENCE NOBILIS GROUP #1		
BILL OF LADING 027592850JJK		

SCALE IN GROSS WEIGHT	33,260	NET TONS	0.76
SCALE OUT TARE WEIGHT	31,740	NET WEIGHT	1,520

INBOUND
INVOICE

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
3.00	DR	Tracking QTY				
3.00	dr	SW-SPECIAL WASTE-LIQUID				
Origin:C1 LIQUID,IN-STATE 100%						

I HEREBY CERTIFY THAT THIS LOAD DOES NOT CONTAIN UNAUTHORIZED
OR HAZARDOUS WASTE.

The undersigned individual signing this document on behalf of Customer acknowledges that he or she has read and understands the terms and conditions
on the reverse side and that he or she has the authority to sign this document on behalf of the customer.

RS-F042UPR2 (12-20)

SIGNATURE _____

NET AMOUNT

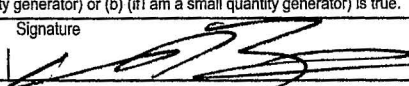
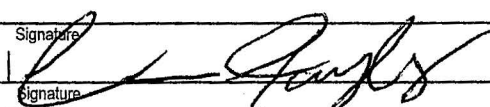
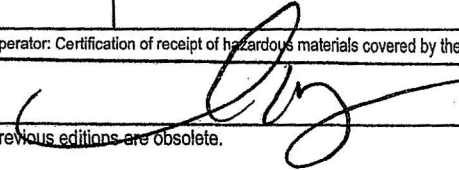
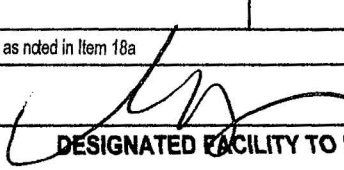
TENDERED

CHANGE

CHECK#

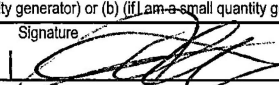
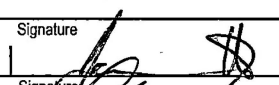
Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TX2500	2. Page 1 of	3. Emergency Response Phone 214-250-5005	4. Manifest Tracking Number 027592850 JJK		
5. Generator's Name and Mailing Address Acme Group 2510 Highway 900 Irving, TX 75038		Generator's Site Address (if different than mailing address)					
Generator's Phone: 214-490-0627							
6. Transporter 1 Company Name Cerule Environmental Service		U.S. EPA ID Number TX045070532					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address DAKOR LEADERS 2580 FM 58 Irving, TX 75035		U.S. EPA ID Number H2341					
Facility's Phone: 214-487-2511							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		1. NON RCRA DOTREGULATED MATERIAL (NONCORE CERMAIC WIFE ON EXTERIOR PROTECTANT) #51102512172	3 DMS				
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name Michael Burnett		Signature 		Month Day Year 8 14 05			
INT'L	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	Transporter signature (for exports only): _____						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Travis Stanley		Signature 		Month Day Year 8 14 05		
Transporter 2 Printed/Typed Name		Signature		Month Day Year			
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator)		U.S. EPA ID Number				
	Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) 179.		Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name 		Signature 		Month Day Year 8 14 05			

Please print or type.

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TW930	2. Page 1 of 1	3. Emergency Response Phone 214-252-5001	4. Manifest Tracking Number 027592673 JJK													
5. Generator's Name and Mailing Address W. McManis 601 Century Parkway Suite 200 Allen, TX 75013		Generator's Site Address (if different than mailing address)																
Generator's Phone:																		
6. Transporter 1 Company Name Regius Environmental Service		U.S. EPA ID Number TW93070431																
7. Transporter 2 Company Name US Ecology Transportation Solutions Inc		U.S. EPA ID Number MM 593743 838																
8. Designated Facility Name and Site Address OF Energy Corp 3277 County Road 09 Rockwall, TX 75080		U.S. EPA ID Number TW93070431																
Facility's Phone:																		
GENERATOR	9a. HM #	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.												
	1.	UN2624: WASTE FLAMMABLE LIQUIDS, CORROSIVE, NDSCHLOROFORM, SODIUM HYDROXIDE; 310 PG I	01	DF	300	P												
	2.	UN1780: WASTE CORROSIVE LIQUIDS, NHOACETIC ACID, HYDROCHLORIC ACID; 5 PG I	01	DF	200	P												
	3.																	
	4.																	
13. Waste Codes <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>D001</td> <td>D002</td> <td>D011</td> </tr> <tr> <td>D022</td> <td>VS06</td> <td>1194</td> </tr> <tr> <td>D002</td> <td></td> <td></td> </tr> <tr> <td></td> <td>VS06</td> <td>1194</td> </tr> </table>							D001	D002	D011	D022	VS06	1194	D002				VS06	1194
D001	D002	D011																
D022	VS06	1194																
D002																		
	VS06	1194																
14. Special Handling Instructions and Additional Information LINE 1 APPROVAL# 000132173-0 LINE 2 APPROVAL# 000132135-0 2x55 Line 1: Additional waste codes F003, F005																		
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.																		
Generator's/Offor's Printed/Typed Name Jeff Klatley		Signature 			Month Day Year 6 12 25													
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____																		
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials																	
	Transporter 1 Printed/Typed Name James Allen		Signature 		Month Day Year 6 12 25													
	Transporter 2 Printed/Typed Name Luis Hernandez		Signature 		Month Day Year 6 19 25													
DESIGNATED FACILITY	18. Discrepancy																	
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Section 5 - Generator's Name (214) 221-0404 re pr Jeremy Orr 7-10-25 CUL																	
	Manifest Reference Number:																	
	18b. Alternate Facility (or Generator) U.S. EPA ID Number																	
	Facility's Phone:																	
	18c. Signature of Alternate Facility (or Generator) Month Day Year																	
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)																	
	1. H111	2. H112	3.	4.														
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a																	
	Printed/Typed Name Salome J. Allen		Signature 		Month Day Year 7 10 25													

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Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TX0500050780	2. Page 1 of 1	3. Emergency Response Phone 877-877-2829	4. Manifest Tracking Number 027592807 JJK		
5. Generator's Name and Mailing Address HOME DEPOT 8557 GO CLEAN EARTH CORP 8250 TRIANGLE PARKWAY, STE. 200 PEACHTREE CORNERS, GA 30082 Generator's Phone: 877-877-2829		Generator's Site Address (if different than mailing address) HOME DEPOT 8557 8555 HOME DEPOT DR IRVING, TX 76063					
6. Transporter 1 Company Name Cactus Environmental Services		U.S. EPA ID Number TX0500780338					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address Chemical Remediation Services, LLC 405 Powell Street Aveion, TX 76023 Facility's Phone: 972-627-3224		U.S. EPA ID Number TX0046844700					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON HAZARDOUS WASTE LIQUID (SUMP WATER & OIL)	1	DM	30	G	301NR	
	2.						
	3.						
4.							
14. Special Handling Instructions and Additional Information Profile # HomeSump-18							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name The Home Depot Yancy Ventura		Signature Yancy Ventura		Month 08	Day 05	Year 2025	
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Nick Osion		Signature Nick Osion		Month 08	Day 05	Year 2025	
Transporter 2 Printed/Typed Name		Signature		Month	Day	Year	
18. Discrepancy							
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. 4141 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Angie Montano		Signature Angie Montano		Month 8	Day 12	Year 25	

Appendix 4

EPA Daily Summary E-mails

From: [Thapa, Sandesh](#)
To: ["jorr@cactusenviro.com"](#); ["jvoss@cactusenviro.com"](#)
Cc: [Pandak, Debra](#); [Penland, John](#)
Subject: Daily Summary for 2025 RCRA inspection of Cactus Environmental Services - Dallas, TX - October 15, 2025
Date: Wednesday, October 15, 2025 5:56:00 PM
Attachments: [General CBI Notice 2.0 12-1-22.pdf](#)
[Small Business Resources Information Sheet.pdf](#)

Hi All,

Here is a summary from today's inspection. If there are any error or omissions, please let me know.

Introduction

During the week of October 15, 2025, I, Sandesh Thapa, conducted an inspection of the Cactus Environmental Services(Cactus) facility located at 4960 Singleton Blvd, Dallas, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector John Penland. The inspection included walkthroughs of the facility's hazardous waste generation and management units; a review of the facility records related to hazardous waste management.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Sandesh Thapa	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-2265	thapa.sandesh@epa.gov
John Penland	Senior Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
James Voss	General Manager	Cactus Environmental Services	832-470-3996	jvoss@cactusenviro.com
Jeremy Orr	Managing Partner	Cactus Environmental Services	214-252-5002	jorr@cactusenviro.com

Daily Summary

- Initial Entry to the facility - approximately 09:40am
- Opening meeting start – 09:54am
 - I presented my credentials to Jeremy Orr and informed him that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act

- We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
- We discussed the purpose of EPA's inspection – Assessment of Cactus compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; air pollution control requirements for hazardous waste units; and the requirements for the management of excluded or exempt materials.
- Discussed the right of Cactus to assert a Confidential Business Information claim for records requested by EPA (see attachment)
- Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants.
 - One Drive Link: RCRA [Cactus](#)
- Discussed the inspection process – the inspection will be conducted on October 15, 2025. The participants will meet at the facility at 9:00am to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summary will be provided by the inspectors at the end of the day to ensure a clear communication of questions and findings. The closing conference will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.
- General Facility Process – Cactus provides waste management services, offering comprehensive clean-up and transportation services for both hazardous and non-hazardous waste. Additionally, the company provides specialized tank cleaning and emergency response services.
- Initial request for compliance records, including:
 - Recent subsequent Notification of regulated waste activity submitted to TCEQ.
 - RCRA related training records of employees, including James Allen and Jeremy Orr.
 - Process diagrams, facility map, emergency procedures and contingency plan.
 - Active permits.
 - Records related to spent carbon stored in the roll off box.
 - Final copies of manifests 027592673JJK, 027592807JJK, 0267774111JJK, 027592818JJK, 027592850JJK and 027335068JJK.

Facility Walkthrough

- Beginning at approximately 12:33 AM

- Front Roll off box storage area
- Mechanic Shop
- Drum storage area
- Roll off storage area.
 - Roll-off box containing spent carbon was observed at the storage area. EPA has requested information concerning the origin and shipment records of this material.
- Notification pertaining to Paint and Paint related waste (PPRW)
 - PPRW is collected from Qarbon Aerospace using a compactor and subsequently shipped to the Arcwood Environmental facility in Benton, Arkansas. This waste is designated as hazardous waste in accordance with the requirements set forth by the Arkansas Department of Environmental Quality (ADEQ). Data records from Enforcement and Compliance History Online (ECHO) indicate that the facility has generated 156,090 kg in 2022, 90,937 kg in 2023, 100,439 kg in 2024, and 65,689 kg in 2025. Cactus is not registered as a generator of hazardous waste.
 - Manifest 027592951JJK
 - Hazardous waste (PPRW) was generated by Cactus on September 10, 2025. Clarification is required regarding the shipment timeline, as the waste was received by the destination facility on September 26, 2025.
- Areas for Additional Review:
 - Review of Personal Training records.
 - List of personnel for review.
 - James Allen
 - Jeremy Orr
- Ongoing request of compliance records, including
 - Recent subsequent Notification of regulated waste activity submitted to TCEQ.
 - Process diagram, facility map, emergency procedures and contingency plan.
 - Active permits.
 - Records related to spent carbon stored in a roll off box.
 - Final copies of manifest 027592673JJK, 027592807JJK, 0267774111JJK, 027592818JJK, 027592850JJK and 027335068JJK.
- Daily Wrap up meeting
- Departed Facility at approximately 02:15pm

Regards,

Sandesh Thapa
Enforcement and Compliance Assurance Division
U.S. EPA Region 6
Office: 214-665-2265