

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

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

Inspection Date(s):	October 7-8, 2025	
Media:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	Hazardous Waste Generator	
Company Name:	Qarbon Aerospace Foundation	
Facility Name:	Qarbon Aerospace Foundation	
Facility Physical Location:	300 Austin Blvd	
(city, state, zip code)	Red Oak, Texas 75154	
Mailing address:	300 Austin Blvd	
(city, state, zip code)	Red Oak, Texas 75154	
County/Parish:	Ellis County	
Facility Contact:	Anais Askari	Environmental Health and Safety (EHS) Manager
	Anais.Askari@Qarbonaerospace.com	
FRS Number:	110054868265	
Identification/Permit Number:	NA	
Media Number:	RCRA:TXR000081252	
NAICS:	336411 – Aircraft Manufacturing	
SIC:		
Personnel participating in inspection:		
John Penland	EPA Region 6 (ECDSR)	Senior Inspector
Sandesh Thapa	EPA Region 6 (ECDSR)	Lead Inspector
Anais Askari	Qarbon Aerospace Foundation (Qarbon)	EHS Manager
Edward Pounds	Qarbon	EHS Manager
EPA Lead Inspector Signature/Date	SANDESH THAPA Digitally signed by SANDESH THAPA Date: 2025.12.22 14:25:08 -06'00'	
	Sandesh Thapa – Lead Inspector	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2025.12.22 14:31:59 -06'00'	
	Debra Pandak – RCRA Section Supervisor	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of October 7, 2025, I, Sandesh Thapa, conducted an unannounced inspection of the Qarbon Aerospace Foundation (Qarbon) facility located at 300 Austin Blvd, Red Oak, 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 concluded the inspection of the Qarbon facility on October 8, 2025, with a closing conference where we presented our observations. A summary of the areas of concern identified during the inspection is provided in Section III.

This report serves as documentation of all onsite activities and observations during the inspection of the Qarbon facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1.

FACILITY DESCRIPTION

Qarbon is a manufacturer of composite products for commercial and military aircraft. It uses automated lay-up systems to build complex composite shapes. The operations include manufacturing of composite fuselages, floor panels, doors, sponsons and wing assembly. The facility operates 24 hours a day, seven days a week, and employs five hundred personnel including contractors, customers and Qarbon's direct employees. Qarbon manages industrial, hazardous and non-hazardous wastes.

Qarbon is currently notified as a Small Quantity Generator and was issued the EPA ID number TXR000081252. It is registered as a Large Quantity Handler of Universal Waste. The facility last submitted a biennial report in 2017.

A general map of the plant is included in Appendix 2. Facility communications are included in Appendix 3. A copy of daily summary is included in Appendix 4.

Section II – OBSERVATIONS

October 7, 2025

We arrived at the Qarbon facility at approximately 9:40am Central Time and began the inspection with an opening conference. During this conference, we presented our credentials to Ms. Anais Askari and informed her 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 and photos collected during this inspection.

Following the opening conference, we had a tabletop discussion of the facility's process. 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. Notably we observed the facility

manufacturing process. The process includes ply cutting, tape laying, composite and structure assembly, and painting and wing assembly. It uses isopropyl alcohol and methyl n-propyl ketone as solvents in their painting process.

Tank Farm:

On the east side of the main building, adjacent to the maintenance shop, I observed a Tank Farm with two above-ground storage tanks in secondary containment (Appendix 1, Photo 1). It contained an 8,500-gallon tank of non-hazardous oily wastewater and an inactive Alodine rinse water tank. The oily wastewater tank is listed as unit 002 with a non-hazardous regulated status in the Notice of Registration (NOR). However, the tank's capacity is recorded as 10,000 gallons instead of the observed 8,500 gallons during the inspection. I noticed a spill of oily wastewater in the secondary containment as a result of overfill. The oily wastewater is generated from washing equipment and an X-ray process. In the same area, I observed an unknown riser within the secondary containment area (Appendix 1, Photo 2).

Manifest Review:

During the inspection, I observed a Cactus Environmental truck picked up a non-hazardous oily wastewater shipment. I reviewed the manifest being used for the pickup and it contained the EPA ID TX6170022770, which corresponds to a former Vought Integrated Programs Division JSF facility located at 9314 W Jefferson Blvd, Dallas, TX. However, it was noted that the location is currently operated as a Home Depot facility. Consequently, the manifest was corrected to reflect the Qarbon EPA ID TXR000081252.

Central Accumulation Area (CAA):

On the northeast side of the main building, I observed a covered CAA with both hazardous waste and universal waste (Appendix 1, Photo 3). There were 4 boxes and two bundles of universal waste lamps that were not labeled or marked clearly as required in the standards for universal waste handlers (See Section III – Preliminary Findings for additional regulatory citations).

Painting Operation:

There are two Satellite Accumulation Areas allocated for the painting operations. During my inspection, I observed a paint compactor on the northwest side of the main building. The paint waste from the painting operations was consolidated and processed at the paint compactor. Additionally, I saw a rolloff box connected to the paint compactor that contained paint waste but was missing universal waste labeling (Appendix 1, Photo 4).

X-ray Operation:

I then walked back inside the facility building to inspect the X-ray operation. I noticed that the wastewater from the used developer solution was drained to the sump and collected in a 275-gallon tote (Appendix 1, Photo 5). Upon my request, Qarbon submitted a wastewater determination result with silver at a Total Recoverable concentration of 0.0671 mg/L (Appendix 3). However, the analytical report states that the sample was received at the laboratory with insufficient preservation at a pH of >2, which does not meet the requirement of <2 under EPA Method 200.8. EPA has requested for a new test.

October 8, 2025

John Penland and I entered the facility at 9:30am Central Time. We reviewed our notes from October 7, 2025, with the facility representatives. We conducted our preliminary document review for the majority of the day.

Records Review:

I reviewed the weekly inspection reports of the CAA. Reports indicated that the weekly inspections for third and fourth week of November 2024 and fourth week of December 2024 were missing. The facility subsequently submitted their weekly inspection reports on October 16, 2025 (Appendix 3), but did not include the missing December inspection.

Section III – PRELIMINARY FINDINGS

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 conduct a weekly inspection of CAA during the fourth week of December 2024 (40 CFR § 262.16(b)(2)(iv)).
- The facility failed to label or clearly mark four boxes and two bundles of universal waste lamps with one of the following phrases: "Universal Waste – Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)" (40 CFR § 273.34(e)).
- The facility failed to label or clearly mark the rolloff box connected to the paint compactor, which contained paint waste, with the words "Universal Waste – Paint and Paint-Related Wastes" (30 TAC 335.262(c)(2)(F)).
 - As a part of corrective action, Qarbon submitted a picture of the same rolloff box with a universal waste label identifying contents as Paint and Paint-Related Waste on October 9, 2025.

Section IV – FOLLOW UP

Actions taken by Qarbon to resolve any areas of concern were documented by Qarbon with photographs or other documentation and submitted to the EPA via the electronic secure online drive. Any information received from Qarbon after the inspection was also received via the secure online drive. These documents are accessible by the EPA Enforcement Officer, as applicable.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 5 photos taken 10/7/2025

Appendix 2 – Facility Diagram

Appendix 3 – Facility Communication

Appendix 4 – EPA Daily Summary E-mails

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Facility/Location:		Qarbon Aerospace Foundation						
City:	Red Oak	County:	Ellis County	State:	TX	Direction:	W	
Filename:	IMG_0102.jpeg	Photo Date:		10/07/2025		Time:	11:51:59	
Photographer:	Sandesh Thapa			Witness Name:		John Penland		



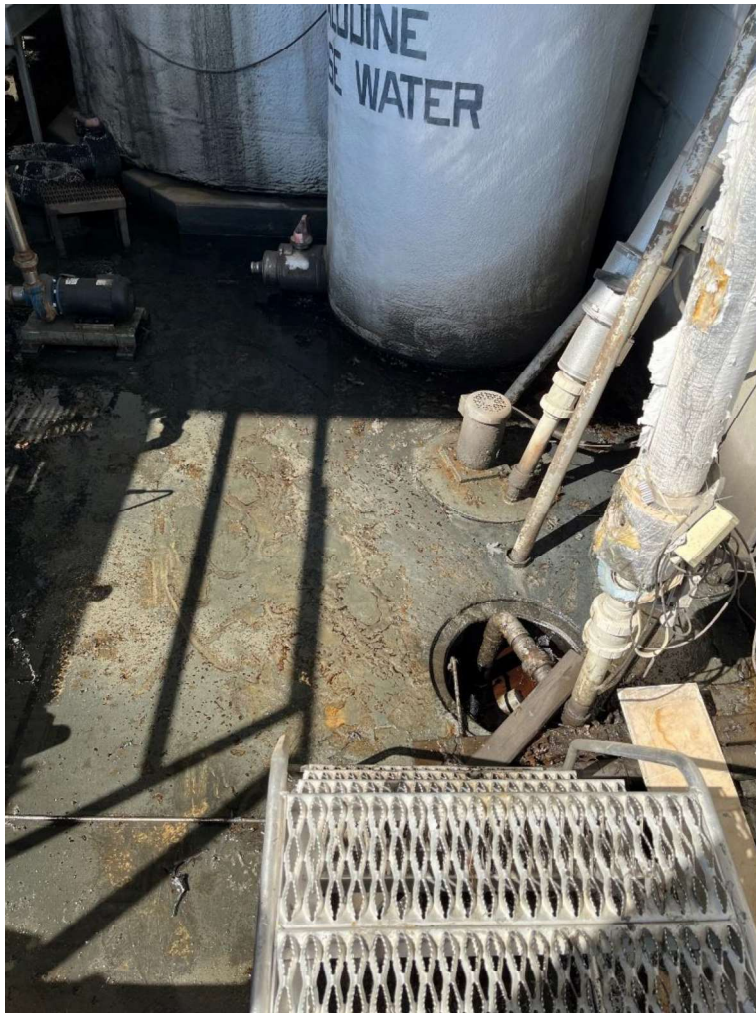
Description:	Overview of tank battery with oily wastewater tank.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Facility/Location:		Qarbon Aerospace Foundation								
City:	Red Oak		County:	Ellis County		State:	TX		Direction:	W
Filename:	IMG_0103.jpeg		Photo Date:		10/07/2025		Time:		11:52:04	
Photographer:	Sandesh Thapa				Witness Name:		John Penland			



Description:	Close view of unknown riser in secondary containment area.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photograph Log

Photo No. 3

Facility/Location:		Qarbon Aerospace Foundation							
City:	Red Oak	County:	Ellis County	State:	TX	Direction:	E		
Filename:	IMG_0112.jpeg	Photo Date:		10/07/2025		Time:	12:09:39		
Photographer:	Sandesh Thapa			Witness Name:		John Penland			



Description:	Overview of CAA.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 4

Facility/Location:		Qarbon Aerospace Foundation						
City:	Red Oak	County:	Ellis County	State:	TX	Direction:	NW	
Filename:	IMG_0118.jpeg	Photo Date:	10/07/2025		Time:	14:10:20		
Photographer:	Sandesh Thapa			Witness Name:		John Penland		



Description:	Roll-off box without universal waste label attached to paint compactor.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Facility/Location:		Qarbon Aerospace Foundation						
City:	Red Oak	County:	Ellis County	State:	TX	Direction:	S	
Filename:	IMG_0120.jpeg	Photo Date:	10/07/2025		Time:	13:57:06		
Photographer:	Sandesh Thapa			Witness Name:		John Penland		



Description: Close view of tote used to collect wastewater from X-ray process.

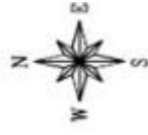
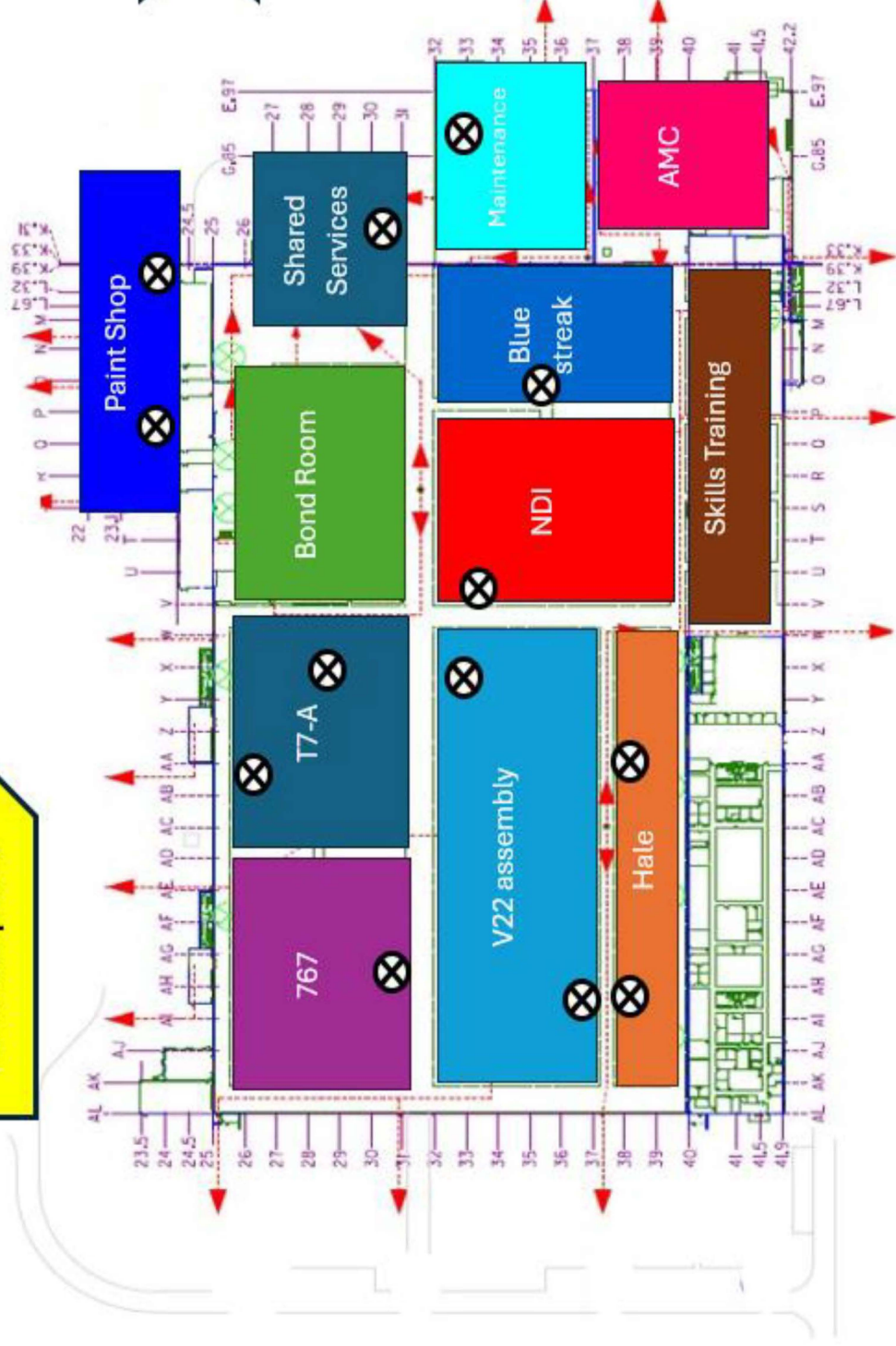
Appendix 2

Facility Diagram

Facility Map



Paint Compactor



Appendix 3

Facility Communication

ANALYTICAL REPORT

PREPARED FOR

Attn: Ms. Jody Walls
A Storm Environmental
PO BOX 10735
College Station, Texas 77842

Generated 10/30/2025 12:38:11 PM

JOB DESCRIPTION

QA-X

JOB NUMBER

870-40968-1

Eurofins Dallas

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

Analytical test results meet all requirements of the associated regulatory program (i.e., NELAC (TNI), DoD, and ISO 17025) unless otherwise noted under the individual analysis.

Authorization



Authorized for release by
Sylvia Garza, Project Manager
Sylvia.Garza@et.eurofinsus.com
(832)544-2004

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10/30/2025 12:38:11 PM



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Definitions/Glossary

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Qualifiers

Metals

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: A Storm Environmental
Project: QA-X

Job ID: 870-40968-1

Job ID: 870-40968-1

Eurofins Dallas

Job Narrative 870-40968-1

The analytical test results presented in this report meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page, unless otherwise noted. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable. Regulated compliance samples (e.g. SDWA, NPDES) must comply with associated agency requirements/permits.

- Matrix-specific batch QC (e.g., MS, MSD, SD) may not be reported when insufficient sample volume is available or when site-specific QC samples are not submitted. In such cases, a Laboratory Control Sample Duplicate (LCSD) may be analyzed to provide precision data for the batch.
- For samples analyzed using surrogate and/or isotope dilution analytes, any recoveries falling outside of established acceptance criteria are re-prepared and/or re-analyzed to confirm results, unless the deviation is due to sample dilution or otherwise explained in the case narrative.

Receipt

The sample was received on 10/22/2025 2:02 PM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 2.5°C.

Metals

Method 200.8 - Total Recoverable: The reference method requires samples to be preserved to a pH of <2. The following sample was received with insufficient preservation at a pH of >2: QA-X (870-40968-1). The sample(s) were preserved to the appropriate pH in the laboratory.

This does not meet regulatory requirements.

Method 200.8 - Total Recoverable: The following sample was diluted due to the nature of the sample matrix: QA-X (870-40968-1). Elevated reporting limits (RLs) are provided.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Eurofins Dallas

Client Sample Results

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Client Sample ID: QA-X
Date Collected: 10/22/25 12:00
Date Received: 10/22/25 14:02

Lab Sample ID: 870-40968-1
Matrix: Water

Method: EPA 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Silver	0.0671		0.0100	mg/L		10/28/25 21:16	10/29/25 18:51	5

QC Sample Results

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Method: 200.8 - Metals (ICP/MS)

Lab Sample ID: MB 860-271737/2-A
Matrix: Water
Analysis Batch: 271999

Client Sample ID: Method Blank
Prep Type: Total Recoverable
Prep Batch: 271737

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Silver	<0.00200	U	0.00200	mg/L		10/28/25 21:12	10/29/25 17:18	1

Lab Sample ID: LCS 860-271737/3-A
Matrix: Water
Analysis Batch: 271999

Client Sample ID: Lab Control Sample
Prep Type: Total Recoverable
Prep Batch: 271737

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Silver	0.0500	0.05252		mg/L		105	85 - 115

Lab Sample ID: LCSD 860-271737/4-A
Matrix: Water
Analysis Batch: 271999

Client Sample ID: Lab Control Sample Dup
Prep Type: Total Recoverable
Prep Batch: 271737

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Silver	0.0500	0.05268		mg/L		105	85 - 115	0	20

Lab Sample ID: LLCS 860-271737/1-A
Matrix: Water
Analysis Batch: 271999

Client Sample ID: Lab Control Sample
Prep Type: Total Recoverable
Prep Batch: 271737

Analyte	Spike Added	LLCS Result	LLCS Qualifier	Unit	D	%Rec	%Rec Limits
Silver	0.00200	0.002559		mg/L		128	50 - 150

QC Association Summary

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Metals

Prep Batch: 271737

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
870-40968-1	QA-X	Total Recoverable	Water	200.8	
MB 860-271737/2-A	Method Blank	Total Recoverable	Water	200.8	
LCS 860-271737/3-A	Lab Control Sample	Total Recoverable	Water	200.8	
LCSD 860-271737/4-A	Lab Control Sample Dup	Total Recoverable	Water	200.8	
LLCS 860-271737/1-A	Lab Control Sample	Total Recoverable	Water	200.8	

Analysis Batch: 271999

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
870-40968-1	QA-X	Total Recoverable	Water	200.8	271737
MB 860-271737/2-A	Method Blank	Total Recoverable	Water	200.8	271737
LCS 860-271737/3-A	Lab Control Sample	Total Recoverable	Water	200.8	271737
LCSD 860-271737/4-A	Lab Control Sample Dup	Total Recoverable	Water	200.8	271737
LLCS 860-271737/1-A	Lab Control Sample	Total Recoverable	Water	200.8	271737

Lab Chronicle

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Client Sample ID: QA-X
Date Collected: 10/22/25 12:00
Date Received: 10/22/25 14:02

Lab Sample ID: 870-40968-1
Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	200.8			50 mL	50 mL	271737	10/28/25 21:16	SHZ	EET HOU
Total Recoverable	Analysis	200.8		5			271999	10/29/25 18:51	DP	EET HOU

Laboratory References:

EET HOU = Eurofins Houston, 4145 Greenbriar Dr, Stafford, TX 77477, TEL (281)240-4200

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Accreditation/Certification Summary

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Laboratory: Eurofins Houston

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Arkansas DEQ	State	88-00759	08-05-26
Florida	NELAP	E871002	06-30-26
Louisiana (All)	NELAP	03054	06-30-26
New Mexico	State	TX00122	06-30-26
Oklahoma	NELAP	1306	12-31-25
Texas	NELAP	T104704215	06-30-26
Texas	TCEQ Water Supply	T104704215	12-30-25
USDA	US Federal Programs	525-23-79-79507	03-20-26

Method Summary

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Method	Method Description	Protocol	Laboratory
200.8	Metals (ICP/MS)	EPA	EET HOU
200.8	Preparation, Total Recoverable Metals	EPA	EET HOU

Protocol References:

EPA = US Environmental Protection Agency

Laboratory References:

EET HOU = Eurofins Houston, 4145 Greenbriar Dr, Stafford, TX 77477, TEL (281)240-4200

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Sample Summary

Client: A Storm Environmental
Project/Site: QA-X

Job ID: 870-40968-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Sample Origin
870-40968-1	QA-X	Water	10/22/25 12:00	10/22/25 14:02	Texas

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Environment Testing

Chain of Custody

Houston, TX (281) 240-4200, Dallas, TX (214) 902-0300
 Midland, TX (432) 704-5440, San Antonio, TX (210) 509-3334
 EL Paso, TX (915) 585-3443, Lubbock, TX (806) 794-1296
 Hobbs, NM (575) 392-7550, Carlsbad, NM (575) 988-3199
 Little Rock, AR (501) 224-5060

Work Order No: _____

Page _____ of _____

Project Manager:	Sylvia Garza	Bill to: (if different)	
Company Name:	Storm Environmental	Company Name:	
Address:	PO Box 10735	Address:	
City, State ZIP:	College Station TX	City, State ZIP:	
Phone:		Email:	swalls@stormenv.net

Work Order Comments	
Program:	UST/PST ☐ PRP ☐ Brownfields ☐ RRC ☐ Superfund ☐
State of Project:	
Reporting:	Level II ☐ Level III ☐ PST/UST ☐ TRRP ☐ Level IV ☐
Deliverables:	EDD ☐ ADaPT ☐ Other: _____

Project Name:		QA-X		Turn Around		ANALYSIS REQUEST												Preservative Codes									
Project Number:				☒ Routine ☐ Rush		Pres. Code														None: NO DI Water: H ₂ O							
Project Location:				Due Date:																Cool: Cool MeOH: Me							
Sampler's Name:		Sally Walls		TAT starts the day received by the lab, if received by 4:30pm																HCL: HC HNO ₃							
PO #:																				H ₂ SO ₄ : H ₂ NaOH: Na							
SAMPLE RECEIPT		Temp Blank: Yes ☒ No ☐		Wet Ice: Yes ☒ No ☐																H ₃ PO ₄ : HP							
Samples Received Intact:		Yes ☒ No ☐		Thermometer ID:		035														NaHSO ₄ : NABIS							
Cooler Custody Seals:		Yes ☐ No ☒ N/A		Correction Factor:		10.1														Na ₂ S ₂ O ₃ : NaSO ₃							
Sample Custody Seals:		Yes ☐ No ☒ N/A		Temperature Reading:		2.4														Zn Acetate+NaOH: Zn							
Total Containers:				Corrected Temperature:		2.5														NaOH+Ascorbic Acid: SAPC							
Sample Identification		Matrix		Date Sampled		Time Sampled		Depth		Grab/Comp		# of Cont														Sample Comments	
QA-X				10/22/25		12P						X															



Total 200.7 / 6010	200.8 / 6020:	8RCRA	13PPM	Texas	11	Al	Sb	As	Ba	Be	B	Cd	Ca	Cr	Co	Cu	Fe	Pb	Mg	Mn	Mo	Ni	K	Se	Ag	SiO ₂	Na	Sr	Ti	Sn	U	V	Zn
Circle Method(s) and Metal(s) to be analyzed		TCLP / SPLP 6010:		8RCRA	Sb	As	Ba	Be	Cd	Cr	Co	Cu	Pb	Mn	Mo	Ni	Se	Ag	Ti	U	Hg: 1631 / 245.1 / 7470 / 7471												

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Eurofins Xenco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Eurofins Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the control of Eurofins Xenco. A minimum charge of \$85.00 will be applied to each project and a charge of \$5 for each sample submitted to Eurofins Xenco, but not analyzed. These terms will be enforced unless previously negotiated.

Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
		10/22/25 1M02			

Login Sample Receipt Checklist

Client: A Storm Environmental

Job Number: 870-40968-1

Login Number: 40968

List Number: 1

Creator: Stoaks, Miya L

List Source: Eurofins Dallas

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	

Login Sample Receipt Checklist

Client: A Storm Environmental

Job Number: 870-40968-1

Login Number: 40968

List Number: 2

Creator: Torrez, Lisandra

List Source: Eurofins Houston

List Creation: 10/24/25 08:15 AM

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	

Hazardous Waste Accumulation Site

Weekly Inspection Log

Month/Year: December 2024

Mark answers (Y)Yes or (N)No below

Week 1	Week 2	Week 3	Week 4	Week 5

Location:

	Date	Time	Inspector's Printed Name and Signature
Week 1	12/3/24	8:15am	Anais Askari
Week 2	12/10/24	12:49pm	Anais Askari
Week 3	12/16/24	9:09am	Anais Askari
Week 4	12/23/		1/3/25 facility closed
Week 5	/ /		

waste handled
at
waste incinerator

Number of Containers in Area: 100

N/A	N/A	N/A		
yes	yes	yes		
yes	yes	yes		
N	N	N		
yes	yes	yes		
yes	yes	yes		
yes	yes	yes		
N	N	N		
yes	yes	yes		

Are all drums and containers marked or labeled as hazardous waste (or "waste pending analysis")?

Are all drums and containers marked with the risk associated with the waste?

Are all containers (excluding satellite containers) marked with the accumulation start date?

Are any drums near or exceeding the SQG 180 days timeframe?

Are all drum labels visible and readable?

Are all containers closed?

Are all drums and containers in good condition?

Are any drums leaking?

Is there adequate aisle space and clearance between rows of containers?

Containment

yes	yes	yes		
yes	yes	yes		

Is the secondary containment free of cracks or other failures?

Are sumps clean and free of contamination, spills, leaks, and standing water?

Comments: Describe the actions taken to correct each deficiency noted above, and note date each action was taken.

Hazardous Waste Accumulation Site

Weekly Inspection Log

Month/Year: November 2024

Mark answers (Y)Yes or (N)No below

Week 1	Week 2	Week 3	Week 4	Week 5

Location:

	Date	Time	Inspector's Printed Name and Signature
Week 1	11/4/24	8am	Anais Aslani / Anais Aslani
Week 2	11/11/24	10:00am	Anais Aslani - Anais Aslani
Week 3	11/18/24	9:00am	Anais Aslani - Anais Aslani
Week 4	11/25/24	9:00am	Anais Aslani / Anais Aslani
Week 5	/ /		

Number of Containers in Area: 80

N/A	N/A	N/A	N/A	
Y	Y	Y	Y	
Y	Y	Y	Y	
NO	NO	NO	NO	
Y	Y	Y	Y	
Y	Y	Y	Y	
Y	Y	Y	Y	
N	N	N	N	
Y	Y	Y	Y	

Are all drums and containers marked or labeled as hazardous waste (or "waste pending analysis")?

Are all drums and containers marked with the risk associated with the waste?

Are all containers (excluding satellite containers) marked with the accumulation start date?

Are any drums near or exceeding the SQG 180 days timeframe?

Are all drum labels visible and readable?

Are all containers closed?

Are all drums and containers in good condition?

Are any drums leaking?

Is there adequate aisle space and clearance between rows of containers?

Containment

Y	Y	Y	Y	
Y	Y	Y	Y	

Is the secondary containment free of cracks or other failures?

Are sumps clean and free of contamination, spills, leaks, and standing water?

Comments: Describe the actions taken to correct each deficiency noted above, and note date each action was taken.

Appendix 4

EPA Daily Summary E-mails

From: [Thapa, Sandesh](#)
To: ["anais.askari@qarbonaerospace.com"](#); ["edward.pounds@qarbonaerospace.com"](#)
Cc: [Pandak, Debra](#); [Penland, John](#)
Subject: Daily Summary for 2025 RCRA inspection of Qarbon Aerospace Foundation - Red Oak, TX - October 8, 2025
Date: Wednesday, October 8, 2025 7:06:00 PM

Hi All,

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

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
Anais Askari	Environmental Health and Safety Manager	Qarbon	469-820-4589	anais.askari@qarbonaerospace.com

Daily Summary

- Inspection Starts: 09:30am
- Recap of Daily summary from October 7, 2025.
 - 5-gallon drum attached to paint gun washer unit is a solvent(product) which is used for cleaning.
 - Total of 5 manifests were used for oily waste with EPA ID TX6170022770 which corresponds to a former Vought Integrated Programs Division JSF facility.
 - Opening meeting start- 09:45am

Used Paint Filters:

- Used Paint filters are disposed as Universal waste. EPA has requested manifests related to used paint filters.

Weekly Inspections:

- Weekly inspection of Central Accumulation Area (CAA) from third and fourth week of November 2024 and fourth week of December 2024 were missing. 40 C.F.R 262.16(b)(2)(IV).

Emergency coordinator's contact number was not posted at the CAA. 40 C.F.R 262.16.(b)(9)(ii)

Closing Conference:

Identified Concerns:

- TCLP test required for X-ray wastewater. Awaiting test results.
- Weekly inspection of CAA from third and fourth week of November 2024 and fourth week of December 2024 were missing. 40 C.F.R 262.16(b)(2)(IV).
- Emergency coordinator's contact number was not posted at the CAA. 40 C.F.R 262.16.(b)(9)(ii)- Resolved
- 4 boxes of lamps and 2 bundles of lamps was observed without universal waste or waste lamps label, 40 C.F.R 273.34(e).- Resolved
- Roll-off container without universal waste label was observed at paint compactor. 30 TAC 335.262(c)(2)(F).
- Total of 5 manifests were used for oily waste with EPA ID TX6170022770 which corresponds to a former Vought Integrated Programs Division JSF facility.

Areas for Additional Review:

- Review of Personal Training records.
- List of personnel for review.
 - Anais Ankari
 - Dale Cheek

Ongoing request of compliance records, including

- Arrangement with local authorities of contingency plan prior to the inspection start date. 40 C.F.R 262.16.(b)(8)(Vi)
- Toxicity Characteristic Leaching Procedure (TCLP) for X-ray wastewater and Oily wastewater.
- Facility maps and process diagrams.
- Weekly inspection reports from recent year- including November and December 2024.

Departed Facility at approximately 1:40 pm

Regards,

Sandesh Thapa

Enforcement and Compliance Assurance Division

U.S. EPA Region 6

Office: 214-665-2265