



U.S. ENVIRONMENTAL PROTECTION AGENCY



Q & A

CES Environmental Services Inc.
Houston, Texas

Texas Organizing Project, a community-based organization led by working families in Texas, submitted the following questions to the U.S. Environmental Protection Agency (EPA) after an Open House at the Harris County Courthouse in Houston, Texas, December 11, 2014.

Does the CES site pose risk to public health and the environment? The EPA believes that this site poses a risk to public health and the environment and is therefore the basis for the EPA's actions on the site.

What is the EPA's plan for reducing this risk? The EPA plans to reduce risk to the public by removing and disposing the hazardous substances located on the property. The EPA realizes that there may be off-site contamination within the residential areas associated with the historic operations as well as spills that have occurred during the period of abandonment/bankruptcy. The EPA and/or the TCEQ intend to conduct or have others conduct on and off-site media sampling to determine the extent of any potential contamination and any subsequent cleanup actions that may be necessary.

How will the impacted community be involved in the process? As long as the EPA is involved in the process, the EPA will continue to produce fact sheets and hold information sessions. This information can also be accessed on our website or by calling our toll-free number 1-800-533-3508, and asking for the Community Involvement Coordinator for the site.

Has the EPA conducted air monitoring? The EPA has conducted air monitoring and air sampling. The air sampling was conducted in August 2014, during the spill response and was taken both on site and within the residential neighborhood Kingsberry. The analy-

tical data for the air sampling is available at <http://www.epaos.org>. Air monitoring is being performed during the current cleanup actions and is associated with specific site operations. The monitoring information varies based upon operations but consists of the following parameters: Phenol, Volatile Organic Compounds (VOCs), Hydrogen Sulfide (H₂S), Lower Explosive Limit (LEL), Oxygen (O₂), and Carbon Monoxide (CO).

Have air monitoring stations been set up? No, the EPA has not set up specific air monitoring stations but performs perimeter and operation specific air monitoring. The waste contains volatile and sulfur-based compounds so EPA expects detections for VOCs and H₂S based upon the site specific operations. The EPA is using an activated carbon unit to reduce the VOC emissions from its operations.

What has each monitoring state discovered? The air monitoring focuses on primarily VOCs and H₂S and we have detections for both during the course of the response and will likely continue to have such detections.

Has the EPA conducted soil testing? In August 2014, the EPA conducted residential area soil sampling as a result of the July/August CES spill. The samples were conducted within the drainage ditches and more heavily impacted soil areas within the City of Houston Right-of-Ways.

Has soil testing been conducted in people's yards? The EPA has not conducted soil sampling in people's yards. The only soil sampling conducted was in the Right-of-Ways and ditches on Kingsbury as associated with the spill response in July/August 2014. Future soil sampling is anticipated but not associated with the current cleanup action.

What has each sample location shown? The data associated with the sampling event is posted on www.epaosc.org. The results do not show any immediate health risk from the residual material that may remain after the spill cleanup operations.

What health risks are present? Based upon the limited sampling conducted within the drainage ditches, the EPA does not believe there are immediate health risks remaining that are associated with the spill, which occurred in July/Aug. 2014.

Has surface or runoff water testing occurred? Yes, the analytical results are posted at www.epaosc.org.

If the water is contaminated, how will it be contained on the site? A dike was installed on the southwest corner of the CES property by the TCEQ and in the City Right-of-Way by the City of Houston to prevent continued runoff to the residential community to the south of the site (Kingsbury). Another dike was installed on the east side of the facility by the trustee to prevent runoff into residential community along Grace Street.

To a more limited extent, runoff may be occurring at the other areas that border the property. Previously, excess stormwater on the north side of the facility would travel to the stormwater drain at the Griggs/Wayland intersection. The EPA negotiated with the City of Houston to allow the discharge of contaminated stormwater into the sanitary sewer pending cleanup of the potentially contaminated sediments below the accumulated water at the north side of the facility. The cleanup of these sediments on the north side of the property was completed and future releases to the storm drain may be able to resume pending future evaluation. The EPA does not intend on preventing excess storm water from draining to storm drains.

Is there a plan for indoor testing of homes, schools, businesses and churches? The EPA has not conducted

any indoor testing. The extent of future testing will be determined by the EPA and/or TCEQ. Indoor testing is not anticipated as part of the current cleanup action.

Has the EPA determined the exact contaminants that exist on the CES site? There are a number of contaminants listed in the EPA Action Memorandum, Fact Sheet, and the laboratory data posted on www.epaosc.org.

Which of these contaminants pose a risk to human health and to what extent do they pose a risk? There are a number of contaminants within the containers on the site. The majority of these contaminants are hazardous substances and as such would be hazardous to human health.

What contaminants and how much of each have been removed from the site? Waste quantities removed from the site are as follows: approximately 200,000 gallons of contaminated stormwater, 2 roll-off boxes, 8 of 12 frac tanks, 14 of 23 above ground storage tanks (ASTs), lab chemicals, company process samples, and process chemicals disposed by the trustee.

What contaminants and how much of each remain at the site? The following materials remain to be removed: 3 frac tanks, 9 ASTs with liquids (14 with sludge/residual materials), 19 waste water treatment tanks, visibly contaminated soils/solids, totes, drums, and miscellaneous containers.

Are funds available to remove all the remaining contaminants? EPA believes that adequate funding to complete the activities is available barring unforeseen disruptions.

What is the time line for the removal of the remaining contaminants? The EPA is pushing to complete the cleanup by early spring.

Which contaminants are producing the odor? What are the human health risks of exposure to the airborne contaminants? The chemical odors emanating from the site are the result of compromised chemical containers with cresol/phenolic compounds and historic spillage. The odors and potential threats will continue until all waste materials are removed from the site and properly disposed. For more information, please reference

the Agency for Toxic Substance and Disease Registry ToxFaqs posted to www.epaossc.org.

When will the contaminants causing the odor be removed from the site? EPA removed the high concentration cresol/phenol wastes. All of the remaining wastes contain these same cresol/phenol wastes to some degree. Residents will continue to notice these compounds but the odors should dissipate over time.

There is a temporary earth berm around the site. Is that berm continuous, intact and will it prevent the escape of contaminants from the site in the event of a major rain event? No, the dike is not continuous and there is no plan to make a continuous dike around the site. Rainfall on the site is approximately 160,000 to 200,000 gallons/inches of rain. There is no feasible way to handle the volume of water that falls on the site except the way it is currently being managed.

Is the site fully secure from vandalism and is the risk of a future spill negligible at this point? The site is not fully secure but it is substantially more secure since the EPA repaired fences, blocked the entrance to Wayland Street in order to prevent vehicular access to the site. We are working with the Houston Police Department to provide increased surveillance around the facility. We need the residents' assistance in notifying the HPD should they notice suspicious activity at the site.

What is the detailed estimate cost for cleanup and full site remediation? The EPA authorized funding up to \$2,000,000 to complete the removal of chemicals and visibly contaminated soils along with cleaning up contaminated asphalt/concrete to the extent possible. Additionally, the Texas Commission on Environmental Quality (TCEQ) committed up to \$500,000 for the same or similar activities to ensure these activities are completed.

Where will additional funds come from to complete the cleanup and full site remediation? The EPA is currently evaluating CES business records to determine the parties who sent waste to the CES facility. The EPA will pursue those companies if they are determined to be liable and viable. The TCEQ has a similar process and is moving forward in this process as well. Should these companies not take action, then the EPA/TCEQ will have to move forward with the Superfund Remedial Process.

What cleanup activities remain and how many are unfunded at this time? The unfunded activities for the site cleanup include soil cleanup based upon analytical results, debris and trash cleanup, empty container disposal, and demolition of structures.

Will the EPA oversee future site usage? The EPA has no jurisdiction on future land use. This is primarily a local decision. The state may have some say in this decision as well. Residents must be vigilant with their local representatives and ensure they know their position on the future use of this property.

The site is currently for sale by the bankruptcy trustee. How would a sale affect the EPA's activities? The EPA/TCEQ have a working relationship with the trustee. As a result, the trustee coordinates activities with the EPA/TCEQ.

How would a sale affect the cleanup of the site? A sale would not impact the cleanup activities as EPA and/or TCEQ will require the new owner under Superfund Law to take necessary response actions.

Will the future owner be required to completely cleanup and fully remediate the site and surrounding properties? Yes, that is the normal Superfund process.

Will a future owner be allowed to engage in a similar industry as CES was permitted to operate? The EPA has no jurisdiction in this matter and the impacted residents should make sure their elected representatives understand their concerns with any future use or development of this property.

What additional oversight, monitoring, licensing, etc., may apply to a new owner's activities on the former CES site? These regulations are controlled by the City of Houston or the State of Texas (TCEQ).



