

## **CES Environmental Services, Inc. (As of May 8, 2015)**

The EPA mobilized to the Site on September 3, 2014 and began addressing the wastes and spills located on the CES Environmental Services, Inc. site.

As of May 8, the EPA Team has addressed the following:

**Vacuum Boxes (original):** Wastes contained in the original 11 vacuum boxes have been transferred into shippable vacuum boxes and off-site for disposal (Trustee addressed 1 of these vacuum boxes). All original vacuum box containers have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

**Roll-Off Boxes (original):** Wastes contained in the original 2 roll-off boxes have been disposed (Trustee addressed 1 roll-off box). All original roll-off boxes have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

**Frac Tanks (original):** Waste removed from 9 of 12 frac tanks (3 of 12 were originally empty). Eight (8) of the emptied frac tanks that were originally rented by CES Environmental Services during their operations were released back to those rental companies (1 to Dynamic Rental Systems, 7 to Dana Transport). At this time, the 4 CES frac tanks will continue to be used as necessary for cleanup operation.

**Aboveground Storage Tanks (ASTs):** Liquids and sludge have been removed from all 20 Steel ASTs and the 3 Poly Tanks (PT1, PT2, and PT3). The secondary containments have been cleaned of oily materials. The south containment continues to have residual oil seepage from under the tanks and this will continue until tanks are removed which will require periodic maintenance.

**Waste Water Treatment Tanks (WWTT):** Liquids and sludge have been removed from 19 of 20 Waste Water Tanks. The remaining tank contains lime. The lime tank will be removed either into vacuum box or roll-off box. The secondary containment of the Waste Water Treatment area will require cleaning to remove sludge. Additionally, the piping needs to be confirmed empty.

**Totes/Drums/Vats/Misc Containers:** All wastes in totes, drums, and miscellaneous containers have been bulked and either disposed or awaiting disposal. The majority of the empty totes, drums and miscellaneous containers have been cleaned (pressure washed), cut up, disposed or packaged for disposal. Minimal containers remain and are being used for separate tasks.

**Removal of Contaminated Sediments/Solids:** General cleaning of visibly contaminated areas causing sheens on storm water has been completed. The cleaning of stained areas will continue to the extent possible but is not a high priority unless it is or possibly could cause a sheen on the storm water. Silt barriers and oil absorbent boom are in place to reduce sediment and hydrocarbon releases to storm water drains during a rain event.

**Loading Bays (Main Warehouse):** The bays have been substantially cleared of debris and chemical wastes to the extent possible although the trenches will have to be addressed. Final cleaning of the bays remain to be completed..

**Truck Cleaning Bay:** The bays will require additional cleaning as the cleaning bay was used for bulking and cleaning operations by the EPA.

**Storm Water Management:** This activity continues as rainfall occurs. Storm water is being allowed to drain from the site through silt barriers and absorbent boom. The southern portion of the facility currently remains diked which disrupts cleanup operations after a rain event. The site is usually inundated with storm water during a rain event. A one inch

rainfall adds approximately 180,000 gallons of water on the facility where approximately 60000 gallons drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility where it is currently diked. The EPA placed two (2) 4 inch pipes with ball valves and an assundry of silt control measures along with absorbent boom to control sediment and sheens. These pipes are designed to allow normal drainage from the facility when the sedimentation pond reaches approximately 2 feet in height. The City of Houston and TCEQ are aware of the piping installed by the EPA to re-establish storm water flow off the site in a controlled manner.

**Waste Piles (Southern Portion of Facility):** Trustee removed wastes dumped to the ground in March 2014 due to the theft of 7 roll-off boxes. An additional debris pile exists that is associated with the construction of the berm around the southern portion of the facility. The EPA does not intend on addressing this debris pile.

**Lab Chemicals/Company Profile Samples:** Trustee consolidated and disposed;

**Bulk Process Chemicals:** Trustee collected and disposed;

**Items that Remain to be completed (05/08/15):**

1. Main Warehouse
  - Sludge Removal: LIME
  - WWTT Containment: Remove solids from containment
  - WWTT Piping: Break Piping to Remove Materials
  - WWTT Containment: Remove Liquids, Pressure Wash for Final Clean
  - Main Warehouse Bays: Remove Solids/Liquids
  - Tanker Trailer: Remove solids
2. Aboveground Storage Tank Area
  - Residual Sludge: NT8, NT2
  - South Containment: Final Cleanup and Boom around tanks
  - Piping: Evaluate Piping to See if Additional Actions Required to Remove Materials
3. Frac Tank Waste Disposal
  - Frac Tanks: FT5180, FT1001
  - Frac Tanks: Residual Sludge Cleanout
  - Frac Tank (Off-Site Cleaning/Deodorizing): FT1004
4. Bulk Poly Tanks, Totes, Vats, Drums, Misc Containers, Carbon, Supersacks:
  - Poly Drums/Totes: Wash and Cut up
5. Truck Wash Bay, Shed, Former Shed, AST Area Site Sumps:
  - Truck Wash Bay: Remove Liquids/Solids - Sump and Trenches and Final Clean
6. Dispose of Containerized Wastes (vac boxes, fracs tanks, roll-offs, drums/totes)

Roll-off Boxes:

Number	Status
OT 25165	Cut Up Poly Drums/Totes
OT 25563	Sand/Trench Residue/Carbon/Super Sacks

OT 25480	Debris 3008 M
OT 25319	Excavated Soils/Debris 3008M
OT 25134	Debris 3008 M
OT 25337	Debris (ADS Hose, Wood,Pails, Plastic )

Vacuum Boxes:

Number	Status
VB 25206	FT1004 Oily Material
VB 25274	FT 1004 Oily Material
VB 25229	FT 1004 Sludge
VB 25315	Empty
VBDW 25147	Sludge from Group 24, 25, 26, and 27

Frac Tanks:

Number	Status
FT 1004	Empty-Still some residual on the wall
FT 1002	Empty-Rinsed
FT 1001	Partially Full
FT 5180	Full

EPA Removal Costs (Estimated as of 5/8/15): \$ 1,724,796