

CES Environmental Services, Inc. (As of June 3, 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 June 3, 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. This will require periodic maintenance.

Waste Water Treatment Tanks (WWTT): Liquids and sludge have been removed from 20 of 20 Waste Water Tanks. The maze of piping in the WWTT has been opened and liquids removed by gravity. It is expected that the WWTT piping will contain additional solids which did not release when piping was opened or strategically cut. It will be necessary for the piping to be removed and cleaned prior to recycling/disposal. Additionally, an open hole in the roof allows rainfall to enter the WWTT secondary containment and will require continuing removal of accumulated liquids.

Totes/Drums/Vats/Misc Containers: All wastes in totes, drums, and miscellaneous containers have been bulked and disposed. The totes and drums were cleaned (pressure washed) and disposed/recycled.

Removal of Contaminated Sediments/Solids: General cleaning of visibly contaminated areas causing sheens on storm water has been completed. The cleaning of stained areas has been completed to the extent possible and is not causing a sheen on storm water.

Loading Bays (Main Operations Building): The bays have been cleared of debris and cleaned to the extent possible and no longer contain hydrocarbons which will overflow and cause a sheen.

Truck Cleaning Bay: The bays have been cleared of debris and cleaned to the extent possible and no longer contain hydrocarbons which will overflow and cause a sheen.

Shed and Former Shed Area: These sumps and oil/water separator have been cleaned and no longer contain hydrocarbons which will overflow and cause a sheen.

Storm Water Management: Storm water is being allowed to drain from the site through silt barriers. The southern portion of the facility currently remains diked with two (2) – 4 inch pipes with ball valves that allow storm water to flow off-site through silt barriers. The north portion of the facility is allowed to drain naturally through the on-site storm water drain

through a silt barrier. The middle portion of the site has no flow off the site except by pumping action which has been used to dewater this area through the North Drain system. 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 60,000 gallons drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility. The EPA placed two (2) 4 inch pipes with ball valves and an assortment of silt control measures to control sediment. 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 by EPA (06/04/15):

1. Dispose of Containerized Wastes:

Frac Tanks (20,000 gallons Liquids): FT1001

Roll-Off Box (20 yds Soil): OT25480

Roll-Off Box (20 yds PPE/Hose): OT25134

Vac Box (3300 gallons Sludge): VB25229

Drum (55 gallons Sludge): Returned Sludge from FT1004 cleaning (est. 2 Drums)

Summary of Waste Disposed by EPA/TCEQ:

USEPA	Volume	Units	# Containers
Haz Waste Incineration	196,860	pounds	10 Vac Boxes
Haz Waste Fuel Blending	6,060	gallons	1 truck, 1 partial
Haz Waste Landfill (ADS Hose, PPE)	65.00	cubic yards	3 Roll-Off Boxes
Haz Waste Waste Water Pretreatment/Treatment	106,150	gallons	24 trucks, 2 partial
Non-Haz Waste Water Pretreatment/Treatment	170,800	gallons	36 trucks
Non-Haz Deep Well Injection	156,161	gallons	24 trucks, 3 partial
Non-Haz Landfill (solids) Class 1	165	cubic yards	7 Roll-Off Boxes
Non-Haz Landfill (liquids for solidification) Class 1	71,596	gallons	17 Vac Boxes
Non-Haz Landfill (resin w/vac box) Class 1	4.74	tons	1 Vac Box
Non-Haz Landfill (solid) Class 2	80.00	cubic yards	4 Roll-Off Boxes
Haz Waste Incineration	50.00	lbs	5-gal Drum
Haz Landfill Stabilization	1,752.11	gallons	1 Vac Truck
	18 Totes 12 Drums		
Haz Landfill Neutralization/Stabilization		Drums/Totes	18 Totes, 12 Drums

TCEQ	Volume	Units	# Containers
Haz Waste Water Pretreatment/Treatment	15,000	gallons	3 truck loads
Haz Waste Incineration	371,340	pounds	14 Vac Boxes
Haz Waste Landfill	50.00	cubic yards	2 Roll-Off Boxes
Hazardous Waste Incineration	6 Totes 34 Drums	Totes/Drums	40 Drums/Totes

EPA Removal Costs (Estimated as of 6/3/15): \$ 1,837,272

Future Actions:

The EPA anticipates that its cleanup actions will be completed by June 12, 2015 or earlier. At that time, cleanup actions associated with the CES Environmental Services, Inc. Facility will transition from an EPA/TCEQ Action to a TCEQ/Potentially Responsible Party (PRP) Action. The PRP Group has entered into a Voluntary Cleanup Program Agreement with TCEQ to conduct additional on and off-site environmental investigation activities as well as additional on-site cleanup actions, as determined necessary by State Environmental Regulations. The PRP Group will commence activities upon receiving property access from the Bankruptcy Trustee. The EPA has coordinated with the PRP Group and they are aware of the additional cleanup work remaining as well as the potential environmental investigation work that will be necessary. The PRP Group has developed a website for the Site in order to transmit information to interested parties. The website currently contains minimal information but will be populated as additional information becomes available. The website is: www.cesgriggsrd.com