

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
CES Environmental Services, Inc. - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #3
Final
CES Environmental Services, Inc.

Houston, TX
Latitude: 29.6984000 Longitude: -95.3435000

To:
From: Gary Moore, FOSC
Date: 9/30/2015
Reporting Period:

1. Introduction

1.1 Background

Site Number:	A6JP	Contract Number:	
D.O. Number:		Action Memo Date:	8/26/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/3/2014	Start Date:	9/3/2014
Demob Date:	6/10/2015	Completion Date:	9/30/2015
CERCLIS ID:	TXD008950461	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical

1.1.2 Site Description

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. The Site is under the control of the Bankruptcy Court where a Trustee has been appointed to administer the CES Environmental Services, Inc. Estate. The CES Estate did not and does not have the funding necessary to address the multitude of environmental conditions at the site. The site consists of approximately 6 Buildings, 11 Vacuum Boxes, 2 Roll-off Boxes, 12 Frac Tanks, 2 Tanker Trailers, 23 Aboveground Storage Tanks (ASTs), 20 Waste Water Treatment Tanks, Waste Piles, and numerous sumps, totes, vats, drums, and smaller containers. There has been spillage of chemicals to exterior surfaces as well as building interiors. The facility has experienced significant vandalism since its bankruptcy in 2010. Additionally, the recent chemical spills in March and July 2014 were a result of theft and vandalism and involved the dumping of chemical wastes to the ground surface and spillage and runoff into an adjacent residential neighborhood to the South of the facility. Emergency responses and cleanup activities to these spills occurred and involved the CES Estate, City of Houston, Texas Commission on Environmental Quality (TCEQ), and the EPA.

1.1.2.1 Location

4904 Griggs Road
Houston, Harris County, Texas 77021
Latitude: 29.6984
Longitude: -95.3435

1.1.2.2 Description of Threat

The Site is situated in a residential/commercial area. The site is bordered by primarily residential properties and a charter school along with several commercial properties. Releases of chemicals from the site have been documented into residential areas south of the site as a result of previous spills. These spills have been cleaned up but residual contamination may remain and will need to be further investigated through the TCEQ Voluntary Cleanup Program. Additionally, the site and the surrounding residential area is experiencing significant cresolic/phenolic odors associated with air emissions from on-site containers and associated spillage.

The primary threat associated with the site is the potential exposure to the surrounding populations from releases from the containers located on the site. Additionally, storm water drainage from the site could carry materials spilled or materials already spilled off-site impacting both the residential populations and the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The site is abandoned and has been significantly vandalized since 2010. Roll-off boxes and Tank Trailers have been stolen from the site and chemical wastes have been deposited in other on-site containers, secondary containment areas, and on the ground surfaces. Additionally, containers have deteriorated, continue to deteriorate and have leaked chemicals to the ground surfaces. The site has approximately 11 vacuum boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 23 Aboveground Storage Tanks (ASTs), 20 Waste Water Treatment Tanks, Waste Piles, and numerous totes, vats, drums, and smaller containers. The site currently floods during rainfall events as on-site storm drains have

been plugged. A one inch rainfall event results in approximately 180,000 gallons of rainfall to the site. Storm water from a portion of the site drains into the neighborhood to the South of the facility but emergency containment actions in early August 2014 by the City of Houston and the TCEQ blocked drainage (diking) from continuing to drain into this residential neighborhood through normal site drainage routes. Storm water continued to drain off-site into the storm drain at the northwest side of the facility as heavy rains cause the pooled areas to reach capacity and overflow.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The EPA transitioned from spill response activities and into a removal assessment on the facility in late August 2014. On September 3, 2014, EPA activated its cleanup contractors to begin removal activities while assessment activities continued due to what EPA believed was an imminent and substantial endangerment to the surrounding population. The EPA demobilized from the Site on June 10, 2015. A PRP-lead action was approved on that same date through the TCEQ Voluntary Cleanup Program.

The actions completed by EPA during its removal action (September 3, 2014 - June 10, 2015) consisted of the following:

Vacuum Boxes (original): Wastes contained in the original 11 vacuum boxes have been transferred into shippable vacuum boxes and transported 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). The 4 CES owned frac tanks continued to be used as necessary for cleanup operation and are now empty of contents. One of the frac tanks (FT1004) was sent off-site to be cleaned and deodorized due to excessive phenol odors resulting from residual sludge attached to the walls and floor of the tank. The remaining CES owned frac tanks were rinsed on-site and still contain residual materials.

Aboveground Storage Tanks (ASTs): Liquid and sludge have been removed from all 20 Steel ASTs and the 3 Poly Tanks. The ASTs have not been hydro-blasted to remove residual contamination on the walls, floors, and ceilings therefore additional cleaning may be necessary for reuse/recycling/disposal. The secondary containments have been cleaned of oily materials. The south containment continues to have residual oil seepage from under the tanks. Absorbent boom have been placed around each tank in the south containment to absorb residual oil that may seep from under the south containment tankage. The seepage from under the tanks will continue until the tanks are removed from the site. Additionally, rainfall will continue to accumulate within the secondary containments and will require periodic removal and/or disposal.

Waste Water Treatment Tanks (WWTT): Liquids and sludge have been removed from 20 of 20 WWTTs. The WWTTs have not been hydro-blasted to remove residual contamination on the walls, floors, and ceilings therefore additional cleaning may be necessary for reuse/recycling/disposal. The maze of piping in the WWTTs have been opened through the valve structure or strategically cut to remove liquids by gravity. The EPA did not flush or otherwise clean the piping. It is expected that the WWTT piping will contain additional solids which did not release when piping was opened or strategically cut. It will likely 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 several of the WWTTs and the associated 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. Some of the metal totes and metal cages for the totes were left on-site for future recycling.

Removal of Contaminated Sediments/Solids: General cleaning/Excavation of visibly contaminated areas that could potentially cause sheens on storm water has been completed to the extent possible.

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.

Sumps and Oil/Water Separator: The sumps and oil/water separator located throughout the facility have been cleaned and no longer contain hydrocarbons which will overflow and cause a sheen. These sumps will continue to fill up with rainwater and will need to be checked periodically for any accumulation that may need to be removed.

Storm Water Management: Rainfall/Storm water is being allowed to drain from the site. The South storm water outfall is open and has various silt barriers and absorbent boom in place to filter the water. The release from this outfall will only occur as height of water in the South Pond reaches the overflow piping. The North storm water outfall is open and has various silt barriers in place to filter the water prior to drainage into the storm drain. The City of Houston and TCEQ are aware of the EPA's effort to re-establish storm water flow off the site in a filtered and controlled manner as it is not feasible to contain such rainfall to the site.

Waste Piles (Southern Portion of Facility): Trustee removed wastes dumped to the ground surface 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 of these chemicals.

Bulk Process Chemicals: Trustee consolidated and disposed of these chemicals.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The TCEQ identified numerous PRPs in late 2014 that resulted in a Voluntary Cleanup Program Agreement with the Griggs Road PRP Group. As of June 10, 2015, the EPA and TCEQ work on the site was transitioned to the Griggs Road PRP Group. The actions by the PRP Group will be overseen by the TCEQ Voluntary Cleanup Program. The EPA continues its efforts to identify and provide notice PRPs.

2.1.4 Progress Metrics

See "09.30.15 Polrep 3 Final Waste Summary" document in the "Document Section" of www.epaosc.net.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The response activities will include the following:

1. Remove/Dispose of all containerized wastes;
2. Cleanup visible spilled material from soil, concrete/asphalt;
3. Manage stormwater to the extent necessary and possible;
4. Remove/Dispose of Contaminated Debris and Other Environmental Concerns as Funding Allows.

2.2.1.2 Next Steps

The EPA and TCEQ have completed their respective on-site actions on or about June 10, 2015 with the remaining activities being the final disposition of the waste by the various disposal vendors, the return of the rental disposal containers, and project closeout. The Griggs Road PRP Group has transitioned and is currently managing the remaining assessment and cleanup activities on the site under the oversight of the TCEQ Voluntary Cleanup Program.

The remaining activities include, but may not be limited to:

1. On and Off-Site Environmental Assessments and Cleanup and determined necessary;
2. AST/WWTT and associated piping hydro-blasting and removal from site for reuse/recycle/disposal;
3. Final cleaning of 3 of 4 of the CES owned frac tanks;
4. Disposal of wash water/solids from hydro-blast cleaning;
5. Removal/Disposal of on-site debris;
6. Removal/Disposal of universal wastes; and,
7. Final Cleaning of concrete/asphalt/sumps/etc and disposal of waste generated.

2.2.2 Issues

It is important that the community be kept informed of the on-going activities as the PRP Group moves forward on the assessment and cleanup activities. The PRP Group has set up a website to keep those interested informed of those activities. The website is www.cesgriggsrd.com.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

City of Houston
Texas Commission on Environmental Quality
Texas Department of State Health Services
Agency for Toxic Substances and Disease Registry

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.