

# Texas Commission on Environmental Quality Investigation Report

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**Customer: CES Environmental Services, Inc.**  
**Customer Number: CN600618946**

**Regulated Entity Name: CES ENVIRONMENTAL SERVICES**

**Regulated Entity Number: RN100693282**

<p><b>Investigation #</b> 379562</p> <p><b>Investigator:</b> ERSKINE GITTENS</p> <p><b>Conducted:</b> 04/28/2005 -- 04/30/2005</p> <p><b>Program(s):</b> SLUDGE</p> <p><b>Investigation Type:</b> Compliance Investigation</p> <p><b>Additional ID(s):</b> 23198</p> <p><b>Address:</b> 4904 GRIGGS RD, HOUSTON, TX , 77021</p>	<p><b>Incident Numbers</b></p> <p><b>Site Classification</b> SLUDGE TRANSPORTER</p> <p><b>SIC Code:</b> 1542 <b>NAIC Code:</b> 562219 <b>SIC Code:</b> 4212</p> <p><b>Location:</b></p> <p><b>Local Unit:</b> REGION 12 - HOUSTON <b>Activity Type(s):</b> SGTRANS - SGE CCI Transporter</p>
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**Principal(s):**

Role	Name
Participated in Investigation RESPONDENT	CES ENVIRONMENTAL SERVICES INC CES ENVIRONMENTAL SERVICES INC

**Contact(s):**

Role	Title	Name	Phone
Participated in Investigation	BRANCH MANAGER	MR MARLIN MOSER	Cell (281) 785-0764
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Participated in Investigation	HEALTH SAFETY AND ENVIRONMENTAL OFFICER	MR ERIC FISHER	Fax (713) 676-1676
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Regulated Entity Mail Contact	SALESMAN	MR DAN BOWMAN	Cell (713) 854-6150
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**Other Staff Member(s):**

<b>Role</b>	<b>Name</b>
QA Reviewer	MARCIA STARK
Supervisor	JAY EASTHAM

**Associated Check List**

<b><u>Checklist Name</u></b>	<b><u>Unit Name</u></b>
SLUDGE TRANSPORTER CEI	CES Env. Services CCI

**Investigation Comments:**

INTRODUCTION: A Comprehensive Compliance Investigation of this transporter operation was commenced on April 28, 2005, and completed on April 30, 2005. Eric Fisher, the Health Safety and Environmental Officer, and Marlin Moser, the business manager, were both present for the entire first part of the investigation. Marlin Moser participated in the second part of the investigation. GENERAL FACILITY AND PROCESS INFORMATION: CES Environmental Services Inc. is an industrial and hazardous waste handling and transport company located at 4904 Griggs Road, Houston, Texas. This company started as a hazardous waste broker, identifying and locating companies for the handling and transport of industrial and hazardous waste. Sometime in 2001, the company started acquiring trucks to transport hazardous waste. The company now has sixteen trucks and 29 tank trailers used to transport waste. Industrial and hazardous wastes are transported to in-state and out-of-state permitted disposal facilities. Requests by its clients to transport liquid domestic waste prompted the company to dedicate two tank trailers for the transport of this waste category. Company operations were initially located at 3901 Trail Mobile Drive off Wallisville Road in Houston, Texas. Sometime in 2002 the company moved to its present location. BACKGROUND: Existing records indicate that an application for registration was filed with the TNRCC, the predecessor agency to the TCEQ, on October 23, 2001. On October 29, 2001, a registration with an expiration date of August 31, 2003, was issued to transport water treatment plant sludge, domestic septage, grit trap waste, grease trap waste, and chemical toilet waste. The registration was renewed on May 15, 2003, with an expiration date of August 31, 2005. Amendments to the registration were issued on 7/24/2002, 9/18/2002, 1/6/2003, 9/26/2003, 6/16/2004, 10/26/2004, 12/2/2004, 1/28/2005, and 3/17/2005. A Comprehensive Compliance Investigation was conducted on 12/14/2001. No violations were issued. ADDITIONAL INFORMATION: Since most of the trucks registered with the TCEQ were not available for inspection, the first part of the investigation consisted primarily of the initial interview, a synopsis of the company's operational history, and a detailed record review. One truck and three tank trailers were also inspected. The truck met all the registration requirements of Chapter 312. The discharge valves on the tank trailers were not prominently marked and there were no means of volume measurement on the tanks. Marlin Moser, the business manager, indicated that these tank trailers were not used to transport domestic waste. The record review revealed that in addition to the sludge transporter registration, the company has a TCEQ solid waste registration, No. 30900, and an EPA ID No. TX008950461 to transport industrial and hazardous waste. Hazardous waste is transported to Pollution Control Industries (PCI), a fully-permitted Part B "RCRA" treatment, storage, and disposal facility located on a 36-acre site in Shelby County in Memphis, Tennessee. The primary activity at this disposal facility is processing and bulking high BTU wastes for use as alternative fuels in cement kilns. Rineco, Inc. in Benton, Arkansas is the other hazardous waste management facility used by CES Environmental Services Inc. Rineco uses a solid and liquid blending process to manufacture waste-derived fuel which is used as a secondary fuel source in cement kilns. Non-hazardous liquid waste transported by CES Environmental Services Inc. is taken to Liquid Environmental Solutions, located at 250 Gellhorn, Houston, Texas. This facility is a Type V facility permitted by the TCEQ to treat and process grease and grit trap waste, septage, leachate, industrial wastewaters and other non-hazardous liquid wastes. U.S. Oil Recovery LLC, located at 400 N. Richey Street in Pasadena, Texas, is the other non-hazardous waste disposal facility.

Class I solid Nonhazardous waste is taken to BFI-Gulf West Landfill in Anahuac, Texas, TCEQ Permit No. SW-39039-00 and Republic Waste Services Seabreeze Landfill, TCEQ Permit No. MSW-1539A. Class II Non-Hazardous waste is taken to BFI-McCarthy Road landfill, TCEQ permit No. MSW-261B. The second part of the investigation focused on the inspection of the trucks. Ten trucks and the two tank trailers, dedicated to the transport of liquid domestic waste, were inspected and they all met the transporter requirements of Chapter 312. Ten other tank trailers including the three that were inspected during the first part of the investigation were also inspected. On this occasion all the discharge valves on the trailers were found to be prominently labeled. On exit interview Marlin Moser, the business manager, was reminded that the Annual Summary Report was due on June 1, 2005. He was also advised to ensure that all trucks used to transport sludge and similar wastes are in continuous compliance with the transporter requirements of Chapter 312.

No Violations Associated to this Investigation

Additional Issues

Description Are sight gauges on all closed vehicles/tanks/containers or alternate method of volume measurement approved?

Additional Comments

Some trucks used to transport liquid hazardous and non hazardous waste do not have a means of volume measurement.

Signed

Date

Environmental Investigator

Signed

Date

Supervisor

Attachments: (in order of final report submittal)

\_\_\_ Enforcement Action Request (EAR)

\_\_\_ Maps, Plans, Sketches

\_\_\_ Letter to Facility (specify type) :

\_\_\_ Photographs

Investigation Report

\_\_\_ Correspondence from the facility

\_\_\_ Sample Analysis Results

\_\_\_ Other (specify) :

\_\_\_ Manifests

\_\_\_ Notice of Registration

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