

# 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> 727090</p> <p><b>Investigator:</b> GARY FOGARTY</p> <p><b>Conducted:</b> 11/05/2008 -- 11/05/2008</p> <p><b>Program(s):</b> PRETREATMENT</p> <p><b>Investigation Type:</b> Compliance Investigation</p> <p><b>Additional ID(s):</b></p> <p><b>Address:</b> 4904 GRIGGS RD, HOUSTON, TX , 77021</p>	<p><b>Incident Numbers</b></p> <p><b>Site Classification</b> INDUSTRIAL USER-APPROVED PT PROGRAM</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</p> <p><b>Activity Type(s):</b> PTRCAPPIU - PT IU Recon - Approved Programs</p>
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**Principal(s):**

Role	Name
RESPONDENT	CES ENVIRONMENTAL SERVICES INC

**Contact(s):**

Role	Title	Name	Phone
Regulated Entity Contact	HSE MANAGER	MR KARL GUIDRY	Work (713) 676-1460
Regulated Entity Contact	HSE MANAGER	PRABHAKAR THANGUDU	Work (713) 676-1460
Regulated Entity Contact	PRESIDENT	MR MATT BOWMAN	Work (713) 826-1329

**Other Staff Member(s):**

Role	Name
QA Reviewer	BARBARA SULLIVAN
Investigator	SHARAREH RAFATI
Investigator	ARON ATHAVALEY
Investigator	BARBARA JOHNSTON
Supervisor	BARBARA SULLIVAN

**Associated Check List****Checklist Name**PRETREATMENT IU IN APPROVED PROGRAM  
RECONNAISSANCE**Unit Name**

CES Environmental 727090

**Investigation Comments:****INTRODUCTION**

An investigation of CES Environmental Services, which is an industrial user (IU) of the City of Houston Pretreatment Program, was conducted on November 5, 2008 to assist other TCEQ Houston Region investigators and determine compliance with applicable pretreatment regulations. This investigation was part of a multimedia investigation carried out by the TCEQ Houston Region Air and Waste Sections. The facility was not notified of the investigation due to this being a complaint investigation. Sharareh Rafati, was the TCEQ Houston Region Air Section Environmental Investigator, Aron Athavaley and Barbara Johnston, Environmental Investigators from the TCEQ Houston Region Office Waste Section were present during the investigation. An exit interview, explaining the results of the investigation, was conducted on November 5, 2008 with Matt Bowman, President, Prabhakar Thangudu, Health Safety and Environment Manager, and Karl Guidry, Health, Safety and Environment Manager. No exit interview form was issued concerning pretreatment regulations as this investigation was performed in support for the Air and Waste Sections. Mr. Bowman, Mr. Thangudu, and Mr. Guidry were notified that findings concerning pretreatment issues would be forwarded to the City of Houston as the City is the designated Control Authority and as such has jurisdiction. A copy of the TCEQ Exit Interview Form was received by Mr. Thangudu from the Air and Waste Sections. Mr. Clyde Smith, Environmental Investigator IV, Industrial Wastewater Service, Department of Public Works and Engineering of the City of Houston was notified of the investigation's findings relating to pretreatment issues.

**GENERAL FACILITY AND CURRENT PROGRAM INFORMATION**

CES Environmental Services discharges treated process wastewater to the City of Houston Sims Bayou Wastewater Treatment Facilities (WWTF). The Sims Bayou WWTF has a Texas Pollutant Discharge Elimination System (TPDES) Permit, Number (No.) WQ0010495-002; EPA ID. No. TX0062201. The Sims Bayou WWTP has had past incidences of interference attributed to industrial users including CES Environmental Services.

**BACKGROUND INFORMATION**

The most recent Pretreatment Audit of the City of Houston pretreatment program was conducted on January 8, 2007. The audit included a site investigation of CES Environmental Service by Rebecca Villalba, TCEQ Central Office Pretreatment Auditor. The findings of the Audit included failure to require an adequate sample point at the end of pipe for CES Environmental Services, Inc. for monitoring local limits without entering enclosed CES Environmental Services' property. The City has had a new sample point installed for monitoring wastewater to determine compliance with the City's local limits. The last TCEQ pretreatment comprehensive compliance investigation (pCCI) was conducted on April 28, 2008. An additional issue related to the pCCI was resolved and did not involve CES Environmental Services. The last EPA pretreatment compliance investigation (PCI) was performed June 30, 2003. No violations were found. A review of the self-reported effluent quality data indicated numerous violations at the Sims Bayou WWTF during 2006. These violations were attributed to industrial users. The latest effluent violation at Sims Bayou WWTP was for total suspended solids (TSS) during the month of January 2008 with a reported concentration of 33 mg/L which exceeded the maximum permitted concentration of 25 mg/L. The POTW has experienced plant upsets, interference, or pass through of pollutants to the receiving water attributable to industrial users (IUs) since the last pCCI. The City conducted investigations and found the responsible parties and followed the enforcement response plan (ERP) to deal with them.

**ADDITIONAL INFORMATION:**

As mentioned above, CES Environmental Services is an industrial user of the City of Houston pretreatment program. The facility is permitted by the City of Houston Department of Public Works and Engineering Wastewater Operations Industrial Wastewater Service to clean the interiors of truck tanker trailers, drums, and to receive and treat metal bearing wastes, oily wastes, and organic chemical wastes. CES Environmental Services is subject to applicable pretreatment standards contained in 40 CFR §§437.16, .26, .36 and 442.16(b). 40 CFR Part 437-Centralized Waste Treatment Point Source Category (CWT) pertains to the process wastewater generated from the metal wastes treatment, oily wastes treatment, and organic chemicals waste treatment. 40 CFR Part 442 - Transportation Equipment Cleaning Point Source Category (TEC) applies to the process wastewater generated from the cleaning of interiors of truck tanker trailers. Neither regulation is applicable to the process wastewater generated from the cleaning of drums. However, the regulations and EPA policy do allow this wastestream to be

treated as if were subject to either regulations. Therefore, the drum cleaning wastestream is not considered to be diluting either of the other regulated wastestreams.

**CES ENVIRONMENTAL SERVICES SITE INVESTIGATION:**

CES Environmental Services has about 150 employees. The hours of operation are 6:00 am to 6:00 pm Monday through Friday, 6:00 am through 12:00 pm Saturday. During the week the oil receiving area shuts down at 5:00 pm. The primary SIC Code is 1542.

The site has two Industrial Waste Permits issued by the City of Houston. The permits pertain primarily to the TEC facility and the CWT facility. The TEC facility is located towards the back of the site while the CWT facility is located in a building located at the front of the site. Adjacent to the TEC cleaning facility is the drum cleaning building. Located between the drum cleaning building and the CWT building is the old TEC building. The site currently obtains approximately 20% of its business from the TEC facility. The CWT facility is about 80% of the operation.

There are several sample points used at the site to determine compliance with applicable pretreatment standards. Sample Point #1 is located next to Griggs Road next to the Centralized Waste Treatment building. Sample Point #1 is used for determining compliance with the City of Houston local limits. The City has 24 hour access to this sample point which meets the requirement of the last Pretreatment Audit. There are three additional sample points for the three CWT wastestreams. The Category A sample point is for the wastewater generated from the treatment of metal bearing wastes. The Category B sample point is for wastewater generated from the treatment of oily wastes. The Category C sample point is for monitoring wastewater generated from the treatment of organic wastes. Under the CWT regulation, oils in the oily wastes and organic wastes wastestreams must have been derived from petroleum. These wastestreams must not contain wastes from food processors or food service establishments.

The current truck wash cleaning facility cleans the interiors of truck tanker trailers. The facility implements a pollution management plan instead of monitoring for applicable categorical pretreatment standards. Under the pretreatment regulations the pollution management at CES Environmental Services is in itself an applicable pretreatment standard. Any deviation from the pollution management plan as stated in the City of Houston Industrial Waste permit constitutes a violation of the applicable pretreatment standard.

The facility tests each heel from a trailer to determine compatibility of the waste before it is sent to the heel storage tank. Tanker trailers with large heels or incompatible heels are sent back to the customer so that the residue can be removed before the trailer is accepted for cleaning. The first flush or rinse is also sent to the heel storage tank. Once the heel tank is full, it is profiled and either sent to the CWT facility for treatment as an oily waste or organic chemical waste or discharged directly to Sample Point #1. Most loads from the heel storage tank are treated as organic chemical wastes.

The drum cleaning wastes are also treated the same as the truck cleaning facility. Residues are sent to the heel storage tank along with first rinses.

The facility also handles used motor oil. If any wastewater is generated, it is sent to the oily wastes section of the CWT facility. Best management practices were in place to reduce spills in the oil off-loading area. The waste oil storage area included a fume scrubber. Wastewater from the scrubber is sent to the CWT facility.

The facility has also expanded to include what was once a machine shop. Metal fabrication and repairs are still being done. No solvents are used in the metal fabrication area although some painting occurs. The facility was observed cleaning a large diameter pipe or conduit between the drum cleaning building and the old TEC shed. When asked about the metal cleaning process the facility representatives explained that the metal is carbon steel. The steel under goes a caustic wash and rinse, then a citric acid rinse, then a light passivation rinse which uses sodium nitrite. The facility representatives were told that the passivation rinse is a conversion coating process which makes the entire metal cleaning operation subject to applicable pretreatment standards in 40 CFR Part 433 - Metal Finishing point Source Category. The wastewater from the metal cleaning process flows to the CWT metals treatment wastestream for treatment. It was explained that the addition of the metal finishing process should require an additional sample point and specific reporting requirements. It is unclear if the City was aware of the new process. The facility was told that the City of Houston would be notified of the findings.

The City of Houston was contacted December 8, 2008 via e-mail concerning the findings at CES Environmental Services.

CONCLUSION: The findings of this investigation concerned the addition of an industrial process subject to metal finishing regulations. The findings were forwarded to the City of Houston. The City of Houston notified the TCEQ that CES Environmental Services had removed the metal finishing process. Therefore, a new sample point to determine compliance with applicable pretreatment standards in 40 CFR Part 433 will not be needed.

**No Violations Associated to this Investigation**

**Additional Issues**

**Description**      Item #1

**Additional Comments**

The facility had initiated an industrial process subject to applicable pretreatment standards in 40 CFR Part 433 without proper notification to the City of Houston. This issue has been referred to the City of Houston, which is the designated control authority

**Signed**  
\_\_\_\_\_  
**Environmental Investigator**

**Date** \_\_\_\_\_

**Signed**  
\_\_\_\_\_  
**Supervisor**

**Date** \_\_\_\_\_

**Attachments: (in order of final report submittal)**

- \_\_\_ Enforcement Action Request (EAR)
- \_\_\_ Letter to Facility (specify type) : \_\_\_\_\_
- Investigation Report
- \_\_\_ Sample Analysis Results
- \_\_\_ Manifests
- \_\_\_ Notice of Registration

- \_\_\_ Maps, Plans, Sketches
- \_\_\_ Photographs
- \_\_\_ Correspondence from the facility
- \_\_\_ Other (specify) :
- \_\_\_\_\_
- \_\_\_\_\_