



U.S. Department of Justice

**Terrence Berg
United States Attorney
Eastern District of Michigan**

*Suite 2001
211 West Fort Street
Detroit, Michigan 48226-3277*

For Immediate Release:

Contact: Gina Balaya (313) 226-9758

Sep 4, 2008

EVENT: Guilty Plea

Defendant: Comprehensive Environmental Solutions, Inc. (CESI)

**Dearborn Wastewater Treatment Facility Pleads Guilty and
Pays \$750,000 in Fines for the Illegal Discharge
of Untreated Waste in Detroit Sewer System**

Comprehensive Environmental Solutions, Inc. (CESI), a Nevada Corporation which operates an industrial waste treatment and disposal facility at 6011 Wyoming Street, Dearborn, Michigan, pleaded guilty today before United States District Judge Victoria A. Roberts to violations of the Clean Water Act and making false statements in connection with illegal discharges of untreated liquid wastes from the facility, announced Acting United States Attorney Terrence Berg and Ronald Tenpas, Assistant Attorney General. CESI pleaded guilty on Thursday, September 4, 2008.

Acting United States Attorney Berg said, "The federal regime of environmental laws is in place to protect the public and prevent unlawful discharges into our water system. Today's plea demonstrates the commitment of my office, U.S. EPA and the FBI to pursue possible violations of the environmental laws as well as attempts to conceal such violations."

According to the plea agreement and other court records, the facility had a permit to treat liquid waste brought to the facility through a variety of processes and then discharge it into the Detroit sanitary sewer system. The facility contained twelve large above ground tanks capable of storing more than 10 million gallons of liquid industrial wastes.

During the period from April 2001 to June 2002, facility employees frequently bypassed the facility's pretreatment system in order to discharge untreated liquid wastes directly into the sanitary sewer system. At the time, the facility had no operable equipment to treat incoming liquid wastes and the 10 million gallon tank farm was full, with virtually no capacity to store additional liquid wastes. Rather than shutting down, the facility continued to accept about 13 million gallons of liquid industrial waste-streams for purported treatment and disposal. Because the facility had no space available for these incoming loads, nor equipment to treat the materials, the facility by necessity discharged to the sanitary sewer all of this untreated liquid waste in violation of the pretreatment regulations, the facility's permit, and the consent order under which the facility operated.

As part of its guilty plea, CESI has agreed to pay a fine of \$600,000, plus an additional \$150,000 to fund a community service project for the benefit, preservation, and restoration of the environment and ecosystems in the waters adjoining the Rouge River and/or the Detroit River. In addition to accepting responsibility today for its past misconduct, CESI, under new management, has taken a number of steps during the last several years to install new equipment and systems to treat liquid industrial waste before it is discharged to the sewer. As a condition of the term of probation set forth in the plea agreement, CESI has agreed to abide by the terms of a consent order with the Michigan Department of Environmental Quality for the cleanup of the facility, at an estimated cost of about \$1.5 million, which includes the proper disposal of the liquid waste previously stored in the facility's tank farm. Also as part of the plea, CESI has agreed to develop, adopt, implement and fund an environmental management system/compliance plan, which will include an annual program to train employees on environmental compliance and ethics to ensure that all CESI employees understand the requirements imposed by the facility's discharge permit.

CESI is scheduled to be sentenced before Judge Roberts on March 18, 2009 at 2:30 pm.

The case was investigated by Special Agents of the U.S. Environmental Protection Agency Criminal Investigation Division and the Federal Bureau of Investigation, with the assistance of the U.S. EPA National Enforcement Investigations Center, the U.S. Coast Guard and the Michigan Department of Environmental Quality Office of Criminal Investigations as part

of the Southeast Michigan Environmental Crimes Task Force. The case is being prosecuted by Assistant U.S. Attorney Mark Chutkow, U.S. Department of Justice Senior Counsel James Morgulec, and U.S. EPA Regional Criminal Enforcement Counsel David Mucha. The Task Force encourages citizens to report suspected environmental crimes to U.S. EPA at <http://www.epa.gov/compliance/complaints/index.html>.