

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Thursday, June 4, 2009

From: Charles Fisher

Subject: Continued Classic Emergency Removal Action

Diaz Intermediates Corp

301 Wyanoke Road, West Memphis, AR

Latitude: 35.1070830

Longitude: -90.1930000

POLREP No.:	7	Site #:	ARR000005843
Reporting Period:	May 26-30, 2009	D.O. #:	
Start Date:	1/9/2008	Response Authority:	CERCLA
Mob Date:	1/8/2008	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	ARR000005843	Contract #	
RCRIS ID #:			

Site Description

Diaz Intermediates Corporation (Diaz) is located in a rural industrial area at 301 Wyanoke Road in West Memphis, Crittenden County, Arkansas (AR). Diaz was a supplier of high purity, halogenated, fine organics to the chemical industry, using bromine as the primary raw material in the formulation of their products. In late July 2007, Diaz shut down the facility and in August they filed for Chapter 7 bankruptcy, in the Eastern District of Arkansas.

The Site contains approximately 2,200 containers of varying sizes (from 5 gallon pails to 550 gallon plastic totes), 8 above ground storage tanks, and 7 railroad tank cars. The contents of these containers varies from finished products, to off-specification/intermediate products, and raw materials. In addition, material remains within some of the processing equipment including vessels and piping. On September 12, 2007, the Arkansas Department of Environmental Quality (ADEQ) requested assistance from EPA for a potential removal action at the Diaz Site.

During late October 2007, EPA conducted a removal site assessment at the Site. All containers were inventoried and 42 samples were collected from representative containers for hazard categorization (HazCat®) field chemistry testing. The results of the field chemistry testing showed that most of the drums were either corrosive or flammable.

On December 4, 2007, ADEQ requested that EPA Region 6 return to the Site to abate the releases or threaten releases to protect public health and the environment, due to deteriorating conditions of the drums, that included several minor leaking drums, and the presence of pooled storm water in the secondary containment areas.

Current Activities

On March 12, 2009 the EPA Region 6 Superfund Division Director approved the continuation of stabilization activities while additional enforcement activities are to be pursued.

EPA, START-3, and ERRS mobilized to West Memphis, AR on May 26, 2009. Between May 27-29, 2008, EPA conducted removal stabilization activities at the site that included inspection of all containers (drums, totes, ASTs, and railroad tank cars), replaced approximately 287 damaged drum bungs, and transferred approximately 200 gallons of material from a leaking 275-gallon plastic tote to a non-leaking plastic tote.

Storm water had accumulated in the following areas: the Old and New Tank Farm secondary containment systems, the Drum Pad area, the Bulk Truck Loading Pad area, the walk-way between the Fork Lift Pad area and the North Drum Pad area, inside the Process Building, and in the east drainage ditch. START-3 collected pH readings from these areas, with the pH's ranging from 1.6 in the Bulk Truck Loading Platform area to 8.6 in the New Tank Farm secondary containment system.

On May 28, 2009, ERRS began to neutralize the acidic liquid in the Bulk Truck Loading Pad area with the addition of caustic soda beads. On May 29, 2009, a pH of 7.4 was obtained for the liquid located inside the Bulk Truck Loading Pad area.

On May 28, 2009, ERRS and START-3 collected six surface water samples for chemical analysis. The samples were shipped to an ERRS-procured laboratory and were to be analyzed for total metals, volatile organic compounds (VOCs), Total Suspended Solids (TSS), pH, and oil and grease. The resulting analytical data will be used to determine if the accumulated storm water can be either discharged into the on-site east drainage ditch or placed in the West Memphis Sanitary sewer system for further treatment.

The site was secured on May 29, 2009 and personnel demobilized on May 29 and 30, 2009.

Planned Removal Actions

Current planned removal activities include coordinating with ADEQ, and local officials and to continue with site stabilization activities as warranted.

Next Steps

EPA will return to the site in approximately three weeks in order to remove the accumulated storm water in the Old and New Tank Farm secondary containment systems, the Drum Pad area, the walk-way between the Fork Lift Pad area and North Drum Pad area, the Bulk Truck Loading Pad area, the Process Building, and the east drainage ditch. In addition, all containers will be inspected for structural integrity and leakage. If warranted, EPA will continue with stabilization activities.

Key Issues

The Site is currently abandoned and will continue to deteriorate if the site is not sold as is or the EPA does not continue with stabilization activities and/or a removal action involving the off-site transportation and disposal of the container contents.

response.epa.gov/DiazRemoval