

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Monday, July 13, 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.:	8	Site #:	ARR000005843
Reporting Period:	July 6-10, 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

EPA, START-3, and ERRS mobilized to West Memphis, AR on July 6, 2009. Between July 7-10, 2009, EPA conducted removal stabilization activities at the site that included:

- Inspected all containers (drums, totes, ASTs, and railroad tank cars);
- Replaced approximately 108 damaged drum bungs and 5 open-top drum bungs;
- Transferred approximately 250 gallons of storm water from the Walkway to 2, 275-gallon labeled, plastic totes;
- Treated the Walkway storm water with caustic soda in order to precipitate the metals out of solution;
- Removed approximately 80 pounds of sediment/sludge from the Walkway sump and placed in a labeled, 35-gallon, black steel drum;
- Transferred storm water located in the Old Tank Farm Secondary Containment Area (pH = 8.3) and the New Tank Farm Secondary Containment System (pH = 6.3) to the West Memphis Sanitary Sewer System for further treatment;
- Transferred storm water from the Bulk Truck Loading Pad Area (pH = 4.2) and Process Building (pH =

8.3) to the Old Tank Farm Secondary Containment System; after determining the pH was 7.4, the storm water was then transferred to the West Memphis Sanitary Sewer System for further treatment;

- Relocated on-site all drums and totes formerly located in the Bulk Truck Loading Pad area to prevent potential future leakage of container contents from contaminating ponding rain water ;
- Transferred approximately 1,300 gallons of sludge/sediment from the Bulk Truck Loading Pad area to 5, 275-gallon, plastic totes;
- Replaced several damaged wooden pallets with undamaged pallets so the staged drums would have a stable base.

On July 7, 2009, storm water was still located 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, and inside the Process Building. There was no storm water accumulation in the east drainage ditch. START-3 collected pH readings from these areas, with the pH's ranging from 4.2 in the Bulk Truck Loading Platform area to 8.3 in the 8.3 in the Process Building and the Old Tank Farm Secondary Containment system.

On July 8, 2009, ERRS and START-3 collected one surface water sample (DIC-SW04) for chemical analysis. The sample was shipped to an ERRS-procured laboratory and was 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.

On July 9, 2009, a representative from the Arkansas Department of Environmental Quality (ADEQ), visited the site and was given an update of EPA actions by the EPA RPM (former EPA OSC) and a brief site tour. In addition, a large grass fire occurred west of the site; however, due to the wind direction (south-southwest to north-northwest) the fire did not come into real close proximity of the site.

The site was secured on July 10, 2009 and personnel demobilized on July 10, 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

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