United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Monday, June 14, 2010
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.:	9	**Site #:**	ARR000005843
Reporting Period:	June 7-11, 2010	**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 pals 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 heath 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 June 7, 2010. Between June 7-10, 2010, EPA conducted removal stabilization activities at the site that included:

• Inspected all containers (drums, totes, ASTs, and railroad tank cars);
• Replaced approximately 229 damaged drum bungs, replaced 8 open-top drum bungs, relieved pressure from 17 drums and replaced approximately 10 cracked and damaged tote lids;
• Transferred approximately 138 gallons of hydrobromic acid (HBr) from a leaking 275-gallon capacity plastic tote to three, 55-gallon, poly drums;
• Transferred approximately 160 gallons of Toluene from a leaking 275- gallon capacity plastic tote to four, 55-gallon, ploy drums;
• Transferred approximately 150 gallons of CBFB/dibromotoluene mix from 3-collapsed drums to three, 55-gallon poly drums;
• Transferred approximately 50 gallons of x-bromotoluene from a collapsed drum to one, 55-gallon poly drum;

• Transferred approximately 50 gallons of an unknown substance (no labels or markings on drum) from a cracked 55-gallon poly drum to a new 55-gallon poly drum;
• Transferred approximately 260 to 280 gallons of MDFH, non-distilled water from a cracked tote to six, 55-gallon poly drums;
• Transferred approximately 200 gallons of Fractionation water from a cracked tote to four, 55-gallon, poly drums;
• Pumped pooled storm water located in the Old Tank Farm Secondary Containment Area, the New Tank Farm Secondary Containment System, the Bulk Truck Loading Pad Area, the Process Building and the Warehouse to the West Memphis Sanitary Sewer System for further treatment;
• Transferred acidic storm water from the South Drum Pad Area to the Bulk Truck Loading Pad Area for neutralization. Approximately 80 pounds of caustic NaOH was used to neutralize approximately 2,000 gallons of acidic storm water to a pH of 6.0. After neutralization, the South Drum Pad Area storm water was then pumped to the West Memphis Sanitary Sewer System for further treatment;

On June 7, 2010, standing storm water was identified in the following areas: the east drainage ditch, the Old and New Tank Farm secondary containment systems, the South Drum Pad Area, the Bulk Truck Loading Pad Area, inside the Process Building and the Warehouse.

On June 8, 2010, START-3 collected pH readings from the areas with standing water. The pH's ranged from 5.5 in the Old Tank Farm Secondary Containment system to 7.0 in the Process Building. In addition, the concentration of zinc in the standing liquid water was determined with the use of a HACH zinc field screening test kit. Zinc concentrations ranged from 0.07 mg/L in the east drainage ditch to 0.90 mg/L in the Old Tank Farm Secondary Containment system. All detected zinc concentrations were below the 2.61 mg/L effluent NPDES standard set for the site.

On June 9, 2010, ERRS/START discovered a leaking 275-gallon plastic tote that was leaking hydrobromic acid (HBr) onto the concrete surface of the South Drum Pad Area. ERRS transferred the HBr to new 55-gallon poly drums, flushed the area with re-circulated water from the South Drum Pad Area. START determined that the pH of the water in the South Drum Pad secondary containment area at the sump was approximately 3.0. The day before the pH had been 6.0. ERRS transferred the acidic storm water from the South Drum Pad Area to the Bulk Truck Loading Pad Area for neutralization. Approximately 80 pounds of solid caustic NaOH beads were used to neutralize the acidic stormwater to a pH of 6.0. The neutralized storm water was then discharged into the West Memphis Sanitary Sewer system for further treatment.

On June 10, 2010, ERRS transferred the contents of several collapsed drums to new, 55-gallon poly drums. In addition, toluene, MDFH, non-distilled water, and fractionation water were transferred from cracked 275-gallon capacity plastic totes to new 55-gallon ploy drums. Several cracked and damaged tote lids were replaced. ERRS secured the site for demobilization. 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.

EPA/START-3/ERRS personnel demobilized on June 11, 2010.

Planned Removal Actions
Current planned removal activities include coordinating with ADEQ, and local officials.

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