

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
DIAZ Removal - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #1
Initial and Final - Diaz BOA / ER Removal
DIAZ Removal
A6C4
West Memphis, AR
Latitude: 35.1070830 Longitude: -90.1930000

To:
From: Adam Adams, OSC
Date: 4/19/2011
Reporting Period: 04/10-15/2011

1. Introduction

1.1 Background

Site Number:	A6C4	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:		Incident Category:	
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/10/2011	Start Date:	4/7/2011
Demob Date:	4/15/2011	Completion Date:	5/30/2011
CERCLIS ID:	ARR000005843	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category - Emergency Response

1.1.2 Site Description - The Site contains approximately 2,200 containers from 5 gallon buckets to 550 gallon totes, 8 above ground storage tanks (ASTs), and 5 railroad tanker cars. The contents in these containers, AST's, and railcars varies from finished high quality products to off-specification and/or intermediate products, substances, and raw materials. It is possible that some materials remain in the process equipment vessels and piping. From hazard categorization field chemistry testing conducted in October 2007, most of the drums were either corrosive or flammable. The site was initiated by the Arkansas Department of Environmental Quality (ADEQ) in September of 2007 requesting assistance from the EPA. ADEQ has monitored the site regularly and called into the EPA for assistance anytime there is a release or threat of release from the drums, totes, AST's, or any equipment or containments at the facility.

1.1.2.1 Location - The Site is located at 301 Wyanoke Road, West Memphis, Crittenden County, Arkansas 72301 in a rural industrial area near the Mississippi River. (35.107083 N / -90.193000 W)

1.1.2.2 Description of Threat - The facility manufactured high purity, halogenated, fine organics to the chemical industry, using bromine as the primary raw material. Characteristically, the threats include Toxics, Flammables, and Corrosives.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA and ADEQ mobilized to the Site on April 10 to meet with and monitor the removal of a large volume of chemicals from the abandoned facility. The bank that holds the securities for the Site arranged with a vendor to remove a portion of the hazardous substances on-Site for recycling/reuse. Over the period from April 10 to April 15, the vendor removed four tanker truck loads of hydrobromic acid and five box truck loads of palletted chemicals (listed below) using a hired contractor.

2.1.2 Response Actions to Date

EPA has conducted several stabilization efforts at the abandoned Site between October 2007 and April 2011. The Site is monitored monthly by ADEQ, who contacts EPA in the event conditions at the Site warrant response stabilization efforts.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Potentially Responsible Party at this time is Diaz Intermediates Corp.

2.1.4 Progress Metrics

The following table provides estimated volumes of the materials removed by the vendor in four 5,000-gallon tanker trucks and five box van trucks carrying 275-gallon totes, 55-gallon drums, and 5-gallon pails. The substances were not disposed of, but rather recycled and reused.

Waste Stream / Hazardous Substance	Medium	Volume (gal) (est)	Manifest #	Treatment	Disposal
Hydrobromic acid		20,025		N/A	Recycled
p-Dibromobenzene <.8% tetrabromobenzene		3,305		N/A	Recycled
p-Dibromobenzene .8%-12% tetrabromobenzene		170		N/A	Recycled
p-Dibromobenzene > 10% tetrabromobenzene		40		N/A	Recycled
p-Dibromobenzene (blue pails) no % listed		60		N/A	Recycled
p-Dibromobenzene (no labels)		15		N/A	Recycled
p-bromochlorobenzene		70		N/A	Recycled
p-Dibromobenzene (empty/cracked/bad)		125		N/A	Recycled
Methanol		1,815		N/A	Recycled
Aluminum Chloride		880		N/A	Recycled
Ferric Chloride		90		N/A	Recycled
n-propanol		2,365		N/A	Recycled
fluorobenzene		440		N/A	Recycled
2-bromopyridine		1,540		N/A	Recycled
p-Fluoroaniline		330		N/A	Recycled
n-propylbromide		825		N/A	Recycled
fluorobenzene		7,975		N/A	Recycled
empty tote		0		N/A	Recycled

2.2 Planning Section

2.2.1 Anticipated Activities

Planning will be conducted to conduct a complete removal at the Site, after the bank has released the hazardous substances to EPA.

2.2.2 Issues

No issues associated to this week's removal efforts by the bank and the chemical purchasing vendor.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

Information can be obtained at www.epaossc.org/DiazRemoval.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Agencies and organizations involved in this response effort include EPA, ADEQ, the bank, the vendor, and the vendor's contractors.

4. Personnel On Site

Personnel on-Site during this response effort include EPA, ADEQ, a representative for the vendor, and the vendor's contractors.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Information can be obtained at www.epaossc.org/DiazRemoval.

6.2 Reporting Schedule

No further POLREPs will be submitted for this emergency response effort.

7. Situational Reference Materials

No information available at this time.