

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #2**
Initial POLREP / Diaz Removal - EPA Lead
DIAZ Removal
A6C4
West Memphis, AR
Latitude: 35.1070830 Longitude: -90.1930000

To:
From: Adam Adams, OSC
Date: 7/27/2011
Reporting Period: 07/13-26/2011

1. Introduction

1.1 Background

Site Number:	A6C4	Contract Number:	EP-S6-07-01
D.O. Number:	0108	Action Memo Date:	7/6/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	7/13/2011	Start Date:	
Demob Date:		Completion Date:	
CERCLIS ID:	ARR000005843	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category - Removal Action, EPA Lead

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 mobilized on 07/13/2011 with contractors to begin the EPA Lead Removal Action at the Diaz Removal Site. Preparations commenced to establish the Support Zone (SZ), Contaminant Reduction Zone (CRZ), the Exclusion (Hot) Zone (EZ), and the Command Post. Additional resources were brought on-Site during the first week's operations. The railcars, tanks, totes, drums, and smaller containers were inventoried and assessed. The drums and totes are being consolidated, segregated, and staged in appropriate areas according to compatibility and like substances. As drums and totes are in shippable condition, they are prepared for transport for disposal or recycling.

2.1.2 Response Actions to Date

EPA has conducted several stabilization efforts at the abandoned Site between October 2007 and March 2011 and oversaw a PRP Lead Removal in April of 2011. The Site is monitored monthly by ADEQ, who contacts EPA in the

event conditions at the Site warrant response stabilization efforts.

In April of 2011, the security holding bank sold some hazardous substances (listed in Section 2.1.4) to a vendor. The vendor hired contractors and removed the estimated volumes of chemicals listed between April 10 and April 15, 2011. The chemicals listed and the volumes are estimates from the vendor. The EPA OSC and ADEQ Representative mobilized to the site to oversee that ER Removal Action, which was separate and apart from the current EPA Lead Removal Action.

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

During the current EPA Lead Removal Action, to date no hazardous substances, contaminants, or pollutants have been removed from the Site.

The following table provides vendor estimated volumes of the substances removed in April of 2011 during an Emergency Response Removal conducted by the security holding bank's vendor of 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) (estimate)	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-bromopyradine		1,540		N/A	Recycled
p-Fluoroanosoie		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

Vendors will be lined up to receive the hazardous substances on-Site either for disposal or recycling. Unknown substances will be sampled and profiled.

2.2.2 Issues

There have been no issues associated to this Removal Action to date.

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

Safety Officers:

EPA - OSC Adams
ADEQ - Michael Gates
START-3 - Noel Biscocho
ERRS - Don Edgington

2.6 Liaison Officer

2.7 Information Officer

Information can be obtained at www.epaosc.org/DiazRemoval. Factsheets can be found in the documents section of this website, as well as at the Site and at the local repository on Avalon Street, just north of Broadway at the West Memphis library.

3. Participating Entities

3.1 Unified Command

This EPA Lead Removal Action is a teaming effort between EPA and ADEQ.

3.2 Cooperating Agencies

Agencies and organizations involved in this response effort include EPA, ADEQ, and EPA Contractors.

Additional local entities notified of the Site and this Removal Action:

City Hall - Mayor Johnson.
WMFD/Hazmat - Fire Chief Gately
Crittenden County Regional Hospital

4. Personnel On Site

Personnel on-Site during this response effort include EPA and EPA Contractors. ADEQ Representation is on-Site at their discretion and maintain daily communications with the EPA OSC.

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.epaosc.org/DiazRemoval.

6.2 Reporting Schedule

Additional POLREPs will be provided as the Removal Action progresses. Additional details, photographs, and documentation will be posted to the website as the Removal Action progresses.

7. Situational Reference Materials

No information available at this time.