United States Environmental Protection Agency Region VI POLLUTION REPORT

Date: Wednesday, January 9, 2008

From: Charles Fisher

Subject: Initiation of Classic Emergency Removal Action

Diaz Intermediates Corp

301 Wyanoke Road, West Memphis, AR

Latitude: 35.1070830 Longitude: -90.1930000

POLREP No.: 1 **Site #:** ARR000005843

Reporting Period: 1/9/2008 **D.O.** #:

Start Date:1/9/2008Response Authority:CERCLAMob Date:1/8/2008Response Type:EmergencyDemob Date:NPL Status:Non NPLCompletion 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 3 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

On January 8, 2008, the EPA OSC and the START-3 and ERRS contractors mobilized to the Site to initiate a emergency removal action. The initial phase will consist of stabilizing the site by inspecting and securing all containers, transferring of materials from currently leaking and/or potential soon to be leaking containers, and the sampling of pooled storm water for fixed laboratory analysis. On January 9, 2008, an ADEQ water quality inspector visited the Site to coordinated with the OSC for the near future collection of the pooled storm water sampling for laboratory analysis.

Planned Removal Actions

The removal action involves securing all containers and the transferring of material from deteriorated containers into good condition drums and/or tote tanks for storage. Pooled storm water will be sampled and submitted to a fixed laboratory for ADEQ storm water permit discharge parameters.

Next Steps

After completion of the initial phase, remobilize to the site will occur when the storm water analytical

results are received, and reviewed to determine the best way to drain the site of all pooled storm water.

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 a removal action.

response.epa.gov/DiazRemoval