

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Friday, January 11, 2008

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.:	2	Site #:	ARR000005843
Reporting Period:	1/10/08 to 1/11/08	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 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 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

On January 10 and 11, 2008, approximately 550 gallons from the 23 dibromobenzene drums, that included several that were leaking, was transferred into three 300-gallon tote tanks for storage. The three tote tanks that were properly labeled and secured in the covered warehouse. Thirteen of the 23 dibromobenzene drums had a portion of their contents that was not pumpable due to it consisting of a thick sludge. Therefore, the 13 drums were placed and secured in poly over-pack drums. The remaining 10 drums were placed on pallets and a secondary containment berm was constructed to prevent contact with storm water.

All personnel demobilized from the site at COB on January 11, 2008.

On January 10, 2008, 6 storm water samples were collected and shipped to a fixed laboratory for industrial wastewater permit discharge analysis.

Prior to demobilization, all containers at the site were inspected and secured.

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 industrial wastewater 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