

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Friday, February 1, 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.:	3	Site #:	ARR000005843
Reporting Period:	1/29/08 to 1/31/08	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

Storm water analytical results from the 6 samples were received and forwarded to both ADEQ and the local Environmental Director. ADEQ approved the discharge of storm water from 5 of the 6 locations, except from the the Old Tank Farm secondary containment area. The analytical results revealed that this area has a low pH value of 4.25 and a high zinc concentration of 21.5 ppm that exceed the NPDES storm water discharge parameters.

On January 29 and 30, 2008, approximately 4,000 gallons and 9,950 gallons of storm water was discharged into the storm water drain and sanitary sewer systems respectively. The storm water in the Drum Pad, the North Pad Sump and the on-site Storm Water Ditch areas was discharged off-site. The pooled water in the New Tank Farm secondary containment and the Bulk Truck Loading Pad areas was discharged into the sanitary sewer system for further treatment.

Several bench scale studies were conducted to determine the best way to treat the water in the Old Tank Farm secondary containment area. When the proper pH was achieved and a zinc precipitate was visual, another storm water sample was collected and shipped to the laboratory for NPDES storm water discharge parameters.

The site was secured and personnel demobilized from the site on January 31, 2008 and February 1, 2008.

Planned Removal Actions

This phase of the removal action involves the discharge of pooled storm water from the following areas: New Tank Farm secondary containment, Drum Pad secondary containment, North Drum Pad Sump area, and the Truck Loading Dock area. The pooled storm water in the Old Tank Farm secondary containment area was treated and remains on-site pending review of more current analytical results.

Next Steps

Currently, the secured lender bank has informed the EPA that a potential buyer is interested in purchasing the facility as is and is planning to make a site visit sometime during the week of February 4, 2008. The next step will be to determine if the facility can be sold as is or is to remain abandoned.

When the analytical results for the storm water sample collected from the Old Tank Farm secondary containment area is received, it will be reviewed and forwarded to ADEQ and the local POTW.

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.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/DiazRemoval

POLREP #3 Last Updated 5/29/2008