

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Friday, April 4, 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.:	4	Site #:	ARR000005843
Reporting Period:	April 1 - 4, 2008	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 7 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

From April 1 through 4, 2008, EPA conducted removal stabilization activities at the Diaz Site that included transferring contents from deteriorating drums into plastic tote tanks, over-packing of drums that exhibited signs of poor integrity, and replacing poor or broken bungs.

The following drum contents were transferred and secured into plastic tote tanks for storage:

- 13 drums of 465 gallons (gals) of bromoanisole
- 7 drums of 150 gal of bromotoluene
- 5 drums of 275 gals of bromofluorobenzene
- 1 drum of 30 gals of bromofluorobenzene crude

The following drums were placed and secured into overpack drums for storage:

- 10 drums of dibromobenzene sludge

- 2 drums of bromofluorobenzene
- 1 drum of bromotoluene mix
- 1 drum of bromotoluene
- 1 drum of bromobenzene pot bottoms

In addition, stormwater that accumulated from recent rainfall events was pumped into the stormwater drainage system. Stormwater from the Old and New Tank Farm secondary containment areas, Process Area, and Warehouse was screened for pH and pumped into the sanitary sewer.

The site was secured on April 4, 2008 and personnel demobilized on April 5, 2008.

Planned Removal Actions

Current planned removal activities include coordinating with ADEQ, and local officials and continue with site stabilization activities as warranted.

Next Steps

Currently, the secured lender bank and a potential buyer are coordinating with EPA in a potential sale/purchase of the site. The next step will be to determine if the site can be sold as is or is to remain abandoned.

If warranted, EPA will return to the site to continue with stabilization activities.

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 stabilization activities and/or a removal action involving the off-site transportation and disposal of the container contents.

response.epa.gov/DiazRemoval