

**United States Environmental Protection Agency**  
**Region VI**  
**POLLUTION REPORT**

**Date:** Tuesday, June 3, 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

<b>POLREP No.:</b>	5	<b>Site #:</b>	ARR000005843
<b>Reporting Period:</b>	05/27/2008 to 05/30/2008	<b>D.O. #:</b>	
<b>Start Date:</b>	1/9/2008	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	1/8/2008	<b>Response Type:</b>	Emergency
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	ARR000005843	<b>Contract #</b>	
<b>RCRIS ID #:</b>			

#### 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

EPA, START-3, and ERRS mobilized to West Memphis, AR on May 27, 2008. On May 28 and 29, 2008, EPA conducted removal stabilization activities at the Diaz Site that included inspecting all containers, and securing or replacing approximately 56 broken drum bungs.

Absorbent material used to construct the containment area around the dibromobenzene sludge drums stored in the warehouse was drummed and replaced with fresh absorbent material.

Stormwater that accumulated from recent rainfall events in the Old Tank Farm, New Tank Farm, Process Building, Forklift Path, and Bulk Truck Loading Pad areas was screened for pH and pumped into the sanitary sewer. Stormwater that accumulated in the Drum Pad containment area was pumped into the stormwater drainage system.

The Site was secured on May 29, 2008 and personnel demobilized on May 30, 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](https://response.epa.gov/DiazRemoval)