UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

Inspection Date: 11/14/12-11/15/12 **EPA ID Number:** ARR000005025

Facility Name: D&D Properties
Physical Location: 713 Industrial Rd, El Dorado, Arkansas 71730
Mailing Address: **Same**

Type of Ownership: _Federal _State _County _Municipal X Private/Commercial

Inspection Participants: **(name and phone number)**
Lead EPA Inspector: Bill Mansfield, 214-665-8321 **Initials (2):** BM
Other Participants: Roxanne King, Eva Steele

Facility Representative(s):
Name: Darrell Madding and Roger Williams Phone No. (870) 918-9340

Facility Description: D&D Properties 713 Industrial Rd, El Dorado, Arkansas (Facility) is an inactive former carbon black manufacturing plant.

Generator Status: Inactive
_LQG (>1000kg/mo) _SQG (100kg/mo to 1000kg/mo) _CESQG (<100kg/mo) _TSDF

Inspection Type: X EPA Lead _State Lead _CSE _CEI
_CDI X Sampling _Multi-Media _Other: Non-financial File Review

Reason for Evaluation:
_ (01) Follow up _ (02) Case Development X (03) Sampling
_ (04) Citizen Complaint X (07) General _ (16) CAV
_ (63) US/Mexico _ (65) CAV-US/Mexico

Summary of Corrective Action Inspection:

A Corrective Action Inspection (CAI) was conducted in conjunction with a Compliance Evaluation Inspection (CEI) on 11/14/12. The EPA inspection team including me (Bill Mansfield), Roxanne King, and Eva Steele addressed four primary questions with the facilities representatives during the CA inspection:

1. Have there been any spills at the facility? No.
2. Is there any ongoing CA at the facility? No, there was no ongoing CA at the Facility at the time of inspection.
3. Upon inspection of the facility, were there any CA issues found (i.e., leaks, stained soils, undocumented spills)? Surface staining was observed throughout the site, most prevalent around tank farm areas.

4. Previous Corrective Action activities (i.e., Phase I/II Site Assessment, Site Investigation)? A Phase I Site Assessment from February 28, 2007 (Appendix 1) was obtained during the inspection. A review of the February 28, 2007 Site Assessment revealed the following Areas of Concern (AOCs):
   - ASTs have impacted the soil in the tank farm areas.
   - Surface staining throughout the site, most prevalent in tank farm areas.
   - Former landfills: subsurface investigations in 1990 revealed presence of carbon black, refractory brick, feedstock oil, and miscellaneous refuse. Sampling was not conducted.
   - Lagoons and Pits: Historical records indicate 2 former ponds with no documentation regarding content, composition and characteristics of the sludge and/or fill.
   - Drains within the former process area reportedly drained to the site's remaining slurry pond. Overflow from the slurry pond and other storm water from the site drain into an intermittent stream then into culverts that run beneath the facility entrance and Industrial Road. Stained excavated material and stressed vegetation were observed from the intermittent stream to Industrial Road.

Sampling was conducted at six locations on site during the inspection.

Figure 1

- Surface water from the slurry pond (Figure 1)
  Lead was above the regional screening level of 15ug/L at 37.8ug/L.

- Sediment sample from the slurry pond (Figure 2)
  Benzo(a)pyrene was above the regional screening level of 0.21mg/kg at 3.28mg/kg
  Arsenic was above the regional screening level of 1.6mg/kg at 2.1mg/kg.
- Sediment sample from the north bank of the slurry pond
  No contaminants above regional screening levels were found.

- Sediment sample from the secondary containment of tanks 5 and 6 (Figure 3).
  Benzo(a)pyrene was above the regional screening level of 0.21mg/kg at 4.57mg/kg.

- Sediment sample from the alternate draining location from sump on the east side of the former process area (Figure 4)
  Arsenic was above the regional screening level of 1.6mg/kg at 3.5mg/kg.

- Sediment sample from drainage culvert on south side of site (Figure 5)
  Arsenic was above the regional screening level of 1.6mg/kg at 4.6mg/kg.

Conclusions:

Sampling results indicate that contamination has occurred and exists on site, however the extent of contamination is unknown. Sampling was limited to surface water and sediment/soil samples in the areas believed to have the most contamination. Historical records of groundwater monitoring were not available during the inspection and may not exist.

Recommendations:

Soil sample from the secondary containment of tanks 5&6 showed evidence of hazardous constituent benzo(a)pyrene above regional screening levels. Tanks 5&6, along with the other tanks in this secondary containment, are known to have contained feed stock oil for the carbon black process. If the former landfills/pits described in the February 28, 2007 Phase I ESA were found to contain feedstock oil during investigations in 1990, then further sampling of soil and groundwater should be strongly considered to determine nature and extent of contamination in the landfills/pits as well as the secondary containment area of tanks 5&6.

Soil sample from the bank of the slurry pond showed hazardous constituent benzo(a)pyrene above regional screening levels. The slurry pond overflows through a pipe that drains into an intermittent stream on the west side of the slurry pond, therefore, it is strongly recommended that additional soil/sediment sampling be conducted in the intermittent stream up gradient and down gradient from the overflow pipe.

Checklists Completed: None

Peer Reviewed by: Dale O Johnson **Date:** 1-22-13

Appendices

Appendix 1: Phase I Environmental Site Assessment
Of
Columbian Chemicals Company Facility
713 Industrial Road
El Dorado, Arkansas
Project No. 207040.00
February 28, 2007