

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

**Date:** Friday, May 19, 2006

**From:** Paul L. Kahn & Eric M. Daly

**To:** Mary Mears, USEPA, Region 2, PAD                      Carole Petersen, USEPA, Region 2ERRD-NJRB  
John Kushwara, USEPA Region 2 DECA-WCB                      Patricia Carr, USEPA-PAD  
Fred Mumford, NJDEP                      Marissa Truono, USEPA ERRD-RAB  
Walter Andrews , USEPA Region 2 DEPP-WPB                      George Zachos, USEPA Region 2 ERRD  
Andrew Radaant, US DOI                      Dave Sweeney, NJDEP  
Tim Grier, USEPA Headquarters 5202G                      Kristin Grun, NJDEP  
Joshua Gradwohl, NJDEP                      Paul King, NJDEP  
Carol Chamberlain, Lawrence Township  
Health Dept.

**Subject:** Friction Division Products  
40 North Enterprise Ave, Lawrence Township (Trenton), NJ  
Latitude: 40.2728000  
Longitude: -74.7083000

<b>POLREP No.:</b>	<b>3 Site #:</b>	XW
<b>Reporting Period:</b>	<b>D.O. #:</b>	
<b>Start Date:</b>	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	<b>Response Type:</b>	Emergency
<b>Demob Date:</b>	<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>	<b>Incident Category:</b>	Removal Assessment
<b>CERCLIS ID #:</b>	<b>Contract #</b>	
<b>RCRIS ID #:</b>		

#### Site Description

This site, a defunct automotive brake pad manufacturer, was brought to the attention of EPA by the NJDEP for a possible referral for a CERCLA removal action. An inspection by EPA OSCs and a DEP responder on 12/23/05 revealed the following hazardous materials/wastes were abandoned at the site: tons of asbestos material, tons of elemental sulphur, 1,000+ drums of mostly unknown materials or materials that do not match the label description, hundreds of smaller containers, acids, flammable liquids, iron and aluminum powders, flammable solids, waste oil, solvents, and other contaminants or pollutants. The site is semi-controlled, with most doors being locked but numerous open windows or sections of sheet metal walls missing. A maintenance man is on-site for a few hours Mon-Fri. The owner of the building (not the business) has balked at doing a cleanup, but with pressure from the DEP, he has hired a company to provide him with an estimate of the clean-up cost. The former operator of the actual manufacturing business has left the state and resumed the same business in Pennsylvania.

#### Current Activities

OSC conducted a site inspection with a rep from NJDEP on 5/15/06. Results of inspection revealed that all solid wastes from Building #8 have been removed, but there is a residue all over the unused portion of that building. In Building #7, where the bulk of the chemicals were located, it was observed that most of the chemical containers are still there, having only been restaged within the building. Some of the containers have been moved directly under active roof leaks, and there are signs of chemical residue on the floors.

#### Planned Removal Actions

EPA is in the process of having this Site referred from the NJDEP for a removal action. A CERCLA site ID has been assigned, an attorney from ORC has been assigned, and the Action Memo is being drafted.

#### Next Steps

EPA will mobilize a team to the Site to haz-cat drums of unknown materials and to sample labeled drums.

**Key Issues**

Site access, completion of documentation of threat of release, and initiation of contact with the two RPs. EPA will also have to devise an enforcement strategy prior to initiating any federally funded removal action.

[response.epa.gov/frictiondivision](https://response.epa.gov/frictiondivision)