

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

Date: Tuesday, August 15, 2006

From: Paul L. Kahn & Eric M. Daly

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

POLREP No.:	5	Site #:	XW
Reporting Period:		D.O. #:	031
Start Date:	6/15/2006	Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NJN0002058677	Contract #	
RCRIS ID #:			

Site Description

This Site, home of a now 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

This POLREP is intended to 1) update the site information with a site ID and a removal start date, and 2) update recent site activities as follows:

Based on information provided EPA by the NJDEP, the OSC visited the Site on 6/14/06. The OSC observed that Friction had rented a trash roll-off and was in the process of disposing of crushed drums, some partially filled drums of chemicals, some empty drums with chemical residue, and trash, in the roll-off. Alarmed that Friction might be improperly disposing of chemicals, EPA used its verbal spending authority to mobilize its ERRS contractor, which, at the direction of the OSC, initiated 24-hour, 7-day a week site security.

Concurrently, the OSC was able to convince the owner of the property to bar Friction from entering the property. With these safeguards in-place, Friction approached EPA and indicated verbally that it was

willing to perform a removal action. After a subsequent meeting with the RP and his attorney at the site, it was agreed that Friction would not enter the site without EPA being present, in return for EPA discontinuing site security.

In the ensuing weeks, EPA has drafted an administrative consent order which will be sent to Friction's attorney for review.

Planned Removal Actions

Following the signing of the consent order by all parties, and the submission of approvable pre-removal documents such as a HASP and work-plan, a mobilization date will be established and the RP removal action will commence.

Next Steps

Finalize draft consent order and action memo.

response.epa.gov/frictiondivision