

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

**Date:** Friday, February 23, 2007  
**From:** Paul L. Kahn & Eric M. Daly

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

<b>POLREP No.:</b>	13	<b>Site #:</b>	XW
<b>Reporting Period:</b>		<b>D.O. #:</b>	031
<b>Start Date:</b>	1/29/2007	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	1/28/2007	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	NJN0002058677	<b>Contract #</b>	EP-W-04-055
<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.

Efforts at negotiating a clean up by the former operator and the owner of the Site has proven unfruitful, and EPA has initiated a Fund-lead removal when it became apparent that no other course of action was feasible.

#### Current Activities

ERRS contractor has completed Site set-up. Office and crew trailers fully operational, phone and fax lines installed, and I-net access acquired. Clearing of underbrush and trash from perimeter of the building is complete. ERRS completed setting up staging areas for supplies, decon/CRZ, used PPE and empty drums.

Areas have been designated for drum sampling, drum overpacking/bulking, drum refurbishment/labeling, and final staging for shipping.

ERRS continues to locate and restage drums and other containers from outside the Site to the inside staging area. ERRS is performing gross decon of floor in areas where drums will be staged pending shipping for disposal off-site.

ERRS mobilized chemist to Site to begin numbering and haz-cating unknown chemicals. Drum-Trak will be used to document each container of chemicals, and the analytical information will be integrated with a digital photograph of each container for cost-recovery documentation.

OSC has sent written notification of the initiation of the removal action to the mayor of Trenton. OSC has also distributed fact sheets with site overview and emergency contact information to the Trenton Fire and Police Departments, and to other tenants located in the industrial park where the Site is located.

The Weston Removal Support Team compiled the Admin Record documents, made arrangements for a local library to act as the repository, and will publish the public notice in a newspaper of general circulation in the Trenton area.

OSC Daly provided a site tour to rep from the NJDEP.

### **Planned Removal Actions**

ERRS will begin sampling and haz-cating unknown chemicals. Compatible waste streams will be devised and partial containers bulked. Samples will be sent to lab for profiling and disposal analysis.

ERRS will sample each of the 10 fabric filter baghouses on the Site, all of which contain a greyish dust generated from the mechanical grinding process which finished the brake pads.

ERRS will also sample/analyze the approximately 20 tons of manufactured brake pads for consideration for recycling or disposal.

### **Next Steps**

ERRS will continue to search for containers outside the main building.

ERRS will assign a number for each chemical container collected, sample it for analytical purposes, and track the data in Drum-Trak.

As each chemical container is identified it will be photographed, bulked or repackaged into a sound drum, bar-coded, and labeled as to the nature of the material.

### **Key Issues**

Key issues are locating all loose containers and moving them indoors, completing the sampling and haz-cating phase, and the safe performance of all removal activities.

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