

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

Date: Friday, March 9, 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

POLREP No.:	17	Site #:	XW
Reporting Period:		D.O. #:	031
Start Date:	6/15/2006	Response Authority:	CERCLA
Mob Date:	1/28/2007	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:	6/26/2006	Incident Category:	Removal Action
CERCLIS ID #:	NJN0002058677	Contract #	EP-W-04-055
RCRIS ID #:			

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.

During June,2006, the OSC observed that employees of the RP, Friction Division Products, were entering the Site and loading contaminated drums and debris in a roll-off from Building #7. In the process of removing the contaminated debris they managed to spill powdered chemicals from broken bags on a pallet. EPA brought this to the attention of the property owners. With EPA management authorization, and the owner's permission, EPA initiated security guard service as of June 15, 2006 to prevent access by the RP and other unauthorized persons. Security guard service was discontinued on June 26, 2006, when RP agreed to not enter the Site unless EPA was present.

Current Activities

OSCs Kahn and Daly and ERRS crew sampled 10 fabric filter baghouses filled with process exhaust particulate matter suspected to contain asbestos and metals. Samples will be sent to analytical lab for asbestos/TCLP-metals analyses. OSCs also sampled friable, deteriorated insulation from an outside storage tank which will be analyzed for asbestos. OSC sampled paint chips which began falling from the ceiling inside Building #7. Because of worker health and safety concerns, the chips will be analyzed for lead content.

ERRS continues to bulk brake pads, clear trash from fiber drums, and bulk burnable debris for

recycling/trash. ERRS chemist continues sampling and haz-cating drums and other containers. ERRS has set up a wireless perimeter air sampling/monitoring system which connects directly to a data recorder on the ERRS computer. The monitoring device has visible and audio alarms which will alert the crew if vapors reach the monitoring perimeter.

Request for proposals for bidding on analytical lab services has been issued by ERRS. Responses from qualified labs are due back the week of 3/12.

OSC issued procurement request for \$200,000 in funds to replenish the current removal ceiling.

Planned Removal Actions

ERRS chemist will continue to sample and haz-cat drums and other containers. ERRS crew will continue to bulk brake shoes and collect burnable debris to reduce fire load inside Building #7.

Next Steps

See Planned Removal Actions.

Key Issues

See previous POLREP.

response.epa.gov/frictiondivision