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

**Date:** Friday, March 16, 2007
**From:** Paul L. Kahn & Eric M. Daly

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|---|---|---|
| **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

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| **POLREP No.:** | 18 | **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**

Removal activities continue. ERRS continues to bulk brake pads, clear trash from fiber drums, and bulk burnable debris for recycling/trash. ERRS chemist has completed sampling and hazcating. A total of 455 samples have been field tested to determine chemical characteristics. The majority of the liquids appear to be ignitable and/or combustible materials, and a few have either an acidic or basic characteristic.

ERRS continues to use 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 overdue.

Received funding ceiling increase of $200,000, bringing the total removal ceiling to $450,000.

OSC gave tour of Site to Director of Lawrenceville Health Department.

**Planned Removal Actions**

ERRS will continue to bulk brake pads and other debris throughout the Site. During the next reporting period ERRS will remove gratings that are covering trenches in the rear of the property. Visible contamination will be sampled for hazardous characteristics.

ERRS will determine if a 20,000 gallon AST oil tank contains any product. If it does the OSC will determine if there is a potential threat for the oil to get into a navigable waterway. If the potential exists the OSC will request OPA funds to mitigate the potential threat.

ERRS chemist will work off-Site to devise bulking schemes to consolidate the 400+ containers of chemicals for disposal.

**Next Steps**

Next steps are to continue organizing and staging chemical containers for bulking and disposal and getting samples to the lab for disposal analyses.