United States Environmental Protection Agency
Region II
POLLUTION REPORT

Date: Thursday, March 29, 2007
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: SPECIAL #4
Friction Division Products
40 North Enterprise Ave, Lawrence Township (Trenton), NJ
Latitude: 40.2728000
Longitude: -74.7083000

POLREP No.:	20	**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

This POLREP reports on the analyses of the dust samples taken from each of the ten fabric filter devices (baghouses) that are on the Site. Nine of the ten baghouses are located outside of the main building which comprises the Site.

The OSC has notified the Lawrence Township Health Department and has enlisted that Department's assistance to review and comment on the proposed work plan as it is developed, as well as other related activities.

The OSC has also notified the property owner of the situation. Property owner's representative stated that the devices were originally purchased and installed by the prior owner and that the last tenant, FDP Brakes Inc., had used the devices in connection with their brake pad manufacturing business at the Site.

Planned Removal Actions

The analyses revealed that the powdery samples from each of the ten baghouses contains Chrysotile-form asbestos, in amounts ranging from 2.66% to 18.75%. The exposed insulation on a small, exterior boiler condensate tank has 21.27% friable ACM. A negative pressure enclosure will be constructed around this tank and the asbestos will be removed and packaged for disposal.

The more significant problem is the ACM in the baghouses, estimated to be at least one ton. Nine of the ten devices are outside the main building. The ACM cannot be removed from the devices without some risk of a release of fugitive ACM. Erecting a negative pressure enclosure around each device would be labor-intensive, dangerous because of the need for an elevated work platform, costly, and would not be fully protective of the environment because of a small risk of a fugitive ACM release. In order to avoid this approach, the decision was made to wrap each baghouse in poly, bring in a 20-ton crane, and lift each one onto the ground. The 'cocooned' device would be moved by forklift to an empty Quonset hut on the Site and processed inside the hut, which would be placed under negative pressure. The friable ACM would be bulked into Gaylord boxes for disposal. The empty carcasses would be power-washed into a sump located under the work platform. The wash-water would be filtered and pumped to temporary storage on site. The filtered water would be tested for asbestos, and if clean, would be discharged to the local POTW. The clean baghouse shells would be staged on-Site for future disposition.

Next Steps

Due to the magnitude of this project, OSC Eric Daly has been assigned to coordinate all the pre-planning, work plan, and the final implementation of the work with the EPA ERRS contractor.

Key Issues

Interacting with local health agencies, developing a sound work plan, and implementation of the actual processing of the baghouses.

response.epa.gov/frictiondivision