

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

Date: Friday, March 30, 2007

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

POLREP No.:	21	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:	6/26/2007	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 site activities continue. ERRS is bulking compatible chemicals together to consolidate volumes of waste material. All the accumulated snow on the roof of the main building has melted, making working conditions inside the Hot Zone much safer.

ERRS has bulked more than 30 tons of brake pads into supersacs and staged this material pending analysis to determine if the pads contain asbestos which could make it a hazardous waste if the pads are actually friable. Samples of various styles of brake pads found at the Site were sent to a lab for asbestos analyses.

ERRS continues working on a draft work-plan to address the approximately one ton of friable asbestos-containing material previously discussed in Special POLREP #4 dated 3/29/07. Information regarding the asbestos found at the Site has been passed to the NJDEP, the NJAG, and the Lawrence Township Health Department.

ERRS has investigated the contents of a 20,000 gallon capacity horizontal AST on the Site. The tank contains approximately 5,500 gallons of aged #6 oil. An examination of the area surrounding the tank revealed the existence of two storm drains within 100 feet of the tank. At this time it is unclear where the drains terminate, but it is believed/presumed that they drain into the nearby Assumpink Creek. Efforts are underway to dump a load of water into the drain and observe where the outfall is. However this may not be relevant, because the drains must go to either a receiving body of water or to the local POTW if this is a combined sewer system. Either way, there is a threat of a release of oil to a navigable waterway of the US, and an OPA account will be activated to eliminate this potential threat. Additional information will be reported in subsequent POLREPS.

Given the fact that it is established that the the RP FDP Inc. did use asbestos in it's operations, there is a possibility that the other building they used, #8, which is now vacant, may have asbestos residue on the horizontal surfaces. ERRS has been tasked with devising a draft Sampling Plan by which a Level B entry will be made to acquire dust samples for asbestos analysis. At the present time the area in Bldg. #8 where FDP operated is unoccupied but is a usable area for a future tenant.

ERRS took a sample of a dark, solid, resinous material found in a wire tote and sent same to lab for TCLP analysis.

OSC has acquired information regarding activities undertaken by the FDP at the Site prior to EPA being granted access. This information has been forwarded to ORC.

Planned Removal Actions

ERRS will continue bulking compatible wastes and process individual containers which will not be bulked.

ERRS will also continue with arrangements for cleaning the baghouses and follow-up on other tasks.

Next Steps

Continue consolidating chemical waste streams, remove asbestos from baghouses, initiate OPA oil remediation, investigate possibility of asbestos in Bldg. #8.

Key Issues

See above.

response.epa.gov/frictiondivision