

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

Date: Friday, April 6, 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.:	22	Site #:	XW
Reporting Period:		D.O. #:	031
Start Date:	6/26/2006	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 activities continue. ERRS continues to bulk compatible chemicals together to consolidate volumes of waste material.

Analytical results of samples of various styles of brake pads found at the Site that were sent to lab for asbestos analyses. Results reveal that the pads contain from 14% to 19% Chrysotile-form asbestos, identical in form and percentages to the friable asbestos-containing material (ACM) that was found in each of the 10 baghouses on the Site. A determination as to whether the brake pads should/can be disposed of as a hazardous waste, contaminant, or pollutant will be made by the OSC after consulting with legal

counsel in ORC.

ERRS continues drafting a work-plan to address approximately one ton of friable ACM in baghouses at the Site, previously discussed in Special POLREP #4, dated 3/29/07. OSC Eric Daly has been assigned to coordinate all removal aspects of this waste stream, within the context of the overall removal action. There is no change to the scope-of-work for the removal action, however an Action Memo has been drafted to request additional CERCLA funds to remediate this waste stream. Lawrenceville Health Department has indicated a desire for a public availability meeting on this matter in the near future. EPA has, of course, agreed to participate in this important event. ERRS contractor is in the process of preparing visual aids for the meeting.

OSC thoroughly investigated the 20,000 gallon horizontal AST on the Site that contains approximately 5,500 gallons of aged #6 oil. Even though there are two storm drains within 100 feet of the tank, the OSC has determined that there is no threat of a discharge of oil from the tank into a navigable waterway, and that it would not be appropriate to open an Oil Spill Liability Trust Fund account to remediate the oil. Should conditions change to warrant reevaluating the situation this determination will be reconsidered.

ERRS contractor has drafted a Sampling Plan for a Level B entry into Building #8 to acquire samples of dust from horizontal surfaces for asbestos analysis. OSC will review and revise/approve plan as appropriate.

Analysis of a sample of a solid resinous material found in a wire tote revealed the presence of less than 1% Chrysotile-form asbestos (thus, by definition is not ACM) and no volatile/semi-volatile or metals in excess of RCRA criteria for D-code wastes.

Planned Removal Actions

ERRS will continue to consolidate compatible waste streams and overpack deteriorated drums.

ERRS will continue with plans to remediate the asbestos in the baghouses at the Site.

Next Steps

See Planned Removal Actions above.

Key Issues

Key issues remain matters relating to the above activities, coordinating with local and state health agencies. Documenting manufacturing activities conducted by recent operator of the facility.

response.epa.gov/frictiondivision