

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

**Date:** Thursday, May 3, 2007  
**From:** Paul L. Kahn & Eric M. Daly

**To:** Paul L. Kahn, USEPA  
John Higgins, USEPA, Region 2, ERRD-RPB  
James Daloia, USEPA, Region 2, ERRD-RPB  
Delmar Karlen, USEPA Region 2 ORC-  
NJSFB  
John Kushwara, USEPA Region 2 DECA-  
WCB  
Fred Mumford, NJDEP  
Paul Zammit, USEPA Region 2 OIG  
  
George Zachos, USEPA Region 2 ERRD  
Dave Sweeney, NJDEP  
Deborah Schwenk, ORC  
Joshua Gradwohl, NJDEP  
Carol Chamberlain, Lawrence Township  
Health Dept.

Eric Daly, USEPA  
Eric Mosher, USEPA, Region 2, ERRD-RPB  
Mary Mears, USEPA, Region 2, PAD  
Carole Petersen, USEPA, Region 2 ERRD-  
NJR  
Patricia Carr, USEPA-PAD  
  
Marissa Truono, USEPA ERRD-RAB  
Walter Andrews, USEPA Region 2 DEPP-  
WPB  
Andrew Radaant, US DOI  
Tim Grier, USEPA Headquarters 5202G  
Kristin Grun, NJDEP  
Paul King, NJDEP

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

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

**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 Spilled 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**

ERRS contractor returned to the Site on April 30, 2007. ERRS has essentially completed bulking all chemical wastes, and the RFP for disposal bids has been issued. Efforts are underway to give away approx. one thousand pounds of red iron oxide paint pigment.

Efforts continue to have the Exide Co. accept a lead-acid forklift battery for recycling, at no cost to the Government.

ERRS continues to devise a comprehensive plan to remove 9 baghouses and one machine and remediate approximately one ton of asbestos containing material contained in those devices. ERRS has begun to prepare the area where the baghouses will be moved to be cleaned. ERRS issued an RFP for a large crane, and has made arrangements with PSE & G to have the overhead power lines deactivated, and at the same time PSE& G will disconnect and remove a large PCB-transformer in Bldg. #7. OSC Daly continues to coordinate this phase of the removal action with ERRS and local officials. ERT has agreed to provide perimeter air monitoring and sampling for asbestos during the actual movement of the baghouses to the on-Site staging area.

Analytical results of four grab-samples from floor of unoccupied portion of Building #8 came back positive for asbestos, in the 2%-3% range. Tenants on either side of the unoccupied area have been notified, and one asked that samples be taken from his work area as well. ERRS took additional samples which were sent to lab for asbestos analysis.

#### **Planned Removal Actions**

Continue to prepare/plan for the baghouse cleaning event. Awaiting return of proposals for disposal of the 14 individual chemical waste streams.

#### **Next Steps**

See Planned Removal Actions above. ERRS/OSC Daly will continue planning for baghouse removal project. As soon as the disposal bid responses are back they will be evaluated and presented to OSC for final selection.

ERRS will begin preparations for removing the residual asbestos contamination in the unoccupied portion of Bldg. #8.

#### **Key Issues**

See all of the above.

#### **Estimated Costs \***

|                           | <b>Budgeted</b> | <b>Total To Date</b> | <b>Remaining</b> | <b>% Remaining</b> |
|---------------------------|-----------------|----------------------|------------------|--------------------|
| <b>Extramural Costs</b>   |                 |                      |                  |                    |
| ERRS - Cleanup Contractor | \$450,000.00    | \$406,000.00         | \$44,000.00      | 9.78%              |
| <b>Intramural Costs</b>   |                 |                      |                  |                    |
|                           |                 |                      |                  |                    |
| <b>Total Site Costs</b>   | \$450,000.00    | \$406,000.00         | \$44,000.00      | 9.78%              |

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

[response.epa.gov/frictiondivision](http://response.epa.gov/frictiondivision)

POLREP #26 Last Updated 5/23/2007