United States Environmental Protection Agency Region II POLLUTION REPORT

Date: Thursday, June 21, 2007 Paul L. Kahn & Eric M. Daly From:

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Health Dept.

Subject: Friction Division Products

40 North Enterprise Ave, Lawrence Township (Trenton), NJ

Latitude: 40.2728000 Longitude: -74.7083000

POLREP No.: 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 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

Crane operations are completed, and to date three baghouses have been emptied, cleaned, and crushed for scrap metal. The fourth baghouse has been moved into the neg pressure decommissioning area and is being cleaned. The cover image shows the disassembled third baghouse in the final stage of being cleaned prior to removal to the scrap metal pile.

Water used for deconing the baghouses and personnel is being filtered to 2 microns and put into temporary storage on Site for eventual sampling and disposal.

Air monitoring samples for asbestos that were taken during the movement of the baghouses to the staging area have been sent to lab for analysis. Air monitoring samples from the individual crew members are taken each day by the H & S person and are being sent to lab for analysis.

The drum disposal subcontractor visited the Site on 6/20/07 to compile profiles of all 12 waste streams for manifesting and disposal.

Planned Removal Actions

ERRS will continue decommissioning the baghouses, which should require another 5-7 work days to complete.

Arrange for T & D of all drummed wastes and PPE.

Next Steps

Complete baghouse decommissioning, ship drummed waste and PPE for disposal, dispose of accumlated rinse waster from baghouse decon, and set date for completion of on-Site removal activities.

Key Issues

See above

response.epa.gov/frictiondivision