

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

Date: Thursday, June 21, 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.:	31	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 accumulated rinse waster from baghouse decon, and set date for completion of on-Site removal activities.

Key Issues

See above

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$675,000.00	\$650,000.00	\$25,000.00	3.70%
Intramural Costs				
Total Site Costs	\$675,000.00	\$650,000.00	\$25,000.00	3.70%

* 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

POLREP #31 Last Updated 6/21/2007