

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

**Date:** Friday, July 13, 2007

**From:** Paul L. Kahn & Eric M. Daly

**To:** Mary Mears, USEPA, Region 2, PAD  
John Kushwara, USEPA Region 2 DECA-WCB  
Fred Mumford, NJDEP  
Walter Andrews, USEPA Region 2 DEPP-WPB  
Andrew Radaant, US DOI  
Tim Grier, USEPA Headquarters 5202G  
Joshua Gradwohl, NJDEP  
Carol Chamberlain, Lawrence Township Health Dept.

Carole Petersen, USEPA, Region 2ERRD-NJRB  
Patricia Carr, USEPA-PAD  
Marissa Truono, USEPA ERRD-RAB  
George Zachos, USEPA Region 2 ERRD  
Dave Sweeney, NJDEP  
Kristin Grun, NJDEP  
Paul King, NJDEP

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

<b>POLREP No.:</b>	33	<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 removed to the Site on 7/9 from the holiday break. ERRS completed decommissioning the 5th of 9 baghouses and bulked an additional 12 cubic yards of ACM removed from the baghouse. ERRS moved the 6th baghouse (see POLREP cover photo), with approximately 1 ton of ACM inside, into the Q3 processing building for decommissioning.

H & S professional continues to monitor the crew for BP, pulse, and asbestos exposure.

#### Planned Removal Actions

Continue removing ACM from the remaining 3 baghouses then decon ACM from duct work removed from Building #7.

### **Next Steps**

Schedule trucks to ship drummed wastes off Site for disposal.

### **Key Issues**

Very hot temperatures hamper physical activity of personnel wearing modified Level "C" PPE, mandating more frequent breaks for the workers.

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