

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

**Date:** Thursday, July 19, 2007

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

<b>POLREP No.:</b>	34	<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>		<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 completed decommissioning the 6th of 9 baghouses, and bulked additional cubic yards of ACM from the baghouse. ERRS moved the 7th baghouse, with approximately 2 tons of ACM, into the Q3 processing building for decommissioning. To date, a total of 56 cubic yards of ACM, totaling more than 50 tons (see POLREP cover photo) has been bulked from the baghouses. H & S professional continues to monitor the crew for BP, pulse, signs of heat stress, and asbestos exposure.

OSC received compliance verification from EPA R-5 RCRA rep for the selected off-Site Ohio disposal facilities for the drummed wastes. Disposal of the wastes was postponed until the week of July 31st

because of administrative delays at the Ohio DEP, which apparently has to pre-approve any wastes going to Heritage Environmental for incineration.

The escape of a prisoner from the jail located next to the Site caused a slight delay in work as the ERRS crew, as a group, searched the two buildings at the Site for the individual, whose whereabouts was unknown at the time.

#### **Planned Removal Actions**

ERRS will continue to process the remaining large baghouse and the two smaller devices.

ERRS will prepare labels and manifests for the drummed wastes for T & D.

Scrap metal, including the powerwashed baghouse duct work will continue to be bulked into roll offs for recycling.

#### **Next Steps**

As soon as all the baghouses are processed, ERRS will power-wash the duct work, bulk the ACM in piles in the alley between Bldgs. #7 & #8, and wash/vac the asbestos from the floor in Bldg. #8.

Other waste streams, including ACM and used PPE will be scheduled for T & D.

#### **Key Issues**

Heat stress concerns for the crew working in modified Level "C" PPE in high temperature/high humidity remains a major concern.

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