

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

**Date:** Monday, September 24, 2007

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

**To:** Mary Mears, USEPA, Region 2, PAD                      Carole Petersen, USEPA, Region 2ERRD-NJRB  
John Kushwara, USEPA Region 2 DECA-WCB                      Patricia Carr, USEPA-PAD  
Fred Mumford, NJDEP                      Marissa Truono, USEPA ERRD-RAB  
Walter Andrews, USEPA Region 2 DEPP-WPB                      George Zachos, USEPA Region 2 ERRD  
Andrew Radaant, US DOI                      Dave Sweeney, NJDEP  
Tim Grier, USEPA Headquarters 5202G                      Kristin Grun, NJDEP  
Joshua Gradwohl, NJDEP                      Paul King, NJDEP  
Carol Chamberlain, Lawrence Township  
Health Dept.

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

<b>POLREP No.:</b>	38	<b>Site #:</b>	XW
<b>Reporting Period:</b>		<b>D.O. #:</b>	031
<b>Start Date:</b>	1/27/2007	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	1/28/2007	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>	9/21/2007	<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>	9/21/2007	<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 the RP agreed to not enter the Site unless EPA was present.

#### Current Activities

OSC Daly was on-Site to oversee the shipment of the last 3 roll-offs of used PPE and the 2 totes (700 gals) of asbestos/water suspension generated from the decommissioning of the baghouses on the Site. As of Friday, 9/21, all wastes have been shipped for disposal, and final demobe has occurred.

#### Planned Removal Actions

None.

## Next Steps

Notify local elected/public officials of the successful conclusion of removal action.

Request EPA-CD issue a press release informing the public of the conclusion of the removal action.

## Key Issues

None.

## Disposition of Wastes

Used Tyvek and other burnable PPE items were shipped to Coventa Inc., Union, NJ for resource recovery.

Asbestos containing material (ACM) approx. 70 cubic yards, in solid form, was sent to a landfill in Pennsylvania. Approx. 700 gallons of asbestos suspended in water was also sent to the same landfill.

Other chemical waste streams were sent to various treatment/disposal facilities around the country.

Cardboard scrap and metal scrap was transported to a local recycler. Monies received from the sale of the recycled scrap was applied as a credit to the EPA site funds.

Waste Stream	Quantity	Manifest #	Disposal Facility
Asbestos suspended in water.	700 gallons	shipped as non-hazardous material	Modern Landfill, York, PA
Solid asbestos containing material.	17 tons	Shipped under straight bill-of-lading	Modern Landfill, York, PA
Manganous oxide	6 drums	919722-15199	Von Roll America, Inc., East Liverpool, OH
Hazardous organic solids.	5 drums	000004382WAS	Von Roll America, Inc., East Liverpool, OH
Oxidizing liquids (sodium nitrate; corrosive liquids (acids, sodium hydroxide, potassium hydroxide); solid hazardous wastes (lead).	7	000004382WAS	Heritage Environmental Services, Indianapolis, IN
Corrosive solids, sodium hydroxide, potassium hydroxide.	2 drums	919496-9000	Heritage Environmental Services, Indianapolis, IN
Liquid hazardous wastes, MEK, TCE, DCE.	38 drums	000003668WAS	Von Roll America, East Liverpool, OH
Waste flammable liquid: ethylbenzene, toluene, paint, MEK, DCE; hazardous waste organic solids.	52	000004379WAS	Von Roll America, East Liverpool, OH