

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

Date: Thursday, November 1, 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: Friction Oil Spill Removal
Friction Division Products
40 North Enterprise Ave, Lawrence Township (Trenton), NJ
Latitude: 40.2728000
Longitude: -74.7083000

POLREP No.:	42	Site #:	XW
Reporting Period:	10/30/07-11/01/07	D.O. #:	050
Start Date:	10/29/2007	Response Authority:	OPA
Mob Date:	1/28/2007	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NJN0002058677	Contract #	EP-W-04-055
RCRIS ID #:		Reimbursable Account #	
FPN#	E08201		

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

On October 30, 2007, OSC and ERRS Contractor mobilized. There was approximately 5,000 gallons of #6 oil in the 20,000 gallon tank. Approximately 2,300 gallons of #2 oil was added to cut the #6 oil in order to pump out the tank. Some piping needed to be removed in order to perform the sparging and the pumping of the tank. There is some friable asbestos insulation on the tank but the majority of the piping is insulated with fiberglass. If asbestos needs to be disposed of, cost will be allocated from the previous Task Order Fund and not the OPA Fund.

Planned Removal Actions

There is still approximately one foot of #6 oil in the tank which could not be removed by the sparging process. Confined space entry is necessary to remove the remainder of the oil.

Next Steps

Bid out the tank entry removal

Key Issues

Safe confined space entry and removal of oil

response.epa.gov/frictiondivision