Form ADM-012

237804

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO FILE THRU JEFFREY STERLING DATE Nov. 17. 89

FROM BOLESLAW CZACHOR

SUBJECT FREY Ind. Inc. NJD000729780, investigation up date.

On Monday Nov. 17. 89, the F.I.I facility located at 29-75 Riverside AVE, NEWARK, NJ. was inspected by the NJDEP officer Thomas Brady and writer of this memo. On site we were accompanied by MR. CHRISTOFER FREY a company vicepresident.

The physical inspection of the warehousing facilities revealed that company has made some progress as far as housekeeping and maintenance of warehouses is concerned. No spills or leaks were observed and floors appeared to be in good standing. Nevertheless some containers were observed in bad conditions and some paper bags were noticed split-open, however the facility operator maintained that those are good product containers and the facility is continously repackaging them during warehousing operations. No product could be wasted before it is reconsidered with the original manufacturer - customer.

Therefore in the light of above sytuation,

Observations and/or Other Comments

accurately there was no haz. waste in storage at the facility during our inspection.

Later during the inspection we were approached by Mr. W. Wertz a rep. of E.W.M.A., a company environmental consultant, who informed us that letters regarding the company closure plan has been submitted to BHWE and the closure plan is to be followed (copies are attached to this memo) The closure plan should be submitted to BHWE & M.E.O. within next 2-3 weeks, accord. to Mr. W. Wertz.

In this situation we decided not to perform the RCRA inspection until ~~the~~ the closure plan will be produced and submited to this office. Also I notified the ECRA that subject company may use wrong SIC code and ECRA compliance may be violated. The company claims that their SIC code is #4225, but my opinion is that proper SIC code for FII is #5169. (see copy attached.)

Inspector's Signature

B. Lodur

Facility Operator's Signature