DECONTAMINATION AND CLOSURE REPORT FOR BULDING 107

WYETH PHARMACEUTICALS, PEARL RIVER NY

A. Background

In 2011 the Wyeth Pharmaceuticals facility at Pearl River NY, facility, notified the New York State Department of Environmental Conservation, NYSDEC, of its intent to exit the Treatment Storage and Disposal ,TSD, status of its 6NYCRR Part 373 permit by closing Building 107, B107, which is currently the only non-exempt area permitted for the storage of hazardous waste exceeding ninety (90) days and for in-container treatment activities such as stabilization, neutralization and solidification.

On September 1, 2012 the facility submitted to NYSDEC a Decontamination and Closure Work Plan, WP, for Building 107 which, with some modifications was the same as the closure plan approved by NYSDEC as part of the Part 373 Permit. Following review comments from NYSDEC, the WP was approved on October 5th and 13th, 2011. The WP with the approval letters are in Attachment A.

B. Decontamination

The facility retained Veolia ES Technical Solutions to execute the WP. Figure 1 shows the organization of the project. PS&S provided field capabilities and a NYS registered Professional Engineer to monitor adherence of the field activities to the approve WP and Integrated Analytical Laboratories, IAL, provided sampling support and analytical capabilities.

The field work started on January 30 2012 with broom cleaning of both indoor and outdoor areas. Figure 2 shows the ten locations, five in each area, that were chosen to be steam-cleaned to characterize the wash water resulting from the decontamination and determine its disposal. These samples were collected on January 31, 2012 and have been referred in this report as " Dirty" samples.

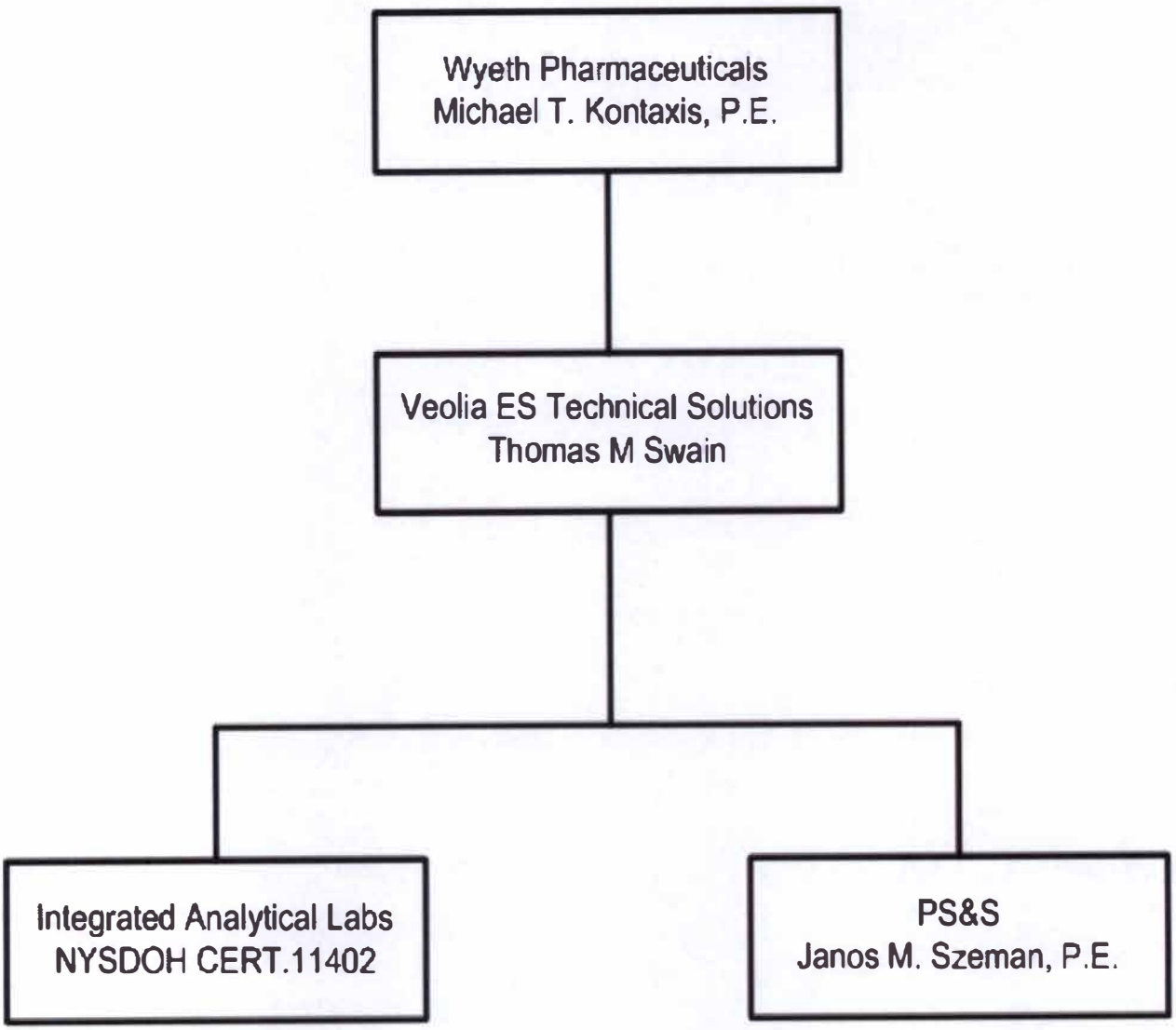


Figure 1. Project Organization

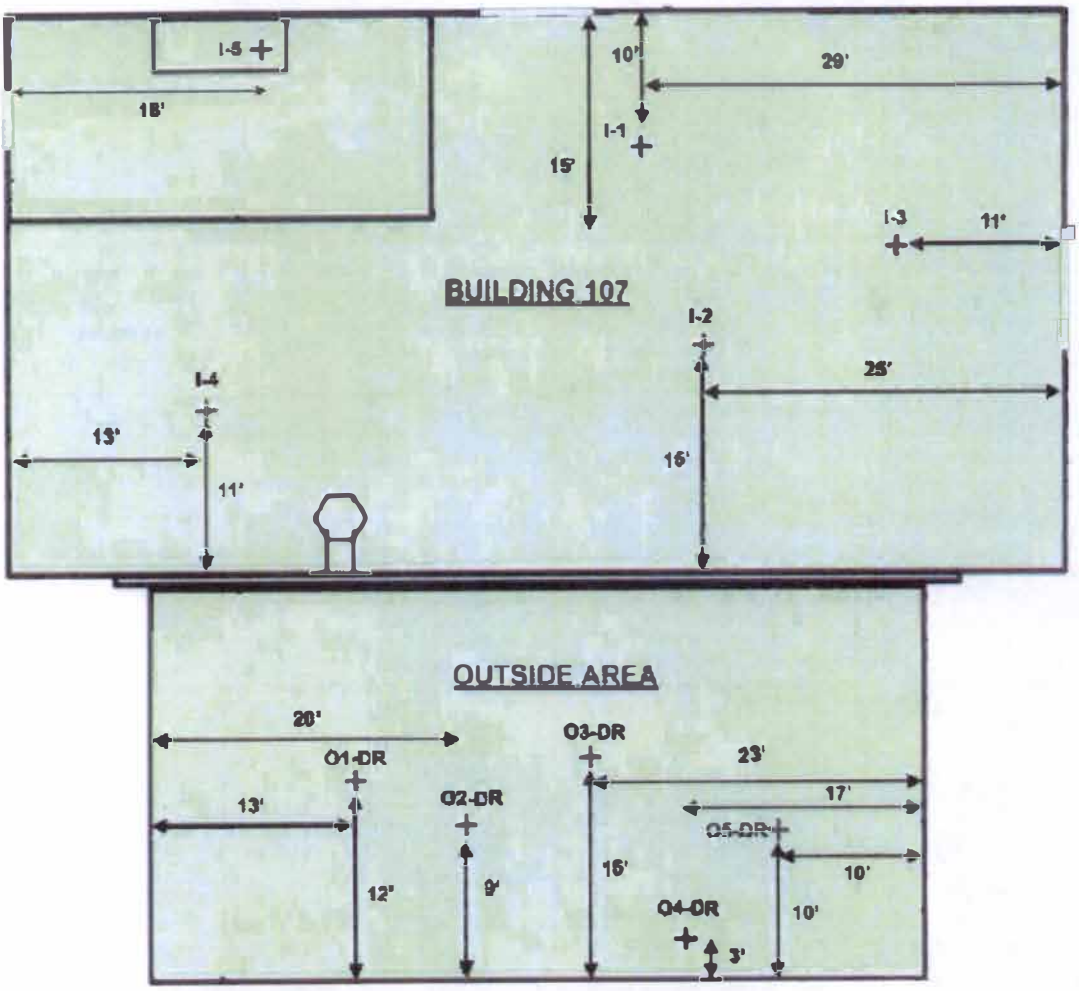


Figure 2. "DIRTY " SAMPLE LOCATIONS

A control sample was also taken to characterize the water to be used in the steam generator. Although the WP specified that the composite of the indoor and outdoor samples were to be analyzed, the individual location samples and the area composites were sent to and analyzed for TCLP parameters by IAL. The individual sample results were to aid in identifying any areas of particular concern. A one-week turnaround time was requested on all analyses. The complete analytical report is included in Attachment B. The analyses of the individual samples and also the area composites were below the TCLP limits. Table 1 shows the results on the composite samples referred to as Waste Determination Sample Data. The B and O samples are the indoor and outdoor samples respectively. On the basis of these results arrangements were made with the on-site wastewater treatment plant to receive the wash waters generated during all phases of the decontamination work.

On February 16, and 17, 2012 the outdoor and indoor areas were steam-cleaned and confirmatory or "Clean" samples were collected according to the approved WP. The locations of the these samples are shown in Figure 3 with the Engineers' designation. There is a transposition of the letters "CL" between the Chain of Custody forms and sample reports by IAL and the Engineer's designation. The correspondence of the WP sample IDs, engineer's IDs and lab's IDs is shown below.

CONFIRMATORY SAMPLE LOCATION AND IDENTIFICATION

OUTSIDE AREA						
Work Plan ID	O5	O4	O2	O1	O3	
Engineer's Designation	OCL-1	OCL-2	OCL-3	OCL-4	OCL-5	
AIL's Sample ID	O-1-CL	O-2-CL	O-3-CL	O-4-CL	O-4-CL	
B107 AREA						
Work Plan ID	B1	B2	B3	B4	B5	
Engineer's Designation	ICL-1	ICL-2	ICL-3	ICL-4	ICL-5	ICL-6
AIL's Sample ID	B-1-CL	B-2-CL	B-3-CL	B-4-CL	B-5-CL	B-6-CL

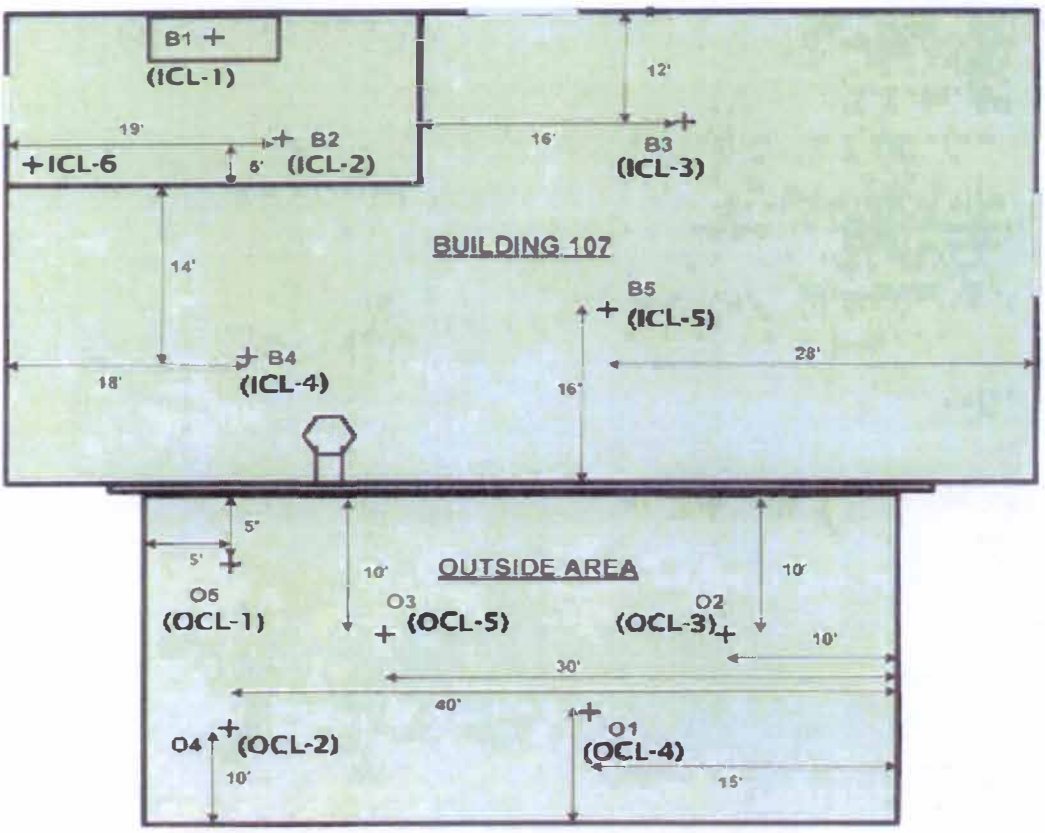


Figure 3. "CLEAN" SAMPLE LOCATIONS

The floor basin along the south side of the building, that was not included in the WP, was also sampled. The samples were sent to the lab for Total VOC and Mercury analyses on a one week turn-around time. With respect to the mercury analyses IAL performed the analyses according to the TCLP protocol. Therefore IAL was instructed to analyze the samples for total mercury as per WP. There was ample sample volume for each location and the total mercury analyses were completed within the required holding time. The results for the "Clean" samples referred to as Confirmatory Sample Results, for VOCs and mercury (total), are shown in Table 1.

Since the values from the waste determination sample data were below the TCLP thresholds, the volume of the total wash waters was not recorded but the field estimate is that there less than 1,000 gallons disposed at the on site IWTP.

The report of the professional engineer is in Attachment C.

Table 1. SUMMARY OF ANALYTICAL DATA

WASTE DETERMINATION SAMPLE DATA

	O-COMPOSITE	B-COMPOSITE
TOT VO's (ug/L)	26.8	14.7
PCB's(ug/L) @MDL 0.020 ug/L	ND	ND
ALL TCLP METALS @ RESPECTIVE MDL	ND	ND

CONFIRMATORY SAMPLE DATA

	O-1-CL	O-2-CL	O-3-CL	O-4-CL	O-5-CL
TOT VO's (ug/L)	**21.9**	**29.5**	**23.8**	**26.7**	**24.7**
Hg (ug/L) @MDL=0.300 ug/L	**ND**	**ND**	**ND**	**ND**	**ND**

	B-1-CL	B-2-CL	B-3-CL	B-4-CL	B-5-CL	B-6-CL
TOT VO's (ug/L)	**30.4**	**22.3 J**	**22.7**	**ND**	**22.5**	**22.4**
Hg (ug/L) @MDL=0.300 ug/L	**ND**	**ND**	**ND**	**ND**	**ND**	**ND**

C. Conclusions

The approved WP specified that if, for each indoor and building sample, the concentration of Total VOCs were no greater that 25mg/L then the decontamination for VOCs will be acceptable. Similarly , if for each indoor and building sample, the concentration of mercury is no greater than 30ug/L, then the decontamination for mercury will be considered acceptable. Inspection of the decontamination sample data in Table 1 shows that both decontamination conditions were met for every sample. Since the originally approved closure plan addressed total VOCs and mercury as criteria for closure, the data in Table 1 show that the decontamination met the closure criteria for Building 107.

ATTACHMENT A

DECONTAMINATION AND CLOSURE WORKPLAN

BUILDING 107 WYETH PHARMACEUTICALS, PEARL RIVER NY

A. Building Description and Operations

Building 107, or B107, It is a 4,000 ft^2 butler building located on a concrete pad. At the southwestern part of the facility. The building has been upgraded and provided with secondary containment and sealed floor. The upgrades were incorporated in the Part 373 permit for the facility. B107 is currently the only non-exempt area permitted for the storage of hazardous waste exceeding ninety (90) days and for in-container treatment activities such as stabilization, neutralization and solidification. Segregation and shipment preparation of hazardous wastes are also performed within this building. Outside of B107 and to its east wall, there is a 2,000ft^2 bermed area which is covered with a roof and protected by heavy plastic curtains on three sides. Besides storage, this area also serves the consolidation of chlorinated and non-chlorinated spent solvents in separate DOT approved metal drums. This area will be referred to as the outside area.

B. Decontamination and Closure

The facility's Part 373 permit contains an approved closure plan of B107 which includes the removal and shipment of inventory followed by floor decontamination via steam cleaning with subsequent sampling and analyses of water rinsates from areas of the decontaminated floor to determine the effectiveness of the decontamination and the generated wash water to be disposed at a hazardous waste incinerator. After communication with the New York Department of Environmental Conservation, (NYSDEC), modifications to the decontamination procedure to facilitate the disposal of the wash have been requested by Wyeth and were reviewed and approved by the NYSDEC. The decontamination procedure and wash water disposal herein is consistent with those modifications.

1. Waste Inventory Removal.

Prior to commencing with decontamination all waste will be removed from B107. The hazardous wastes will be shipped off site for disposal, and new waste generated will be

temporarily stored at the various less that ninety day exempt storage areas. There is sufficient storage capability to accommodate the current waste generation rate as compared to the expected duration of decontamination. Alternatively the facility has the capability to ship wastes from the less that ninety day exempt storage areas.

2. Decontamination Procedure

The decontamination procedure will proceed in the following steps

a. The floor of B107 and the outside area will be broom cleaned.

b. Materials on B107 and solvent consolidation area will be staged in such a fashion as to facilitate sampling.

c. Five (5) locations inside building 107 and 5 locations outside building 107 will be sampled and composited into 2 samples for waste classification purposes. Sample locations for classification of waste will be randomly selected. Waste classification samples will be collected as follows.

d. At these locations, 2.5'x2.5 temporary sampling dike will be constructed and the area inside the dikes will be pressure washed/filled utilizing a hot/steam type pressure washer delivering steam to the floor with the tip no more than 4 inches away from the surface.

e. Potable water will be used to generate the steam using a steam generator. A sample of the potable water and a sample from the condensed steam from the steam generator will be collected. Following completion of step d, one sample of the wash water from each of the bermed areas will be collected. The sample of the potable water, condensed steam and the samples from the bermed areas will be sent to a NYSDOH approved laboratory. The laboratory will then composite the 5 samples from inside B107 into 1 sample and the 5 samples from the outside area into another sample. A sample of the potable water, a sample of the condensed steam and each composite sample will be analyzed for pH, Volatile Organic Compounds, (VOCs) utilizing SW 846 methods 8010 and 8020, RCRA Metals through TCLP and PCBs. A one week turn-around time for analytical results will be requested.

f. When results from the waste classification samples become available the entire floor of B107 and the outside area will be decontaminated utilizing hot/steam type pressure washers in the same manner as in step d above. All wash water will be collected into a

vacuum/air induction truck and will be delivered, depending on sample results, to an offsite waste water treatment plant or off-loaded into Pfizer's IWTP for processing.

g. To confirm the effectiveness of the decontamination, sampling will be performed utilizing the methods spelled out in (attachment A), supplied by the NYDEC. The locations of these samples are designated on the sampling diagram (attachment B).

h. If the sum of the VOC concentrations of each composite sample in step i above is no greater that 25mg/L then the decontamination for VOCs will be considered acceptable. If the mercury concentration of each composite sample is no greater than 30ug/L then the decontamination for mercury will be considered acceptable.

3. Closure

From the initiation of the decontamination procedures, Wyeth Pharmaceuticals will retain an independent Professional Engineer registered in New York to provide supervision during the work and issue a final closure certification for B107 and outside area.

4. Schedule

Execution of all the tasks in this work plan will proceed according to the schedule on the next page. The time interval for wash water disposal is no shown. It is estimated that if the wash water need s to be sent to an off-site facility disposal, the at least 5 to 7 calendar days need to be added prior to proceeding with task 2g.

DURATION OF TASK IN CALENDAR DAYS

TASK	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
2a: Broom clean both areas	-------->																	
2b: Stage waste in both areas			---------->															
2c: Build temporary sampling dikes						--->												
2d &2e: Sample collection and shipping							-------->											
2f: Watiting for sample results									---------->									
2g: Rinsate sampling per NYSDEC protocol*																---------->		

*This task will follow the disposal of the wash waters consisten with the results from Task 2f.

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway, Albany, New York 12233-7014
Phone: (518) 402-9662 • **Fax:** (518) 402-9679
Website: www.dec.ny.gov

Joe Martens
Commissioner

October 5, 2011

Mr. Michael T. Kontaxis, P.E.
Manager, Environmental Technology
Pfizer Inc.
401 North Middletown Road
Pearl River, NY 10965-1299

RE: Wyeth Pharmaceuticals, Building 107 Decontamination and Sampling
ID No. NYD-054065909, DEC Site #344003
Town of Orangetown, Rockland County

Dear Mr. Kontaxis:

The New York State Department of Environmental Conservation has reviewed the Wyeth Pharmaceuticals, Closure of Building 107 work plan dated September 1, 2011. The work plan is approved with the following modifications:

- The Rinsate Sample Collection Protocol (Attachment A) is to be followed.
- Samples may be composited during the initial sampling described in paragraph B.2.e of the workplan to determine the fate of the wash water however, the final samples described in paragraph B.2.i can not to be composited.
- One sample each, from building 107 and the outside area are to be from the secondary containment areas which are grated on top.
- Sample results must be evaluated against the effluent limitation values found in the Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1, Part II, Table 5. The TOGS may be viewed at: www.dec.ny.gov/docs/water_pdf/togs111.pdf

Please provide a schedule of implementation of this work within 15 days of receipt of this letter. If you have any questions, please contact me at (518) 402-9662.

Sincerely,

Keith H. Gronwald
Senior Engineering Geologist
Remedial Bureau C
Division of Environmental Remediation

Attachment
cc: C. Stein, EPA Reg. II

Attachment A

Rinsate Sample Collection Protocol

This procedure is intended to be used to collect samples for analysis of concrete floors, secondary containment areas and sumps, including surfaces that have been coated, to establish whether or not there is any contamination on the concrete surfaces. This procedure is to be performed after the surfaces have been cleaned and decontaminated pursuant to the approved closure plan. This procedure may also be suitable for use on other surfaces on a case-by-case basis.

1. Mark areas to be sampled on a facility floor plan for the area(s) to be closed. Sketches should include locations of building columns, walls, fixed equipment, and the rinsate sampling locations themselves to accurately locate the rinsate sampling points within the buildings.

2. Assemble and clean all equipment necessary for sample collection. Equipment needs to be cleaned, if not already pre-cleaned by the laboratory.

3. Create a temporary containment area on the floor using an inert, pre-cleaned, flexible boom.

4. Label the sample containers with a unique sample code, information on the site, sample location and date/time sample was collected. Affix appropriate labels for test parameters on the sample containers. Put on a new pair of disposable nitrile gloves.

5. At each sampling location, slowly pour the minimum quantity of de-ionized water (start with one gallon for metals analysis, much less for only volatiles) needed to collect all sample parameters, including QC samples, onto the concrete area. If the individual area is sloped, start pouring at the highest elevation. The de-ionized water may be provided by the analytical laboratory, purchased, or generated on-site.

6. Allow de-ionized water to collect and remain in the sample location for 10 minutes.

7. Collect the number of samples as specified in the closure plan along with appropriate QA/QC samples. Samples may be collected using dedicated, sterile glass pipettes provided by the laboratory, or any other suitable device approved in the closure plan. The pipettes are used to transfer the sample fluids into the appropriate laboratory supplied containers. Volatile sample containers shall be filled first to minimize loss of volatiles.

8. Samples must not be composited.

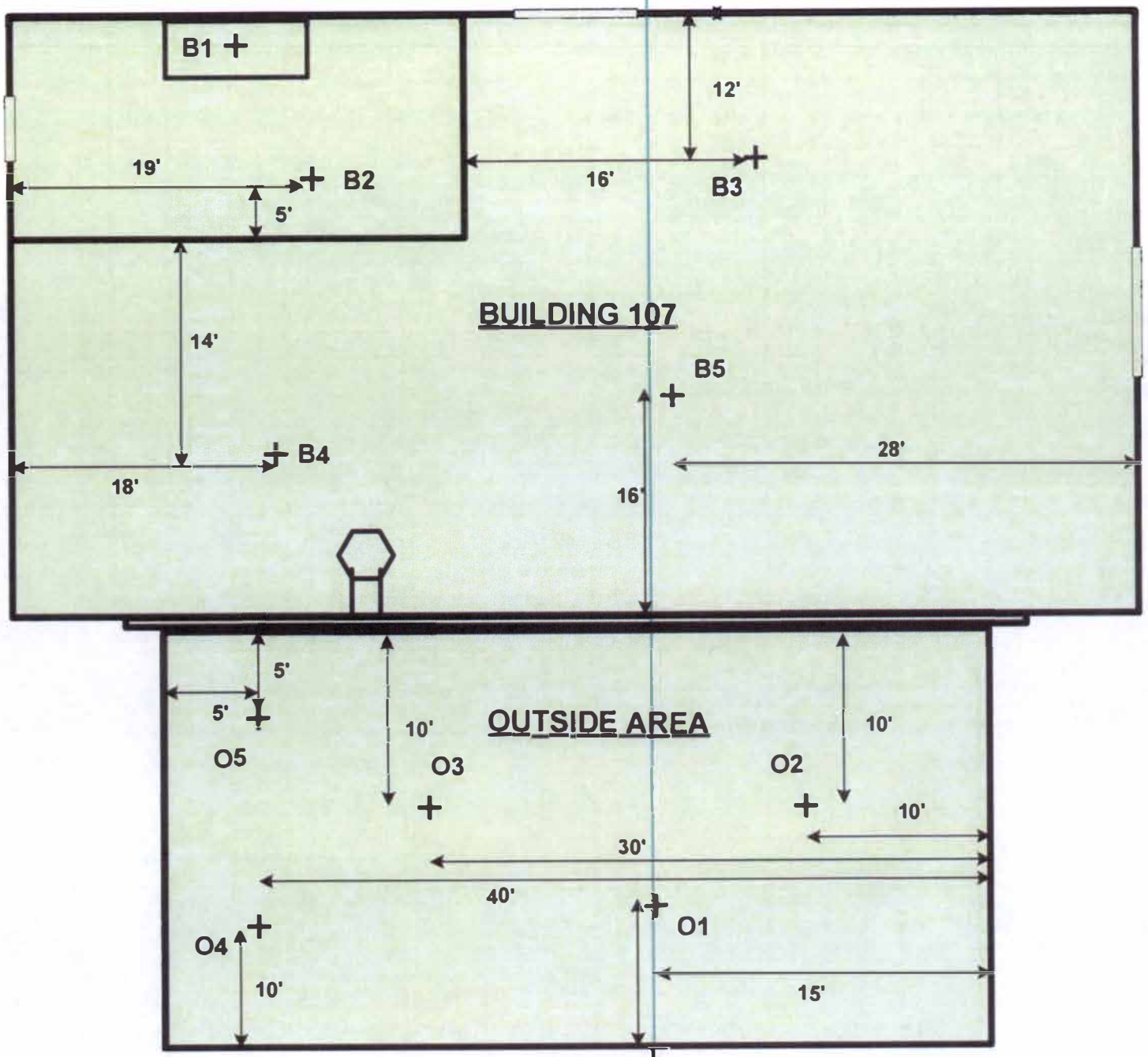
9. Cap the sample container and place sample containers in a cooler with ice to maintain a temperature of 4 ^{o}C.

10. Remove and discard the gloves. Place all disposable gloves into a plastic bag designated for proper disposal.

11. Fill out sampling details in field log book. Photographs of the sample locations, wetted areas, equipment, and actual sampling events may be taken by the facility or Department staff and a list of the photographs shall be recorded in the field book.

12. Fill out the chain-of-custody and any other sample forms. Prepare the samples for storage and shipping in the cooler with ice to maintain a temperature of 4 ± 2°C. Ship overnight to the laboratory for analysis.

13. Follow the chain-of custody procedures as detailed in the Quality Assurance Project Plan.



ATTACHMENT B
SAMPLE LOCATIONS

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway, Albany, New York 12233-7014
Phone: (518) 402-9662 • **Fax:** (518) 402-9679
Website: www.dec.ny.gov

Joe Martens
Commissioner

October 13, 2011

4215

Mr. Michael T. Kontaxis, P.E.
Manager, Environmental Technology
Pfizer Inc.
401 North Middletown Road
Pearl River, NY 10965-1299

RE: Wyeth Pharmaceuticals, Building 107 Decontamination and Sampling
ID No. NYD-054065909, DEC Site #344003
Town of Orangetown, Rockland County

Dear Mr. Kontaxis:

As a follow-up to our October 6, 2011 telephone conversation and the materials which you had transmitted on October 7th, the New York State Department of Environmental Conservation has reconsidered the modifications to the building 107 closure plan which were specified in our letter of October 5, 2011. The 4th bullet of that letter which read:

> "Sample results must be evaluated against the effluent limitation values found in the Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1, Part II, Table 5. The TOGS may be viewed at: www.dec.ny.gov/docs/water_pdf/togs111.pdf"

is hereby withdrawn. The cleanup values will be those specified in your permit and stated in your September 1, 2011 workplan.

Please provide a schedule of implementation of this work within 15 days of receipt of this letter. If you have any questions, please contact me at (518) 402-9662.

Sincerely,

Keith H. Gronwald
Senior Engineering Geologist
Remedial Bureau C
Division of Environmental Remediation

cc: C. Stein, EPA Reg. II

ATTACHMENT B

ATTACHMENT C

PS&S
integrating design & engineering

PS&S Engineering, Inc.

HAND DELIVERY

April 11, 2012
K4670.0001

Mr. Michael Kontaxis, P.E.
Pfizer, Inc.
401 North Middletown Road
Pearl River, New York 10965

Mr. Thomas M. Swain
Veolia ES Technical Solutions, LLC
1 Eden Lane
Flanders, New Jersey 07836

RE: Decontamination of Building B107
Pearl River, New York
Decontamination Project Completion Report

Dear Mr. Kontaxis and Mr. Swain:

1.0 INTRODUCTION

PS&S Engineering, Inc. ("PS&S") is pleased to present this Decontamination Project Completion Report ("Report") to document the completed decontamination of Building B107 ("B107 Facility") at the Wyeth Pharmaceuticals ("Wyeth") plant in Pearl River, New York. PS&S provided Facility decontamination observation services to Veolia ES Technical Solutions, LLC ("Veolia"), the decontamination contractor, in accordance with the PS&S Observation and Documentation of Building Decontamination Proposal dated November 17, 2011.

2.0 BUILDING B 107 FACILITY DECONTAMINATION PROGRAM

2.1 Building B 107 Overview

The B 107 Facility is a 4,000-square-foot Butler Building ™ featuring a sealed floor and secondary containment, constructed on a concrete pad (refer to Figure 1-1). The building is partitioned into two areas: an indoor ("Indoor") area; and, outdoor ("Outdoor") area. PS&S understands each area has been historically used for various temporary waste management purposes.

Under the Wyeth New York State Department of Environmental Conservation (NYSDEC) Part 373 Permit, Building B 107 is the only non-exempt area within the Wyeth plant which is permitted for the storage of hazardous waste for more than 90 days and for in-container treatment activities.

PS&S understands that segregation and shipping preparation have also occurred in this building. PS&S understands that most of the activities described above were limited to the Indoor area. Further, PS&S understands that the Outdoor area has been used for consolidation of chlorinated and non-chlorinated solvents in Department of Transportation (DOT) approved metal drums.

2.2 Decontamination and Closure Plan

PS&S understands that the B 107 Facility's original closure plan was incorporated into the overall Wyeth plant NYSDEC Part 373 Permit. Modifications requested by Wyeth were approved by the NYSDEC and incorporated into the Final Decontamination and Closure Plan dated September 1, 2011 ("Work Plan"; refer to Attachment A).

2.3 Purpose

The primary purpose of this report is to describe the field and laboratory activities undertaken by Veolia, Veolia's analytical laboratory - Integrated Analytical Lab ("IAL"), Veolia's quality assurance engineer - PS&S Engineering, Inc. ("PS&S"), and Wyeth in compliance with the requirements of the Work Plan. This Report also provides a summary of the Dirty and Clean analytical laboratory results and a brief review of the effectiveness of the decontamination program.

2.4 Building B 107 Decontamination Summary

The decontamination processes, sampling methods and laboratory analyses performed over the course of the project were completed, with a very minor variance which increased the number of Indoor Clean samples by one, in accordance with the NYSDEC-approved Work Plan. The minor variance described in this Report would not affect the analytical results and was required in order to accommodate field conditions and the approved Work Plan (Refer to the October 5, 2011 NYSDEC letter in Attachment A).

In accordance with the October 13, 2011 NYSDEC approval (refer to Attachment A) of the September 1, 2011 Work Plan, both the pre-decontamination ("Dirty") composite sample results and the post-decontamination ("Clean") composite sample results were reported at concentrations below the following decontamination limits as specified in the Wyeth NYSDEC Permit and the Work Plan:

- Volatile Organic Compound (VOC) Concentrations of 25 milligrams per liter (mg/L); and,
- Mercury Concentrations of 30 micrograms per liter (ug/L).

Based on the Clean sample results, it is PS&S' opinion that no further action would be required.

3.0 FIELD ACTIVITIES

3.1 Responsibilities

The following list identifies the roles and responsibilities of the Veolia term that was mobilized to perform the B 107 Facility decontamination program:

- Wyeth and Veolia cleared the Facility floor for the sampling processes described below;
- Wyeth provided plant-specific health and safety training;
- Veolia provided project-specific health and safety training;
- Veolia performed sweeping, pressure washing, procurement and placement of inert sample containment dikes, pouring of water and general sampling assistance, as needed;
- IAL performed all of the sampling, maintained chain of custody documents, and performed all analytical laboratory work; and,
- PS&S performed in-field quality assurance, oversight, mapping and photography.

3.2 Field Narrative

The following three subsections provide a summary of the PS&S observations during the three day B 107 Facility decontamination program.

3.2.1 January 31, 2012

Containers stored in the B 107 Facility were re-located to permit access to the floor for collection of the Dirty samples. The floor was swept and sampling locations were designated and mapped (refer to Figure 1-1). The Dirty sampling program followed the procedures presented in the Work Plan. The Rinsate Sample Collection Protocol ("RSCP"; refer to the Work Plan enclosed as Attachment A) was also complied with and facilitated the comparability of the Dirty and Clean samples.

3.2.2 February 16, 2012

Activities of February 16, 2012 focused exclusively on decontamination and Clean sampling in the Outdoor area. The Work Plan and RSCP were followed. The Clean sample locations are depicted in Figure 2-1. Veolia and Wyeth reported to PS&S that wastewater was pre-treated at the Pfizer wastewater treatment plant and then disposed of off-site in the Pearl River Township sanitary sewer. PS&S understands that the decontamination contractor, Veolia, collected on the order of 1,000 gallons of

decontamination wastewater that was then pre-treated on-site and disposed of off-site at the local publically owned treatment works (POTW) facility.

3.2.3 February 17, 2012

Activities of February 17, 2012 focused exclusively on decontamination and Clean sampling of the Indoor area. The only variance permitted over the course of the field work occurred as a result of a requirement in NYSDEC's response to the Work Plan (Attachment A, letter from Keith Gronwald to Michael T. Kontaxis, October 5, 2011). The letter requires that "One sample each from B 107 and the outside area are to be from the secondary containment areas…". It should be noted that there is no secondary containment area in the Outdoor area and there are two in the Indoor area. Following the spirit of the requirement, both of the recessed secondary containment areas in the Indoor Area were sampled, increasing the total number of samples for the Indoor Area by one.

4.0 LABORATORY RESULTS

4.1 Sample Concordance

The sampling locations are labeled by field/Work Plan sample numbers and Chain of Custody Information (refer to Figures 1-2 and 2-1). Concordance information is also shown in tabular form in the IAL Data Package Directory (refer to Attachment B).

4.2 Summary of Results

IAL's complete data package is presented as Attachment B. The results were compared with the Work Plan values. No reported exceedances were noted in either the Dirty or Clean samples.

5.0 CONCLUSIONS

In view of the strict adherence to the requirements of the Work Plan and RSCP, and the lack of reported exceedances of any kind in both the Dirty and Clean samples, PS&S concludes that the decontamination process undertaken at the B 107 Facility was successful and recommends no further action.

Should you have any questions or require additional information, please call me direct at 732-560-9700, Extension 7437.

Very truly yours,

PS&S Engineering, Inc.

Janos M. Szeman, P.E.
Project Manager
N.Y.P.E. License Number 084542-1

Copy: E. Csipkay, Veolia
M. Tomaso, PS&S

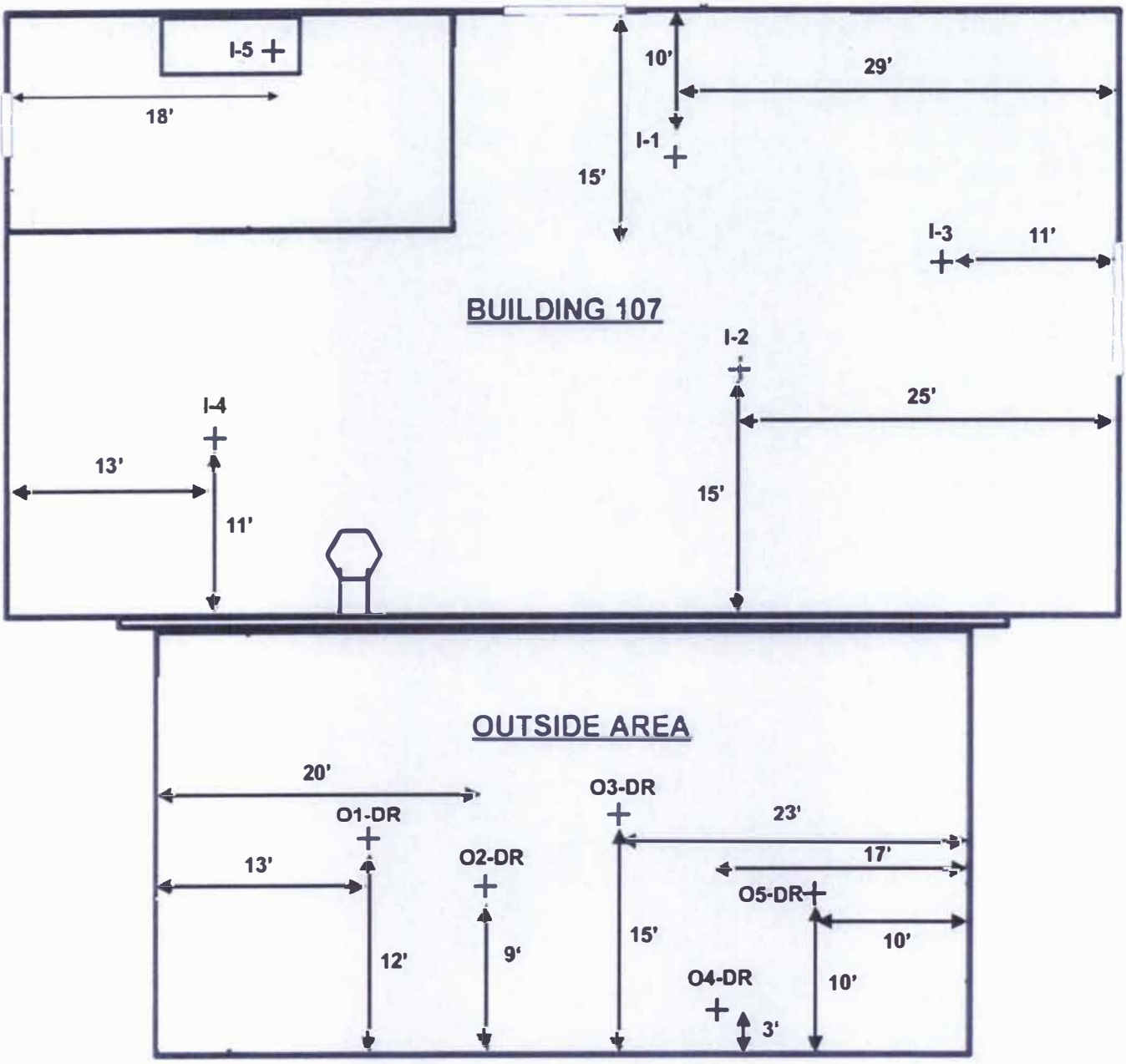
Attachments

- Figure 1-1: Dirty Sample Locations
- Figure 2-1: Clean Sample Locations
- Attachment A: Work Plan
  - October 5, 2011 NYSDEC Approval
  - October 13, 2011 NYSDEC Approval
- Attachment B: IAL Data Package Directory
  - ***NOTE:*** *Complete Dirty and Clean Sample Analytical Laboratory Package will be bound under separate cover.*

FIGURES

Figure 1-1: Dirty Sample Locations
Figure 2-1: Clean Sample Locations

PS&S
integrating design & engineering
67B Mountain Boulevard Extension
P.O. Box 4039
Warren, NJ 07059
Tel 732.560.9700



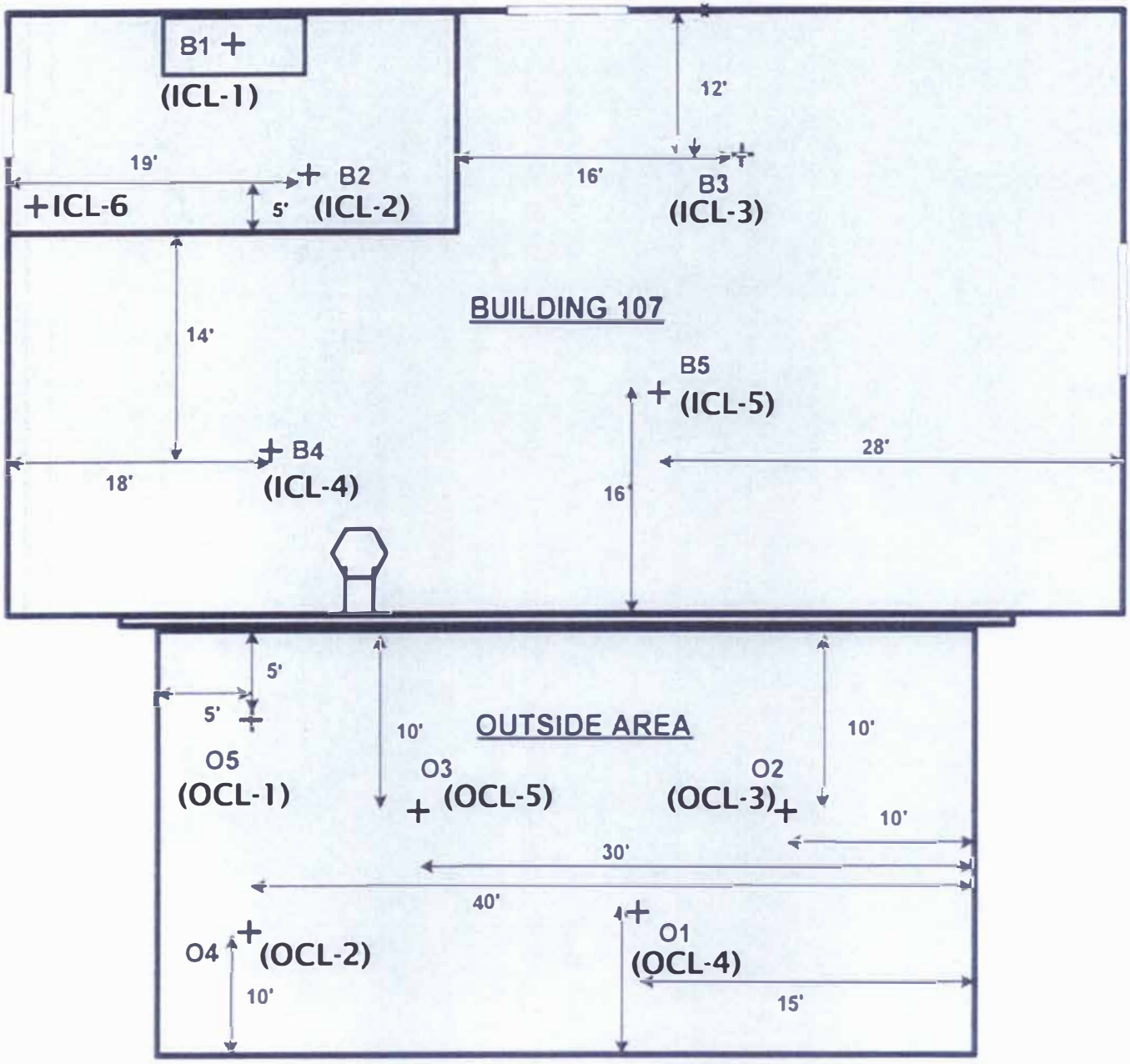
LEGEND:

I-4 : Inside dirty sample

O4-DR : Outside dirty sample

Figure 1-1: Dirty Sample Locations

PS&S
integrating design & engineering
67B Mountain Boulevard Extension
P.O. Box 4039
Warren, NJ 07059
Tel 732.560.9700



LEGEND:

(ICL-1): Inside clean sample

(OCL-1): Outside clean sample

Figure 2-1: Clean Sample Locations

ATTACHMENT A

Work Plan
October 5, 2011 NYSDEC Approval
October 13, 2011 NYSDEC Approval

DECONTAMINATION AND CLOSURE WORKPLAN

BUILDING 107 WYETH PHARMACEUTICALS, PEARL RIVER NY

A. Building Description and Operations

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1. Waste Inventory Removal.

Prior to commencing with decontamination all waste will be removed from B107. The hazardous wastes will be shipped off site for disposal, and new waste generated will be

temporarily stored at the various less that ninety day exempt storage areas. There is sufficient storage capability to accommodate the current waste generation rate as compared to the expected duration of decontamination. Alternatively the facility has the capability to ship wastes from the less that ninety day exempt storage areas.

2. Decontamination Procedure

The decontamination procedure will proceed in the following steps

a. The floor of B107 and the outside area will be broom cleaned.

b. Materials on B107 and solvent consolidation area will be staged in such a fashion as to facilitate sampling.

c. Five (5) locations inside building 107 and 5 locations outside building 107 will be sampled and composited into 2 samples for waste classification purposes. Sample locations for classification of waste will be randomly selected. Waste classification samples will be collected as follows.

d. At these locations, 2.5'x2.5 temporary sampling dike will be constructed and the area inside the dikes will be pressure washed/filled utilizing a hot/steam type pressure washer delivering steam to the floor with the tip no more than 4 inches away from the surface.

e. Potable water will be used to generate the steam using a steam generator. A sample of the potable water and a sample from the condensed steam from the steam generator will be collected. Following completion of step d, one sample of the wash water from each of the bermed areas will be collected. The sample of the potable water, condensed steam and the samples from the bermed areas will be sent to a NYSDOH approved laboratory. The laboratory will then composite the 5 samples from inside B107 into 1 sample and the 5 samples from the outside area into another sample. A sample of the potable water, a sample of the condensed steam and each composite sample will be analyzed for pH, Volatile Organic Compounds, (VOCs) utilizing SW 846 methods 8010 and 8020, RCRA Metals through TCLP and PCBs. A one week turn-around time for analytical results will be requested.

f. When results from the waste classification samples become available the entire floor of B107 and the outside area will be decontaminated utilizing hot/steam type pressure washers in the same manner as in step d above. All wash water will be collected into a

vacuum/air induction truck and will be delivered, depending on sample results, to an offsite waste water treatment plant or off-loaded into Pfizer's IWTP for processing.

g. To confirm the effectiveness of the decontamination, sampling will be performed utilizing the methods spelled out in (attachment A), supplied by the NYDEC. The locations of these samples are designated on the sampling diagram (attachment B).

h. If the sum of the VOC concentrations of each composite sample in step i above is no greater that 25mg/L then the decontamination for VOCs will be considered acceptable. If the mercury concentration of each composite sample is no greater than 30ug/L then the decontamination for mercury will be considered acceptable.

3. Closure

From the initiation of the decontamination procedures, Wyeth Pharmaceuticals will retain an independent Professional Engineer registered in New York to provide supervision during the work and issue a final closure certification for B107 and outside area.

4. Schedule

Execution of all the tasks in this work plan will proceed according to the schedule on the next page. The time interval for wash water disposal is no shown. It is estimated that if the wash water need s to be sent to an off-site facility disposal, the at least 5 to 7 calendar days need to be added prior to proceeding with task 2g.

DURATION OF TASK IN CALENDAR DAYS

TASK	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
2a: Broom clean bothe areas	-------->																	
2b: Stage waste in both areas			---------->															
2c: Build temporary sampling dikes						-->												
2d &2e: Sample collection and shipping							-------->											
2f: Watiting for sample results									---------->									
2g: Rinsate sampling per NYSDEC protocol*																---------->		

*This task will follow the disposal of the wash waters consisten with the results from Task 2f.

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway, Albany, New York 12233-7014
Phone: (518) 402-9662 • **Fax:** (518) 402-9679
Website: www.dec.ny.gov

Joe Martens
Commissioner

October 5, 2011

Mr. Michael T. Kontaxis, P.E.
Manager, Environmental Technology
Pfizer Inc.
401 North Middletown Road
Pearl River, NY 10965-1299

RE: Wyeth Pharmaceuticals, Building 107 Decontamination and Sampling
ID No. NYD-054065909, DEC Site #344003
Town of Orangetown, Rockland County

Dear Mr. Kontaxis:

The New York State Department of Environmental Conservation has reviewed the Wyeth Pharmaceuticals, Closure of Building 107 work plan dated September 1, 20 1. The work plan is approved with the following modifications:

- The Rinsate Sample Collection Protocol (Attachment A) is to be followed.
- Samples may be composited during the initial sampling described in paragraph B.2.e of the workplan to determine the fate of the wash water however, the final samples described in paragraph B.2.i can not to be composited.
- One sample each, from building 107 and the outside area are to be from the secondary containment areas which are grated on top.
- Sample results must be evaluated against the effluent limitation values found in the Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1, Part II, Table 5. The TOGS may be viewed at: www.dec.ny.gov/docs/water_pdf/togs111.pdf

Please provide a schedule of implementation of this work within 15 days of receipt of this letter. If you have any questions, please contact me at (518) 402-9662.

Sincerely,

Keith H. Gronwald
Senior Engineering Geologist
Remedial Bureau C
Division of Environmental Remediation

Attachment
cc: C. Stein, EPA Reg. II

Attachment A

Rinsate Sample Collection Protocol

This procedure is intended to be used to collect samples for analysis of concrete floors, secondary containment areas and sumps, including surfaces that have been coated, to establish whether or not there is any contamination on the concrete surfaces. This procedure is to be performed after the surfaces have been cleaned and decontaminated pursuant to the applicable [illegible] procedure may also be suitable for use on other surfaces on a case-by-case basis.

1. Mark areas to be sampled on a facility floor plan for the areas to be closed. Sketches should include locations of building columns, walls, fixed equipment, and the rinsate sampling locations themselves to accurately locate the rinsate sampling points within the buildings.

2. Assemble and clean all equipment necessary for sample collection. Equipment needs to be cleaned, if not already pre-cleaned by the laboratory.

3. Create a temporary containment area on the floor using an inert, pre-cleaned, flexible boom.

4. Label the sample containers with a unique sample code, information on the site, sample location and date/time sample was collected. Affix appropriate labels for test parameters on the sample containers. Put on a new pair of disposable nitrile gloves.

5. At each sampling location, slowly pour the minimum quantity of de-ionized water (start with one gallon for metals analysis, much less for only volatiles) needed to collect all sample parameters, including QC samples, onto the concrete area. If the individual area is sloped, start pouring at the highest elevation. The de-ionized water may be provided by the analytical laboratory, purchased, or generated on-site.

6. Allow de-ionized water to collect and remain in the sample location for 10 minutes.

7. Collect the number of samples as specified in the closure plan along with appropriate QA/QC samples. Samples may be collected using dedicated, sterile glass pipettes provided by the laboratory, or any other suitable device approved in the closure plan. The pipettes are used to transfer the sample fluids into the appropriate laboratory supplied containers. Volatile sample containers shall be filled first to minimize loss of volatiles.

8. Samples must not be composited.

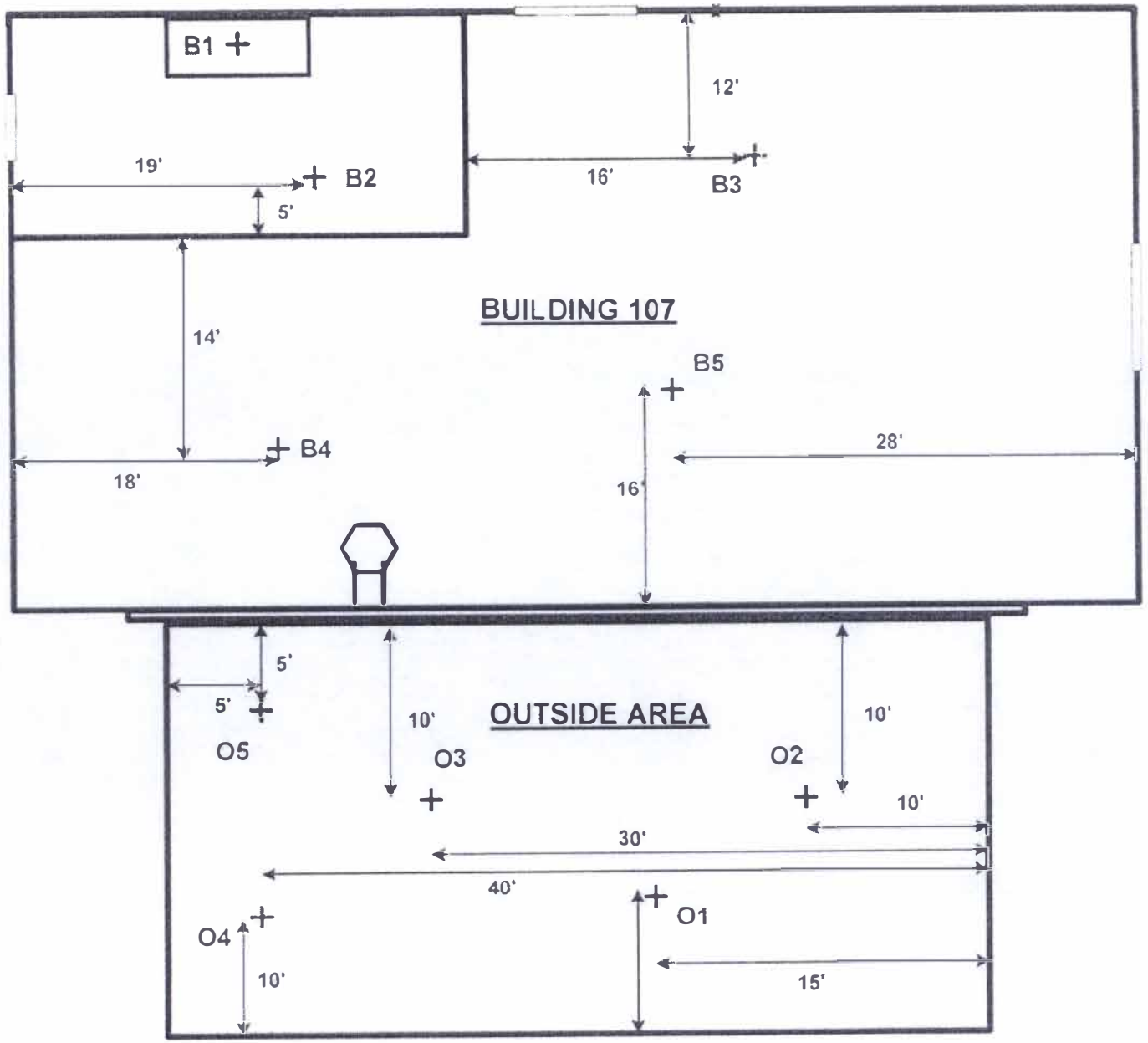
9. Cap the sample container and place sample containers in a cooler with ice to maintain a temperature of 4 °C.

10. Remove and discard the gloves. Place all disposable gloves into a plastic bag designated for proper disposal.

11. Fill out sampling details in field log book. Photographs of the sample locations, wetted areas, equipment, and actual sampling events may be taken by the facility or Department staff and a list of the photographs shall be recorded in the field book.

12. Fill out the chain-of-custody and any other sample forms. Prepare the samples for storage and shipment in the cooler with ice to maintain a temperature of 4 ± 2 °C. Ship overnight to the laboratory for analysis.

13. Follow the chain-of-custody procedures as detailed in the Quality Assurance Project Plan.



ATTACHMENT B
SAMPLE LOCATIONS

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway, Albany, New York 12233-7014
Phone: (518) 402-9662 • **Fax:** (518) 402-9679
Website: www.dec.ny.gov

Joe Martens
Commissioner

October 13, 2011

4215

Mr. Michael T. Kontaxis, P.E.
Manager, Environmental Technology
Pfizer Inc.
401 North Middletown Road
Pearl River, NY 10965-1299

RE: Wyeth Pharmaceuticals, Building 107 Decontamination and Sampling
ID No. NYD-054065909, DEC Site #344003
Town of Orangetown, Rockland County

Dear Mr. Kontaxis:

As a follow-up to our October 6, 2011 telephone conversation and the materials which you had transmitted on October 7th, the New York State Department of Environmental Conservation has reconsidered the modifications to the building 107 closure plan which were specified in our letter of October 5, 2011. The 4th bullet of that letter which read:

> "Sample results must be evaluated against the effluent limitation values found in the Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1, Part II, Table 5. The TOGS may be viewed at: www.dec.ny.gov/docs/water_pdf/togs111.pdf"

is hereby withdrawn. The cleanup values will be those specified in your permit and stated in your September 1, 2011 workplan.

Please provide a schedule of implementation of this work within 15 days of receipt of this letter. If you have any questions, please contact me at (518) 402-9662.

Sincerely,

Keith H. Gronwald
Senior Engineering Geologist
Remedial Bureau C
Division of Environmental Remediation

cc: C. Stein, EPA Reg. II

ATTACHMENT B

IAL Data Package Directory

NOTE: ***Complete Dirty and Clean Sample Analytical Laboratory Package will be bound under separate cover.***

IAL Data Package Directory
Veolia Project: Bldg 107 Wyeth Pharm. Decontamination and Closure Analyses

Decontamination Samples - collected 1/31/12
IAL Case # E12-01005

Client Sample ID	IAL Lab ID	Analyses
PW-1	01005-001	VOCs, PCBs, TCLP Metals, field pH
PW-2	01005-002	VOCs, PCBs, TCLP Metals, field pH
O1-D	01005-003	Composited into O COMP. & field pH
O2-D	01005-004	Composited into O COMP. & field pH
O3-D	01005-005	Composited into O COMP. & field pH
O4-D	01005-006	Composited into O COMP. & field pH
O5-D	01005-007	Composited into O COMP. & field pH
B1-D	01005-008	Composited into B COMP. & field pH
B2-D	01005-009	Composited into B COMP. & field pH
B3-D	01005-010	Composited into B COMP. & field pH
B4-D	01005-011	Composited into B COMP. & field pH
B5-D	01005-012	Composited into B COMP. & field pH
O COMP.	01005-013	VOCs, PCBs, TCLP Metals, field pH
B COMP.	01005-014	VOCs, PCBs, TCLP Metals, field pH

Clean Samples- collected 2/16/12
IAL Case # E12-01617

Client Sample ID	IAL Lab ID	Analyses
O-1-CL	01617-001	VOCs, PCBs, TCLP Metals, Total Hg, field pH
O-2-CL	01617-002	VOCs, PCBs, TCLP Metals, Total Hg, field pH
O-3-CL	01617-003	VOCs, PCBs, TCLP Metals, Total Hg, field pH
O-4-CL	01617-004	VOCs, PCBs, TCLP Metals, Total Hg, field pH
O-5-CL	01617-005	VOCs, PCBs, TCLP Metals, Total Hg, field pH
B-1-CL	01617-006	VOCs, PCBs, TCLP Metals, Total Hg, field pH

Clean Samples- collected 2/17/12
IAL Case # E12-01649

Client Sample ID	IAL Lab ID	Analyses
PW-1	01649-001	VOCs, PCBs, TCLP Metals, Total Hg, field pH
B-6-CL	01649-002	VOCs, PCBs, TCLP Metals, Total Hg, field pH
B-2-CL	01649-003	VOCs, PCBs, TCLP Metals, Total Hg, field pH
CONTROL	01649-004	VOCs, PCBs, TCLP Metals, Total Hg, field pH
B-3-CL	01649-005	VOCs, PCBs, TCLP Metals, Total Hg, field pH
B-4-CL	01649-006	VOCs, PCBs, TCLP Metals, Total Hg, field pH
B-5-CL	01649-007	VOCs, PCBs, TCLP Metals, Total Hg, field pH