File Reg 3
Lederle (Wyeth)

WYETH PHARMACEUTICALS
401 NORTH. MIDDLETOWN ROAD
PEARL RIVER,NY 10965-1299
(845) 602-5000

Wyeth

January 21, 2003

Certified Mail/Return Receipt

Mr. Paul Patel
Environmental Engineer
Bureau of Hazardous Waste Facilities
Division of Solid & Hazardous Materials
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7251

Re: SWMU #27 & 28 Proposed Closure Plan

Dear Mr. Patel:

This letter captures the main points of several telephone conversations between yourself and Wyeth personnel concerning the field investigations and proposed closure plan for the referenced SWMUs. It also provides background information and analytical data derived from these investigations.

Background

SWMUs 27 & 28 are subgrade floor drain tanks located north of Building 130. In Attachment 1 there are two field sketches showing the physical layout of the tanks relative to nearby structures. Please note the substantial grade change between the Pasteur Road level and the foot of the North side of Building 130, and the 18" cooling tower water transite lines running underground at a rather shallow depth. Although there is no readily available documentation for the tanks, interviews of employees involved in manufacturing at that area reveal that these tanks, carbon steel 1,200 gallons each, were installed in mid-to-late 1980's in order to capture a potential release from the reactors in Room 209, Building 130.

These reactors were used to complete a step in the manufacture of Minocycline, a synthetic antibiotic. The step required the use of a catalyst containing Rhodium and Palladium on granular carbon. The price of the Rhodium-Palladium catalyst justified the capture of a reactor spill and the subsequent recovery of the metals. These tanks were also receiving floor washings, from Room 209, that were characteristically black due to the handling of carbon in that room.

By late 1993 it was decided to take these tanks out of service since no reactor spill had occurred in the intervening years. Thus the pipe from Room 209 to these tanks was cut at the interior side wall of the room and was sealed. There is no record of any action for the tanks. This was essentially the basis for including these tanks in the SWMU list.

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Recent Actions

Following Wyeth's decision to exit Minocycline Production, Parsons Engineering (our environmental contractor) interviewed former operating personnel and found no historical record of spills occurring in Room 209. To confirm this, samples were collected in December 2000 from the two SWMU tanks and were analyzed for the presence of Rhodium and Palladium. These metals were used as "Tracers" to reveal a spill from the reactor. Such a spill would have released economically recoverable quantities. The results, in Attachment 2, indicate concentrations of <0.1%and confirm the "no-spill" history.

As part of the Minocycline Decommissioning Project, the tanks were emptied and the liquid and sludge from these tanks were sampled and analyzed for all the compounds that were handled in Room 209. The tanks were then cleaned with water using a spherical multihead high pressure wand and emptied. The results, Attachment 3, show no presence of the catalyst in the liquid samples and 51 and 42 ppb for Rhodium and Palladium respectively for the sludge samples. The observed concentrations of the organics used in the production were below detection levels. These low concentrations of the metals and organics are consistent with the no spill history and are attributed to floor washings in Room 209.

The liquid and sludges were manifested for offsite disposal and after cleaning it was determined that the tanks were actually 950 gallons each and made of stainless steel.

Proposed Closure Plan

The sampling and analysis data from 2000 and 2002 using the metals as conservative tracers demonstrate that the tanks did not receive any spills from processing operations in Room 209. The filling and cleaning operations also indicate that the tanks retained their integrity.

In view of their location, steep slope and nearby critically sensitive infrastructure support such as cooling tower lines, we propose to close these tanks in place. Since these tanks have been cleaned, we propose to fill them with concrete, demolish part of the access vault and vault pipes, and regrade the area. A notification of the location of these tanks will be made on the facility map.

We propose this plan because of the evidence of no release and because the removal of these tanks involves extensive shoaring and the mobilization of heavy equipment on surface above the transite cooling tower water lines. The engineering estimates of shoaring and excavation are in the neighborhood of $500,000. In the very likely event that the cooling tower lines, made of transite, break there will be grave disruptions to the operations of this facility.

Wyeth

We believe that the submitted information will enable you to approve the proposed closure plan for SWMUs 27 and 28 and should you, however have any questions please contact me at 845 602-2500.

Sincerely,

Michael T. Kontaxis, P.E.
Manager, Environmental
Technology

MTK:lc
M012103-2.doc

cc: T. Killeen, P.E. - NYSDEC Region 3, New Paltz

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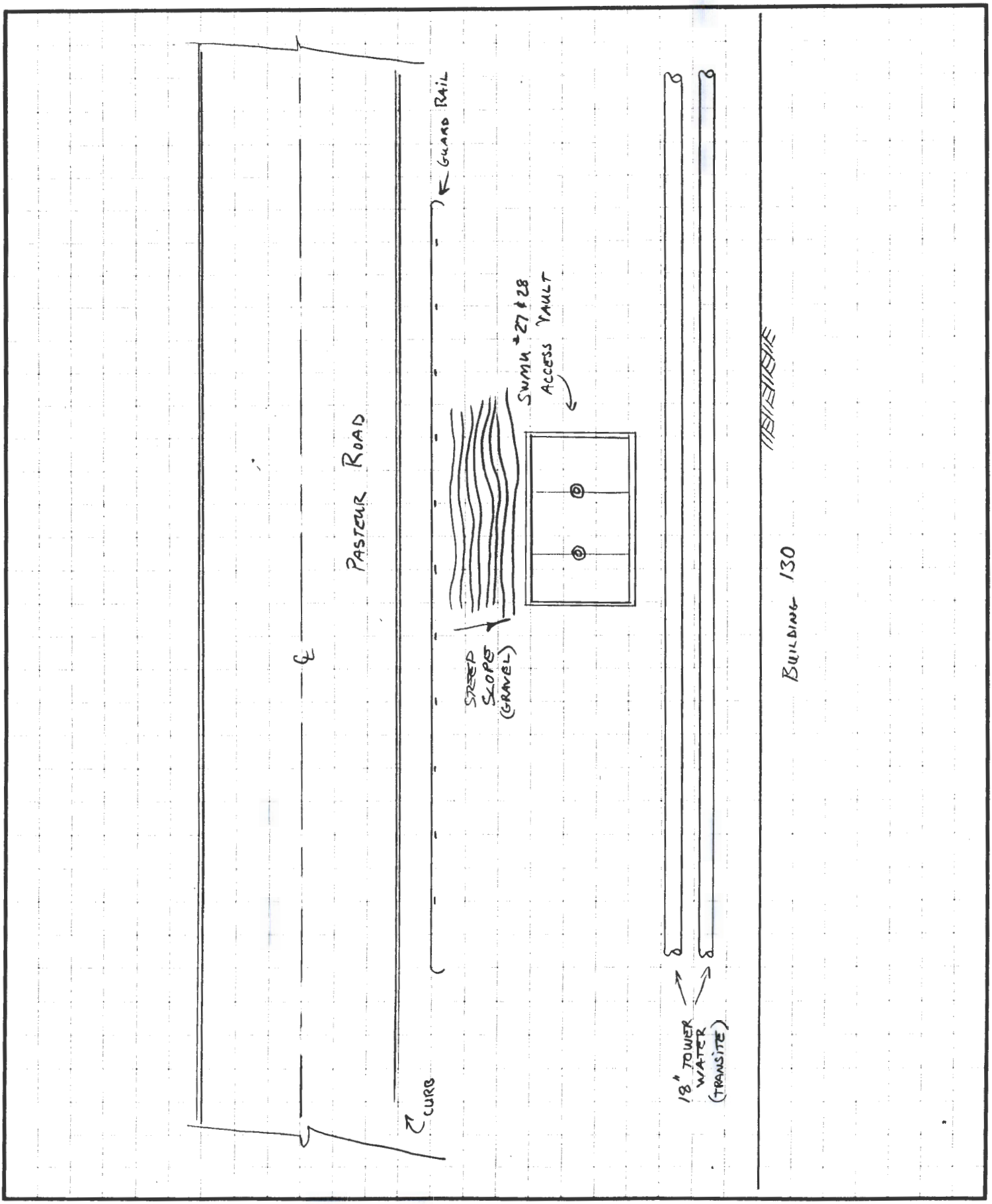
ATTACHMENT 1

PARSONS

Client WYETH PHARMACEUTICALS | Job No. | Sheet 1 of 2

Subject SWMU #27 & #28 | By DKL | Date 11/26/02

PLAN VIEW | Checked | Rev.

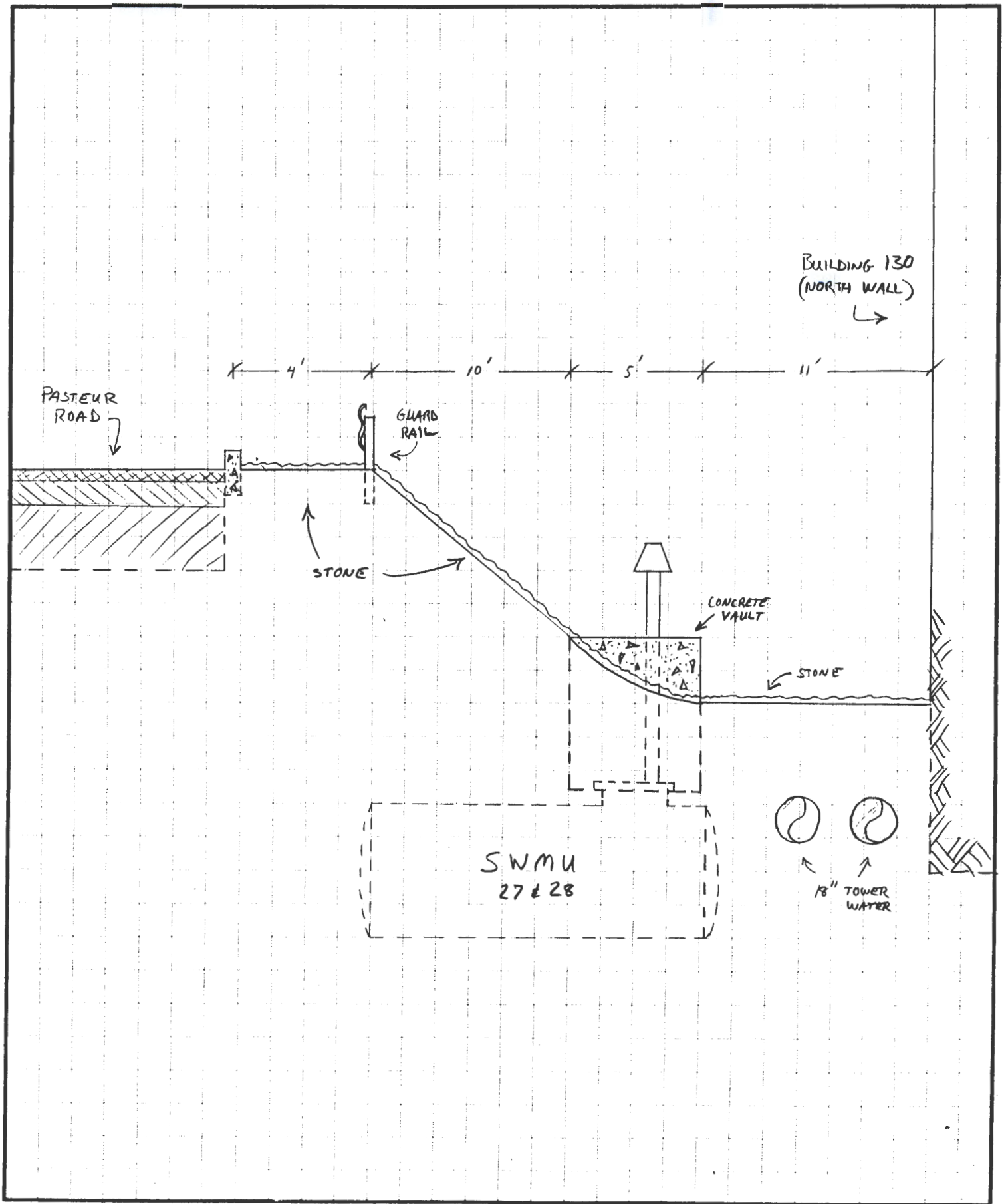


PARSONS

Client WYETH PHARMACEUTICALS | Job No. | Sheet 2 of 2

Subject SWMU #27 & #28 | By DKL | Date 11/26/02

CROSS SECTION | Checked | Rev.



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ATTACHMENT 2

December 2000

Analytical Data For SWMU 27 & 28

Galbraith Laboratories, Inc.

Accuracy with Speed ~ Since 1950

LABORATORY REPORT

Mr Matthew McGowan
Parsons ES
290 Elwood Davis Rd
Liverpool NY 13088

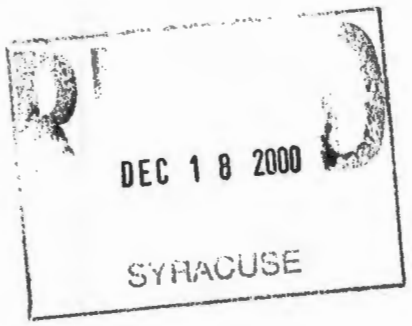
Report Date: 12/14/00

Purchase Order #: AMEX,McGowan
Fax Number: 315-451-9570

SAMPLE ID	LAB ID	ANALYSIS	RESULT(S)		
130-FD-1	H-8131	Palladium	< 0.01	*	%
		Rhodium	< 0.01	*	%
130-FD-2	H-8132	Palladium	0.033		%
		Rhodium	0.019		%

3.3 %
1.9
matrix = liquid

Floor Drain?



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ATTACHMENT 3

December 2002

Analytical Data For SWMU 27 & 28

Adirondack Environmental Services, Inc.
Experience is the solution
314 North Pearl Street • Albany, New York 12207 • 800-848-4983 • (518) 434-4546 • Fax (518) 434-0891

CLIENT: Parson's Engineering Science
CLIENT'S SAMPLE ID: SWMU Liquid
AES sample #: 021218 Y01
Samples taken by: D.Leun
MATRIX: Liquid Sample
Date Sampled: 12/17/2002
Date sample received: 12/18/02
Location: Wyeth-Pearl Rvr
composite

PARAMETER PERFORMED	METHOD	RESULT	UNITS	NOTEBK REF	TEST DATE
Methanol	EPA-8015	<10	mg/l	TN-MIS-J41	12/18/02
Triethyl Amine	EPA-8015	<10	mg/l	TN-MIS-J41	12/18/02
2-Methoxyethanol	EPA-8015	<10	mg/l	TN-MIS-J41	12/18/02
Rhodium	EPA-6010	<2.5	mg/l	SM-I-3I-83	12/19/02
Palladium	EPA-6010	<2.5	mg/l	SM-I-3I-83	12/19/02
pH	EPA-9045	7.4	su	PL-Z-44	12/19/02

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CLIENT: Parson's Engineering Science
CLIENT'S SAMPLE ID: SWMU Sludge
AES sample #: 021218 Y02

Samples ~~taken by:~~ D. Leun
MATRIX: Sludge

Date Sampled: 12/17/2002
Date sample received: 12/18/02
Location: Wyeth-Pearl Rvr composite

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2-Methoxyethanol	EPA-8015	<10	ug/g	TN-MIS-J41	12/18/02
Rhodium	EPA-6010	51.4	ug/g	SM-I-3I-83	12/19/02
Palladium	EPA-6010	42.0	ug/g	SM-I-3I-83	12/19/02
pH	EPA-9045	8.0	su	PL-Z-44	12/19/02

why hetter MDL for sluge, instead of Liquid? liquid

No QA/QC yet

APPROVED BY: [signature]
Report date: 12/19/02