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

Wyeth

June 7, 2005

CERTIFIED MAIL/RETURN RECEIPT

Mr. Mattur R. Balakrishna
Environmental Engineer
NYSDEC - Div. of Solid & Haz. Waste
Bureau of Haz. Waste Management
625 Broadway - 8th Floor
Albany, NY 12233-7251

RE: Biennial Hazardous Waste Reduction Plan Update
Wyeth Pharmaceuticals, Pearl River, NY

Dear Mr. Balakrishna:

Enclosed please find three (3) copies of the Pearl River facility's biennial hazardous waste reduction plan as required under ECL 27-0908 and Module IV of our Part 373 permit.

The strategic positioning of Wyeth in the ever-changing global marketplace has precipitated changes in the operations of this facility and has also set conditions for changes in the future. As such, future reduction opportunities, outlined herein, as well as others that may arise from unanticipated operational changes, will be thoroughly evaluated.

If you should have any questions, please contact Mr. Michael Kontaxis at (845) 602-2500 or myself at (845) 602-2160.

Sincerely,

Peter J. Alexandro
Senior Director, Environmental Health and Safety

PA/mtk/pta
PA060705-1.doc

Enclosures

cc: P. Patel, NYSDEC, Albany
C. Simon, USEPA, New York
K. Grzyb, NYSDEC, New Paltz

Appendix

HAZARDOUS WASTE REDUCTION PLAN

Lederle Laboratories (Wyeth Pharmaceuticals), Pearl River, NY
EPA ID# NYD 054065909

Table of Contents

Introduction and Environmental Commitment:

The facility is located approximately 20 miles northwest of New York City in Pearl River, New York. At this location, the facility is engaged in the manufacture, research and development of pharmaceutical products. The facility encompasses approximately 585 acres, of which the facility has developed only about 180 acres. Research & development, production and support operations are conducted in over 122 buildings at this site. Lederle has been in operation since 1906 at its Pearl River location and presently employs approximately 3,000 personnel.

The facility produces pharmaceutical products, which include biological vaccines and multivitamins. As a result of these activities, hazardous and non-hazardous wastes are generated.

The research and development of pharmaceutical products requires the use of various solvents. These solvents unfortunately are unable to be reclaimed or reused. Spent solvents are disposed off site at a permitted facility.

In addition to and in conformance with the above policies, Lederle also adheres to New York's waste minimization hierarchy to preferentially:

1. Find ways to not generate the waste.
2. Recycle and or reuse wastes generated.
3. Treat wastes that cannot be reclaimed.
4. Dispose of wastes in a secure land disposal facility.

The above policies and the importance of the waste minimization program are communicated to waste generating departments by various methods, such as meetings, personnel training, one-on-one communications and review of operational practices. Internal publications will also be used to further communication and the commitment to waste minimization and pollution prevention.

Teams and committees are established where needed to draw upon areas of expertise to meet specific reduction needs and initiatives. One example of committee work is associated with the site's wastewater reduction needs. There is an active wastewater reduction program on-site, and a committee is assigned the responsibility of reviewing wastewater discharges for reduction potential. Additionally, considerable efforts are directed toward specific projects aimed at process improvement and waste reduction. Typically these project teams are composed of engineering, environmental, safety and production personnel. These efforts are part of an overall commitment to waste reduction.

The production departments have the responsibility to initiate waste management reduction plans and practices. Process improvement is an integral part of solvent use reduction, both in improving operating efficiencies and in the favorable economics of reducing chemical usage.

The production departments are aided in their efforts by the engineering and environmental departments. The Environmental Technology Department is responsible for tracking the performance of minimization projects. Due to Corporate decisions on production a number of streams have been eliminated and their sections have

been removed from this report. Questions and inquires into this facility's pollution prevention efforts should be directed to:

Mr. Peter Alexandro
Senior Director Environmental Services
401 North Middletown Road
Pearl River, NY 10965

(845) 602-2160

WYETH
Environmental, Health and Safety Policy

It is the policy of Wyeth, its divisions and subsidiaries to conduct business in a responsible way and in a manner designed to protect the health and safety of our employees, customers, the public and the environment.

As a good corporate citizen, we must be conscious of the effects of our operations on the environment. We, therefore, will continually evaluate and assess our products and processes in order to reduce adverse environmental and safety impacts as we strive toward being a more sustainable Company and fulfilling our vision of "leading the way to a healthier world."

Wyeth will act responsibly in addressing environmental impacts caused by releases and past practices and will endeavor to return impacted properties to productive use.

The Company is committed to providing a healthy and safe workplace for our employees, contractors, visitors and neighbors by operating our facilities in a manner that is harmonious with the communities in which the facilities are located.

Wyeth will continue to comply with the spirit as well as the letter of the national and local laws relating to the protection of employees, the public and the environment. We will supplement compliance with local laws and regulations with our own Environmental, Health and Safety Guidelines that provide a framework for all of our facilities worldwide.

The Company has assigned qualified corporate, division and facility staff to ensure that this Policy is implemented globally. However, it is the responsibility of all employees to accept accountability for following this Policy, our Environmental, Health and Safety Guidelines, and all specific safety and environmental laws and regulations in order to protect themselves, their co-workers, their community and the environment.

The Company shall carry out this Policy as follows:

- Develop and maintain Environmental, Health and Safety (EHS) Guidelines that provide direction and demonstrate commitment to all of our employees. Our facilities shall follow the more stringent of the EHS Guidelines or the applicable local requirements.
- Develop and maintain an EHS assessment program to ensure that the company policy is being implemented and that the Guidelines are being followed.
- Provide a healthy and safe environment for all employees, contractors, visitors and neighbors with an ultimate goal of elimination of these impacts.
- Prevent or reduce adverse environmental impacts with an ultimate goal of elimination of these impacts.
- Establish appropriate forums for facilitating communication and disseminating environmental, health and safety information throughout the Company.
- Conduct training for EHS personnel within the Company.
- Evaluate the performance of the Company's EHS programs in order to promote continuous improvement.

- Create products and processes that are inherently safe and that incorporate the principles of pollution prevention, waste minimization and process safety.
- Conduct due diligence investigations and remediation of properties in a responsible manner.
- Understand and consider stakeholder points of view in the development of EHS policy.
- Add value to the Company by coordinating EHS initiatives with business objectives.
- Participate in trade associations and professional organization regarding EHS issues.

[As issued August 2002]

Training Programs:

Training for pollution prevention at the facility is accomplished in several ways. For general information, publications and company newsletters are circulated to employees and stockholders to provide information on the company's progress and efforts. This facility holds an Environmental Awareness Day to accentuate the various environmental programs on site. For 2005 an Environmental Health and Safety day will be held on June 17. Under the motto "WE CARE" the various environmental programs on site will be showcased and integrated with the Health and Safety complimentary programs.

Several specific training programs are provided to employees, and many of these programs incorporate elements of waste minimization. Training in "Current Good Manufacturing Practices" (cGMP) is conducted at this facility to ensure conformance with all process steps controlled by the Food and Drug Administration (FDA). Relevant employees are trained in the performance of their specific job tasks in accordance with established and approved standard operating procedures (SOPs). These SOPs provide instructions on each incremental process step, including the quantities of specific process inputs. Logs, which demonstrate conformance with the SOPs, are maintained in accordance with FDA requirements. As a consequence of the regulatory structure provided by FDA, changes to operational aspects of the manufacturing process are strictly controlled and subject to review by a Change Control Committee. A function of that committee is to review any environmental impacts associated with the production process (environmental impact statements, regulatory standards, emissions, etc). In addition, Engineering, Production and Maintenance personnel are trained in procedures designed to specifically assess the environmental impacts of new and changes to existing products, manufacturing procedures, construction and demolition projects. Attached to this plan is a copy of the procedure.

Pollution prevention is a fundamental component of our facility's environmental awareness training. The environmental training programs are customized, and presented to the various functional groups by the individual department supervisors. The environmental training program was enhanced in 1998 to include specific pollution prevention and recycling information. In 1999, the site rolled-out environmental training (including information on the site's pollution prevention program) to all new employees.

Waste minimization training continues to be an important part of the annual RCRA training provided to employees involved in the management of hazardous waste.

Overview of Hazardous Wastes Generated:

The Pearl River facility is a large quantity generator of hazardous wastes. With the outsourcing of Minocycline production in 2001, six more waste streams (1, 7, 8, 13, 14 and 15) have been eliminated and removed from this report. The following table summarizes all discrete hazardous waste streams generated in quantities greater than five (5) tons per calendar year and, subsequently, more than 90% of all hazardous waste generated at the facility. The table also identifies all hazardous waste streams that are acutely hazardous:

ID #	Waste Stream Description	2000 (tons)	2001 (tons)	2002 (tons)	2003 (tons)	2004 (tons)
1	Methanol solution	260	139	0	0	0
2	Mixed waste solvents	206.5	234.8	195.3	136.8	156.3
3	Organic mercury solution - D009	7.3	14.7	3.8	2.2	0
4a	Lab pack waste (D, F, U codes)	26.0	50.0	37.3	44.9	52.2
4b*	Acutely hazardous lab pack waste (P codes)	0.1	0.4	0.6	0.3	0.3
5	PCB waste (B codes)	0	0	0	0	0
6	Scintillation cocktail (F codes)	1.4	1.3	1.5	1.7	1.3
7	Methanol mother liquor (F code)	1623	586	0	0	0
8	Methanol still bottoms (F code)[a]	1776	811	0	0	0
9	Isopropyl alcohol (IPA) mother liquor (D code)	0	0	0	0	0
10	IPA wash (30%) (D code)[a]	0	0	0	0	0
11	IPA resin wash (D code)[a]	0	0	0	0	0
12	Methyl isobutyl ketone still bottoms (F code)[a]	0	0	0	0	0
13	Butanol still bottoms (F code)[a]	3033	662	0	0	0
14	Triethylamine (D code)[a]	21	8	0	0	0
15	2-Methoxyethanol (D code)	0	0	0	0	0
16	Multivitamins (D010)	23.0	49.4	128.1	108.5	116.6
17	Waste vaccines (D009)	13.6	10.9	4.6	1.7	1.9
18	Hazardous maintenance supplies	4.7	10.6	5.7	6.5	2.7
19	Discarded isopropanol (D001)	0	0	0	0	0
	Annual Totals	6995.6	2578.4	376.9	302.6	331.3

**Acutely hazardous wastes*

Since 2000, there has been a 95% decrease in hazardous waste as depicted in the above table.

[a] These wastes are treated on-site in a biological wastewater treatment plant. 743,438 tons in 2000, 1,689,938 tons in 2001. These treated streams were discharged to the Orangetown Treatment Plant (POTW). Since 2002 these wastes are no longer generated at this facility.

RESEARCH AND BIOLOGICAL PURIFICATION

Mixed waste solvents (*Waste stream number 2*)
Lab pack waste (*Waste stream number 4a and 4b*)

Process Brief:

Mixed waste solvents are generated through a variety of means. There are approximately 1000 research personnel dedicated to exploring new avenues of pharmaceutical discovery and clinical pharmacology. Waste solvents are generated in the purification of biological products and new compounds with potential therapeutic properties. Waste solvents are collected at the point of origin in plastic 5-gallon cans and transported to building 107. Our hazardous waste contractor empties the waste solvents into steel 55-gallon drums for consolidation prior to off-site shipment. The following paragraphs summarize the types of processes employed and the types of waste generated.

Research Activities - Fields of research include chemical synthesis, animal toxicology, biomedical products, anti-infectious agents, oncology, microbial physiology and molecular pharmacology. Doctorate level experimenters supervise research laboratory activities. The generation of wastes, a by-product of this research, comes from micro-scale chemical syntheses to kilogram scale development work. Laboratory wastes are managed so that solvents are not discharged to the sewer system, but rather are placed into solvent safety cans, accumulated in drums and sent off site for disposal. The quantity of solvents generated is dependent on both the nature and number of research projects underway, and also the nature and number of quality control tests performed. As a consequence of the types of research conducted, most of the solvents generated are not recoverable or suitable for reuse and must be managed as a hazardous waste.

Additionally, through research activities there are surplus or out-of-date chemicals and laboratory reagents that are disposed of as packaged laboratory chemicals. The quantity of lab pack chemicals is dependent on the number of research projects terminated during the course of the year, the number of laboratory cleanouts performed and the relocation of laboratory personnel to newer facilities and buildings. As researchers complete experiments, reagent chemicals are either returned to the stock room or disposed of as recommended by the manufacturer's listed shelf life. Waste laboratory chemicals are identified as waste stream numbers 4a and 4b. This group is split into two categories to track the generation of acutely hazardous wastes. Those chemicals meeting the definition of a P-code waste are counted as waste stream number 4b with all others counted as stream number 4a.

Waste Generation Indices:

Since the mixed waste solvent stream is generated from research activities, there is no appropriate index for this stream. In 2004, this site generated 156.3 tons of mixed waste solvents (both chlorinated and non-chlorinated).

Waste Management Costs:

The cost for off-site waste disposal, inclusive of transportation, of the mixed waste solvents was $329,596 in 2004. The on-site storage and handling costs are not broken down separately, and are not available.

Waste Reduction Opportunities:

There have been no options or waste minimization opportunities identified for the mixed waste solvent stream.

PHARMACOKINETIC RESEARCH

Scintillation Cocktail (*Waste stream number 6*)

Process Brief:

Pharmacokinetic research involves the determination of the distribution of an experimental drug or vaccine in the body of a test animal. Radioactive, e.g., C_{14} tagged molecules are injected into animals and animal tissues. Sections of the tissue are analyzed to determine if the tagged molecule is accumulating in the organ of interest. The analysis is conducted through the oxidization of a sample of tagged tissue in an oxidizer. The scintillation cocktail, consisting of methanol and toluene, collects the evolved gas from the oxidation process. The resulting liquid is run through a scintillation counter that measures the β-radiation. The amount of β-radiation detected is proportional to the accumulation of the tagged molecule in the tissue sample. The scintillation cocktail from the scintillation counter is collected in drums for off-site disposal. Approximately half of the cocktail has to be managed as a mixed waste (hazardous and radioactive) and is managed under both the hazardous waste rules and a New York State Radioactive Materials License, issued under the New York State Department of Labor.

Waste Generation Indices:

There is no appropriate index for this waste, since its generation is strictly dependent on the research activities that are constantly changing. In 2004, this site generated 1.3 tons of scintillation waste.

Waste Management Costs:

The current costs of managing this waste stream consist of SR waste and SX waste. This relates to an annual cost of $ 151,843 in 2004. Storage and handling costs are not broken down separately and are not available.

Waste Reduction Opportunities:

No waste reduction opportunities have been identified.

MULTIVITAMIN PRODUCTION

Multivitamins (*Waste stream number 16*)

Process Brief:

As selected multivitamin and nutritional supplement products made on-site have been reformulated to reduce the level of selenium in the tablets.

Waste Generation Indices:

The waste stream generated is the off-specification product and the material utilized in analytical and stability testing. The waste index is generated using the following formula:

$$\text{Waste Index} = 100\left(1 - \left\{ {P_{91}/W_{91}} \Big/ {(P_{04}/W_{04})} \right\}\right)$$

where: Px = product production in year x

Wx = waste generated in year x

The following table reports the quantity of waste generated in 2004 and the waste index:

Waste Description	#	Code	2004 (tons)	Index
Waste multivitamins	16	D010	116.6	24.8%

Waste Management Costs:

In calendar year 2004, the facility spent $280,566 on off-site waste management of this hazardous waste stream, inclusive of transportation.

Waste Reduction Opportunities:

As described previously, this product has been reformulated to lower the levels of selenium. Manufacturing modifications to some of the blending operations reduced the amount of the mass directed to emission control devices. These modifications resulted in reduced air emissions from these operations.

Biological Vaccines (*Waste stream number 17*)

Process Brief:
Out-of-date or rejected biological vaccines are discarded. Typically, the products are manufactured and samples are collected for quality assurance/quality control evaluation. Activities of the vaccines are measured against standards and the lot is graded on a pass/fail system. The vaccines are hazardous due to the presence of the mercury bearing preservative thimerosal (D009).

Waste Generation Indices:
There is no index for this waste stream since it is an end product, not a side or by-product.

Waste Management Costs:
The cost for the disposal of the discarded biological vaccines was $4,007 for the calendar year 2004.

Waste Reduction Opportunities:
Out-of-date lots of biological vaccines do not have the potential to be reworked since it is a mixture of the cellular vaccine, an aqueous media and a preservative.

Hazardous Maintenance Supplies (*Waste stream number 18*)

Process Brief:
Hazardous maintenance supplies are from the routine cleanout of several maintenance warehouses and the disposal of production/maintenance wastes. The supplies discarded were solvent-based paints and paint scraps, unused herbicides, aerosol cans and other flammable or corrosive materials. In 2004, this facility discarded 5.7 tons of hazardous maintenance supplies.

As these wastes are not based on any specific production or manufacturing process, we have not created an index. Furthermore, two waste reduction opportunities have been identified and are being pursued. Solvent-based inks used in the printing of packaging of vaccines and multivitamins are being replaced with water-based inks. A solvent-based cleaner used in the production of multivitamins is planned to be substituted by a water-based cleaner.

Attachment A -- Project Environmental Checklist

PROJECT ENVIRONMENTAL CHECKLIST

07/02

Section 1 - To be completed by Operating Department and/or Project Engineer

Project Title		Project Number
Departmental Contact	Ext.	Bldg./Rm;
Project Location:		
Project Description (attach pages as necessary):		
Project Schedule:	Prepared by: Ext.: Date: Bldg/Rm.:	

Does the project involve/impact any of the following (during construction phase or upon completion):

Changes (including location) to or new air emission points / sources -----	☐ yes	☐ no	☐ do not know
Changes to or new wastewater discharges -----	☐ yes	☐ no	☐ do not know
Changes to or new bulk storage -----	☐ yes	☐ no	☐ do not know
Changes to or new chemical storage -----	☐ yes	☐ no	☐ do not know
Changes to or new (type or quantity) solid waste disposal -----	☐ yes	☐ no	☐ do not know
Changes to or new hazardous waste disposal -----	☐ yes	☐ no	☐ do not know
Changes to or new regulated medical waste disposal -----	☐ yes	☐ no	☐ do not know
Changes to or new low level radioactive waste disposal -----	☐ yes	☐ no	☐ do not know
Refrigerants (except as excluded in scope)-----	☐ yes	☐ no	☐ do not know
Soil disturbance (excavations) -----	☐ yes	☐ no	☐ do not know
Import or export soil -----	☐ yes	☐ no	☐ do not know
Cement / concrete work -----	☐ yes	☐ no	☐ do not know
Noise that may noticeably carry beyond property line -----	☐ yes	☐ no	☐ do not know
Emergency power generation -----	☐ yes	☐ no	☐ do not know
Temporary power generation >or = 225 HP -----	☐ yes	☐ no	☐ do not know
Application of architectural coatings (except as excluded in scope) -----	☐ yes	☐ no	☐ do not know
Asbestos or lead removal -----	☐ yes	☐ no	☐ do not know
Odors that may noticeably carry beyond property line -----	☐ yes	☐ no	☐ do not know

Attachment A -- Project Environmental Checklist (continued)

If you answered "yes" to any of the questions on the front side of this form please describe, as fully as possible, the specific impact so an accurate environmental assessment may be made.

Specific Project Impacts (as identified on other side)

Date:

Section 2 - To be Completed by Environmental Reviewer

Environmental Assessment:

Time constraints:

Project Meeting Required ☐ yes ☐ no

Reviewed By:

Date

Types of Permits / approvals needed (if necessary)

Permit to construct	☐ yes	☐ no
Permit to construct a modification	☐ yes	☐ no
Permit Modification	☐ yes	☐ no
Certificate to operate	☐ yes	☐ no
SPDES permit modification	☐ yes	☐ no
RCRA permit modification	☐ yes	☐ no
Other	☐ yes	☐ no

Attachment B -- Engineering Demolition & Construction Projects -- Pearl River Site Environmental Requirements

Demolitions / Renovations:

- Refrigerant removals must be completed early in the project to minimize the potential for accidental releases (see refrigeration equipment, below).
- Follow SPI PR 2K-413 for decommissioning of equipment.
- Solid waste disposal must be pre-arranged through the Environmental Operations Supervisor (x22498).
- Hazardous waste disposal to be coordinated with site Hazardous Waste Control Department
- Update air emission drawings (vent flow; source location; emission point location).
- Asbestos and lead surveys and notifications must be coordinated through the Safety Department per established procedures.

Refrigeration Equipment:

- Under no circumstances may refrigerants be intentionally vented while maintaining, servicing, repairing or disposing of any appliance.
- Coordinate with site Refrigeration Department; refrigerants are recovered (not waste); waste oil through on site Hazardous Waste Control Department
- Certified technicians and recovery equipment must be used for Class 1 & 2 refrigerants.

Construction -- Environmental Permits:

NOTE: Do not proceed with construction unless required environmental permits have been secured (coordinated through site Environmental Technology Department).

- Air emission permits need drawings, identification of emission points / controls, description of sources & identification of owners. Air pollution control equipment needs manufacturer's literature for removal efficiency and O&M recommendations for incorporation in PMO's.
- If cumulative disturbed area is more than 1 acre; a stormwater pollution prevention plan (SPPP) for the construction is required.
- Provide "as built" sanitary and stormwater collection and connection drawings

Construction -- Temporary Internal Combustion Engine Power Sources, 225 hp and larger:

- Contact Environmental Technology Department for approval before bringing on-site internal combustion engines rated for 225 hp or greater. Notify Environmental Technology Department when the unit arrives on site and leaves the site.

Construction -- Spill control / Storm-water protection / Pollution prevention

- Assure protection against runoff or windblown debris from dumpsters.
- Maintain oil, lubricants, etc. in a contained area and keep spill control materials at hand.
- Protect storm-water drains affected by construction; inspect and repair controls after each rain (>0.5") event.
- Protect disturbed soil from erosion.
- Contain and collect concrete cleaning waste or clean equipment off site.
- Prior to importing / exporting soil, analysis of priority pollutants and metals is required.

Construction -- Architectural Coatings & paving projects:

- Secure documentation from contractors and include in contracts that "only coatings that do not exceed the volatile organic compound content limits in 6 NYCRR 205.4 will be used" *(internet link = http://www.dec.state.ny.us./website/regs/205.htm).*
- For asphalt paving and patching, include in contracts that work will comply with VOC limits in *6 NYCRR 211.4, (internet link = http://www.dec.state.ny.us./website/regs/211.htm#211!4).*

Design -- Wastewater

Generate water balance & waste characterization; identify maximum flow to treatment plant.

Design -- Spill prevention / containment

Provide secondary containment for bulk storage tanks and bulk transfer stations.

Design -- Waste management

Provide secure / locked area(s) for regulated medical waste.

Design -- Noise

- Obtain noise level (near field) in dbA for all external noise sources.
- Noise abatement required for sources (particularly air handling systems) where nearfield is greater than 85dbA or if the source is elevated or near property boundary.

Company: Lederle Laboratories
401 North Middletown Road
Pearl River, NY 10965

USEPA ID# NYD 054 065 909

Hazardous Waste Generation Summary
Table 1 Last revised 5/30/05

Waste Stream ID Number	Name of Waste	Source of Generation	Disposal Method	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004
#1	Methanol solvents	WASTE STREAM ELIMINATED		405	[illegible]	177.7	[illegible]	259.2	312.1	103	[illegible]	178	[illegible]	280	[illegible]	0	0	0
#2	Mixed waste solvents	Pharmaceutical manufacturing	Fuels blending/ Incineration	280	[illegible]	434.6	[illegible]	233.8	[illegible]	348	[illegible]	277.3	[illegible]	286.4	254	393.5	[illegible]	[illegible]
#3	Organic solution	Pharmaceutical manufacturing	Treatment	13	[illegible]	19.1	[illegible]	23.1	[illegible]	20.3	[illegible]	[illegible]	[illegible]	[illegible]	14.7	3.8	2.2	[illegible]
#4a	Lab pack waste (D, F, U codes)	Pharmaceutical research		25.9	[illegible]	28.5	[illegible]	19.4	[illegible]	48.8	[illegible]	22.5	[illegible]	[illegible]	[illegible]	22.2	[illegible]	[illegible]
#4b	Lab pack waste (P codes)	Pharmaceutical research	Varies	0.6	[illegible]	0.6	[illegible]	0.5	[illegible]	0.7	[illegible]	0.1	[illegible]	0.1	[illegible]	0.6	0.3	[illegible]
#5	PCB Waste	WASTE STREAM ELIMINATED								+								[illegible]
#6	Scintillation cocktail	Pharmaceutical research	Fuels blending/ Incineration	5.2	[illegible]	3.4	[illegible]	3.3	[illegible]	1.8	[illegible]	0.4	[illegible]	1.4	[illegible]	1.5	[illegible]	[illegible]
#7	Methanol mother liquor	WASTE STREAM ELIMINATED		1,591	[illegible]	882	[illegible]	1,288	[illegible]	1382	[illegible]	1510	[illegible]	[illegible]	[illegible]	0	0	0
#8	Methanol still bottoms	WASTE STREAM ELIMINATED		2,380	[illegible]	1,431	[illegible]	1,586	[illegible]	1452	[illegible]	2061	[illegible]	[illegible]	[illegible]	0	0	0
#9	Isopropanol mother liquor	WASTE STREAM ELIMINATED								+								
#10	Isopropanol wash	WASTE STREAM ELIMINATED								+								
#11	Isopropanol tank wash	WASTE STREAM ELIMINATED								+								
#12	MIBK still bottoms	WASTE STREAM ELIMINATED								+								
CHANGE IN WASTE STREAM, NO NYSTATIN PRODUCED IN 1999																		
#13	Butanol still bottoms	WASTE STREAM ELIMINATED		6,309	[illegible]	4,900	[illegible]	7,904	[illegible]	7566	[illegible]	5352	[illegible]	[illegible]	[illegible]	0	0	0
#14	Trioxolamine	WASTE STREAM ELIMINATED		94	[illegible]	50.7	[illegible]	31.6	[illegible]	35	15	6	17	21	[illegible]	0	0	0
*#15	2-Methoxyethanol	WASTE STREAM ELIMINATED		166	[illegible]	98.5	[illegible]	182.9	[illegible]	336	[illegible]	163	[illegible]	0	0	0	[illegible]	0
#16	Hexachlorophene	OTC Manufacturing	Incineration		47.5	58.1	[illegible]	45.1	[illegible]	0.4	[illegible]	1.3	[illegible]	23.8	[illegible]	128.1	[illegible]	[illegible]
#17	Waste vaccines	Rejected product	Incineration		7.6	6.6	[illegible]	11.1	[illegible]	8.1	[illegible]	6.5	12.9	13.6	[illegible]	4.6	1.7	[illegible]
#18	Maintenance supplies *	Discarded supplies, etc.	Land disposal/ Incineration			17.9	[illegible]	6.1	[illegible]	5.9	[illegible]	11.3	[illegible]	4.7	[illegible]	5.7	[illegible]	[illegible]
#19	Discarded isopropanol	WASTE STREAM ELIMINATED								+								

Waste Stream ID Number	Basis	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004
#1	Note A	1 lb/hr	[illegible]	-32.8%	[illegible]	[illegible]	[illegible]	-3.5%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	+	+	+
#2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
#3		0.1 lb/hr	[illegible]	0.5 lb/hr	[illegible]	0.5 lb/hr	[illegible]	0.5 lb/hr	[illegible]	[illegible]	[illegible]	0.7 lb/hr	[illegible]	0.3 lb/hr	0.3 lb/hr	0.3 lb/hr
#4a / #4b	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
#5								NA+								
#6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
#7	Note A	1 lb/hr	[illegible]	[illegible]	[illegible]	9.9%	[illegible]	1.6%	[illegible]	2.9%	[illegible]	-10.9%	[illegible]	+	+	+
#8	Note A	0.5 lb/hr	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	22.8%	[illegible]	[illegible]	[illegible]	12.2%	[illegible]	+	+	+
#9								NA+								
#10								NA+								
#11								NA+								
#12								NA+								
BUTANOL STILL BOTTOMS GENERATED FROM DISTILLATION OF 2-METHOXYETHANOL IN 1999 (INDEX BASED ON MINOCYCLINE PRODUCTION)																
#13	Note A	1.2 t/hr	[illegible]	-19.8%	[illegible]	4.9%	[illegible]	-37.2%	[illegible]	[illegible]	[illegible]	41.9%	[illegible]	+	+	+
#14	Note A	22 lb/hr	[illegible]	6.8%	64.8%	41.2%	[illegible]	31.2%	[illegible]	80.4%	[illegible]	64.2%	[illegible]	+	+	+
*#15	Note A	NA	[illegible]	40.7%	[illegible]	-31.2%	[illegible]	-97.1%	[illegible]	0.2%	[illegible]	100.0%	[illegible]	+	+	+
#16	Note A		NA	40.9%	78.9%	42.9%	[illegible]	100.0%	[illegible]	80.0%	[illegible]	87.1%	77.7%	81.0%	27.7%	24.8%
#17	NA		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
#18	NA			NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
#19								NA+								

Note A: The indices are calculated by NYSDEC formula [illegible]
Calendar year 1990 is used as a base year for all indices reported on this form.
* Waste batteries and fluorescent light tubes were recycled and are not reported on this form.
\+ These values are zero (or 100% respectively) due to the termination of the use of these in the process or the termination of the process itself.

TABLE-1.XLS

Company: Lederle Laboratories
401 North Middletown Road
Pearl River, NY 10965

USEPA ID# NYD 054 065 909

Hazardous Waste Reduction Program
Table 2 Date of last revision May 30, 2005

Waste ID #	Name of Waste	Waste Stream Affected	Reduction Plans/Projects	Established Waste Reduction (Tons)	Method Used to Calculate ROI*	ROI (est.)	Goal Date	Remarks
#18	Solvent-based inks and cleaners	Haz. Maintenance Supplies & Wastes	Substitutions with water based products	0.5 tons	Not determined (ND)	ND	3/1/2006	Initiated ink substitution trials in early 2005 and started researching cleaner substitutes.

**** ROI = Return on Investment***