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Pfizer Inc
Pfizer Global Manufacturing
Specialty/Biotechnology Operating Unit
401 North Middletown Road
Pearl River, New York, 10965-1299
(845) 602-5000

January 20, 2012

CERTIFIED MAIL - RETURN RECEIPT

Mr. Keith H. Gronwald
Senior Engineering Geologist
Remedial Bureau C
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway,
Albany, NY 12233-7014

RE: Wyeth Pharmaceuticals
Closure of Building B107
ID No. NYD-054065909, DEC Site #344003
Permit # 3-3924-00025/00107-0
Town of Orangetown, Rockland County

Dear Mr. Gronwald:

Enclosed is the revised document entitled "Decontamination and Closure Workplan Building 107 Wyeth Pharmaceuticals, Pearl River NY. The Workplan was revised to include the comments you provided in your letter of October 5, 20011 which appears as Attachment A to the Workplan and also a schedule for the various tasks in Section B2.

The actual field work will commence on January 24, 2012 with the preparation of the areas for the sampling at selected spots to determine the disposal of the wash waters.

Should you need any additional information, please contact me at (845) 602-2500.

Sincerely,

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

Enclosures

c: E. Moore, NYSDEC, Region 3

bc : W. Edsall
M Amideneau
P. Sidoti
R. Schott (NY)
C. Clark (NY)
File 4210
File 4262

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.

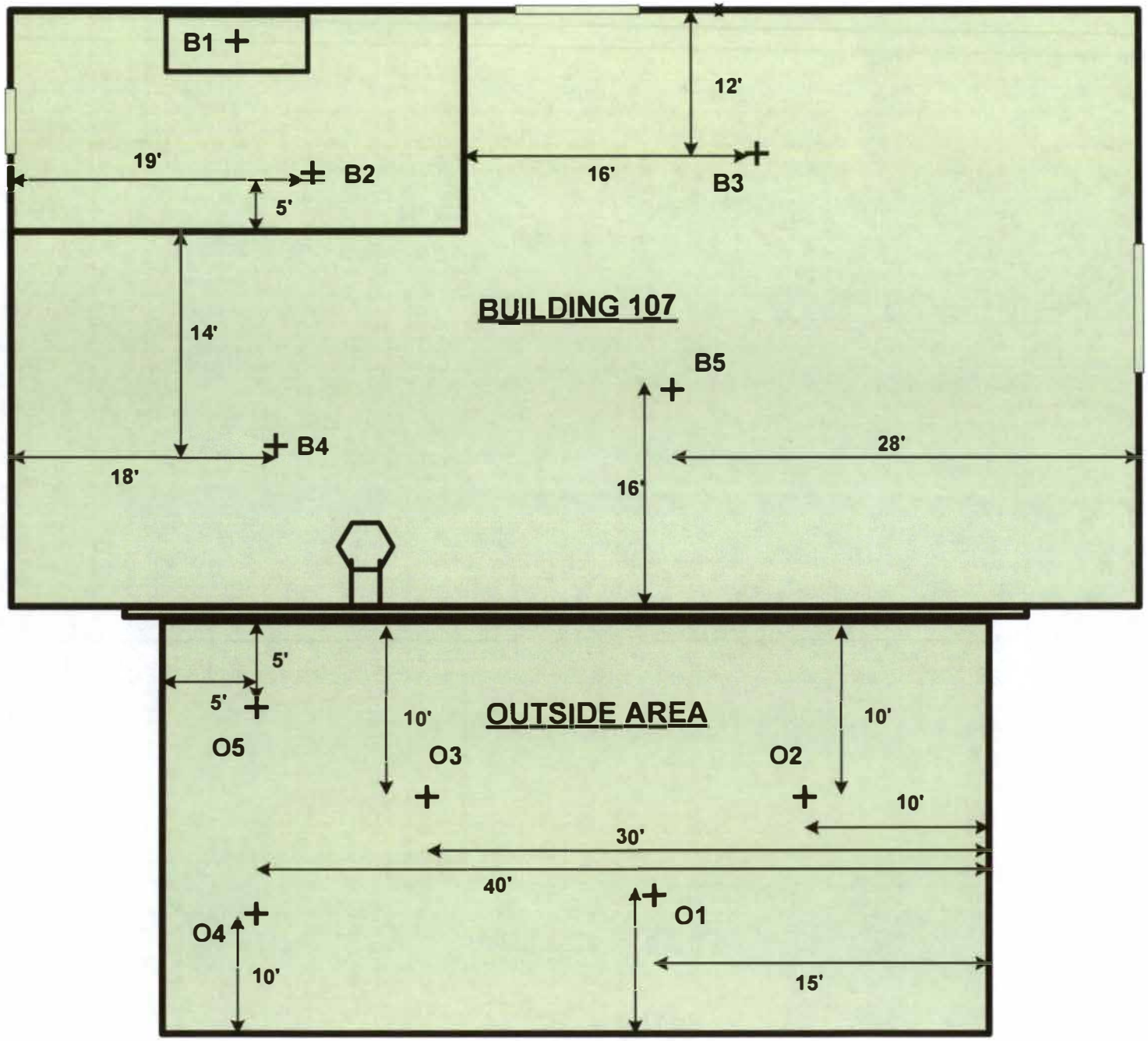
9. Cap the sample container and place sample containers in a cooler with ice to maintain a temperature of 4 °C.

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