

Via Electronic Mail

July 8, 2022



Lynn M. Winterberger  
NYSDEC- RCRA Permitting Section  
Bureau of Hazardous Waste and Radiation Management  
Division of Materials Management  
625 Broadway  
Albany New York 12233

Re: Response to Comments on November 2021 Focused Feasibility Study and Corrective Measures Study Addendum  
Pfizer, Rouses Point, NY (NYD002081396)

Dear Lynn:

On behalf of Pfizer, Woodard & Curran is submitting this response to the New York State Department of Environmental Conservation's (NYSDEC) June 1, 2022 comments on the November 2021 Focused Feasibility Study and Corrective Measures Study Addendum (Focused CMS Addendum) for Buildings 18 & 27 previously submitted for the Rouses Point facility.

The Focused CMS Addendum will not be updated and instead comments will be incorporated into the revised draft CMS as discussed in previous meetings.

Each NYSDEC comment is provided below in italicized format followed by the comment response.

***Comment 1: Section 3.1 Constituents of Concern (COCs).*** *The summarization table (unnumbered) within this section shows highest reported concentrations in soils categorized by its exceedance (or not) of the particular 6 NYCRR Part 375 Soil Cleanup Objectives (SCOs). While this visual representation is readily understood, Wyeth also needs to specify the SCO that they intend to reach. Wyeth needs to be consistent in the units of measures through the document. Section 3.1 discusses the SCOs in ppm whereas Section 4.2 uses ppb. Please note, there is an error in the Unrestricted Use SCO provided for Benzene. Additionally, Section 3.1 fails to provide information regarding the levels of contaminate concentration noted in the groundwater. This information needs to be discussed in detail within the text of this document.*

Response: This section is to identify constituents of concern (COCs) and not describe media cleanup levels, which are discussed in a separate section. Consistent units will be used for tables in the CMS. The CMS discusses concentrations in groundwater.

***Comment 2: Section 3.5 Data Gaps.*** *Please provide additional information of what is meant by "limited" as regards the "limited pre-remedial design borings."*

Response: The word "limited" will be removed. A description of the pre-remedial design borings will be provided in the Interim Correction Measure (ICM) or Corrective Measure Implementation (CMI) Work Plan.



**Comment 3: Section 4.1 Corrective Action Objectives.** Please address the overall goal for corrective action soil cleanup objectives. While this section discusses that actions need to be taken to reduce COCs concentrations in soils and groundwater, it does not specify the actual corrective action goal of cleanup to a specific DEC SCO of either Unrestricted or Restricted Use (Residential, Restricted Residential, Commercial, or Industrial).

Additionally, Wyeth has not addressed the groundwater contaminant concentration level they plan to achieve with this cleanup. As has been previously discussed during several meetings, the Department requires that site cleanup be performed to the extent that is both technically and economically feasible. Additional information on this may be found in Section B.6 of Commissioner Policy (CP)-51, Soil Cleanup Guidance.

Response: The proposed numerical corrective action goal is presented in Section 4.2 Media Cleanup Criteria of the CMS Addendum. Corrective action objectives including numerical goals for soil and groundwater will be presented in the revised CMS. The technical and economic feasibility for cleanup to a specific soil DEC SCO will be discussed in the revised CMS for the Buildings 18 & 27 area and previously completed ICMs.

**Comment 4: Section 4.2 Media Cleanup Criteria.**

On Page 4-2, this section includes the following statement:

*"The Site will rely on an MNA strategy to reduce concentrations of COCs in groundwater. Because groundwater impacts prior to remediation are already defined and do not pose a risk to human health or the environment, designing and implementing soil remediation to address the Unrestricted Use and Protection of Groundwater SCOs in the Study Area is unnecessary. Also designing and implementing remediation to achieve Restricted Use-Residential SCOs is cost prohibitive and unnecessary for protection of human health and the environment.*

*Remediation performed to achieve one of the Restricted Use SCOs will reduce COC mass in the Study Area and facilitate ongoing MNA for groundwater in this area. It is believed that following remediation, MNA will be effective within a reasonable length of time. Furthermore, use of the NYSDEC Restricted Use – Commercial SCOs is consistent with the objectives of the CMS because:*

- *Soils above Restricted Use Residential Criteria are located beneath the former building slab and do not pose a hazard to human health. Should other buildings be constructed in this area, soil vapor sampling and/or mitigation will be utilized to control risk."*

*The information in this section as well as the table with which it begins seems to exclude the contaminant levels which need to be met to achieve cleanup of the groundwater as well as providing an estimation of time on when contaminants are expected to reach attainment under the Monitored Natural Attenuation (MNA) scenario.*

*The next bullet listed on Page 4-2, which continues the text from above, states:*

- *The former facility property is zoned I-2, Industrial. A deed restriction limiting the Site to industrial use is anticipated as part of the Corrective Action plan for the Site."*



*The Department requires the use of an Environmental Easement as opposed to a deed restriction. Please correct this text.*

*In general, Section 4 needs to be updated to include these concerns, which may in turn, require changes to the sections which follow.*

Response: The revised CMS will include a discussion of groundwater cleanup levels, points of compliance, and restoration timeframe for the MNA scenario.

The text will be updated to replace “deed restriction” with “Environmental Easement”.

**Comment 4: Section 8.2 Response to Inquiries.** *Update NYSDEC contact information to:*

*New York State Department of Environmental Conservation  
Cecia Bicknell, Project Manager 518-402-8651  
[cecia.bicknell@dec.ny.gov](mailto:cecia.bicknell@dec.ny.gov)*

Response: Contact information will be updated in the revised CMS.

**Comment 5: Appendix A. Cost Estimate Summary.** *Based on the CP-51 requirements, the cost analysis for the ISCR estimate should include separate the base costs for performing ISCR (Site Preparation and the Professional/Technical Services) from the detail(s) associated with the number of injections that may be necessary for each proposed clean up level from Unrestricted to Commercial or Industrial SCOs.*

Response: A cost estimate will be developed for the application of ISCR in the Buildings 18 & 27 area to reach unrestricted SCOs and presented in the revised CMS. Please note that the base costs may also vary for the different SCOs, and therefore separate cost estimates maybe developed for the different SCOs endpoints.

There are also technical feasibility concerns in that ISCR may not be able to achieve Unrestricted SCOs for soil because of the variability of permeabilities in the glacial till. The technical and economic feasibility of attaining unrestricted SCOs will be presented in the revised CMS.

Thank you for your attention on this matter. If you have any questions regarding these comment responses, feel free to contact Nick Hastings at 203-699-6154 or Tom Donohue at 908-901-7395.



Sincerely,

WOODARD & CURRAN, INC.

*Kimberly M Reinauer*  
Kimberly Reinauer  
Technical Manager

A handwritten signature in blue ink, appearing to read "Nick Hastings", with a long horizontal flourish extending to the right.

Nicholas Hastings, PG  
Project Director

cc: Tom Donohue (Pfizer)  
Cecia Bicknell (NYSDEC)  
Jack Markey (W&C)

PN: 206910