

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Materials Management, Bureau of Hazardous Waste and Radiation Management  
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May 9, 2023

## **CORRECTED LETTER**

**Sent via e-mail, no hard copy to follow**

Mr. Eric Gaulin, PhD, CHMM  
Pfizer Inc.  
100 Route 206 North  
Peapack, NJ 07977  
[eric.gaulin@pfizer.com](mailto:eric.gaulin@pfizer.com)

Re: 2016 Solid Waste Management Unit and Sampling Analysis Report  
Chemical Development Pilot Plant  
100 Academy Street, Rouses Point, New York  
NYSDEC Permit No: 5-0928-00017/00175  
EPA ID No.: NYD002081396, UIS Site No. 510018

Dear Mr. Gaulin:

The New York State Department of Environmental Conservation (Department or DEC) has received and reviewed the aforementioned Solid Waste Management Unit and Sampling Analysis Report Chemical Development Plant Report (Report), dated April 4, 2016. This report was submitted by Woodard & Curran Engineering and Geological Services P.A.P.C. (Woodard & Curran) on behalf of Wyeth Pharmaceuticals (Wyeth), which is part of Pfizer Inc.

Within the Report, Wyeth discusses results of the investigation of several Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) throughout the footprint of the Chemical Development Pilot Plant in accordance with the Module II-Corrective Action Requirements of the 6 NYCRR Part 373 Hazardous Waste Management Permit issued by the Department. These investigations took place while the plant was in operation as well as after its demolition. Wyeth submitted No Further Action (NFA) recommendations on specific SWMUs and AOCs as the result of these activities. Based on the information provided within this Report, the Department assessed the recommendations for each of the listed SWMUs/AOCs.

The Department has determined that the following SWMUs/AOCS are subject to additional investigation/information submittal, as detailed in the enclosure, and the NFA recommendation is disapproved:

- SWMU-7: Process Sewer – Exterior Piping Segment from Building 17C (Part of 2023 SMWU definition for SWMU-7B)
- SWMU-7: Process Sewer – Exterior Piping on East Side from Building 23 (Part of 2023 SMWU definition for SWMU-7B)



Department of  
Environmental  
Conservation

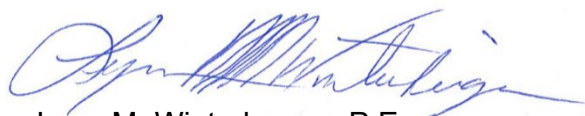
- SWMU-7: Process Sewer – Interior Sub-Slab Piping in Buildings **24, 31 & 40**. (Part of 2023 SMWU definition for SWMU-7B)

The Department has determined that the NFA recommendation for the following SWMUs/AOCS are approved:

- SWMU-1: Interim Drum Storage
- SWMU-4: Former Container Storage Area
- SWMU-5: Container Storage Area
- SWMU-6: (Tank Farm)
- SWMU-7: Process Sewer - Exterior conveyance piping from Building 17C and Building 34 (Part of 2023 SMWU definition for SWMU-7B)
- SWMU-7: Process Sewer - Exterior sewer piping on East site of Building 23 (Part of 2023 SMWU definition for SWMU-7B)
- SWMU-7: Process Sewer – Interior Sub-Slab Piping in Buildings 16, 23, 26, & 34 (Part of 2023 SMWU definition for SWMU-7B)
- SWMU-12: Building 16 Former Drywell
- SWMU-13: Building 16 Former Sanitary Sewer Holding Tanks
- SWMU-15: Building 24 Wastewater Treatment Plant
- SWMU-17: Building 40 Wastewater Steam Stripper Building
- SWMU-23: Building 16 Former Waste Storage Area in Northwest Corner
- SWMU-24: Building 31 Solvent Condensate System
- SWMU-26: Chemical Development Reactor Bay Drumming Areas – Multiple Locations (former Buildings 16 and 23)
- AOC-8: Release of Acetonitrile to the Concrete at Chemical Development
- AOC-10: Building 23 Therminol Release to Soil

If you have any questions, please contact Cecia Bicknell of my staff at [cecia.bicknell@dec.ny.gov](mailto:cecia.bicknell@dec.ny.gov).

Sincerely,



Lynn M. Winterberger, P.E.  
Supervisor, HW Permitting Section

Enclosure

ec: C. Bicknell, NYSDEC  
J. Deming, NYSDOH  
S. Surani, NYSDOH  
J. Markey, Woodard & Curran  
N. Hastings, Woodard & Curran  
K. Reinauer, Woodard & Curran