

**RCRA PART 373 PERMIT
EXECUTIVE SUMMARY/FACILITY FACT SHEET**

**Former Wyeth Pharmaceuticals Site
EPA ID No. NYD002081396
DEC Permit No. 5-0928-00017/00175**

**Rouses Point, New York
Clinton County**

1.0 FACILITY PERMIT AND GENERAL INFORMATION

Permittee Name (Property Owner):	ERS Rouses Point, LLC
Permittee Name (CA Operator)	Wyeth Pharmaceuticals, LLC
Facility Name:	Former Wyeth Pharmaceuticals Site
Facility Location:	64 Maple Street, Rouses Point, NY 12979
EPA ID No.:	NYD002081396
DEC Permit No.:	5-0928-00017/00175
DEC DER No.:	510018
Facility Size:	78.6 acres
Facility Latitude/Longitude:	Latitude: 44.98861679; Longitude: -73.37083944
Commercial/Non-Commercial TSDF:	Non-Commercial (Corrective Action Only)
Facility Contact (Property Owner):	Mark A. Haynes mark@ers-investors.com (413) 348-0886
Facility Contact (CA Operator):	Eric Gaulin Eric.Gaulin@pfizer.com (908) 901-7463
DEC Contact/Responsible Permit Writer:	Cecia Bicknell cecia.bicknell@dec.ny.gov 518-402-8652
Initial/Renewal Permit:	Renewal
Permit Type (Yes/No): Operating Corrective Action Post-Closure Care	No Yes No
Permit Term (5 or 10 years):	10 Years
Estimated Costs: Closure	\$0.00

Corrective Action	\$5,180,000
Post-Closure Care	\$0.00
Total	\$5,180,000
On-site Environmental Monitor(s):	Not Applicable

Facility Background

The Former Wyeth Pharmaceuticals Site (Facility) contained two operational units, the Main Plant and the Chemical Development (ChemD) Plant. The Main Plant and ChemD Plant operated as semi-autonomous units, although much of the infrastructure was shared between the two plants including steam, process wastewater treatment facilities, and hazardous waste storage.

The Main Plant (located primarily on the eastern portion of the Facility) included approximately one (1) million square feet of manufacturing and supporting infrastructure space. This portion of the Facility was previously owned by Wyeth and sold to Akrimax Manufacturing, LLC in 2006, who then leased the plant back to Wyeth (later acquired by Pfizer) for pharmaceutical manufacturing operations. Pfizer re-acquired the Main Plant portion of the facility from Akrimax in 2011. Previous operations at the Main Plant included the manufacturing, primary processing and packaging of over-the-counter and prescription pharmaceuticals. Production operations at the Main Plant ceased in December 2017. The Main Plant facility included the manufacturing buildings, boiler house, air treatment buildings, and general Facility grounds including the undeveloped portions of the Facility.

The ChemD Plant (located on the western portion of the Facility) was owned and operated by Pfizer until 2018 and included approximately 120,000 square feet of pharmaceutical research and development and warehouse space. The ChemD Plant facility included the process wastewater treatment plant, steam stripper, tank farm, various storage buildings, the fire water system, and the greater than 90-day hazardous waste storage facility.

In November 2018, the Facility was sold to ERS Rouses Point NY LLC. A portion of the buildings were demolished prior to the sale of the property. Most of the remaining buildings have since been demolished by the current owner. The former Main Plant portion of the facility maintains an address of 64 Maple Street. The former ChemD Plant portion of the facility maintains an address of 100 Academy Street. Hence the multiple addressees listed above for the facility location. See the included tax parcel map for full area of the Part 373 Corrective Action Permit.

As of 2024, the facility no longer operates as a large quantity generator of hazardous waste as all operations at the facility ceased in 2017. Current waste generation is from remedial work associated with the Facility's Corrective Action requirements. In 2023, a large portion of the Facility's Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) were reviewed and approved by NYSDEC as requiring No Further Action. Three (3) SWMUs and two (2) AOCs still require remedial work.

Corrective Action at the Facility includes remedial activities necessary to address on-site Trichloroethene (TCE) contamination and an off-site Carbon Tetrachloride release. Cleanup

actions for the soil and groundwater are also targeting contaminant surrogates. The Facility was required to perform a PFAS investigation in 2018 for groundwater. As NYS promulgated PFAS soil guidance values in 2023, the facility is required to perform a soil investigation to complete data gaps. Pending the conclusion of this investigation, the Department shall make determinations on any necessary further actions.

2.0 RCRA PERMITTED UNITS

There are no hazardous waste management units (HWMU) permitted to operate at the facility. All previously permitted HWMUs have been closed in accordance with state and federal regulations.

3.0 CORRECTIVE ACTION SUMMARY

The following table summarizes the ongoing corrective action activities occurring at the facility:

SWMU/AOC Designation	Corrective Action Steps Completed	Remaining Activity to be Completed
SWMU-7D: Process Sewers – Buildings 18 (GLATT 1) and 27 (PAL 4) (formerly defined as part of SMWU-7)	Soil and groundwater sampling investigation completed in 2019 to address TCE contamination	Monitored Natural Attenuation and In-situ Chemical Reduction Controls
SWMU-10: North Field	PFAS groundwater Sampling	Supplementary PFAS Investigation for soil and groundwater
SWMU-16: Former Fire Fighting Training Areas 3 and 4	PFAS groundwater Sampling	Supplementary PFAS Investigation for soil and groundwater
AOC-1: Former PCB-Containing Transformer – Staining on Concrete Pad	PCB investigation determined the Site has residual contamination.	Institutional Controls – Easement (to be established)
AOC-11: Off-Site Carbon Tetrachloride Plume	Corrective Measures implemented and completed in 2016 to address off-site contamination of Carbon Tetrachloride near Rouses Point Elementary School	Monitored Natural Attenuation and reassessment of contamination and remedy

4.0 SITE MANAGEMENT

The facility has an NYSDEC-approved:

Yes No

- | | | |
|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Post-Closure Plan - Not Applicable |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Groundwater Monitoring Program - Formal program to be required under Permit |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Site Management Plan – To be required under Permit |

4.1 Institutional Controls

The Facility is managed under this Permit as well as site restrictions directed by Soil Cleanup Objectives to Commercial Use. Additionally, an environmental easement is being required in this the Permit.

4.2 Engineering Controls

Numerous engineering controls are in place at the facility to prevent future exposure to contamination and/or restrict the further migration of contamination. These engineering controls are as follows:

- Overburden cover at the former Main Plant footprint: A concrete slab, which measures approximately 320 feet by 160 feet, was left in place following the demolition of the Main Plant to restrict additional surface water infiltration over the TCE source area at SWMU-7D: Process Sewer. As it is acting as a control barrier to reduce plume migration and mitigate potential exposure from rising soil vapors, the concrete slab must be retained until and unless it is evaluated for modifications for future re-development of the property. Due to the reported TCE exceedances and the recalcitrant nature of chlorinated compounds and their by-products, an In-Situ Chemical Reduction (ISCR) remedy is being used for soil treatment to address the contamination in this area. It is anticipated that evaluation of the slab will not be done until after the ISCR injections.
- Long-term Groundwater Monitoring Program: The facility currently has a long-term program designed to monitor concentrations, fate and transport of contaminants in the groundwater. It has a network of off- and on-site monitoring wells connected to the upper and lower zones of the overburden.
- Off-site Soil Vapor Intrusion Program: Resident homes impacted with TCE and/or Carbon Tetrachloride and surrogates will continue the use of Sub-Slab Depressurization System until non-detections are consistently reported and approved by the Department, and/or at the request of the residents.

5.0 ISSUES AND CONCERNS

The following sections describe any potential issues or concerns for the facility related to its hazardous waste permit. Additionally, it includes information on any major changes made between the last issued permit and this renewal permit.

5.1 Environmental Risk Assessment

The Facility was evaluated as part of a 2015 RCRA Corrective Action Environmental Indicators USEPA CA725 Current Human Exposures Under Control and CA750 Migration of Contaminated Groundwater Under Control. Based on these reviews, it was determined that contamination at the Facility did not pose imminent danger to human health or the environment, but that corrective action was required to control risks to health and environment.

Corrective action programs have been implemented to clean up, restrict migration of, and prevent exposure to contamination.

5.2 Climate Leadership and Community Protection Act (CLCPA)

Pursuant to the requirements of Section 7(2) of the CLCPA, during its review of the permit renewal application the DEC has taken into consideration information regarding the facility's consistency with the CLCPA.

5.3 Climate Risk and Resilience Act (CRRA)

The Facility has demonstrated to the DEC that future physical climate risk, not limited to sea-level rise, storm surge and flood, was considered during the permit renewal process. The DEC has made a tentative assessment that the Facility is not at risk of adverse climate change impacts due to extreme weather events, and no additional actions are necessary at this time to improve the resiliency at the facility.

5.4 Environmental Justice (EJ)

The Facility is located near a mapped Environmental Justice community. The project was reviewed in accordance with Commissioner's Policy (CP)-29. A public participation plan was developed and a fact sheet outlining the project will be mailed to the community within 0.5 miles of the project. It was determined a public participation meeting was not required since this renewal application will no longer be an operational permit and will only allow for remediation of the hazardous materials.

5.5 Unresolved Issues and Concerns

There are no unresolved issues or concerns with the Facility.

5.6 Compliance Schedule Items

The Permittee has not proposed to incorporate any items into the Permit renewal.

5.7 Public Participation

The draft RCRA Part 373 Renewal Permit (Permit) will have a 45-day public notice comment period. Renewal Application documents and the draft RCRA Part 373 Renewal Permit as well as other pertinent documents are accessible at DEC Info Locator ([Index of /data/DecDocs/510018 \(ny.gov\)](https://data.dec.ny.gov/data/DecDocs/510018)), or at the facility's electronic repository (<https://rpupdate.com/document-repository/index.html>). If no comments are received, the draft Permit shall be issued as final. If comments are received, they shall be address in either a Response to Comments document or a direct response letter to the commentor(s).

5.8 Significant Permit Modifications

The Permittee closed all hazardous waste management units (HWMU), prior to expiration and State Administration Procedure Act (SAPA)-extension of the Facility Permit being renewed herewith. As such, the Facility is subject only to Corrective Action permitting and the Department has made minor modifications to the Permit to remove HWMU content, update formatting, implement any new regulatory requirements and address technical concerns raised during the renewal process.

5.9 Upcoming Remedial Activities

Various RCRA remedial activities associated with soil-vapor intrusion, soil and groundwater will be performed and covered under this Permit. There are no anticipated closures of any operating units during the life of this Permit. Remaining SWMUs and AOCs will be retained until cleanup goals are achieved.

Figure 1 – Facility Location

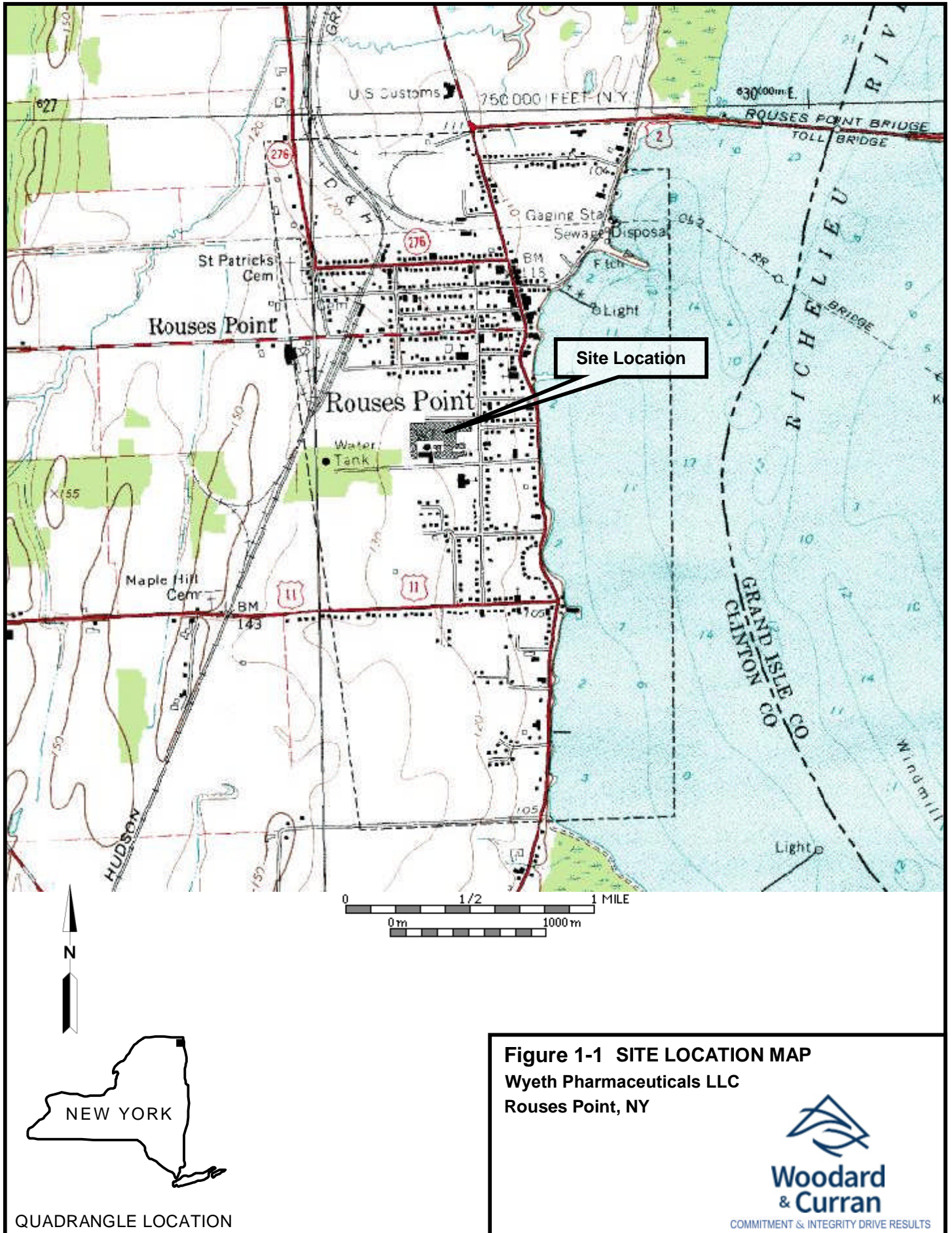
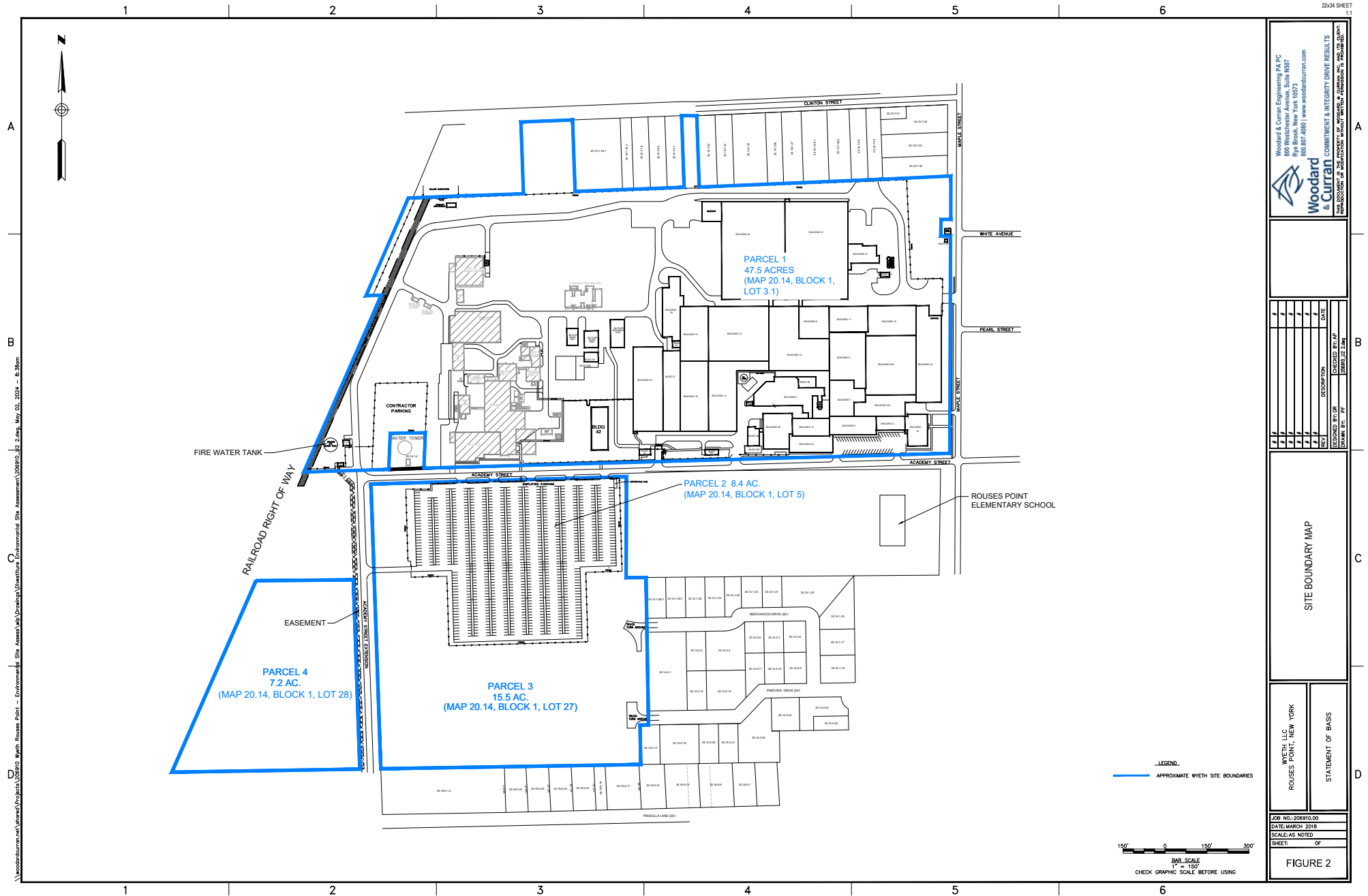


Figure 2 – Rouses Point, NY Site Boundary Map
 Parcels Number: 20.14-1-3.3, 20.14-1-3.1, 20.14-1-5, 20.14-1-27 and 20.14-1-28



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 COMMITMENT & INTEGRITY DRIVE RESULTS

NO.	DESCRIPTION	DATE
1	DESIGNED BY J.P.	
2	CHECKED BY J.P.	
3	DRAWN BY J.P.	

SITE BOUNDARY MAP

WYETH LLC
 ROUSES POINT, NEW YORK

STATEMENT OF BASIS

JOB NO. 200910.00
 DATE: MARCH 2015
 SCALE: AS NOTED
 SHEET: 1 OF 1

FIGURE 2

Figure 3 – Facility SWMUs and AOCs

