

**Via Electronic Mail**

March 10, 2015



Daniel J. Eaton  
NYSDEC  
Division of Environmental Remediation  
Remedial Bureau A, Section C  
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**Subject: Annual Update – Table II-1, II-1A, and II-2 of Module II (Corrective Action Requirements) of NYSDEC 6 NYCRR Part 373 Hazardous Waste Management Permit (NYD002081396) for Pfizer, Rouses Point, NY**

Dear Mr. Eaton:

On behalf of Pfizer, Woodard & Curran is submitting the attached annual update of the Status of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at the Pfizer facility, 64 Maple Street/100 Academy Street, in Rouses Point, NY (the "Site") in Tables II-1 and II-2 of Module II of the NYSDEC 6 NYCRR Part 373 Hazardous Waste Management Permit as required by Module II Part E.

Please do not hesitate to contact me at (203) 271-0379 with any questions or comments.

Sincerely,

WOODARD & CURRAN

A handwritten signature in blue ink that reads "Donald J. Weeks".

Donald J. Weeks, PG, LEP  
Senior Project Manager

Enclosures: Annual Update of Status of SWMUs and AOCs, Tables II-1/II-2

Cc: Matt Basso – Pfizer  
Mark McCullough – Pfizer  
Tom Killeen - NYSDEC

<b>Table II-1 SWMUs and AOCs</b>				
	<b>Name</b>	<b>Active or Inactive</b>	<b>RCRA Status</b>	<b>Corrective Action Status</b>
X	SWMU 1 Interim Drum Storage Area	Inactive	Sampling & Analysis Report (Ref 2) CMS Work Plan (Ref 11) Groundwater monitoring results in draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
	SWMU 2 Building 20A Accumulation Area	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended
	SWMU 3 Building 20 Accumulation Area	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)	No further investigation at this time until time of decommissioning
X	SWMU 4 Former Container Storage Area	Inactive	Sampling & Analysis Report (Ref 2) CMS Work Plan (Ref 11) Groundwater monitoring results in draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
X	SWMU 5 Container Storage Area	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Minor Modification suspending monitoring requirements (Ref 14) Final Rinsate Sample Collection Plan (Ref 14) Final Closure Report (Ref 14) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress

<b>Table II-1 SWMUs and AOCs</b>				
	<b>Name</b>	<b>Active or Inactive</b>	<b>RCRA Status</b>	<b>Corrective Action Status</b>
X	SWMU 6 Tank Farm	Inactive	<p>Sampling &amp; Analysis Report (Ref 2)</p> <p>Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)</p> <p>Interim Corrective Measure (Soil Removal) Completed (Ref 9)</p> <p>Tanks decontaminated/out of service (Ref 12)</p> <p>Notice of Final Receipt of Waste (Ref 12)</p> <p>Final Rinsate Sample Collection Plan (Ref 12)</p> <p>Tank Farm Final Closure Report (Ref 12)</p> <p>Sampling &amp; Analysis Plan (Ref 16)</p>	SAP implementation in progress
X	SWMU 7 Process Sewer	Active	<p>Sampling &amp; Analysis Report (Ref 2)</p> <p>Interim Corrective Measures Workplan (Ref 7)</p> <p>Camera Inspection Completed (Engineering Evaluation of Select SWMUs)(Ref 8)</p> <p>Interim Corrective Measure Completed (Soil and Pipe Removal/Replacement) Conducted on North and West Sides (Chemical Development Plant) (Ref 7)</p> <p>Supplemental Sampling and Analysis Plan Addendum No. 3 (Ref 7)</p> <p>Groundwater monitoring results in draft CMS Report (Ref 11)</p> <p>Sampling &amp; Analysis Plan (Ref 16)</p>	<p>No Further Action (NFA) for north and west sides of Chemical Development for soil investigation or excavation activities.</p> <p>SAP implementation in progress (to address remaining east-side).</p>
	SWMU 8 Waste Neutralization USTS	Active	Sampling & Analysis Report (Ref 2)	No further investigation at this time until time of decommissioning
	SWMU 9 Lab Waste Mgmt Area	Inactive	Sampling & Analysis Report (Ref 2)	Proposed for Corrective Measures Implementation (CMI) or SAP Implementation
	SWMU 10 North Field	Inactive	<p>Sampling &amp; Analysis Report (Ref 2)</p> <p>Interim Corrective Measure (Soil Removal) Completed (Ref 4)</p> <p>Groundwater monitoring results in draft CMS Report (Ref 11)</p>	No Further Action (NFA)

<b>Table II-1 SWMUs and AOCs</b>				
	<b>Name</b>	<b>Active or Inactive</b>	<b>RCRA Status</b>	<b>Corrective Action Status</b>
	SWMU 11 Sumps and Catchments in Solvent Use Areas (8 sumps and solvent storage catchments)	Inactive and Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)	No further investigation at this time until time of decommissioning
X	SWMU 12 Building 16 Former Drywell	Inactive and Inaccessible	Sampling & Analysis Report (Ref 2) Supplemental SAP 6/29/07 (Ref 3) CMS Work Plan (Ref 11) Soil/groundwater monitoring results in draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
X	SWMU 13 Building 16 Former Sanitary Sewer Holding Tanks	Inactive	Sampling & Analysis Report (Ref 2) Supplemental SAP Addendum No. 3 (Ref 7) CMS Work Plan (Ref 11) Groundwater monitoring results in draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
X	SWMU 14 Waste Toluene Mgmt East of Tank Farm	Inactive	Sampling & Analysis Report (Ref 2) Supplemental SAP 6/29/07 (Ref 3) Interim Corrective Measures Workplan (Ref 7) Interim Corrective Measure (Soil Removal) Completed (Ref 7) Supplemental SAP Addendum No. 3 (Ref 7) CMS Work Plan (Ref 11) Groundwater monitoring results in draft CMS Report (Ref 11)	No Further Action (NFA)
X	SWMU 15 Bldg 24 Wastewater Trmt Plant	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Groundwater monitoring results in draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
	SWMU 16 Former Fire-fighting Area 3 & 4	Inactive	Sampling & Analysis Report (Ref 2) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended

<b>Table II-1 SWMUs and AOCs</b>				
	<b>Name</b>	<b>Active or Inactive</b>	<b>RCRA Status</b>	<b>Corrective Action Status</b>
X	SWMU 17 Bldg 40 Wastewater Steam Stripper Building	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
	SWMU 18 Bldg 41 Process Wastewater AST	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Groundwater monitoring results in draft CMS Report (Ref 11)	No further investigation at this time until time of decommissioning
	SWMU 19 Process Equipment Solvent Recovery Units (multiple locations)	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)	No further investigation at this time until time of decommissioning
	SWMU 20 Process Dust Collection Drum-outs (multiple locations)	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)	No further investigation at this time until time of decommissioning

<b>Table II-1 SWMUs and AOCs</b>				
	<b>Name</b>	<b>Active or Inactive</b>	<b>RCRA Status</b>	<b>Corrective Action Status</b>
	SWMU 21 Bldg 25 Active Pharmaceutical Ingredient Waste Storage Area	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)	No further investigation at this time until time of decommissioning
	SWMU 22 Bldg 20 Courtyard Waste Oil Storage Shed	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8)	No further investigation at this time until time of decommissioning
X	SWMU 23 Bldg 16 Former Waste Storage Area in NW Corner	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) CMS Work Plan (Ref 11) Draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
X	SWMU 24 Bldg 31 Solvent Condensate System	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
	SWMU 25 Bldg 11 Inactive Spray Paint Booth	Inactive	Sampling & Analysis Report (Ref 2) CMS Work Plan (Ref 11) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended
X	SWMU 26 Chem Develop Reactor Bay Drumming Areas	Active	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 16)	SAP implementation in progress
	SWMU 27 Building 13 Accumulation Area	Active	Minor modification (Ref 15)	No further investigation at this time until time of decommissioning

<b>Table II-1 SWMUs and AOCs</b>				
	<b>Name</b>	<b>Active or Inactive</b>	<b>RCRA Status</b>	<b>Corrective Action Status</b>
	AOC 1 Former PCB Transformer	Inactive	Sampling & Analysis Report (Ref 2) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended
	AOC 2 Stained Soil Near Contractor AST	NA	Reference (2) and Reference (3)	No Further Action (NFA)
	AOC 3 Petroleum Staining Soil Bldg 6 Former 30K UST	Inactive	Sampling & Analysis Report (Ref 2) CMS Work Plan (Ref 11) Draft CMS Report (Ref 11)	Proposed for Corrective Measures Implementation (CMI) or SAP Implementation
	AOC 4 Petroleum AST without Base Containment - Bldg 6	NA	Sampling & Analysis Report (Ref 2) Interim Corrective Measure (Soil Removal) Completed (Ref 10)	No Further Action (NFA)
X	AOC 5 Ethylene Dichloride release near Bldg 23 dock	NA	Reference (2)	No Further Action (NFA)
	AOC 6 Petroleum & Dichloromethane release from Bldg 25 dock	NA	Reference (2)	No Further Action (NFA)
	AOC 7 No. 6 Fuel oil release to concrete trench north of Bldg 6	NA	Reference (2)	No Further Action (NFA)
X	AOC 8 Acetonitrile release to concrete at Chem D	Inactive	Sampling & Analysis Report (Ref 2) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended
X	AOC 9 Bldg 34 loading dock mixed Alcohol waste release	NA	Reference (2)	No Further Action (NFA)
X	AOC 10 Bldg 23 Therminol Release to soil	Inactive	Sampling & Analysis Report (Ref 2) Supplemental SAP Addendum No. 3 (Ref 7) CMS Work Plan (Ref 11) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended

X= part of Chemical Development property.

NA = not applicable based on no further action determination

**Table II-1A  
Vapor Intrusion Assessment**

	<u>Name</u>	<u>RFI Status</u>	<u>Implementation status</u>
	Vapor Intrusion Investigation - On-Site Chem D	Investigation Complete (Ref 5)	No Further Action (NFA) Requested
	Vapor Intrusion Investigation - On-Site Main Plant	Investigation Complete (Ref 5)	No Further Action (NFA) Requested
	Vapor Intrusion Investigation - Off-Site Elementary School	Investigation Complete (Ref 6)	No Further Action (NFA)
	Vapor Intrusion Investigation - Off-Site Residential	Investigation Complete (Ref 6)	Mitigation system installations complete. OM&M in progress (biennial OM&M formerly started Y2008; occurs every second year).



**Table II-2  
Reference List**

Ref (#)	Title	Approval Date
1	SWMU/AOC Assessment Report; Woodard & Curran (W&C), 9/2006	NYSDEC Ltr dtd 10/17/2006
2	Sampling & Analysis Report; W&C, 4/5/2007 Includes Appendix A: Engineering Evaluation Workplan	NYSDEC Ltr dtd 5/8/2007
3	Supplemental Sampling & Analysis Plan (SAP); W&C, 6/29/2007	NYSDEC Ltr dtd 7/17/2007
4	Interim Corrective Measure Workplan, SWMU-10; W&C, 6/15/2007  Interim Corrective Measure Completion Report, SWMU-10; W&C; 3/19/2010 (revision 1 4/29/2010)	NYSDEC Ltr dtd 7/17/2007  NYSDEC Ltr dtd 5/12/2010
5	Supplemental Sampling & Analysis Plan (SAP) Addendum 1; W&C, 9/27/2007  Supplemental Sampling & Analysis Plan (SAP) Addendum 2; W&C, 9/16/2008  Vapor Intrusion Investigation Workplan-Main Plant; W&C; 11/2009  Supplemental Sampling & Analysis Report (SAR); W&C; 6/25/2010  Vapor Intrusion Investigation Workplan - Chemical Development Plant; W&C; 10/15/2010  Vapor Intrusion Investigation Report - Chemical Development Plant; W&C; 9/23/2011	Verbal Approval 10/2007; field overview 10/18/07  NYSDEC Ltr 9/16/2008  NYSDEC Ltr 11/12/2009  NYSDEC Ltr 7/30/2010  NYSDEC Ltr 11/3/2010

**Table II-2  
Reference List**

Ref (#)	Title	Approval Date
6	<p>Vapor Intrusion Investigation Workplan; W&amp;C, 2/8/2008 (off-site only)</p> <p>Vapor Intrusion Investigation Workplan, Addendum 1; W&amp;C; 8/19/2008</p> <p>Vapor Intrusion Investigation Work Plan Addendum No.2; W&amp; C: 12/10/2008</p> <p>Vapor Intrusion Investigation Work Plan Addendum No.3: W&amp;C; 5/20/2009</p> <p>Off-Site Soil Vapor Mitigation System Completion Report; W&amp;C; May 2009</p> <p>Off-Site Soil Vapor Mitigation System Operation, Maintenance, &amp; Monitoring (OM&amp;M) Plan, W&amp;C; May 2009 (revision 1 July 2009; revision 2 3/15/2010)</p> <p>Off-Site Soil Vapor Mitigation System OM&amp;M Report, 3/22/2010</p> <p>Off-Site Soil Vapor Mitigation System Completion Report No.2; W&amp;C; 4/20/2010</p>	<p>NYSDEC Ltr 2/15/2008</p> <p>NYSDEC Ltr 8/21/2008</p> <p>NYSDEC Ltr 12/30/2008</p> <p>NYSDEC Ltr 5/29/2009</p> <p>NYSDEC Ltr 3/23/10</p> <p>NYSDEC Ltr 4/19/2010</p>
7	<p>Interim Corrective Measure (ICM) Workplan, SWMU-7 Process Sewer (Chem D) &amp; SWMU-14 Waste Toluene Management Area; W&amp;C, 6/13/2008</p> <p>ICM Workplan Addendum No. 1, SWMU-7 Process Sewer (Chem D) &amp; SWMU-14 Waste Toluene Management Area; W&amp;C, 5/28/2009</p> <p>ICM Workplan Addendum No.2, SWMU-7 Process Sewer (Chem D) &amp; SWMU-14 Waste Toluene Management Area; W&amp;C; 8/21/2009</p> <p>ICM Completion Report, SWMU-7 Process Sewer, North and West Sides (Chem D); W&amp;C; 5/14/2010</p> <p>ICM Completion Report, SWMU-14 Waste Toluene Management; W&amp;C; 5/21/2010</p> <p>Supplemental Sampling and Analysis Plan Addendum No.3; W&amp;C; 6/21/2010</p>	<p>NYSDEC Ltr 6/9/2008</p> <p>NYSDEC Ltr 6/2/2009</p> <p>NYSDEC Ltr 8/24/2009</p> <p>NYSDEC Ltr 6/3/2010</p> <p>NYSDEC Ltr 6/17/2010</p> <p>NYSDEC Ltr 6/24/2010</p>
8	<p>Engineering Evaluation of Select Solid Waste Management Units (SWMUs) Report; W&amp;C; 3/12/2010</p>	<p>NYSDEC Ltr 4/27/2010</p>

**Table II-2  
Reference List**

Ref (#)	Title	Approval Date
9	ICM Completion Report, SWMU-6 Tank Farm (Truck Containment Pad); W&C; 5/28/2010	NYSDEC Ltr 8/26/2010
10	ICM Completion Report, AOC-4 Petroleum AST Without Base Containment; W&C; 6/4/2010	NYSDEC Ltr 7/21/2010
11	<p>Corrective Measures Study Work Plan; W&amp;C; 10/8/2010 (revised 12/9/2010)</p> <p>In-Situ Chemical Oxidation (ISCO) Pilot Study Work Plan; W&amp;C; 7/7/2011</p> <p>Corrective Measures Study Progress Report No. 1; W&amp;C; 2/25/2011</p> <p>Corrective Measures Study Progress Report No. 2; W&amp;C; 6/3/2011</p> <p>Corrective Measures Study Progress Report No. 3; W&amp;C; 9/22/2011</p> <p>Corrective Measures Study Progress Report No. 4; W&amp;C; 12/22/2011</p> <p>Draft Corrective Measures Study Report; W&amp;C; 3/29/2013</p>	<p>NYSDEC Ltr 11/9/2010 NYSDEC Ltr 12/20/2010</p> <p>NYSDEC Email 8/4/2011</p>
12	<p>Rinsate Sample Collection Plan; W&amp;C; 5/4/2011</p> <p>Rinsate Sample Locations; W&amp;C; 6/13/2011</p> <p>Request for Permit Modification; Pfizer; 8/1/2011</p> <p>Rinsate Sample Collection Report; W&amp;C; 9/23/2011</p> <p>Notice of Final Receipt of Waste; Pfizer; 11/5/2013</p> <p>Final Rinsate Sample Collection Plan; W&amp;C; 11/22/2013</p> <p>Tank Farm Final Closure Report; W&amp;C; 1/24/2014</p>	<p>NYSDEC Ltr 5/13/2011</p> <p>NYSDEC Ltr 7/7/2011</p> <p>NYSDEC Ltr 12/27/2011</p> <p>NYSDEC Ltr 12/27/2011</p> <p>NYSDEC Ltr; 3/19/2014</p>

**Table II-2  
Reference List**

Ref (#)	Title	Approval Date
13	Request for Major Permit Modification for Corrective Measures; 2/8/2013  ISCO Interim Corrective Measure (ICM) Recommendation Letter; NYSDEC; 3/29/2013  Fact Sheet for Corrective Measure Study; NYSDEC; 3/2013  ISCO ICM Work Plan; W&C; 6/5/2013	NYSDEC Ltr 7/1/2013
14	Minor Modification Request to Suspend Monitoring Requirements; Pfizer; 2/13/2014  Final Rinsate Sample Collection Plan; W&C; 2/25/2014  Building 17C (Container Storage Building) Final Closure Report; Pfizer; 6/10/2014	NYSDEC Ltr 2/14/2014   NYSDEC Ltr 7/23/2014
15	Minor Modification Request to update Table 1 in Attachment XI to include <90 day storage area; Pfizer; 12/17/2013	
16	Solid Waste Management Unit Sampling & Analysis Plan - Chemical Development Pilot Plant; 9/18/2014 (revised 12/1/2014)	NYSDEC Email 12/10/2014