

Via Electronic Mail

March 4, 2019



Daniel J. Eaton
NYSDEC
Division of Environmental Remediation
Remedial Bureau A, Section C
625 Broadway
Albany, NY 12233-7258

Re: 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
Wyeth Pharmaceuticals, LLC, Rouses Point, NY

Dear Mr. Eaton:

On behalf of Wyeth Pharmaceuticals, LLC (Wyeth, which is part of Pfizer Inc.), Woodard & Curran is submitting the attached annual update of the Status of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at the former Wyeth facility, 100 Academy Street, in Rouses Point, NY 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 Anne Proctor at (203) 699-6042 or Nick Hastings at (203) 699-6154 with any questions or comments.

Sincerely,

WOODARD & CURRAN

A handwritten signature in blue ink that reads "Anne E. Proctor".

Anne E. Proctor, PE
Senior Project Manager

WOODARD & CURRAN

A handwritten signature in blue ink that reads "Nick Hastings".

Nicholas A. Hastings, PG
Senior Principal

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

Copy (electronic): T. Donohue – Pfizer
M. McCullough – Wyeth
T. Killeen – NYSDEC

PN: 206910

**Table II-1
SWMUs and AOCs**

	Name	Active or Inactive	RCRA Status	Corrective Action Status
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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
	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	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)
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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended

Table II-1 SWMUs and AOCs				
	Name	Active or Inactive	RCRA Status	Corrective Action Status
X	SWMU 6 Tank Farm	Inactive	<p>Sampling & 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 & Analysis Plan (Ref 16)</p> <p>Sampling & Analysis Report (Ref 16)</p>	<p>No Further Action (NFA) for Truck Containment Pad for soil excavation activities.</p> <p>No Further Action (NFA) Recommended for Tank Farm</p>
X	SWMU 7 Process Sewer	Inactive	<p>Sampling & 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 & Analysis Plan (Ref 16)</p> <p>Sampling & Analysis Report (Ref 16)</p> <p>Sampling & Analysis Plan (Ref 17)</p>	<p>No Further Action (NFA) for exterior piping on north and west sides of Chemical Development for soil investigation or excavation activities.</p> <p>No Further Action (NFA) Recommended for exterior piping from Building 17C and Building 34, exterior piping on east side of Chemical Development, and interior piping.</p> <p>Report to update Corrective Action Status for Main Plant piping pending (Ref 17).</p>
	SWMU 8 Waste Neutralization USTS	Inactive	<p>Sampling & Analysis Report (Ref 2)</p> <p>Sampling & Analysis Plan (Ref 17)</p>	<p>Report to update Corrective Action Status pending (Ref 17)</p>
	SWMU 9 Lab Waste Mgmt Area	Inactive	<p>Sampling & Analysis Report (Ref 2)</p> <p>Sampling & Analysis Plan (Ref 17)</p>	<p>Report to update Corrective Action Status pending (Ref 17)</p>

Table II-1 SWMUs and AOCs				
	Name	Active or Inactive	RCRA Status	Corrective Action Status
	SWMU 10 North Field	Inactive	Sampling & Analysis Report (Ref 2) Interim Corrective Measure (Soil Removal) Completed (Ref 4) Groundwater monitoring results in draft CMS Report (Ref 11)	No Further Action (NFA)
	SWMU 11 Sumps and Catchments in Solvent Use Areas (8 sumps and solvent storage catchments)	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)
X	SWMU 12 Building 16 Former Drywell	Inactive	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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
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)

Table II-1 SWMUs and AOCs				
	Name	Active or Inactive	RCRA Status	Corrective Action Status
X	SWMU 15 Bldg 24 Wastewater Trmt Plant	Inactive	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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
	SWMU 16 Former Fire-fighting Area 3 & 4	Inactive	Sampling & Analysis Report (Ref 2) Draft CMS Report (Ref 11)	No Further Action (NFA) Recommended
X	SWMU 17 Bldg 40 Wastewater Steam Stripper Building	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 16) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
	SWMU 18 Bldgs 36 and 41 Process Wastewater ASTs	Inactive	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 17) Notification and Assessment Report to Add Building 36 Tank T36-2 (Ref 1)	Report to update Corrective Action Status pending (Ref 17)
	SWMU 19 Process Equipment Solvent Recovery Units (multiple locations)	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)
	SWMU 20 Process Dust Collection Drum-outs (multiple locations)	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)

Table II-1 SWMUs and AOCs				
	Name	Active or Inactive	RCRA Status	Corrective Action Status
	SWMU 21 Bldg 25 Active Pharmaceutical Ingredient Waste Storage Area	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)
	SWMU 22 Bldg 20 Courtyard Waste Oil Storage Shed	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)
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) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
X	SWMU 24 Bldg 31 Solvent Condensate System	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 16) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
	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	Inactive	Sampling & Analysis Report (Ref 2) Visual Inspection Completed (Engineering Evaluation of Select SWMUs Report)(Ref 8) Sampling & Analysis Plan (Ref 16) Sampling & Analysis Report (Ref 16)	No Further Action (NFA) Recommended
	SWMU 27 Building 13 Accumulation Area	Inactive	Minor modification (Ref 15) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)

Table II-1 SWMUs and AOCs				
	Name	Active or Inactive	RCRA Status	Corrective Action Status
	AOC 1 Former PCB Transformer	NA	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	NA	Sampling & Analysis Report (Ref 2) CMS Work Plan (Ref 11) Draft CMS Report (Ref 11) Sampling & Analysis Plan (Ref 17)	Report to update Corrective Action Status pending (Ref 17)
	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	NA	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	NA	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 East Residential Properties	Investigation Complete (Ref 6)	Mitigation systems installed, with one system pending pursuant to a re-offer letter that was signed and returned in 1/2019 and weather-related access to the unoccupied residence. OM&M in progress (started in Y2008; reporting currently biennial with next report in Y2020).
	Vapor Intrusion Investigation - Off-Site North and South Residential Properties	Investigation Pending (Ref 6)	Work Plan pending (Ref. 6)

Table II-2 Reference List		
Ref (#)	Title	Approval Date
1	SWMU/AOC Assessment Report; Woodard & Curran (W&C); 9/2006 SWMU-18 Tank T36-2 Notification Letter; W&C; 5/18/2018 and Assessment Report; W&C; 6/15/2018	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
6	Vapor Intrusion Investigation Workplan; W&C; 2/8/2008 (off-site only) Vapor Intrusion Investigation Workplan, Addendum 1; W&C; 8/19/2008 Vapor Intrusion Investigation Work Plan Addendum No.2; W&C; 12/10/2008 Vapor Intrusion Investigation Work Plan Addendum No.3; W&C; 5/20/2009 Off-Site Soil Vapor Mitigation System Completion Report; W&C; May 2009 Off-Site Soil Vapor Mitigation System Operation, Maintenance, & Monitoring (OM&M) Plan; W&C; May 2009 (rev 1 July 2009; rev 2 3/15/2010) Off-Site Soil Vapor Mitigation System OM&M Report; W&C; 3/22/2010 Off-Site Soil Vapor Mitigation System Completion Report No.2; W&C; 4/20/2010 Off-Site Soil Vapor Mitigation System OM&M Report; W&C; 1/28/2016 Off-Site Soil Vapor Mitigation System Completion Report No.3; W&C; 8/1/2017 Off-Site Soil Vapor Mitigation System OM&M Report; W&C; 3/30/2018 Supplemental Vapor Intrusion Investigation Workplan; W&C; Pending	NYSDEC Ltr 2/15/2008 NYSDEC Ltr 8/21/2008 NYSDEC Ltr 12/30/2008 NYSDEC Ltr 5/29/2009 NYSDEC Ltr 3/23/10 NYSDEC Ltr 4/19/2010 Pending

Table II-2 Reference List		
Ref (#)	Title	Approval Date
7	Interim Corrective Measure (ICM) Workplan, SWMU-7 Process Sewer (Chem D) & SWMU-14 Waste Toluene Management Area; W&C; 6/13/2008 ICM Workplan Addendum No. 1, SWMU-7 Process Sewer (Chem D) & SWMU-14 Waste Toluene Management Area; W&C; 5/28/2009 ICM Workplan Addendum No.2, SWMU-7 Process Sewer (Chem D) & SWMU-14 Waste Toluene Management Area; W&C; 8/21/2009 ICM Completion Report, SWMU-7 Process Sewer, North and West Sides (Chem D); W&C; 5/14/2010 ICM Completion Report, SWMU-14 Waste Toluene Management; W&C; 5/21/2010 Supplemental Sampling and Analysis Plan Addendum No.3; W&C; 6/21/2010	NYSDEC Ltr 6/9/2008 NYSDEC Ltr 6/2/2009 NYSDEC Ltr 8/24/2009 NYSDEC Ltr 6/3/2010 NYSDEC Ltr 6/17/2010 NYSDEC Ltr 6/24/2010
8	Engineering Evaluation of Select Solid Waste Management Units (SWMUs) Report; W&C; 3/12/2010	NYSDEC Ltr 4/27/2010
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	Corrective Measures Study Work Plan; W&C; 10/8/2010 (revised 12/9/2010) In-Situ Chemical Oxidation (ISCO) Pilot Study Work Plan; W&C; 7/7/2011 Corrective Measures Study Progress Report No. 1; W&C; 2/25/2011 Corrective Measures Study Progress Report No. 2; W&C; 6/3/2011 Corrective Measures Study Progress Report No. 3; W&C; 9/22/2011 Corrective Measures Study Progress Report No. 4; W&C; 12/22/2011 Corrective Measures Study Progress Report No. 5; W&C; 9/1/2012 Corrective Measures Study Progress Report No. 6; W&C; 12/14/2012 Draft Corrective Measures Study Report; W&C; 3/29/2013 2013-2014 Annual Progress Report for RCRA Corrective Action Activities; W&C; 4/9/2014 2014-2015 Annual Progress Report for RCRA Corrective Action Activities; W&C; 9/18/2015 2015-2016 Annual Progress Report for RCRA Corrective Action Activities; W&C; 2/8/2017 2016-2017 Annual Progress Report for RCRA Corrective Action Activities; W&C; 3/21/2018	NYSDEC Ltr 11/9/2010 NYSDEC Ltr 12/20/2010 NYSDEC Email 8/4/2011

Table II-2 Reference List		
Ref (#)	Title	Approval Date
12	Rinsate Sample Collection Plan; W&C; 5/4/2011 Rinsate Sample Locations; W&C; 6/13/2011 Request for Permit Modification; Pfizer; 8/1/2011 Rinsate Sample Collection Report; W&C; 9/23/2011 Notice of Final Receipt of Waste; Pfizer; 11/5/2013 Final Rinsate Sample Collection Plan; W&C; 11/22/2013 Tank Farm Final Closure Report; W&C; 1/24/2014	NYSDEC Ltr 5/13/2011 NYSDEC Ltr 7/7/2011 NYSDEC Ltr 12/27/2011 NYSDEC Ltr 12/27/2011 NYSDEC Ltr 3/19/2014
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 2014 ISCO ICM Work Plan; W&C; 7/11/2014 Request to Reauthorize the 2014 ISCO ICM Work Plan; W&C; 6/10/2016	 NYSDEC Ltr 7/1/2013 NYSDEC Email 7/28/2014 NYSDEC Email 6/21/2016
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; W&C; 9/18/2014 (revised 12/1/2014) Addendum to the Chemical Development Pilot Plant Solid Waste Management Unit Sampling & Analysis Plan; W&C; 9/22/2015 Solid Waste Management Unit Sampling & Analysis Report - Chemical Development Pilot Plant; W&C; 4/8/2016	NYSDEC Email 12/10/2014 NYSDEC Email 10/5/2015 Pending NYSDEC review and approval
17	Solid Waste Management Unit & Area of Concern Sampling & Analysis Plan - Main Plant; W&C; Rev. 3/7/2018 Solid Waste Management Unit & Area of Concern Sampling & Analysis Report - Main Plant; W&C; Pending	NYSDEC Email 5/9/2018 Submission pending completion of tasks

Note: Part A Permit Application Package to renew NYSDEC Permit No. 5-0928-00017/00175 submitted to the NYSDEC on 9/4/2018. NYSDEC acknowledged receipt of the Application Package by email on 9/4/2018. Renewal of permit pending.