Wyeth Pharmaceuticals
64 Maple Street
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Wyeth

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July 21, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
#7003 1680 0004 9059 6031

Mr. Gus Carayiannis
NYSDEC - Region 5
Division of Solid and Hazardous Materials
PO Box 220
232 Hudson Street
Warrensburg, New York 12885-0220

Re: Final SWMU/AOC Notification
Wyeth Pharmaceuticals
Rouses Point, New York

Dear Mr. Carayiannis:

Thank you for taking the time to meet with us on July 13, 2006 to complete a site tour and discuss the Solid Waste Management Unit (SWMU) and Area of Concern (AOC) Notification for the Wyeth Rouses Point, NY facility. As a result of this meeting, Wyeth, has prepared the attached SWMU/AOC list and summary descriptions of each SWMU/AOC (see Table 1). Each SWMU/AOC identified in Table 1 is also depicted on the attached figure (see Figure 1).

The SWMU/AOC list presented in Table 1 summarize the existing SWMUs identified by NYSDEC in the RCRA Facility Assessment (RFA) dated September 1991, and revised December 1992. NYSDEC's RFA concluded that no further action at these previously identified SWMUs was necessary and, pursuant to Module III, Section E.1 of the Part 373 Permit, no further action is required at those SWMUs in the absence of newly identified releases.

As you are aware, Wyeth is currently in the process of evaluating potential transactional opportunities associated with the property and its assets. As part of the environmental due diligence process initiated by Wyeth in connection with these potential transactional opportunities, a number of additional SWMUs and AOCs, as defined by the Part 373 Permit, have been identified (see Table 1).

As we discussed at the recent site meeting, and in accordance with the conditions outlined in the NYSDEC Part 373 Permit (Module III), a SWMU/AOC Assessment Report will be prepared and submitted to the NYSDEC within 45 days of the receipt of this Notification. In addition, a RCRA Sampling & Analysis Plan will be submitted simultaneously to address further action at each of the newly identified SWMU/AOCs, if necessary.

As previously discussed at our meeting on July 13, 2006, Wyeth may request expedited review of select areas (SWMU/AOCs) associated with the Main Plant and surrounding exterior locations in order to facilitate field activities prior to the onset of winter weather. These areas will be clearly identified in the SWMU/AOC RCRA Sampling & Analysis Plan and associated figures.

We appreciate your assistance with this project. If you have any questions or require any additional information, please contact me at (518) 297-1269.

Regards,
WYETH

Scott M. Stoddard
Environmental Manager

Attachments: Table 1: Summary of SWMUs and AOCs
Figure 1: Location of SWMUs and AOCs

cc: Robert Vincent – Wyeth
Matthew Basso – Wyeth
Nick Hastings – Woodard & Curran, Inc.

Table 1

Summary of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Wyeth Pharmaceutical Rouses Point Facility

Location Identifier	SWMU Name	SWMU Description
		Existing SWMUs
SWMU-1	**Interim Drum Storage Area**	55 gallon drums of solvents and other hazardous materials were historically stored outside in the area of the existing Tank Farm and west and northwest of Building 16.
SWMU-2	**Building 20A Accumulation Area**	Building 20A was formerly used as a less than 90 day hazardous waste satellite accumulation area and to store raw solvent. The building was reportedly cleaned out and is currently used for compressed gas cylinder storage.
SWMU-3	**Building 20 Accumulation Area**	A small area in the basement of Building 20 was used for accumulating 2-3 drums of solvent wastes.
SWMU-4	**Former Container Storage Area**	55 gallon drums of solvents and other hazardous materials were historically stored outside in the area of the existing Tank Farm and west and northwest of Building 16.
SWMU-5	**Container Storage Area**	The container storage area originally consisted of an uncovered, 6-inch-thick reinforced concrete pad which measured 100-feet by 100-feet. The pad was sloped and diked and was used to store up to 600 drums. Wastes stored on this pad included toluene, methanol, isopropyl alcohol, and other RCRA D001, D002, F002, F003, and F005 wastes. The area was lined with an impermeable membrane and an additional four inches of concrete in the late 1980s or early 1990s. A roof was added over the container storage area in 1993 creating the present Building 17C. Building 17C is the primary accumulation area for hazardous wastes generated at the Site. The building is equipped with secondary containment spill controls and a 7,000-gallon spill/rainwater sump.
SWMU-6	**Tank Farm**	Beginning with the first aboveground storage tank (AST) in 1983, raw solvents and waste solvents have been stored at the Tank Farm and currently eight product/waste solvent ASTs exist.
SWMU-7	**Process Sewer**	A network of underground wastewater piping has existed in Buildings 16 and 23 since they were constructed. Prior to 1991, the piping was primarily constructed of Pyrex glass. The integrity of the piping was tested in 1987 in association with NYSDEC Part 373 permit requirements, and breaches in the piping system were detected. A portion of the system was replaced with double lined piping with leak detection in 1991. Exterior process wastewater piping (yard piping) encircles Buildings 23 and 26 and connects to Buildings 16, 24, 31, 31A and 34 as well. Process sewers also exist at the Main Plant including Building 11 (former Anabuse production) and Building 14.

Table 1

Summary of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Wyeth Pharmaceutical Rouses Point Facility

Location Identifier	SWMU Name	SWMU Description
	Newly Identified SWMUs	
SWMU-8	**Waste Neutralization USTs**	The Site maintains two pH neutralization systems, one in Building 21A (installed in 1979) and one in Building 33 (installed in 1995). Both systems use underground mixing tanks and add concentrated acid or caustic to neutralize the wastewater prior to release to the sanitary sewer.
SWMU-9	**Laboratory Waste Management Area**	Shock-sensitive laboratory waste was discovered when excavating for the addition of Building 6H in 1986. This material was removed and successfully detonated onsite in the north field (see SWMU-10).
SWMU-10	**North Field**	Buried, shock-sensitive, laboratory waste was discovered when excavating for the addition of Building 6H in 1986 (see SWMU-9). This material was removed and successfully detonated onsite in the north field. Additionally, The Site formerly conducted fire extinguishing practices at two locations in the north field, as well as two locations farther south in the area of Building 32 (see SWMU-16). Reportedly, 55-gallon drums were cut in half and partially buried in the ground. The drums were filled with a fuel oil/gasoline/kerosene mixture, set on fire and then extinguished.
SWMU-11	**Sumps and Catchments in Solvent Use Areas (multiple locations)**	Sumps and catchments are located in multiple areas of the Main Plant where chemicals are now, or were formerly, used or stored. These include eight Best Management Practice (BMP) sumps in the Main Plant which were formerly used as spill control sumps, with valves to control release to the underground process wastewater sewer. In addition, several catchments are located in areas of solvent storage (i.e., solvent dispensing room in Building 13, and a hazardous waste drum accumulation area in the basement of Building 20). These are closed catchments (no outlet) and any material entering the catchments is pumped out into drums for disposal.
SWMU-12	**Building 16 Former Drywell**	A drain was depicted on the original Chemical Development Plant Building 16 construction plans, extending from the western portion of Building 16 to a drywell located approximately 50 feet west of the building. This drywell accepted waste from a floor drain located in the northwest corner of Building 16, in a raw material and waste storage room. Reportedly, mechanical equipment was also located in this room. According to Site interview sources, the drywell was excavated and removed in the 1980s and no distinct chemical staining or odors were noted during the removal.
SWMU-13	**Building 16 Former Sanitary Sewer Holding Tanks**	The Building 16 sanitary waste line was originally connected in 1967 directly to the sanitary sewer, with a piping tee connecting the line to a 1,000-gallon holding tank. Flow could be manually diverted to the holding tank in the event of a spill or other release to the wastewater system. The holding tank could then be pumped out and the product recovered or drummed for off-site disposal. Later, a larger 5,000-gallon tank was installed on the waste line for the same purpose. Use of these holding tanks was discontinued in 1985 when a process wastewater treatment system was constructed to treat the Chemical Development Plant wastewater. The former holding tanks were removed in 2004.

Table 1

Summary of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Wyeth Pharmaceutical Rouses Point Facility

Location Identifier	SWMU Name	SWMU Description
SWMU-14	**Waste Toluene Management East of Tank Farm**	Two waste toluene releases were documented between the Tank Farm and Building 23, both occurring in 1992. The first release reportedly occurred on March 27, 1992. Three rounds of soil excavation were conducted between April 1992 and August 1992 to remove soil with solvent odor from this area. Following the final soil removal, limited soil analyses indicated no detectable VOCs. A second toluene spill was reported on September 8, 1992. Soil was reportedly excavated and sent offsite for disposal. This spill case was formally closed by the NYSDEC on August 9, 1993. Toluene concentrations were documented in the soil over a period of five months from the first release and an unknown period, up to eleven months, from the second release. The potential impact from these releases has not been fully evaluated.
SWMU-15	**Building 24 Wastewater Treatment Plant**	The treatment plant formerly consisted of carbon beds for wastewater treatment. Currently, holding tanks, sumps, and pH neutralization are used for wastewater treatment prior to steam stripping.
SWMU-16	**Former Fire Fighting Training Areas 3 and 4**	The Site formerly conducted fire extinguishing practices at two locations in the north field, as well as two locations farther south in the area of Building 32. Reportedly, 55-gallon drums were cut in half and partially buried in the ground. The drums were filled with a fuel oil/gasoline/kerosene mixture, set on fire and then extinguished.
SWMU-17	**Building 40 Wastewater Steam Stripper Building**	This building was constructed in 2003. Solvent recovery activities are conducted including a decanting AST, distillate solvent storage AST, and a distillate solvent drumming room.
SWMU-18	**Building 41 Process Wastewater AST**	A 7,000 gallon AST collects BMP sump wastewater, which may contain solvents from washing and normal processing. Sump below AST.
SWMU-19	**Process Equipment Solvent Recovery Units (multiple locations)**	Solvent collection in the Main Plant that is part of the coating and granulating processes located in Buildings 18, 21, 27, 35, 37, 14.
SWMU-20	**Process Dust Collection Drum-outs (multiple locations)**	Dust collection systems that are located in 13 buildings (4a, 13, 14, 16, 18, 19, 20, 21, 23, 27, 32, 35, 37).
SWMU-21	**Active Pharmaceutical Ingredient (API) Waste Storage Area Building 25**	Waste API in the form of dust from bag houses or off specification finished products were stored in Building 25.
SWMU-22	**Building 20 Court Yard Waste Oil Storage Shed**	Drums and 5 gallon containers of waste oil in shed.
SWMU-23	**Building 16 Former Waste Storage Area in Northwest Corner**	Raw/waste drum storage in room in northwest corner of building.
SWMU-24	**Building 31 Solvent Condensate System**	Within Chemical Development Plant, approx. 27 solvent vent condensers, two interior solvent condensate ASTs, and waste solvent drumming areas.
SWMU-25	**Building 11 Inactive Spray Paint Booth**	Booth still remains (no longer used).
SWMU-26	**Chemical Development Reactor Bay Drumming Areas (multiple locations)**	Reactor bays in Building 16 and 23.

Table 1

Summary of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Wyeth Pharmaceutical Rouses Point Facility

Location Identifier	SWMU Name	SWMU Description
		Newly Identified AOCs
AOC-1	**Former PCB-containing Transformer, Staining on Concrete Pad**	Two former PCB transformers, in the Building 6 area, were removed in the 1980s. These were replaced by dry type transformers. Staining was noted on the concrete pad under one of the current transformer banks.
AOC-2	**Stained Soil Near Contractor AST**	Two contractor diesel fuel ASTs are located in the north field area, including one, located east of the construction trailers, with staining on the soil around the AST.
AOC-3	**Petroleum Stained Soil - Building 6 Former 30,000 gallon UST**	A 30,000-gallon UST was removed from the area north of Building 6 in the mid 1980s. Petroleum impacted soil was noted in the NYSDEC records at the time of the UST removal, and again in 1991 when the area was excavated for a Building 6 addition.
AOC-4	**Petroleum AST without Base Containment - Building 6**	A 60,000-gallon fuel oil AST, located northwest of Building 6, was constructed in 1984 on a gravel base (no secondary containment underneath the AST). A leak was noted shortly after construction, and repaired by the installer under warranty. Concrete diking and skirting (containment) was added around the AST at a later time. This AST remains in use and currently stores #2 fuel oil.
AOC-5	**Ethylene dichloride Release Near Building 23 Loading Dock**	A 55-gal drum of ethylene dichloride slipped off a skid while being transferred between Building 23 and the drum storage pad in 1995. Release to soil.
AOC-6	**Petroleum and dichloromethane Release from Building 25 Loading Dock**	Three (3) spills: (1) 1/14/98 (a 20-gal release of diesel due to leaky fitting on truck; the release was cleaned up; (2) 04/21/1995 (a 55-gal drum of waste methylene chloride was dropped during moving (25-gal were recovered and 25-gal entered storm sewer); (3) 10/1/98 (a drum of paste tipped off dock while loading waste truck spilling 15-20 lbs of methylene chloride; the release was cleaned up.
AOC-7	**Multiple No. 6 Fuel Oil Releases to Concrete Trench North of Building 6**	Two (2) spills: (1) 01/20/1996 (400-gal of #6 fuel oil was released from a leaky pipe in a concrete trench; the release was contained and cleaned up; (2) 11/10/96 (20-gal of #6 fuel oil was from a leaky pipe in a concrete trench; the release was contained and cleaned up.
AOC-8	**Release of Acetonitrile to the Concrete at Chemical Development**	A 25-gal release ocurred in 2000 from a pinhole leak in a drum; the release was cleaned up.
AOC-9	**Building 34 Loading Dock Mixed Alcohol Waste Release**	A 250-gal release occurred in 2002 from a punctured tote and flowed into a waste sump in Building 24.
AOC-10	**Building 23 Therminol Release to Soil**	A 40-gal release occurred to soil in 2004; the release was cleaned up.

Notes:
1) AOCs 5 through 10 previously reported and addressed under NYSDEC Spills program
2) See Figure 1- Location of SWMUs and AOCs dated July 2006

LEGEND

SITE BOUNDARIES

EXISTING SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU-1	INTERIM DRUM STORAGE AREA
SWMU-2	BUILDING 20A ACCUMULATION AREA
SWMU-3	BUILDING 20 ACCUMULATION AREA
SWMU-4	FORMER CONTAINER STORAGE AREA
SWMU-5	CONTAINER STORAGE AREA
SWMU-6	TANK FARM
SWMU-7	PROCESS SEWER

NEWLY IDENTIFIED SWMUs

SWMU-8	WASTE NEUTRALIZATION USTs
SWMU-9	LABORATORY WASTE MANAGEMENT AREA
SWMU-10	NORTH FIELD
SWMU-11	SUMPS AND CATCHMENTS IN SOLVENT USE AREAS (MULTIPLE LOCATIONS)
SWMU-12	BUILDING 16 FORMER DRYWELL
SWMU-13	BUILDING 16 FORMER SANITARY SEWER HOLDING TANKS
SWMU-14	WASTE TOLUENE MANAGEMENT EAST OF TANK FARM
SWMU-15	BUILDING 24 WASTEWATER TREATMENT PLANT
SWMU-16	FORMER FIRE FIGHTING TRAINING AREAS 3 AND 4
SWMU-17	BUILDING 40 WASTEWATER STEAM STRIPPER BUILDING
SWMU-18	BUILDING 41 PROCESS WASTEWATER AST
SWMU-19	PROCESS EQUIPMENT SOLVENT RECOVERY UNITS (MULTIPLE LOCATIONS)
SWMU-20	PROCESS DUST COLLECTION DRUM-OUTS (MULTIPLE LOCATIONS)
SWMU-21	ACTIVE PHARMACEUTICAL INGREDIENT WASTE STORAGE AREA BUILDING 25
SWMU-22	BUILDING 20 COURT YARD WASTE OIL STORAGE SHED
SWMU-23	BUILDING 16 FORMER WASTE STORAGE AREA IN NORTHWEST CORNER
SWMU-24	BUILDING 31 SOLVENT CONDENSATE SYSTEM
SWMU-25	BUILDING 11 INACTIVE SPRAY PAINT BOOTH
SWMU-26	CHEMICAL DEVELOPMENT REACTOR BAY DRUMMING AREAS (MULTIPLE LOCATIONS)

NEWLY IDENTIFIED AREAS OF CONCERN (AOCs)

AOC-1	FORMER PCB-CONTAINING TRANSFORMER, STAINING ON CONCRETE PAD
AOC-2	STAINED SOIL NEAR CONTRACTOR AST
AOC-3	PETROLEUM STAINED SOIL - BUILDING 6 FORMER 30,000 GALLON UST
AOC-4	PETROLEUM AST WITHOUT BASE CONTAINMENT - BUILDING 6
AOC-5	ETHYLENE DICHLORIDE RELEASE NEAR BUILDING 23 LOADING DOCK
AOC-6	PETROLEUM AND DICHLOROMETHANE RELEASE FROM BUILDING 25 LOADING DOCK
AOC-7	MULTIPLE NO. 6 FUEL OIL RELEASES TO CONCRETE TRENCH NORTH OF BUILDING 6
AOC-8	RELEASE OF ACETONITRILE TO THE CONCRETE AT CHEMICAL DEVELOPMENT
AOC-9	BUILDING 34 LOADING DOCK MIXED ALCOHOL WASTE RELEASE
AOC-10	BUILDING 23 THERMINOL RELEASE TO SOIL

NOTE: SEE TABLE 1 - SUMMARY OF SWMUs AND AOCs DATED JULY 2006

100' 0 100' 200'

BAR SCALE
1" = 100'
CHECK GRAPHIC SCALE BEFORE USING

WOODARD & CURRAN
Engineering · Science · Operations

REV	DESCRIPTION	CHECKED BY: BG	DATE
		DESIGNED BY:	DRAWN BY: EVR

LOCATION OF SOLID WASTE MANAGEMENT UNITS (SWMU) AND AREAS OF CONCERN (AOCs)

WYETH PHARMACEUTICALS, INC.
64 MAPLE STREET
ROUSES POINT, NEW YORK

JOB NO.: 206910.01
DATE: JULY 2006
SCALE: AS NOTED
SHEET: OF

FIGURE 1