COMMITMENT & INTEGRITY
DRIVE RESULTS

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Via Electronic Mail

June 15, 2018

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

Re: Newly Identified SWMU/AOC Assessment Report
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), Woodard & Curran is submitting this Assessment Report for the a newly-identified Solid Waste Management Unit (SWMU) tank at the Wyeth facility, located at 64 Maple Street/100 Academy Street, Rouses Point, NY (the "Site"). This Assessment Report is submitted per condition C.2 of Module II of the NYSDEC 6 NYCRR Part 373 Hazardous Waste Management Permit for the Site.

As documented in the May 18, 2018 Notification Letter, recent due diligence being conducted in connection with the cessation of Wyeth's manufacturing operations at the Site resulted in the identification of an additional tank associated with SWMU – 18. Accordingly, SWMU – 18, as defined in the Part 373 Permit, is updated as follows:

SWMU-18 – Building 41 and Building 36 Process Wastewater Tanks

SWMU-18 consists of a 7,000-gallon aboveground storage tank (AST) located in Building 41 and a 6,000-gallon AST (Tank T36-2) in Building 36 that were used to collect process wastewater.

SWMU-18 Tank T36-2 Assessment Report

Information for the newly identified SWMU-18 Tank T36-2 is provided in the following paragraphs as outlined below:

- Type and location, dimensions, capacities, and structural descriptions of the unit/area;
- Function and dates that the unit/area was operated;
- Description of the wastes that were placed or spilled at the unit/area, and description of any known releases from the unit/area;
- Results of any sampling and analysis from the unit/area and whether the unit/area, individually or in combination with other units/area is a significant source of contaminant release; and
- Proposed status.

Tank T36-2 is a 6,000-gallon cylindrical flat-bottom AST constructed of fiberglass located within secondary containment in Building 36 at the Main Plant. A Site Location Map and a Site Map depicting Tank T36-2 are included as Figures 1 and 2, respectively.

The AST was installed at this location in 2002 to store Sodium Hydroxide for service associated with former acid scrubbers. In 2014, the tank was cleaned and repurposed to provide additional collection capacity for the SWMU-18 tank in Building 41. Wastewater was conveyed from Building 41 to Building 36 by existing aboveground piping formerly associated with the steam stripper in Building 40 until steam stripping operations ceased in 2017. The tank has been pumped down and is currently idle. The tank is proposed to be subject to a final cleaning, and then recycled or scrapped.

The wastewater directed to Tank T36-2 may have contained de minimis amounts of solvents from washing and normal processing. No releases have been identified for this newly identified SWMU tank and it is not expected that this SWMU tank was a significant source of a release; however, no sampling or analysis has been conducted.

Since operations at this tank location were conducted within secondary containment, Woodard & Curran proposes to conduct an integrity inspection of the containment area to evaluate the potential for subsurface releases.

SWMU-18 Tank T36-2 Assessment Actions

Per condition C.3 of Module II of the NYSDEC 6 NYCRR Part 373 Hazardous Waste Management Permit for the Site, the following Assessment Actions are proposed as an addendum to and in general accordance with the procedures in the NYSDEC-approved Main Plant Sampling and Analysis Plan dated August 2015 (revised March 2018):

SWMU-18 Building 36 Tank T36-2 Proposed Investigation Activities

A visual inspection will be conducted of the Building T36-2 containment to evaluate the potential for subsurface releases including identifying any cracks, deterioration, or staining. The Visual Inspection Checklist provided in Appendix C of the Main Plant Sampling and Analysis Plan will be used to document visual inspection activities. If conditions are observed during the visual inspection that indicate the potential presence of a release (e.g., staining or crack), then additional actions will be conducted including potential visual inspection of a concrete core from the SWMU tank location to evaluate if the condition fully penetrates to the subsurface and, if so, facilitate the collection of a sub slab soil sample.

Please contact me at (203) 699-6042 with any questions or comments to facilitate approval of this SWMU Assessment Report and the proposed investigation activities for SWMU-18 Tank T36-2. Thank you for your time and assistance.

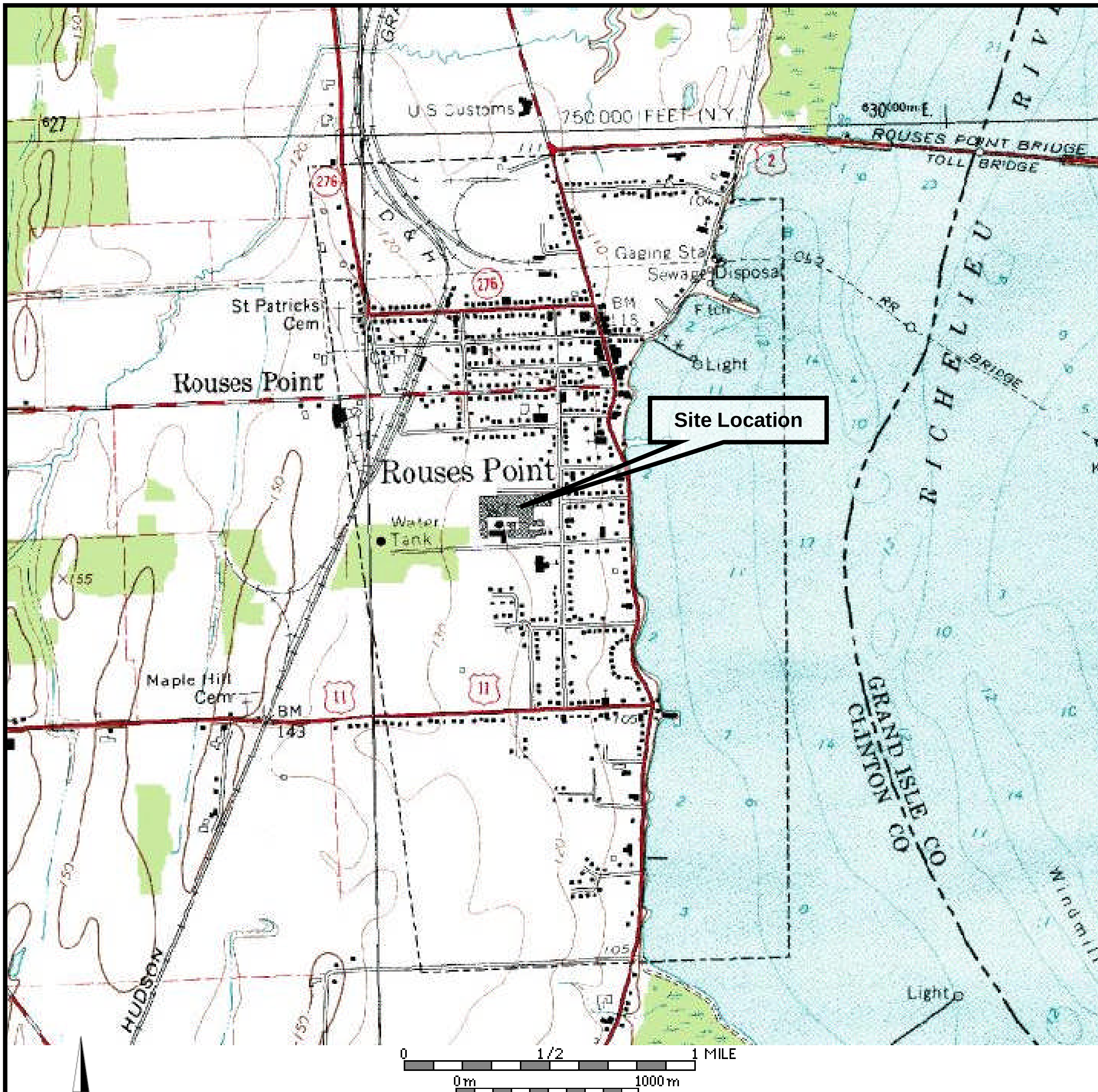
Sincerely,

WOODARD & CURRAN

Anne E Proctor

Anne E. Proctor, PE
Senior Project Manager

cc: Christopher Clark – Pfizer
Mark McCullough – Wyeth
Tom Killeen – NYSDEC
Nick Hastings, Don Weeks – W&C



QUADRANGLE LOCATION

Figure 1 SITE LOCATION MAP

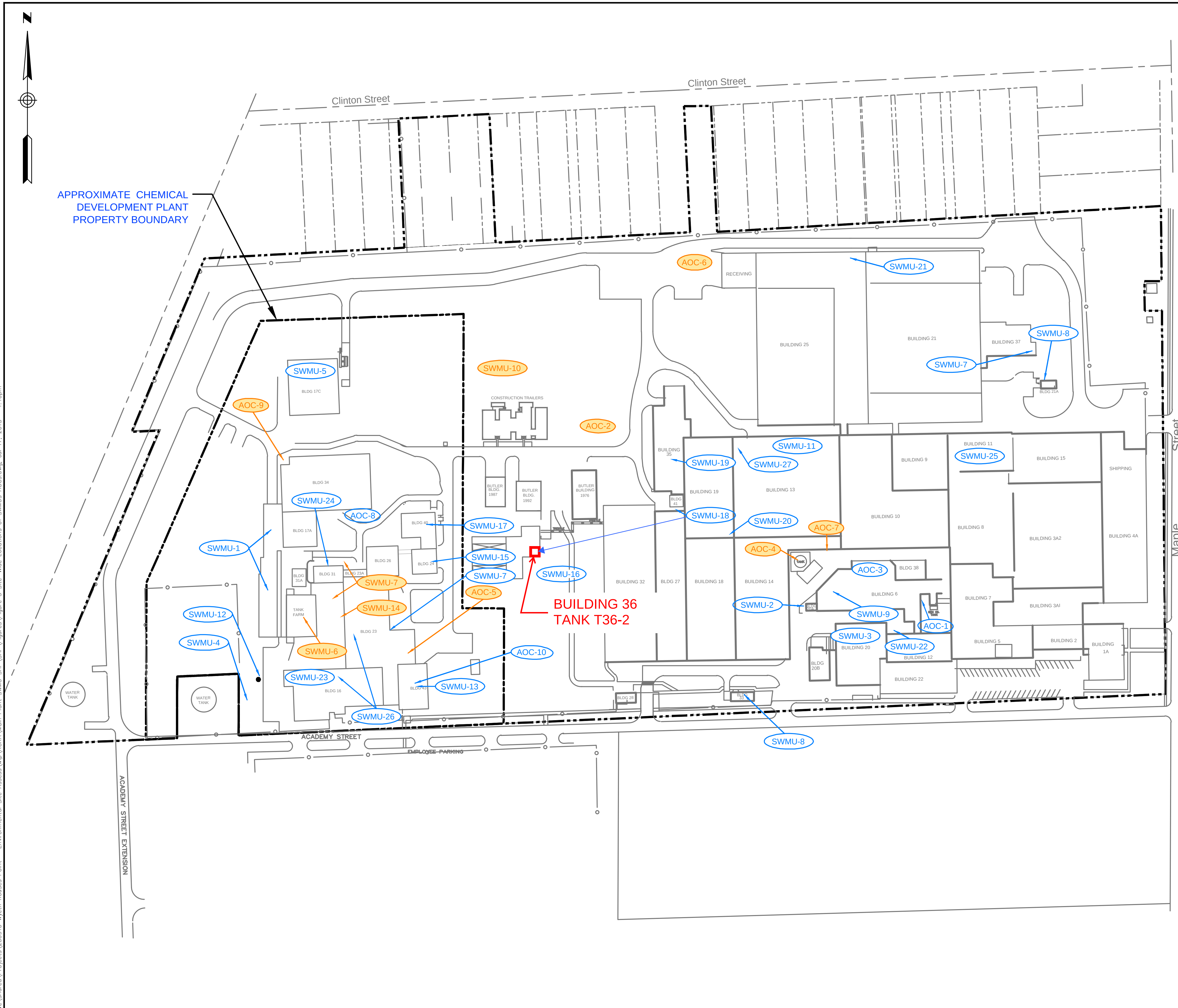
Wyeth Pharmaceuticals, LLC

Rouses Point, NY

WOODARD & CURRAN

COMMITMENT & INTEGRITY DRIVE RESULTS

22x34 SHEET
1:1



LEGEND

APPROXIMATE SITE BOUNDARIES

AOC-7 NO FURTHER ACTION STATUS APPROVED

SWMU-1 SWMU\AOC

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 WASTE (MULTIPLE LOCATIONS)
SWMU–8	NEUTRALIZATION USTs (MULTIPLE LOCATIONS)
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	BUILDING 25 ACTIVE PHARMACEUTICAL INGREDIENT WASTE STORAGE AREA
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)
SWMU–27	BUILDING 13 ACCUMULATION AREA

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	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:

1. ALL BUILDINGS AT THE CHEMICAL DEVELOPMENT PLANT HAVE BEEN DEMOLISHED.
2. SWMU 6 HAS RECEIVED NO FURTHER ACTION FOR TRUCK CONTAINMENT PAD.

100' 0 100' 200'
BAR SCALE
1" = 100'
CHECK GRAPHIC SCALE BEFORE USING

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COMMITMENT & INTEGRITY DRIVE RESULTS

WOODARD & CURRAN

REV	DESCRIPTION	DATE

DESIGNED BY: SS CHECKED BY: DW
DRAWN BY: PF FIGURE 3 SITE-WIDE LOCA.dwg

SWMU AND AOC LOCATIONS

WYETH PHARMACEUTICALS, LLC
ROUSES POINT, NEW YORK

MAIN PLANT SWMUS/AOCS SAMPLING AND ANALYSIS PLAN

JOB NO.: 209610.14
DATE: JULY 2015
SCALE: AS NOTED
SHEET: 3 OF

FIGURE 2