**New York State Department of Environmental Conservation**
**Division of Solid & Hazardous Materials**
**Bureau of Hazardous Waste & Radiation Management**
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Alexander B. Grannis
Commissioner

July 30, 2010

Mr. Matthew R. Basso, CHMM
Principal Remediation Specialist-II
Pfizer Inc.
100 Route 206N
M/S 613; Room 6P69
Peapack, NJ 07977

Re: Supplemental Sampling and Analysis Report – June 2010
Pfizer (formerly Wyeth) Pharmaceuticals Inc. NYD002081396
Rouses Point, New York Facility

Dear Mr. Basso:

The New York State Department of Environmental Conservation (DEC) and New York State Department of Health (DOH) have reviewed the Supplemental Sampling and Analysis Report that was submitted on June 25, 2010. The report compiles results from numerous on-site and off-site investigations that have been conducted over the last several years and will serve as a useful reference document. Comments on the report are enclosed. Please respond to the comments by September 30, 2010.

As discussed during the conference call on July 28th, we understand that Pfizer is conducting additional on-site investigation of groundwater, as outlined in the Supplemental SAP Addendum 3, and is developing a workplan for additional off-site investigation, primarily to the east/ southeast of the site. Although some additional groundwater investigation off-site may be needed to address data gaps, DEC recommends that efforts initially be directed at further evaluating the data that has already been generated, to refine the site conceptual model and to identify contaminant migration pathways. This will help determine activities and tasks that need to be completed to support corrective measures selection for the groundwater.

In parallel, Pfizer needs to begin preparing a preliminary corrective measures study work plan for the facility. In order to support corrective measures decision-making, Pfizer will need to complete a vapor intrusion investigation at Chem D and provide alternatives to address the potential exposures from soil vapor intrusion at the eastern portion of the Main Plant site. A timeline for this work should be added to the Project Management list.

We appreciate the Pfizer's efforts to continue to keep us updated regarding the status of the site and the work in progress. If you have any questions regarding this letter, please call me at 518-402-8594.

Sincerely,

Ruth Curley

Ruth Curley, P.E.
Environmental Engineer
Hazardous Waste Engineering Eastern Section
Bureau of Hazardous Waste & Radiation Management

Enclosure

ecc: w/enc -L. Thomas - DEC CO
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S. Stoddard - Pfizer - Rouses Point
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**Enclosure**

Comments on the Supplemental Sampling and Analysis Report

June 25, 2010

Pfizer - Rouses Point

NYD0002081396

General Comments

1. The report briefly outlines a Conceptual Site Model, but needs to take the next step of using the model as a tool to better understand contaminant transport pathways at and in the vicinity of the site. The report currently contains a lot of data but there is relatively little interpretation of that information. The site model should be used to help explain the observed contaminant distributions or suggest possible migration pathways that can be further evaluated. In addition, although the off-site residential vapor intrusion data sets were generated on a separate track, they provide high resolution data that needs to be considered and integrated with the conceptual site model. Similarly, for the on-site area, an integrated assessment of data from the storm sewer, vapor intrusion and groundwater sampling efforts is needed.

2. DEC recommends that a groundwater flow model be developed for the site. Hydrogeologic conditions appear to vary considerably as one moves from the site into the residential area to the east (the tills thin, bedrock rises irregularly, etc.). A flow model, coupled with particle tracking, should help us better understand the system, and may help explain some of the observed contaminant distributions. This could also be used to calculate groundwater flow budgets, generate groundwater fate diagrams, and develop and evaluate potential remedial scenarios.

3. The Agencies agree that the nine (9) inactive SWMUS and AOCs identified in Section 6.2 of the report should be addressed. Based on the data compiled to date, NYSDEC does not expect extensive additional investigation for any of the SWMUs/AOCs identified, and recommends one work plan addressing these SWMUs/AOCs.

Specific Comments

1. Drilling Logs – Descriptions provided in the logs, even for the "upper till" are generally logged predominantly as "Sand." This seems to be at odds with other sections of the report (conceptual site model) that characterize the upper till as a low conductivity unit that is not a significant horizontal flow pathway. (e.g. MW-6 log shows borehole caving within the "upper till" interval – likely more indicative of running sand, than low K material). Although the overall characterization of the upper till may be accurate, there are some seeming inconsistencies, and there may be a need to better understand the role of this unit in the flow system, since contaminant migration is occurring across/through this unit.

2. Information from the MW-17 boring log shows top of bedrock at about 99.5 feet, but on Figure 15 (bedrock surface contour) a value of 103 feet is shown for MW-17. Figures 11 and 14 plot the bedrock elevation at 100 ft at MW-17, though the labels read 103 ft. This may affect bedrock and groundwater contours in Figures 15 and 16. A similar, less extreme, discrepancy exists at MW-10. Please clarify and provide updated Figures, as needed.

3. Lower Till Isoconcentration Plots – On Figure 33 (cis-1,2-DCE), MW-5 and MW-8 are shown as being within a continuous area contained within the greater than 50 ug/l isopleth. Based on the groundwater elevation information, it appears unlikely that contamination at these two locations is due to a common source, as suggested by this figure.

4. Conductivity Testing –
    a. A number of the hydraulic conductivity test plots are not labeled.
    b. Please provide all raw data from the hydraulic conductivity testing (submit in electronic form).

5. A figure showing a plan view of the off-site utilities for the area between the plant and the lake should be provided (particularly for storm and sanitary sewers). This should include invert elevations where available. This should be at the same scale as, and possibly overlain by, the lower groundwater contour map.

6. Figure (5) should include inverts for the on-site catch basins. In addition, catch basins 29, 30 and 31 do not appear to be connected to the rest of the storm drain system. Please address the discharge pathway(s) for these locations.

7. General observations that were not specifically noted in the report

    a. In the residential area, the upper flow zone is more contaminated than the lower till at the MW-19 and MW-23 locations. This is consistent with the vertical head gradients that show upward potential at these locations. It seems that at these locations the lower till wells cannot see (is not well connected to) a drain/discharge feature. These points are also local "high" spots in the groundwater surface for the lower till, which is consistent with this interpretation.
    b. Well MW-8 is a local low spot on the groundwater contour map, suggesting that it may be well connected to a local drainage feature.

8. A soil vapor intrusion investigation at Chem D portion of the site should be designed and implemented during the next heating season. Sample locations identified within Chem D should consider locations where sub-slab vapor samples may assist in source identification. Sample locations should be provided to the Agencies for review prior to initiation of fieldwork. Approximately 5 to 10 sample locations should be sufficient.

9. Section 6.2
    a. Based on the SVI data for the Main Plant (Figure 30), a number of the sampling locations are classified as needing mitigation based on strict application of the decision matrices in NYSDOH guidance. This was not clearly stated in the report. For future soil vapor investigation work, a third column on the call-out boxes indicating the recommended action per the NYSDOH matrices, should be presented

       Pfizer should provide a management plan to address the locations at Main Plant that would be categorized as "monitor" or "mitigate" by the NYSDOH guidance matrices.

    b. With an indoor source of the methylene chloride, and a lower sub-slab concentration, it is likely that indoor air concentrations at Bldgs 25 and 13 are not fully attributable to soil vapor intrusion. However, an improvement to the local ventilation, possibly through modification of the air handling system, is recommended.