

# Holland & Knight

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March 3, 2011

Blake Hannafan, Esq.  
Hannafan & Hannafan, Ltd.  
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Chicago, IL. 60601

Re: NJDEP v. Occidental Chemical Corporation, et al., Docket No. L-9868-05 (PASR)  
Supplemental Third-Party Disclosure by American Cyanamid Company, Wyeth and  
Shulton, Inc. Pursuant to Case Management Order XII and the Order on Consent  
dated January 31, 2011

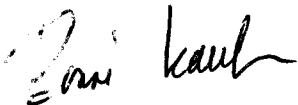
Dear Mr. Hannafan:

Enclosed is Third Party Defendants American Cyanamid Company, Wyeth and Shulton, Inc.'s Supplemental Third-Party Disclosure in connection with the above-referenced matter, pursuant to Case Management Order XII and the Order on Consent dated January 31, 2011, and your consent to an extension. The enclosed consists of: (i) a document entitled "Supplemental Third-Party Disclosure by American Cyanamid Company, Wyeth and Shulton, Inc.," dated March 3, 2011, (ii) a disc containing responsive, non-privileged/protected documents Bates stamped as Shulton00001 to Shulton07218, (iii) a Public Document Log and (iv) and a certificate of service. The Privilege Log will be provided next week.

Thank you for your courtesy in granting an extension.

Sincerely yours,

HOLLAND & KNIGHT LLP



Bonni Fine Kaufman

Enclosures

cc: Honorable Marina Corodemus, Esq. (via posting on CT Summation, without CD)  
Eric B. Rothenberg, Esq. (via UPS, with enclosures)  
Lee D. Henig-Elona, Esq. (via UPS, with enclosures)

Blake Hannafan, Esq.

March 3, 2011

Page 2

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Attorney for Third-Party Defendants  
American Cyanamid Company, Wyeth,  
and Shulton, Inc.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION and THE ADMINISTRATOR OF THE NEW JERSEY SPILL COMPENSATION FUND,	:	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: ESSEX COUNTY
	:	
Plaintiffs,	:	DOCKET NO. L-9868-05 (PASR)
v.	:	
	:	CIVIL ACTION
OCCIDENTAL CHEMICAL CORPORATION, TIERRA SOLUTIONS, INC., MAXUS ENERGY CORPORATION, REPSOL YPF, S.A., YPF, S.A., YPF HOLDINGS, INC. and CLH HOLDINGS, INC.,	:	<b>SUPPLEMENTAL THIRD-PARTY DISCLOSURE OF AMERICAN CYANAMID COMPANY, WYETH AND SHULTON, INC.</b>
Defendants.	:	
MAXUS ENERGY CORPORATION and TIERRA SOLUTIONS, INC.,	:	
Third-Party Plaintiffs,	:	
vs.	:	
AMERICAN CYANAMID COMPANY, <i>et al.</i> ,	:	
Third-Party Defendants.	::	

Third-Party Defendants American Cyanamid Company (now known as Wyeth Holdings Corporation), Wyeth (now known as Wyeth LLC, a subsidiary of Pfizer), and Shulton, Inc. (collectively "Respondent") hereby provide their Supplement to Initial Disclosure pursuant to Case Management Order ("CMO") XII and prior CMO's incorporated therein by reference and in accordance with terms of the January 31, 2011 Consent Order ("Consent Order") applicable to certain of those Third-Party Joint Defense Group members who have received written confirmation that CMO XII paragraph 21(a) production of site files is complete from Drinker Biddle & Reath LLP, Andrews Kurth LLP, and/or Hannafan & Hannafan, Ltd. firms (counsel for Third-Party Plaintiffs) together with the written agreement as to terms for timing, scope and manner of production reached with Blake Hannafan regarding an extension of time for this production, collectively the "Amended Production Requirements".

**General Objections, Reservations and Comments and Limitations**

1. Respondent reserve the right to object to the production of any documents or other information on any ground, including relevance and undue burden, and to assert any applicable privilege, including the attorney-client privilege, the work product doctrine, the common interest doctrine, confidentiality, trade secret, State and Federal Homeland Security confidentiality and any other applicable protection. These disclosures are not intended to prejudice or waive any privileges or objections Respondent may have with respect to any current, outstanding or subsequent requests for discovery or discovery obligations.

2. Respondent's investigation in this matter is continuing. Accordingly, it reserves the right to supplement, amend, clarify, and revise these disclosures any time prior to trial to the extent additional information becomes available or is obtained through discovery. Further, Respondent

reserves the right to amend these disclosures to the extent the claims brought by or alleged against Respondent in this litigation are amended.

3. Respondent reserves its right to rely on any facts, documents or other evidence that may develop or come to Respondent's attention during the course of this matter. Respondent's responses are set forth herein without prejudice to its right to assert additional objections or supplement, amend, clarify and revise its responses should Respondent discover additional grounds for doing so during the course of this matter.

4. "Documents", excluding electronic e-mail and Electronically Stored Information, shall have the meaning set forth in this Court's August 11, 2009 Order for Preservation of Documents and Data.

5. "Alleged Discharges" shall have the meaning set forth in the Court's CMO VIII.

6. "Sites", per CMO VIII, shall be defined as those site(s) or properties with which Respondent is associated in Third-Party Complaint D.

7. Document Production requirements as set forth in CMO XII, paragraph 21 (as amended by the Consent Order) ("Amended Production Requirements") are read in concert with CMO VIII, paragraph 3 and CMO V, paragraph 8 which are incorporated by reference in CMO XII, paragraph (1). CMO VIII, *inter alia*, called for a listing of those documents to be produced by Third-Party Defendants with certain excepted categories, the "Excepted Information Categories". The Amended Production Requirements are also answered with reference to the Alleged Discharges as defined in CMO VIII, and include certain documents under the Excepted Information Categories except to the extent those documents are covered by logs attached hereto

and to be provided. To the extent requirements set forth in Amended Production Requirements are repetitive, burdensome and/or unfairly place a duty of inquiry on Third-Party Defendants as to the Newark Bay Complex locations other than the Sites, disclosures herein are provided with reference to the Amended Production Requirements and CMO XII paragraph 21(c) unless otherwise noted. With respect to Amended Production Requirements as to CMO XII, paragraph 21(b), reference is made to information previously furnished by the JDG in connection with CMO V, paragraph 8.

8. Documents subject to claims of privilege will be detailed in a log to be furnished in accordance with the August 11, 2009 "Agreed Order Regarding Documents Withheld from Production" as appended to CMO VIII, and provided under the Amended Production Requirements. Inadvertent production of any such documents shall constitute neither a waiver of any privilege or protection nor a waiver of any right Respondent may have to demand the return or destruction of such document and/or to object to the use of any such document or the information contained therein in this litigation or any subsequent litigation or proceeding.

In accordance with the Court's August 11, 2009 Agreed Order Regarding Documents Withheld From Production and CMO XII, paragraph 21 (d), Respondent has neither produced nor logged any documents after December 13, 2005 or those documents which are communications regarding, or which reflect the activities of, the Cooperating Parties Group, the Small Parties Group and/or the Joint Defense Group; for all such documents Respondent asserts confidentiality and/or attorney-client privilege and/or protection under the joint defense, common interest and/or work product doctrines.

10. These General Objections, Reservations, Comments and Limitations apply to and are incorporated in each of Respondent's responses as if specifically set forth in each response below. The stating of a specific objection, reservation, comment and/or limitation, or the absence of any, shall not be construed as a waiver of any of these General Objections, Reservations, Comments and Limitations.

**Production as to Paragraph 21(c) Requests as Amended by the Amended Production Requirements**

1. A copy of all Documents relating to the following information for the site(s), properties and/or operations with which the Third-Party Defendant is associated in the Third-Party Complaints:

i. the release or discharge of Hazardous Materials from or at that Third Party Defendant's properties or operations.

**Response** - Documents responsive to this request, to the extent available, are on the enclosed discs subject to the General exceptions provided under the Amended Production Requirements.

ii. the operations, manufacturing and/or production processes, any Hazardous Materials stored or utilized on the property, and any sampling that took place on the property and any sampling or testing of the materials, by products or waste products used in connection therewith;

**Response** – Respondent limits its response in accordance with paragraph 7 above and in accordance with the Amended Production Requirements. Responsive Documents to this request, to the extent available, are on the enclosed discs as provided under the Amended Production Requirements.

iii. sampling results from environmental, chemical, or biological testing conducted at that Third Party Defendant's properties; and

**Response** – Respondent limits its response to those documents as to the Alleged Discharges in accordance with paragraph 7. Documents responsive to this request, to the extent available, are on the enclosed discs as provided under the Amended Production Requirements.

iv. any communications involving that Third-Party Defendant and any branch, department, agency or instrumentality of municipal, State or federal government relating to any discharges or releases of Hazardous Materials or this litigation.

**Response** - Documents responsive to this request will be produced pursuant to the requirements of CMO XII, Paragraph 21(c) as to the Alleged Discharge as provided under the Amended Production Requirements.

2. Any Documents relating to any industrial waste containing Hazardous Materials that was transported to, processed or treated at, or discharged from any of the sites and/or properties with which a Third Party Defendant is associated in the Third Party Complaints.

**Response** - Documents responsive to this request as to the Alleged Discharge, to the extent available, are on the enclosed discs as provided under the Amended Production Requirements.

c. Any insurance or indemnity agreement under which another person or entity may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy said judgment.

**Response** - Documents responsive to this request, to the extent available, are on the enclosed discs as provided under the Amended Production Requirements and as to policies potentially covering the Alleged Discharges.

**Production as to Paragraph 21(b) Requests as Amended by the Amended Production Requirements**

Copies of all non-privileged Documents other than electronic email discovery, that relate to  
(i.) the alleged discharge of any hazardous wastes, hazardous substances, pollutants or contaminants ("Hazardous Materials") to the Newark Bay Complex;

**Response** - See, Paragraph 5-9, above. See, Response to Paragraph 21c 1, i., above.

(ii.) the potential pathways and methods by which the Hazardous Materials have been released to the Newark Bay Complex, as well as the quantity, nature and toxicity of such Hazardous Materials;

**Response** - See, Paragraph 5-9, above. See, Response to Paragraphs 21(c), 1, i. - iv., above.

(iii.) other actions relating to properties or operations that may have adversely impacted the environmental condition of the Newark Bay Complex

**Response** - See, Paragraph 5-9, above.

(iv.) the costs and damages costs and damages sought in connection with any alleged discharge of Hazardous Materials.

**Response** - See, Paragraph 5-9, above. Third-Party Defendant further notes that certain cross-claims and counterclaims and Fourth-Party claims are stayed in the present action and, as such, it has made no such claim against parties in this action at this time.



**Production as to Paragraph 21(b) Requests as Amended by the Amended Production Requirements**

Copies of all non-privileged Documents other than electronic email discovery, that relate to (i.) the alleged discharge of any hazardous wastes, hazardous substances, pollutants or contaminants ("Hazardous Materials") to the Newark Bay Complex;

**Response -** See, Paragraph 7, above. See, Response to Paragraph 21(c) 1, i., above.

(ii.) the potential pathways and methods by which the Hazardous Materials have been released to the Newark Bay Complex, as well as the quantity, nature and toxicity of such Hazardous Materials;

**Response -** See, Paragraph 7, above. See, Response to Paragraphs 21(c), 1, i. - iv., below.

(iii.) other actions relating to properties or operations that may have adversely impacted the environmental condition of the Newark Bay Complex

**Response -** See, Paragraph 7, above.

(iv.) the costs and damages costs and damages sought in connection with any alleged discharge of Hazardous Materials.

**Response -** See, Paragraph 7, above. Third-Party Defendant further notes that all cross-claims and counterclaims and Fourth-Party claims are stayed in the present action and , as such, it has made no such claim against parties in this action at this time.

**August 11, 2009 CMO VIII Excepted Information Categories**

Excepted Information includes the following:

"Information, ("Information"), including, but not limited to, environmental, chemical and/or biological testing of groundwater, surface water, soil or sediment (hereinafter "Sampling Information") contained in the nexus packages produced pursuant to paragraph 8(e) of CMO V".

See, Paragraph 4(a), as well as information produced under CMO XII, paragraph 21(a).

"Information previously produced to any branch, department, agency or instrumentality of the State of New Jersey including to the New Jersey Department of Environment Protection ("NJDEP") or Information produced to any other governmental agency or entity whose

responsibility it is to oversee environmental compliance in the Newark Bay Complex Area, including, but not limited to, the United States Environmental Protection Agency and the United States Army Corps of Engineers (hereinafter "Governmental Recipients"). We believe information received from such agencies are included within the exception, although we have produced information received from such agencies.

"Information produced to any Licensed Site Remediation Professional (hereinafter "LSRP") who is duly licensed by the State of New Jersey at the time of receipt of such Information where such disclosure of Information is intended to be used in connection with any remedial investigation or remedial action having an assigned case number in the NJDEP's NJEMS system;" See, Paragraph 4(c).

"Sampling Information compiled with the expectation of being produced to a Governmental Recipient or an LSRP under Paragraphs 4(b) or 4(c) but which Sampling Information has not yet undergone quality assurance/ quality control or similar analysis;" See, Paragraph 4(d).

"Information produced by a third-party defendant to any third-party plaintiff pursuant to the New Jersey Open Records Act or other freedom of information law or regulation;" See, Paragraph 4(e).

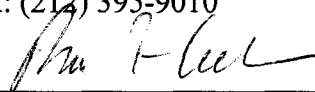
"Information previously produced to Defendants" See, Paragraph 4(f).

"Information that falls within the attorney-client privilege and/or the attorney work product privilege." See, Paragraph 4(g).

Dated: March 3, 2011

Respectfully submitted,

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*Attorney for Third-Party Defendants American Cyanamid Company (now known as Wyeth Holdings Corporation), Wyeth (now known as Wyeth LLC), and Shulton, Inc., solely as to allegations in Third Party Complaint D related to the Clifton, NJ facility.*

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Attorney for Third-Party Defendants  
American Cyanamid Company, Wyeth  
and Shulton, Inc.

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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION and THE ADMINISTRATOR OF THE NEW JERSEY SPILL COMPENSATION FUND,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: ESSEX COUNTY
	:	
	:	DOCKET NO. L-9868-05 (PASR)
	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION
	:	
OCCIDENTAL CHEMICAL CORPORATION, TIERRA SOLUTIONS, INC., MAXUS ENERGY CORPORATION, REPSOL YPF, S.A., YPF, S.A., YPF HOLDINGS, INC. and CLH HOLDINGS, INC.,	:	<b>CERTIFICATE OF SERVICE OF SUPPLEMENTAL THIRD-PARTY DISCLOSURE BY AMERICAN CYANAMID COMPANY, WYETH, AND SHULTON, INC. PURSUANT TO CASE MANAGEMENT ORDER XII AND THE ORDER ON CONSENT DATED JANUARY 31, 2011</b>
Defendants.	:	
	:	
MAXUS ENERGY CORPORATION and TIERRA SOLUTIONS, INC.,	:	
Third-Party Plaintiffs,	:	
	:	
vs.	:	
	:	
3M COMPANY, <i>et al.</i> ,	:	
Third-Party Defendants.	:	

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I, Bonni F. Kaufman, hereby certify that Third-Party Defendants American Cyanamid Company, Wyeth, and Shulton, Inc.'s Supplemental Third-Party Disclosure pursuant to Case Management Order XII and the Order on Consent dated January 31, 2011, including (i) a document entitled "Supplemental Third-Party Disclosure by American Cyanamid Company, Wyeth and Shulton, Inc.", dated March 3, 2011, (ii) a disk containing responsive, non-privileged/protected documents Bates stamped as Shulton00001 to Shulton07218, and (iii) a Public Document log to the Supplemental Third-Party Disclosure by American Cyanamid Company, Wyeth, and Shulton, Inc., prepared in accordance with the Court's August 11, 2009 Agreed Order Regarding Documents Withheld From Production and Case Management Order XII, paragraph 21(d), was served on the following liaison counsel for the third-party defendants and counsel of record for the original parties, on March 3, 2011 via overnight courier:

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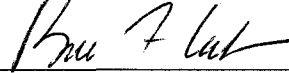
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Dated: March 3, 2011

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*Counsel for Third-Party Defendants American Cyanamid Company (now known as Wyeth Holdings Corporation), Wyeth (now known as Wyeth LLC), and Shulton, Inc., solely as to allegations in Third Party Complaint D related to the Clifton, NJ facility.*



**March 3, 2011**  
**Publically Available Documents of American Cyanamid Company,**  
**Wyeth and Shulton, Inc.**

<b>Beginning Bates No.</b>	<b>Date</b>	<b>Type of Document</b>	<b>Author(s)</b>	<b>Recipient(s)</b>	<b>Copied To</b>	<b>Subject Matter</b>	<b>Pages</b>
TSI-HH-00003972	12/15/99	Letter	Bruce Venner, NJDEP	Thomas Gortych	Mayor James Anzaldi; David Pry	Area of Concern/Restricted Use/No Further Action Letter and Covenant Not to Sue	4
TSI-HH-00003978	10/3/03	Letter	Vance Matthews	Division of Responsible Party Site Remediation, Bureau of Field Operations	Charles Pocsi; Karl Reidel, Esq.	Memorandum of Agreement Application regarding Cambridge Crossing	1
TSI-HH-00003985	12/15/03	Letter	Vance Matthews	Sarah Mihalik, NJDEP	Charles Pocsi; Karl Reidel; Michael Friedman	Registration Certification Questionnaire for one, 1000 gallon inactive underground perfume (solvent) tank at Shulton, Inc.	1
TSI-HH-00003990	1/31/05	Letter	Michael Friedman	A.J. Joshi, NJDEP	Chuck Pocsi; Karl Reidel, Esq.	Preliminary Assessment/Remedial Investigation Report/Remedial Action Report	1
TSI-HH-00003991	1/31/05	Report	EcolSciences, Inc.	Town & Country Developers		Preliminary Assessment Remedial Investigation Report Remedial Action Report for a 1.0± Acre Portion of the Royal Club at Winthrop Court City of Clifton, Passaic County MOA Case No. 03-05-29-1132	55
Wyeth001226	06/11/99	Letter with enclosures	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith, AHPC; William Kelly, AHPC; David Pry, Malcolm Pirnie; M. Friedman, EcolSciences; S. Moulthrop, Riker Danzig; K. Koneval, AHPC	Remedial Action Workplan and Certification for Clifton site	64

Beginning Bates No.	Date	Type of Document	Author(s)	Recipient(s)	Copied To	Subject Matter	Pages
Wyeth001290	10/25/99	Letter with enclosure	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith, AHPC; William Kelly; T. McCann, AHPC; K. Koneval, AHPC; David Pry, Malcolm Pirnie; M. Friedman, EcolSciences; S. Moulthrop, Riker Danzig	Remedial Action Report for Clifton site	65
Wyeth003459	10/10/91	Letter	Jennifer Nulty, Killam Assocs.	Murdo Morrison, NJDEP	Richard Tabakin; James Shirk; Linda Doucette-Ashman	Sampling Plan Addendum regarding former UST Area, West of Building 5 at Clifton site	10
Wyeth004139	10/10/99	Letter	Thomas Gortych	J. Mark Walters, NJDEP	G. Smith; W. Kelly; T. McCann; K. Koneval; D. Pry; M. Friedman; S. Moulthrop	Remedial Investigation/Remedial Action Selection Report for the American Cyanamid (Shulton) Site in Clifton, NJ	2
Wyeth004141	10/25/99	Letter	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith; William Kelly	Remedial Action Report for Clifton site	2
Wyeth004274	06/11/99	Letter with enclosures	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith; AHPC; William Kelly, AHPC; David Pry, Malcolm Pirnie; M. Friedman, EcolSciences; S. Moulthrop, Riker Danzig; K. Koneval, AHPC	Remedial Action Work Plan and Certification for Clifton site	63
Wyeth004350	08/30/94	Letter (missing pages)	Cyanamid	Richard Gimello, NJDEP		NJDEP approval for proposed measures for remaining contamination issues at Clifton site	1
Wyeth004393	02/18/94	Letter	Richard Tabakin, Cytec	Murdo Morrison, NJDEP	J. Nash, J. Terenzi, Jack Titmas, Margaret Tribble	Negative Declaration package and lead concentration levels taken at drum storage pad	2

Beginning Bates No.	Date	Type of Document	Author(s)	Recipient(s)	Copied To	Subject Matter	Pages
Wyeth004411	11/15/93	Letter with enclosure	Richard Tabakin	Murdo Morrison, NJDEP		Negative Declaration Affidavit for Clifton site	5
Wyeth004418	10/18/93	Letter with enclosure	Richard Tabakin	Gale Vincent, NJDEP	Linda Doucette-Ashman, T. Harris, Jack Titmas	Remedial Action Workplan and Certification for former Shulton site	5
Wyeth004499	08/30/93	Letter with enclosure	Richard Tabakin	Murdo Morrison, NJDEP	J. Terenzi; Jack Titmas; Margaret Tribble	Killam Assocs. submitting cleanup activities report and post-excavation sampling results for Clifton site in response to NJDEP's 7/21/93 letter requiring annual emission report	4
Wyeth004542	04/15/93	Letter	Richard Tabakin, Cytec	Murdo Morrison, NJDEP	Margaret Tribble	Approval of RCRA closure on drum storage areas	2
Wyeth004618	03/10/93	Letter	Richard Tabakin, Cytec	Thomas Sherman, NJDEP	K. Ratzman, NJDEP; Margaret Tribble, St. John & Wayne;	Soil sampling data results from Clifton site	2
Wyeth004629	2/26/93	Letter	Sherri A. Cauwels	EPA Freedom of Information Officer	R.B. Tabakin; M.R. Tribble	FOIA request for Shulton, Inc. Plant, Clifton, NJ	1
Wyeth004633	12/31/92	Letter and Handwritten Note	Margaret Tribble	US EPA Freedom of Information Officer	Richard Tabakin; Linda Doucette-Ashman	FOIA request for EPA's record on Clifton, NJ plant	2
Wyeth005333	4/22/91	Letter	John E. Titmas	SPCC Coordinator, Response and Prevention Branch	J. McKnight, B. Sprague, L. Doucette-Ashman	Response to letter regarding a spill on 11/15/90 in Weasel Brook, Clifton, NJ	3

Beginning Bates No.	Date	Type of Document	Author(s)	Recipient(s)	Copied To	Subject Matter	Pages
Wyeth005539	07/23/91	Letter	Jennifer Nulty	Joshua Gradwohl, NJDEP	Linda Doucette-Ashman	Documents prepared by Killam Associates and submitted to NJDEP-Bureau of Freshwater Wetlands	1
Wyeth005622	06/24/91	Letter	Cyanamid (signature page missing)	Bryan Moore, NJDEP		Summaries of how actions items identified in NJDEP's 5/29/92 letter were handled	1
Wyeth005766	05/15/91	Letter	Richard Tabakin	Jeannette Cleary, NJDEP	Linda Doucette-Ashman	Providing additional information for General Information Submission	3
Wyeth005786	04/24/92	Letter	Richard Tabakin	Murdo Morrison, NJDEP	Linda Doucette-Ashman; Jack Titmas	Extension for responding to issues raised in his 5/8/92 letter	1
Wyeth005807	01/16/92	Letter	Richard Tabakin	Thomas Sherman, NJDEP	K. Ratzman, NJDEP; Linda Doucette-Ashman; T. Holmes; Jack Titmas	Revised soil sampling and analytical plan	2
Wyeth005871	11/13/91	Letter	Daniel Flatin, Killam Assocs.	Murdo Morrison, NJDEP	Richard Tabakin; James Shirk; Linda Doucette-Ashman; Jack Titmus,	Schedule for installing groundwater monitoring wells and soil borings at Clifton site	1
Wyeth005877	11/12/91	Letter with enclosure	Jennifer Nulty	Murdo Morrison, NJDEP	Richard Tabakin; James Skirt; Linda Doucette-Ashman	Revised schedule of ECRA compliance efforts and reporting events re Clifton site	3
Wyeth005896	10/04/91	Letter	James Shirk,	Murdo Morrison, NJDEP	Linda Doucette-Ashman; Richard Tabakin; J. McKnight; W. Hoehlein, Killam Assocs.	Detection of volatile material in soils at Shelton site	2
Wyeth005898	09/27/91	Letter with enclosures	Richard Tabakin,	Murdo Morrison, NJDEP		Carbon-14 radioactive materials were disposed and labs inspected by Radiation Safety Officer	16

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Wyeth005914	9/30/91	Letter with enclosures	R.B. Tabakin	Murdo Morrison, NJDEP	L.J. Doucette-Ashman	Information regarding removal of transformer from the rear of building #5	10
Wyeth005930	08/19/91	Letter with enclosure	Richard Tabakin	Murdo Morrison, NJDEP	K. Hart, NJDEP; Linda Doucette-Ashman, J. McKnight	Dates for reducing workforce and ceasing all manufacturing operations at Clifton facility	6
Wyeth005964	08/14/91	Letter	Richard Tabakin,	Murdo Morrison, NJDEP	James Shirk; Linda Doucette-Ashman; J. McKnight; Jack Titmas, J. Multy, Killam Assoc.	Cyanamid initiating field activities during week of 9/2/91	1
Wyeth006022	10/16/92	Letter	Richard Tabakin	Murdo Morrison, NJDEP	Linda Doucette-Ashman, Jack Titmas	Cost estimate for remediation of Parkway Iron & Steel discharge and fill areas.	2
Wyeth006042	07/10/92	Letter with enclosure	Richard Tabakin	Murdo Morrison, NJDEP		Procedures to be implemented for achieving residential standards at Clifton site; "Data Exceeding ECRFA Standards (PPM)" taken from discharge areas	5
Wyeth006058	06/18/92	Letter	Teresa Kosson, Cyanamid	Thomas Sherman, NJDEP	K. Ratzman, NJDEP; Murdo Morrison, NJDEP; Linda Doucette-Ashman; Jack Titmas	Analytical data from soil sampling at Clifton site	1
Wyeth006111	04/27/92	Letter with enclosure	Linda Doucette-Ashman	John Graham, NJDEP	Murdo Morrison, NJDEP; Richard Tabakin; T. Kossen; J. Multy	Response to NJDEP's conditional approval to Draft Sampling Plan	9

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Wyeth006176	07/17/90	Letter	Daniel Toder, Killam Assocs.	Joseph Miller, NJDEP	Robert Draeger, Shulton, U.S.A.; James Shirk, Cyanamid	Response to NJDEP 5/17/90 letter regarding Discharge Investigation and Corrective Action Report	5
Wyeth006218	4/26/99	Letter	Peter Bundock	Gary Pierson, NJDEP	F. Kelley; M. Martin-Wayne; M. Tribble-Wayne; M. Holland; L.A. Savarese; C. Sario; J. Shirk; S. Meszaros	Final follow-up report on the spill cleanup activities near Shulton Building 9/9A	2
Wyeth006220	04/10/89	Letter	Peter Bundock, Shulton Group	Joseph Miller, NJDEP	F. Kelley, C. Sario, L. Savarese, S. Meszaros, Margaret Tribble, M. Martin	Investigative and premeditative actions taken in response 11/88 oil spill leakage from fuel oil tanks at Shulton site	1
Wyeth006222	02/08/89	Letter	Peter Bundock	City of Clifton's Fire Sub Code Official	F. Kelley, Shulton Gp.; L.A. Savarese, Shulton Gp; C. Sarlo, Shulton, Gp; W. Shirk, St. John & Wayne; M. Martin, St. John & Wayne; Margaret Tribble, St. John & Wayne; T. Harris, St. John & Wayne; S. Meszaros	Results of soil samples performed in conjunction with removal of underground storage tanks at Clifton site	1
Wyeth006229	12/21/88	Letter	Peter Bundock	NJDEP	F Kelley, S. Meszaros, Margaret Tribble, J. Shirk, L. Savarese, D. Toder, M. Martin, T. Harria, M. Holland, C. Sarlo	Initial soil sample analysis results for spill clean up and for underground tank removal project	1
Wyeth006235	12/01/88	Letter	Peter Bundock, Shulton Group	Ed Frey, Fire Sub Code Official, City of Clifton	F. Kelley; S. Meszaros; Margaret Tribble; M. Martin	Removal of underground tanks on Shulton property	1

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Wyeth006269	02/28/91	Letter	Richard Tabakin	Ken Hart, NJDEP	Linda Doucette-Achman; J. Shirk; J. Terenzi; L. Savares; L. Tilton; J. McKnight	General Information Submission for Clifton plant site	1
Wyeth007259	4/15/94	Letter	J.F. Nash	Frank Pecci, President, Clifton Board of Education		NJDEP's 4/14/94 "No Further Action" letter	1
Wyeth007260	04/15/94	Letter	J.F. Nash, Cyanamid	James Anzaldi, Mayor of Clifton		NJDEP's 4/14/94 "No Further Action" letter	1
Wyeth007263	04/12/94	Letter with enclosure	Richard Tabakin, Cytec	Murdo Morrison, NJDEP	J. Nash; P. Pecci; J. Terenzi	Comparison of excavation base samples and sidewall samples to residential soil criteria	3
Wyeth007279	04/11/94	Facsimile	Richard Tabakin, Cytec	Murdo Morrison, NJDEP		Letter sent to NJDEP re procedure for shipping hazardous and nonhazardous waste	2
Wyeth007339	03/10/93	Letter with enclosure	Richard Tabakin, Cytec	Thomas Sherman, NJDEP	K. Ratzman, NJDEP; Margaret Tribble, St. John & Wayne; Jack Titmas; R. Hillard; J. Terenzi; C. Brown; D. Mulvaney	Soil sampling data from Clifton site	2
Wyeth007365	07/10/92	Letter with enclosure	Richard Tabakin, Cyanamid	Murdo Morrison, NJDEP		Procedures needing to be implemented for achieving residential standards at Clifton site; "Data Exceeding ECRFA Standards (PPM)" taken from discharge areas	5

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Wyeth007372	07/08/92	Letter (missing pages)	Cyanamid	Murdo Morrison, NJDEP		Procedures needing to be implemented for achieving residential standards at Clifton site	1
Wyeth008004	10/28/99	Letter	Steven Tasher, Cyanamid	NJDEP		Permission to inspect Clifton site	1
Wyeth008098	03/10/99	Letter with enclosure	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith, AHPC; William Kelly, T. McCann, AHPC; K. Koneval, AHPC, David Pry, Malcolm Pirnie; M. Friedman, EcolSciences; S. Moulthrop, Rilker Danzig	Certification for AHPC's Remedial Investigation/Remedial Action Selection Report	2
Wyeth008107	01/11/99	Letter	Thomas Gortych	J. Mark Walters, NJDEP	David Pry, Malcolm Pirnie, C. McAullife, Riker Danzig; M. Friedman, EcolSciences; R. Wayne, Jt. John & Wayne, W. Kelley, AHPC, K. Koneval, AHPC, Geraldine Smith, AHPC, S. Moulthrop, Riker Danzig	Maps showing boundary delineation and sample locations for Weasel Brook restricted area	3



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Wyeth008126	12/01/98	Facsimile	David Pry, Malcolm Pirnie	J. Mark Walters, NJDEP	Mark Pedersen, Malcolm Pirnie; R. Wayne, St John & Wayne; W. Kelley, AHPC; K. Koneval, AHPC; T. Gortych, AHPC; M. Friedman, Ecolsciences; S. Moulthrop, Riker Danzig; C. McAuliffe, Riker, Danzig	Confirmation of 12/2/98 meeting regarding Clifton, NJ Site	3
Wyeth008333	12/5/97	Pleading	Kevin Giordano on behalf of American Cyanamid Co.	City of Clifton Law Dept.		American Cyanamid Co. v. City of Clifton, Dkt. No. 002753-1997, Answers to Interrogatories	6
Wyeth011905	12/02/99	Letter with enclosure	Mary Joan Sheridan, Riker Danzig	J. Mark Walters, NJDEP	Albert Greco, City of Clifton's Dep't of Health & Human Services; Richard Moran, City of Clifton Clerk; Thomas Gortych, William Kelly, Geraldine Smith, AHPC	Enclosing original Deed Notice for Shelton site	26
Wyeth012029	08/04/99	Letter with enclosure	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith, AHPC; William Kelly, AHPC; T. McCann, AHPC, K. Koneval, AHPC, David Pry, Malcolm Pirnie; M. Friedman, EcolSciences, S. Moulthrop, Riker Danzig	Proposed Deed Notice for Shulton site	18
Wyeth012301	02/02/98	Letter with enclosures	Joseph Lagrotteria, St. John & Wayne	J. Mark Walters, NJDEP	Mark Pederson, NJDEP; Steven Tasher; William Kelly; Kenneth Koneval; Thomas Gortych; David Pry; Robert Wayne	Summary of Remedial Investigation/Remedial Action Data Report	44

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Wyeth012346	1/98	Report	Malcolm Pimie, Inc.	American Home Products Corp.		Summary of Remedial Investigation/Remedial Action Data, American Cyanamid, Clifton, NJ, Case No. 88-12-05-1448	50
Wyeth012396	12/31/97	Letter	Joseph Lagrotteria, St. John & Wayne	J. Mark Walters, NJDEP	Steven Tasher, AHPC; William Kelly, AHPC; K. Koneval, AHPC, T. Gortych, AHPC; David Pry, Malcolm Pirnie; M. Pederson; R. Wayne, St. John & Wayne	Thomas Gortych will be AHPC's contact person for technical matters on the MOA	2
Wyeth012417	10/07/97	Letter with enclosure	Joseph Lagrotteria, St. John & Wayne	Mark Pederson, NJDEP	Steven Tasher; William Kelly, AHPC; K. Koneval, AHPC; T. Gortych, AHPC; David Pry, Malcolm Pirnie; R. Wayne, St. John & Wayne	Memorandum of Agreement allowing Cyanamid to submit remedial investigative information and remedial action information on Parkway Iron & Steel area, bank of the Weasel Brook, and fill area adjacent to Weasel Brook	10
Wyeth012477	11/08/94	Letter with enclosures	Richard Tabakin, Cytec	Jerry O'Donnell, NJDEP		Revisions to draft MOA	6
Wyeth012524	12/23/99	Letter with enclosure	Geraldine Smith, AHPC	Bruce Venner, NJDEP	J. Mark Walters, NJDEP; AHPC	Executed No Further Action Letter and Covenant Not to Sue	5
Wyeth012529	12/23/99	Letter with enclosures	Geraldine Smith, AHPC	Bruce Venner, NJDEP	J. Mark Walters, NJDEP	Executed No Further Action Letter and Covenant Not to Sue	5
Wyeth012557	03/31/94	Letter with enclosure	J. F. Terenzi, Cyanamid	Murdo Morrison, NJDEP	R. Tabakin	Executed Industrial Site Recovery Act Negative Declaration Affidavit	3

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Wyeth012592	06/11/99	Memorandum with enclosure	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith; William Kelly; David Pry, Malcolm Friedman, EcolSciences; S. Moulthrop, Riker Danzig; K. Koneval	Remedial Action Workplan and Certification for Clifton site	60
Wyeth012652	05/00/1999	Document	Malcolm Pirnie	*		Draft Remedial Action Workplan	67
Wyeth012719	10/25/99	Letter	Thomas Gortych	Mark Walters	G. Smith; W. Kelly	Remedial Action Report for Shulton site in Clifton, NJ	3
Wyeth012847	06/11/99	Letter and enclosure	Thomas J. Gortych	J. Mark Walters, NJDEP	Geraldine Smith; William Kelly; David Pry; M. Friedman; S. Moulthrop; K. Koneval	Remedial Action Workplan and Certification for Clifton site	2
Wyeth012849	06/09/99	Document		*		Certification of Remedial Action Workplan executed by Steven Tasher, Vice President, American Cyanamid Company	1
Wyeth012850	06/16/99	Letter with enclosures	David Pry	J. Mark Walters, NJDEP	Geraldine Smith, William Kelly, T. McCann, Thomas Gortych, M. Friedman; S. Moulthrop; K. Koneval	Revised plates and exhibits for Remedial Action Workplan for Clifton site	4
Wyeth012856	12/10/98	Letter	David Pry	J. Mark Walters, NJDEP	T. Gortych, M. Friedman; S. Moulthrop	Additional delineation sampling for DER	4
Wyeth012860	11/24/98	Letter	David Pry	J. Mark Walters, NJDEP	R. Wayne, St John & Wayne; William Kelly; K. Koneval; T. Gortych; M. Friedman; S. Moulthrop	Additional information needed for reviewing Remedial Action Report/Remedial Action Workplan	2

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Wyeth013020	03/10/99	Letter with enclosure	Thomas Gortych	J. Mark Walters, NJDEP	Geraldine Smith; William Kelly; T. McCann; K. Koneval; David Pry; M. Friedman; S. Moulthrop	Revised Certification for AHPC's Remedial Investigation/Remedial Action Selection Report	2
Wyeth013240	04/12/94	Letter with enclosure	Richard Tabakin, Cytec	Murdo Morrison, NJDEP	J. Nash; F. Pecci; J. Terenzi	Comparison of excavation base samples and sidewall samples to residential soil criteria	3
Wyeth013278	12/02/92	Letter	Jennifer Multy, Killam	Murdo Morrison, NJDEP	Richard Tabakin, Cyanamid	Summary of sampling done at Weasel Brook area and groundwater sampling done at Clifton site	13
Wyeth013291	07/10/92	Letter with enclosure	Richard Tabakin, Cyanamid	Murdo Morrison, NJDEP		Procedures needing to be implemented for achieving residential standards at Clifton site and enclosing tables on "Data Exceeding ECRFA Standards (PPM)" taken from discharge areas	5

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