Pfizer Inc
David L. Rader
P.O. Box 88
Terre Haute, Indiana 47808-0088
Tel (812) 299-2121, Ext. 551
Fax (812) 299-6103
E:mail:david.rader@pfizer.com

Vigo Plant

A05-0045
JUL 05 2001

June 29, 2001

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Subject: Pfizer Inc, Terre Haute Facility, National Environmental Achievement Track Application Package Revisions

To Whom It May Concern::

As discussed with Mr. Mark Messersmith by telephone earlier this week, I have revised our application package and am submitting by fax and hard copy for your further consideration copies of the revised pages.

We are looking forward to your response and stand ready to assist your office in any way necessary as you review our application.

Best regards,

David L. Rader,
Manager, Environmental & Safety

cc: Mr. E. Gray
Mr. M. Garamone
Mr. Mark Messersmith, Fax (312) 353-5374

File: admin/Env Achieve Track,r1

A05-0045
MAY 01 2001

National Environmental Achievement Track

Application Form

Pfizer Inc. Terre Haute
Name of facility

Name of parent company (if any)

100 Pfizer Drive
Street address

Street address (cont.)

Terre Haute, IN 47802
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

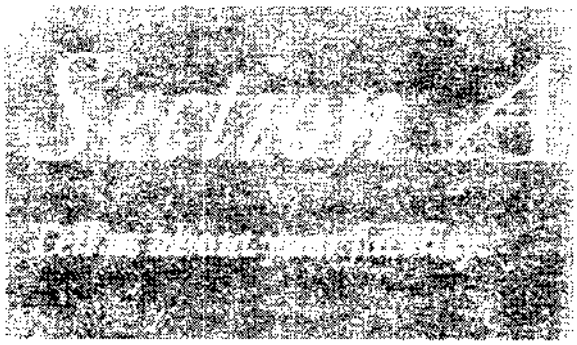
Name Dave Rader

Title Manager, Environmental & Safety

Phone (812) 299-2121 Ext.551

Fax (812) 299-6103

E-mail davidrader@pfizer.com



Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

Manufacture and packaging of pharmaceutical products.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2833 _____ - _____ - _____

NAICS
_____ _____ _____

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes [No]

4 How many employees (full-time equivalents) currently work at your facility?

Fewer than 50

50-99

[100-499]

500-1,000

More than 1,000

5 Does your facility have an EPA ID number(s) ? [Yes] No

If yes, list in the right-hand column.

IND 006059075

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

I've listed the requirements above.

[I've enclosed the Checklist with my application.]

8 Optional: Is there anything else you would like to tell us about your facility?

See attached copy of IDEM 100% Club application package and membership notice.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check yes if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ———— [Yes]

b. Planning ———— [Yes]

c. Implementation and operation ———— [Yes]

d. Checking and corrective action ———— [Yes]

e. Management review ———— [Yes]

2 Have you completed at least one EMS cycle (plan-do-check-act)? [Yes]

3 Did this cycle include both an EMS and a compliance audit? [Yes]

4 Have you completed an objective self-assessment or third-party assessment of your EMS? [Yes]

If yes, what method of EMS assessment did you use?

Self-assessment

GEMI Other

CEMP Corporate EHS

Third-party assessment

ISO 14001 Certification

Other IDEM review

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)? (1998)		What is the current level? (2000)	
	Quantity	Units	Quantity	Units
Release History	0	Reportable Releases	0	Reportable Releases

i. How is the current level an improvement over the previous level?

Our perpetual goal is zero. Underlying this is our goal of reducing non-reportable releases. These were reduced from 15 non-reportable releases in 1996 to 3 in 2000.

ii. How did you achieve this improvement?

Employee training, construction of secondary containment tank farm upgrade and investigation of all non-reportable small releases for root cause and corrective action.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)? (1998) Quantity	Units	What is the current level? (2000) Quantity	Units
Total Solid Waste	8,055,797	lb.	5,567,470	lb.

i. How is the current level an improvement over the previous level?

Production improvement & increased emphasis on recycling.

ii. How did you achieve this improvement?

Increased antibiotic yields to reduce mycelium volume per unit antibiotic; recycling of paper, corrugate, metals; increased use of bulk raw materials over bagged RM's; recycling of fly ash in cement.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Habitat Impacts

b. Is this aspect identified as significant in your EMS? (Yes) No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value — 0 acres of functional habitat (Quantity/Units)

Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value: 30 acres functional habitat (Quantity/Units)

Option B: In terms of units of production or output: _____ (Quantity/Units)

e. How will you achieve this improvement?

Removal and control of exotic and invasive plants; silvicultural control (controlled burns & clearing re-establish natural indigenous species competition.

Second aspect you've selected

a. What is the aspect? Remediation

b. Is this aspect identified as significant in your EMS? (Yes) No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value: 0 acres of remediated landfill. (Quantity/Units)

Option B: In terms of units of production or output: _____ (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A: Absolute value: 34 acres of remediated landfill. (Quantity/Units)

Option B: In terms of units of production or output: _____ (Quantity/Units)

e. How will you achieve this improvement?

Phase I & II Investigations will be done & remedial plan implemented under Indiana VRP program.

Acceptance into VRP may be approved by IDEM only if the project is not otherwise required by rule or order.

Third aspect you've selected

a. What is the aspect? Total Energy Use

b. Is this aspect identified as significant in your EMS? (Yes) No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value 729,261 mm BTU (Quantity/Units)

Option B: In terms of units of production or output _____ (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A: Absolute value 692,798 mm BTU (Quantity/Units)

Option B: In terms of units of production or output _____ (Quantity/Units)

e. How will you achieve this improvement? Replace three, #6 Fuel oil fired boiler with one natural gas/ #2 Fuel oil fired boilers. Cuts hot standby use by 50%; eliminates heating #6 oil tank; increases boiler efficiency; better turn down capability to reduce steam venting.

Fourth aspect you've selected

a. What is the aspect? Total Solid Waste

b. Is this aspect identified as significant in your EMS? (Yes) No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value 5,567,470 lbs. (Quantity/Units)

Option B: In terms of units of production or output _____ (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A: Absolute value 4,175,000 lbs. (Quantity/Units)

Option B: In terms of units of production or output _____ (Quantity/Units)

e. How will you achieve this improvement? Elimination of mycelium filter cake; developing reliable source for fly ash recycling; optimize boiler use to minimize coal use. Recycle insulin packaging.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Member of LEPC; contacts with habitat restoration partners; employee outreach; support of Audubon Chapter; dialogue with local government and community organizations.

2 How do you inform community members of important matters that affect them?

Direct contact; press releases; meetings; membership in local organizations.

3 How will you make the Achievement Track Annual Performance Report available to the public?

Website www.pfizer.com/ehs/

(Newspaper)

Open Houses

Other

Employee briefings IDEM Notification

4 Are there any ongoing citizen suits against your facility? Yes [No]

If yes, describe briefly in the right-hand column.

5 List references below.

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Audubon Society	Dr. Peter Scott	(812) 237-2403
State/Local regulator	Vigo County Air Pollution Control	George Needham	(812) 462-3433
Other community/local reference	Vigo County Parks Department	Keith Ruble	(812) 462-3392

Section E

Application and Participation Statement

On behalf of Pfizer Inc, Terre Haute
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Ed Gray 4/26/01

Printed Name/Title Ed Gray, Plant Manager

Facility Name Pfizer Inc, Terre Haute

Facility Street Address 100 Pfizer Drive, Terre Haute, IN 47802

Facility ID Numbers IND 006059075

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility," Question 6.* The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility. .

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: Pfizer Inc.

Facility Location: Terre Haute, IN

Facility ID Number(s): IND 006059075
(attach additional sheets if necessary)

Air Pollution Regulations		**Check All That Apply**
1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☒
2.	Permits and Registration of Air Pollution Sources	☒
3.	General Emission Standards, Prohibitions and Restrictions	☒
4.	Control of Incinerators	☐
5.	Process Industry Emission Standards	☒
6.	Control of Fuel Burning Equipment	☒
7.	Control of VOCs	☒
8.	Sampling, Testing and Reporting	☒
9.	Visible Emissions Standards	☒
10.	Control of Fugitive Dust	☒
11.	Toxic Air Pollutants Control	☒
12.	Vehicle Emissions Inspections and Testing	☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above *(identify)*

13.	Indiana equivalent rules	☒
14.		☐

Hazardous Waste Management Regulations

1.	Identification and Listing of Hazardous Waste (40 CFR 261)	☒
	- Characteristic Waste	☒
	- Listed Waste	☒
2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	☒
	- Manifesting	☒
	- Pre-transport requirements	☒
	- Record keeping/reporting	☒
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	☐
	- Transfer facility requirements	☐
	- Manifest system and record-keeping	☐
	- Hazardous waste discharges	☐
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	☐
	- General facility standards	☐
	- Preparedness and prevention	☐
	- Contingency plan and emergency procedures	☐
	- Manifest system, Record keeping and reporting	☐
	- Groundwater protection	☐
	- Financial requirements	☐
	- Use and management of containers	☐
	- Tanks	☐
	- Waste piles	☐
	- Land treatment	☐
	- Incinerators	☐
5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	☐
6.	Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)	☐
7.	Administered Permit Program (Part B) (40 CFR 270)	☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above *(identify)*

8.	Indiana equivalent rules	☒
9.		☐

Hazardous Materials Management

1.	Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	☐
2.	Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)	☒
3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)	☒
4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)	☒
5.	Community Right-to-Know Regulations (40 CFR 350-372)	☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above *(identify)*

6. Indiana equivalent rules ☒

7. _____ ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐
4. Solid Waste Storage and Removal Requirements ☒
5. Disposal Requirements for Special Wastes ☒

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above *(identify)*

6. Indiana equivalent rules ☒

7. _____ ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☒
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☒
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☒
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above ***(identify)***

17. Indiana equivalent rules ☒

18. _____ ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☒
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above ***(identify)***

7. Noncommunity water system rules ☒

8. Indiana equivalent rules ☒

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒
8. Regulations on Use of Fully Halogenated Chlorofluorealkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above ***(identify)***

10. Indiana equivalent rules ☒

11. Part 717, Subpart A, "Records & Reports of Allegations..." ☒

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above *(identify)*

9. _____ ☐

10. _____ ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) *(identify)*

_____ ☐

_____ ☐

2. RCRA Corrective Action *(identify)*

_____ ☐

_____ ☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above *(identify)*

3. _____ ☐

4. _____ ☐