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September 28, 1990

Mr. David Markell
Director, Division of Environmental Enforcement
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233-5500

Dear Mr. Markell:

Subject: Kodak Park Site Development and Operations History Report

Enclosed are two of three elements of the Kodak Park Site Operations History Report. The elements address the technical requirements outlined in Order-On-Consent #B8-0190-88-04 relative to Kodak Park West (KPW) site history and satisfy the initial submittal technical requirements under Paragraph II(a) of Order-On-Consent #D8-4003-88-4. The elements are:

- Revised Environmental Occurrences Summary for Kodak Park KPW Section Site Operations History Report
- 2. Initial submittal of Kodak Park KPE, KPX, KPS, and KPT Section Site Operations History Reports

A third element, the complete Kodak Park KPM Section Site Operations History Report is being submitted under separate cover.

REVISED KPW SECTION ENVIRONMENTAL OCCURRENCE SUMMARY

The revised KPW Site Operations History Report, Environmental Occurrence Summary (Attachment 1) is a complete accounting of chemical releases through January 1, 1990 which may have resulted in released material contacting soil, based on available written records. Where appropriate, the summary is divided into two categories. The first category includes releases that are documented as resulting in soil contact. The second category includes releases for which insufficient documentation is available to determine whether soil contact occurred.

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The summary does not include non-soil contacting releases, since the focus of the report is on Kodak Park subsurface conditions. The summary includes all the occurrences presented in the original KPW report and additional occurrences gleaned from previously unavailable records. A revised Chemical Management Map is included with the summary. The map has been updated to include additional chemical release information.

It should be noted that prior to evidence of groundwater contamination south of the KPW main industrial sewer trunk, chemical releases in areas served by subsurface containment and groundwater collection systems (Bldg. 115 tank farm, etc.) were considered to be contained and controlled by these systems. Some of the events presented in the revised chemical release summary preceded this evidence and therefore may not have been previously reviewed by NYSDEC.

KODAK PARK KPE. KPX. KPS and KPT SECTION INITIAL SUBMITTAL

Initial site history report submittal (Attachment 2) for the KPE, KPX, KPS, and KPT Sections is represented by 1988 Land Use Maps (base maps), Building Layout Maps and brief descriptions of the respective sections. The base maps present land use features as interpreted from the most recently available aerial photographs (May, 1988) and are consistent with the time period of the base map included in the KPW Site History Report. Aerial photographic interpretation for KPE, KPX, KPS, and KPT and other site information collection and analysis is still in progress. Analysis of this information may result in the 1988 base maps being revised in the final reports and because of this status, the maps included in this submittal are considered as "draft" versions. Complete site history reports for these sections will be submitted sequentially with the last submission made by December 16, 1990.

NYSDEC shall consider the information presented in these documents to be business confidential and proprietary, unless a contrary determination is made under the procedures set forth in Article 6, including Section 89 of the Public Officers Law.

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If you have any questions regarding this information, please feel free to contact Mr. David Shevlin of my staff at (716) 477-1217.

Sincerely, Bruce D. Klanderman

Bruce H. Klanderman, Ph.D.

Director

Environmental Technical Services Health and Environment Laboratories

0566Q/DJShevlin Enclosure

cc: P. Bush, NYSDEC Region 8

N. Kaul, NYSDEC Central Office (w/o enclosure)

T. Marriott, NYSDEC Region 8 (w/o enclosure)

E. Miles, NYSDEC Central Office (w/o enclosure)cc:

bcc: R. Freese / R. Grose
T. Lee / S. Summers
J. Wilson / E. Stern
Central File

ATTACHMENT 2

KODAK PARK SITE DEVELOPMENT AND OPERATIONS HISTORY REPORT

INITIAL SUBMITTAL FOR KPE. KPX. KPS. AND KPT

KODAK PARK SITE DEVELOPMENT AND OPERATIONS HISTORY REPORT

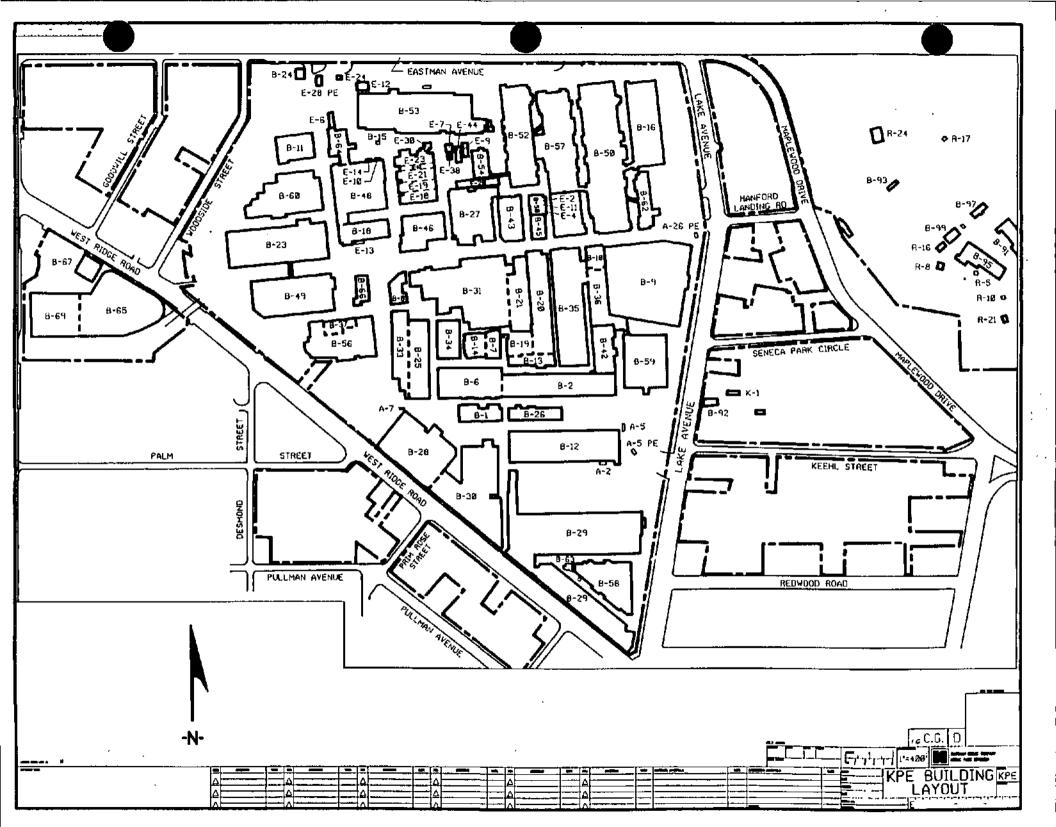
INITIAL SUBMITTAL FOR KPE, KPX, KPS, AND KPT

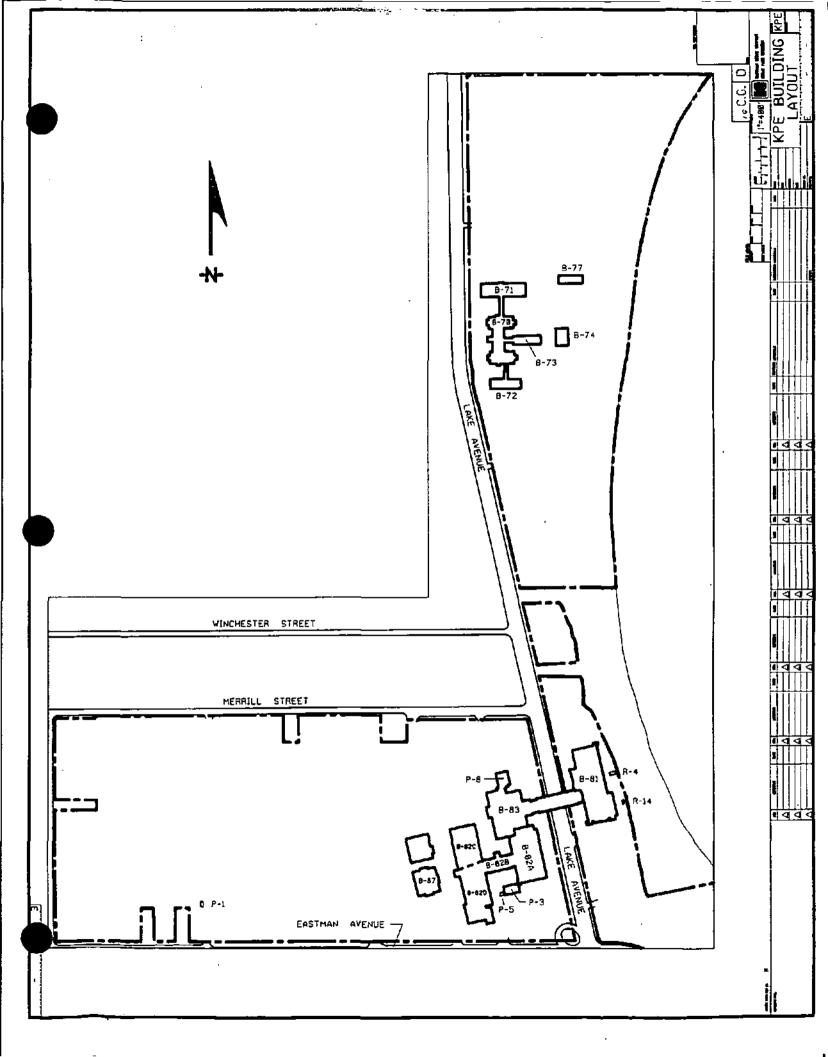
The initial site history report submittal for the Kodak Park KPE. KPX, KPS, and KPT Sections is represented by 1988 Land Use Maps (base maps), Building Layout Maps, and brief descriptions of the respective sections. The base maps present land use features as interpreted from the most recently available aerial photographs (May, 1988) and are consistent with the time period of the base maps included in the KPW and KPM site history reports. Discussion of map development and presentation as well as a glossary of land use classification definitions are presented in the KPW and KPM site history reports in Section 3.1.1 and Appendix B respectively. Aerial photographic interpretation for KPE, KPX, KPS, and KPT and other site information collection and analysis is still in progress. Analysis of this information may result in the 1988 base maps being revised in the final reports and because of this status, the maps included in this submittal are considered as "draft" versions. Complete site history reports for these sections, presented in a manner consistent with the KPW and KPM site history reports, will follow this initial submittal.

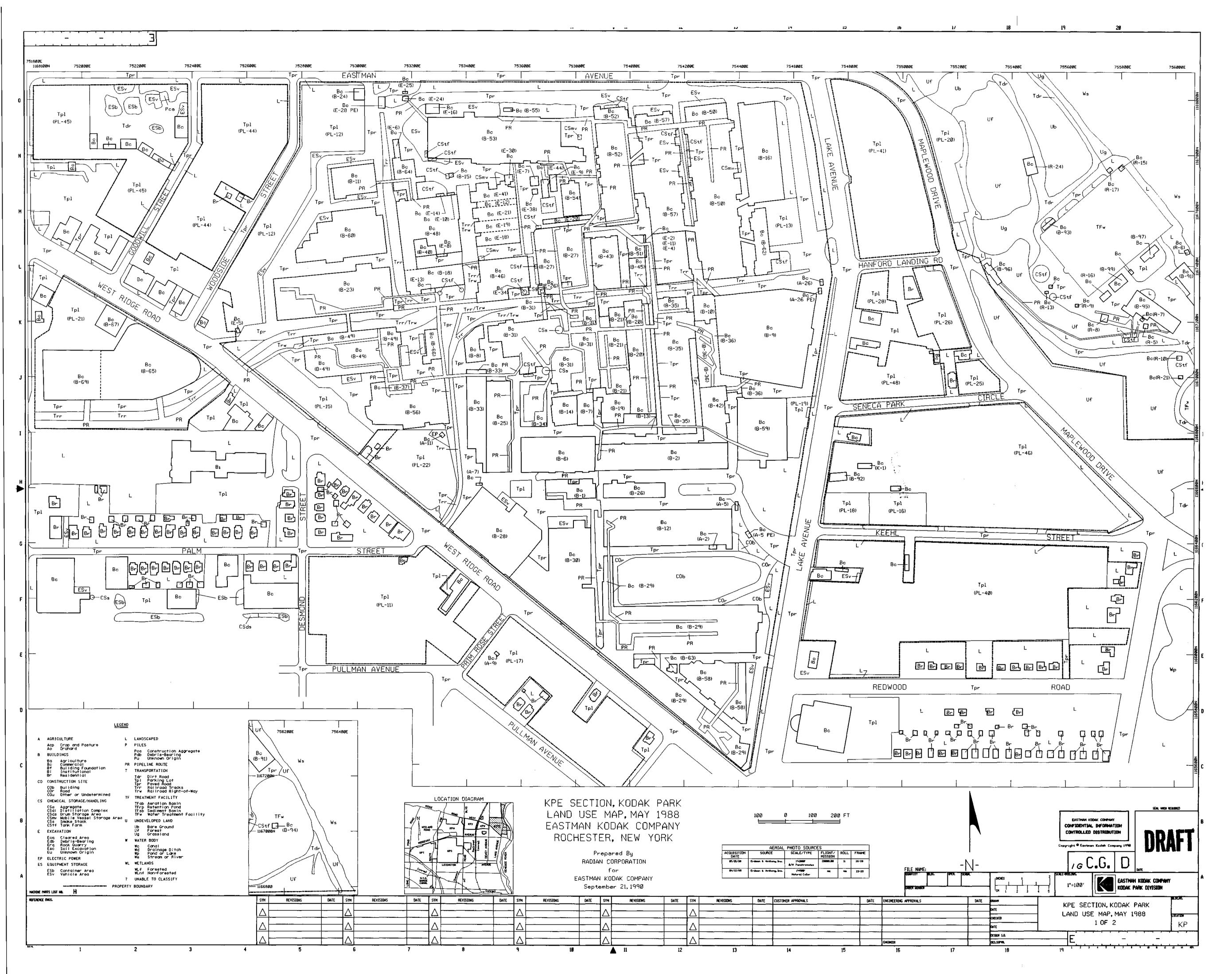
KODAK PARK KPE SECTION DESCRIPTION

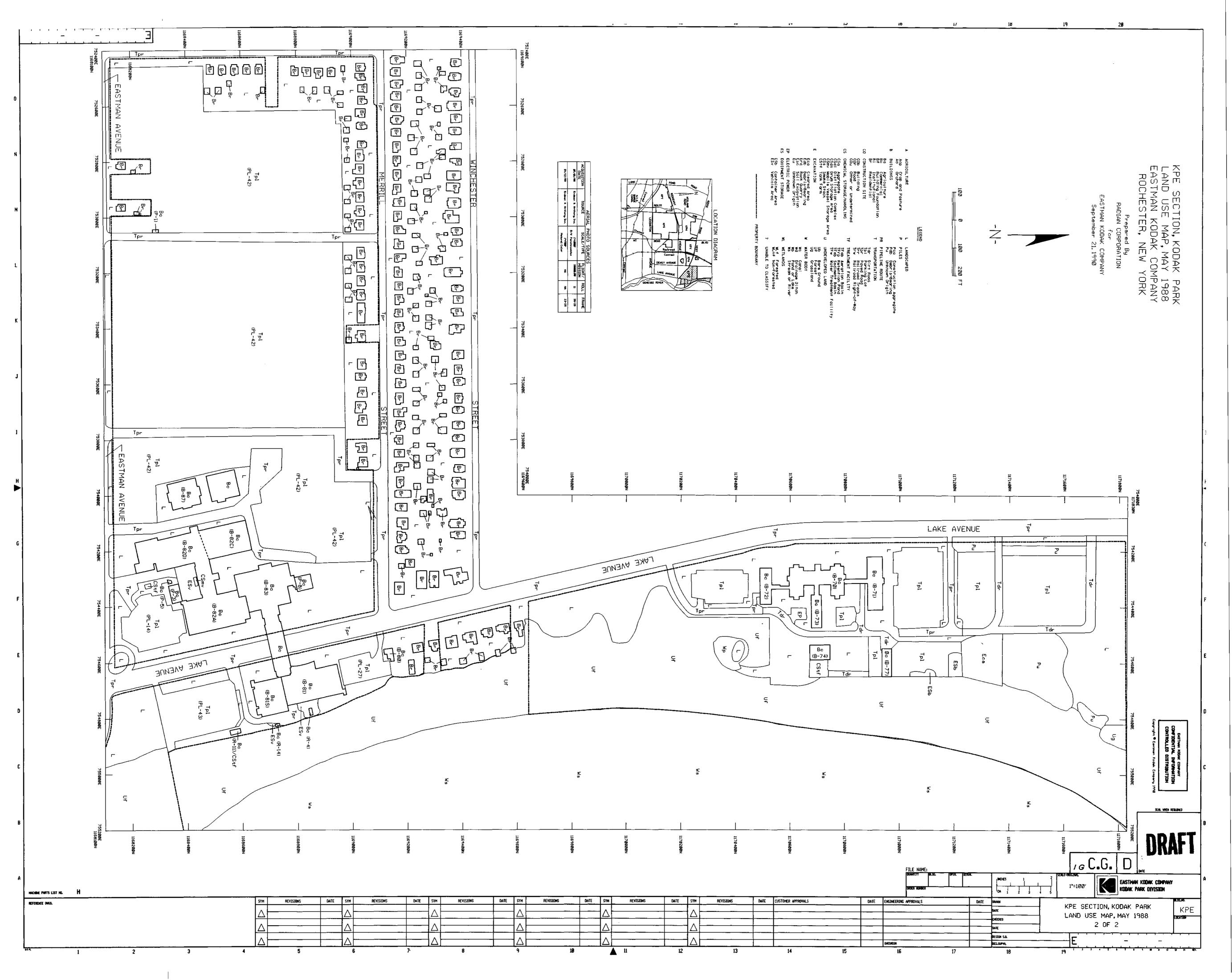
Kodak Park KPE Section (KPE) is located within the City of Rochester, Monroe County, New York State. The majority of the section is bounded to the north by Merrill Street, to the east by the Genesee River, to the south by Ridge Road (NYS Route 104) and to the west by Dewey Avenue. Exceptions to these limits are an elongated parcel that extends north of Merrill Street between Lake Avenue and the Genesee River and several parcels south of Ridge Road. A plan view of KPE is presented in the General Layout Map. There are approximately 80 buildings in KPE and the area encompasses approximately 240 acres.

The KPE section is the earliest developed area of Kodak Park with the first building construction in 1890; today the area is essentially fully developed. The primary activities conducted in KPE are film and paper base manufacturing, photographic emulsion coating operations, and photographic product finishing. Raw, intermediate and finished products flow between KPE and other Kodak Park sections. Several major utility facilities are located in KPE, including steam and electrical power generation, refrigeration, process water storage (reservoir) and wastewater treatment. Process wastewater generated in KPE is discharged to a combined industrial/storm sewer and is treated at the Eastman Kodak Company King's Landing Wastewater Purification Plant (KLWPP). Surface water is collected and treated in the same systems. A very limited portion of KPE includes separate storm sewers that conduct surface water to the Genesee River. A separate sanitary sewer system conducts wastes to the Frank E. Van Lare Publicly Owned Treatment Works (POTW).







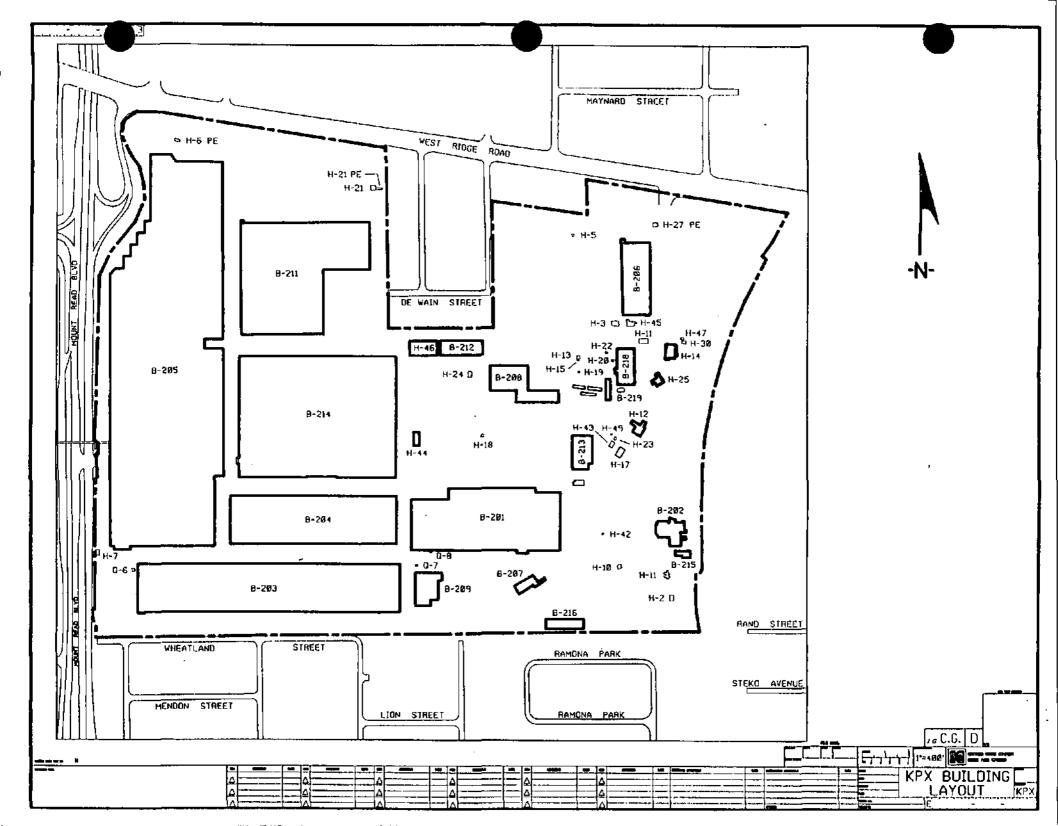


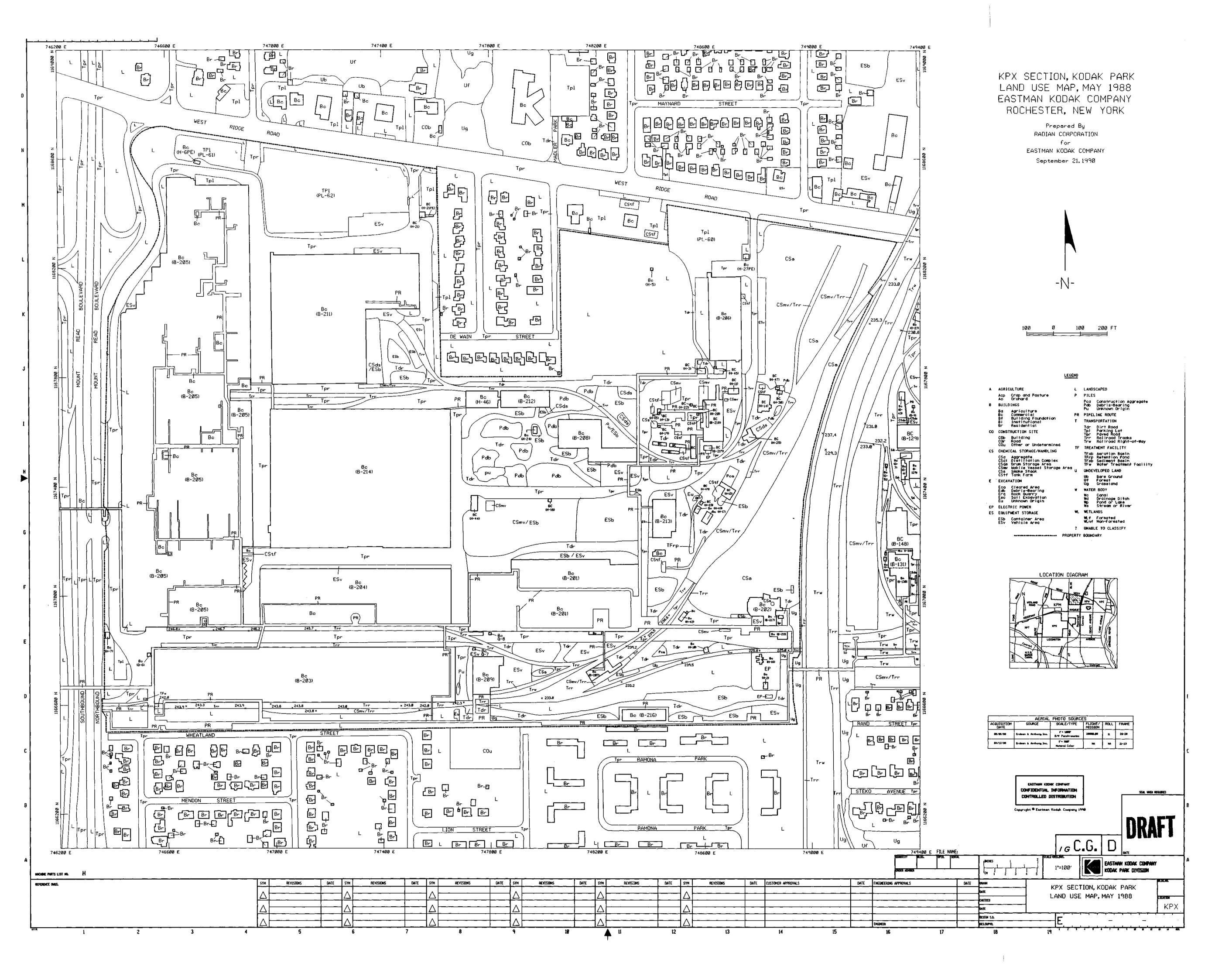
KODAK_PARK KPX SECTION DESCRIPTION

Kodak Park KPX Section (KPX) is located within the City of Rochester, Monroe County, New York State. The majority of the section is bounded to the north by Ridge Road (NYS Route 104), to the east by the Conrail and Chessie railroads, to the south by Wheatland Street and Romona Park and to the west by Mount Read Boulevard. A small residential area extends into the north border of KPX. A plan view of KPX is presented in the General Layout Map. There are approximately 20 buildings in KPX and the area encompasses approximately 110 acres.

The earliest development in KPX occurred in 1929 and followed substantial development of KPE and KPW. The KPX area is one of two Kodak Park sections (the other being KPS) in which the primary activities are material storage and distribution. There are several major warehouse structures located in KPX as well as a distribution center and a material shipping and receiving facility. Several material recovery operations are conducted in the area, including a salvage and recovery facility dedicated to recycling used or surplus material for Kodak reuse or outside disposal, and a sensitized products incinerator used in the silver recovery process. The Kodak Park chemical waste incinerator is also located in KPX.

The KPX area is served by separate industrial, storm, and sanitary sewers. Industrial wastewater is treated at KLWPP and sanitary wastewater is treated at the Frank E. Van Lare POTW. Surface water is discharged to the Genesee River. A major municipal combined sanitary/storm sewer interceptor tunnel crosses KPX from south to north.



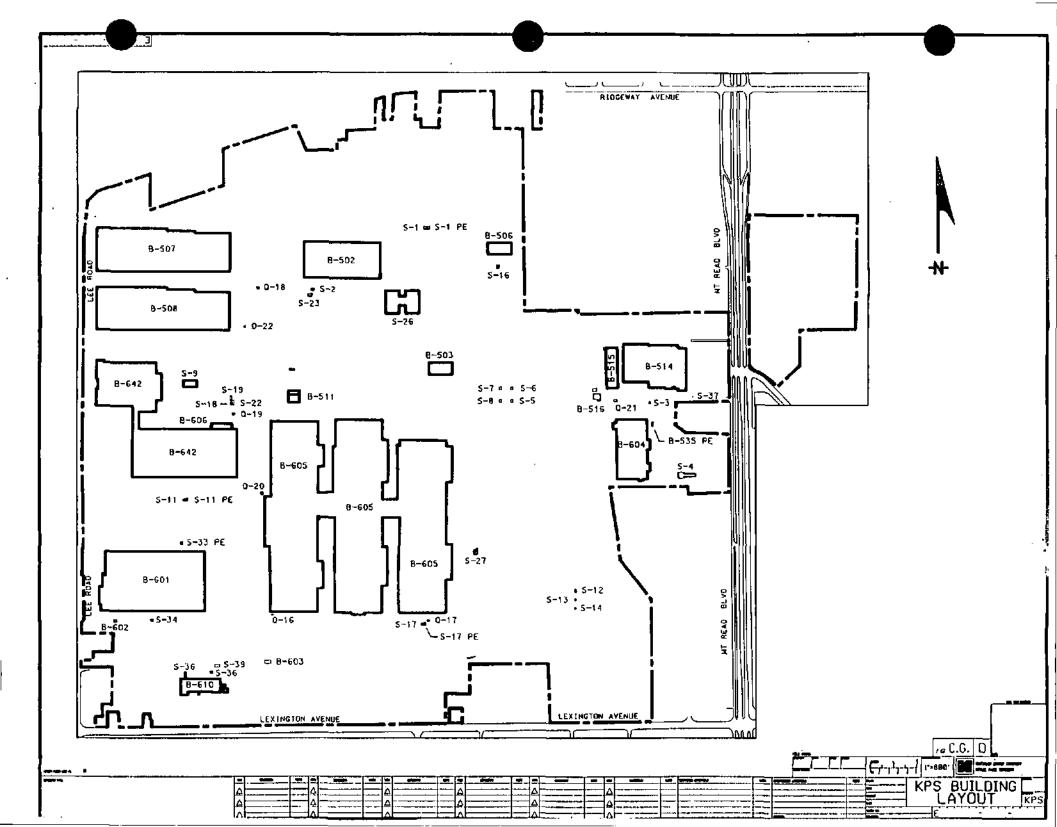


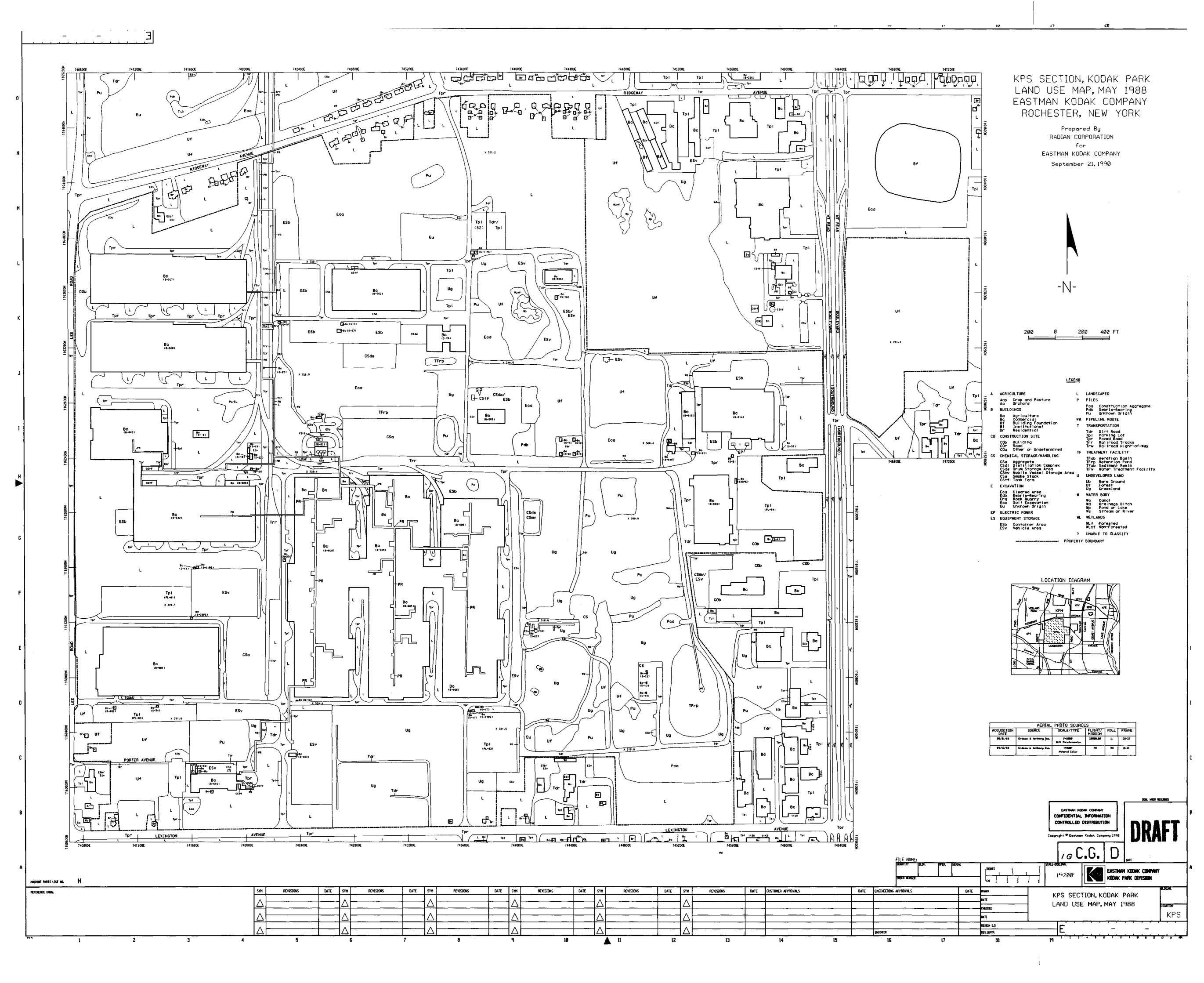
KODAK PARK KPS SECTION DESCRIPTION

The developed portion of Kodak Park KPS Section (KPS) is located within the Town of Greece, Monroe County, New York State. The majority of the section is bounded to the north by Ridgeway Avenue, to the east by Mount Read Boulevard, to the south by Lexington Avenue and to the west by Lee Road. An undeveloped portion of KPS extends east of Mount Read Boulevard into the City of Rochester. A plan view of KPS is presented in the General Layout Map. There are approximately 20 buildings in KPS and the area encompasses approximately 540 acres.

The earliest development in KPS occurred in 1964 and followed substantial development of KPE, KPW, KPX, and KPM. The principal activities conducted in KPS are material storage and distribution. There are several major warehouse structures located in KPS as well as the primary Kodak Park material distribution center. Additional KPS operations include photographic product finishing, customer equipment service, fabrication shops, and a biological material production facility. A refrigeration and compressed air generating facility is also located in KPS.

The KPS area is served by separate sanitary and storm sewers. The limited amount of process wastewater generated in KPS is discharged to the sanitary sewer and is regulated by conditions specified in the municipal sewer use permit. Sanitary sewer waste is conducted to the Frank E. Van Lare POTW. Surface water discharges to the storm sewer are conducted to the New York State Barge Canal, Paddy Hill Creek, and a Rochester combined sanitary/storm sewer (located off Kodak property).





KODAK PARK KPT SECTION DESCRIPTION

The KPT Section of Kodak Park is located in the Town of Greece, Monroe County, New York State. The area is roughly bounded to the north by Ridgeway Avenue, to the east by Lee Road, to the south by the New York State Barge Canal, and to the west by Long Pond Road. The KPT parcel located between NYS Route 390 and Lee Road (eastern parcel) is developed for industrial purposes, while the parcel located between NYS Route 390 and Long Pond Road (western parcel) is developed for recreational activities and agricultural purposes. A plan view of KPT is presented in the General Layout Map. There is one building (Building 701) located in the eastern parcel and the area encompasses approximately 30 acres. Three structures are located on the western parcel and that area encompasses approximately 280 acres.

Building 701 was constructed in the eastern parcel in 1966. The facility has functioned as an equipment fabrication center and chemical repackaging operation. Building 701 sanitary waste and process waste are discharged to a sanitary sewer that connects to the KPS sanitary sewer, and are subsequently treated at the Frank E. Van Lare POTW. Surface water is discharged to Paddy Hill Creek.

The western parcel was substantially undeveloped until the mid-1980's. A portion of the site was used in the 1970's for boiler slag storage and some wastewater sludge incorporation experiments were conducted in the area. In the mid-1980's the parcel was partially converted to employee recreational use. The recreation complex includes three structures. The area is served by sanitary waste storage tanks from which waste is pumped out and transported to a POTW. An area adjacent to the recreational complex is leased for agricultural purposes.

