Introduction

The purpose of this Statement of Basis is to provide an opportunity for the public to be informed of and to participate in the selection of a final remedy for soils and groundwater at Investigation Area MIA-329, located in the northwest portion of Kodak Park Section M (KPM), in Rochester, New York (see Figure 1). The investigation area is comprised of a grouping of solid waste management units that were identified during the RCRA Facility Assessment. The grouping has been designated MIA-329.

This document:

- Provides a brief overview of the site history and site investigations which were conducted at MIA-329;
- Identifies the proposed remedy and presents the basis for its selection;
- Describes the remedial goals that were considered;
- Solicits public review and comment on the proposed remedy and other plausible remedies; and
- Provides information on how the public can be involved in the remedy selection process.

The New York State Department of Environmental Conservation (NYSDEC or Department) has selected a proposed remedy. Changes to the proposed remedy, or the selection of an alternative remedy may be made if public comments or additional data indicate that such changes are warranted. The Department will select a final remedy for the facility after the public comment period has ended and the comments have been reviewed and considered.

This document summarizes information that can be found in greater detail at the document repositories identified below. The Department encourages the public to review the documents at the repositories to gain a more comprehensive understanding of the environmental investigations and interim corrective measures that have been undertaken for MIA-329, and the possible remedies to address that contamination.

Proposed Remedy

The Department has tentatively selected the remedy for MIA-329 described below.

The proposed remedy includes:

- continued operation of the existing KPM B-329/349 Top-of-Rock groundwater Migration Control System (MCS). This system includes two "trenches", linear zones in the

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

STATEMENT OF BASIS
FOR
KODAK PARK INVESTIGATION AREA MIA-329

FINAL
September 2003

FACILITY: **Eastman Kodak Company**
Kodak Park
ROCHESTER, NEW YORK
MONROE COUNTY

USEPA ID No.: NYD980592497
Inactive Hazardous Waste Site Code: 828082

bedrock, where the rock has been purposefully fractured to enhance the collection of groundwater. Each trench segment extends approximately 25 feet into the upper bedrock and is equipped with a single pumping well. One 200 foot long trench segment is oriented east-west, to the north of Building 349. The other segment is approximately 150 feet long and is oriented north-south, to the east of Building 329. Groundwater is discharged to the industrial sewer for treatment at Kodak's Kings Landing Wastewater Purification Plant (KLWPP), located next to the Genesee River in KPE.

- a groundwater monitoring program to assess the effectiveness of the remedy.

- an operation and maintenance plan for the groundwater recovery systems. This plan specifies routine monitoring, maintenance, and reporting requirements to ensure that the systems continue to operate as designed.

- administrative controls to address potential exposure to contaminated soils and groundwater, both currently and in the future.

Facility Background

Since the late 1800's Kodak Park has been Eastman Kodak Company's primary photographic manufacturing facility. Primary current or historic operations at the site include the manufacture of film and paper base; preparation and coating of photographic emulsions; production of vitamins and food; manufacture of electrophotographic toner; cutting, packaging and distribution of finished products; and the production of synthetic organic chemicals, dyes, and couplers.

The MIA-329 investigation area covers approximately 8 acres and is located in the northwest portion of Kodak Park Section M (KPM). KPM is bounded by Mount Read Boulevard to the east, Latona Road and Interstate 390 to the west, the Koda Vista neighborhood to the north, and approximately Ridgeway Avenue to the south (Figure 1). Development in KPM began in the 1940's, following development of KPE, KPW and KPX, which are all located to the east. KPM has historically been used primarily for photographic paper/film base, toner/copier, and chemical manufacturing. KPM is on the New York State Department of Environmental Conservation Registry of Inactive Hazardous Waste Disposal Sites.

MIA-329 includes B-329, used for film coating operations and B-349, used for electrostatic copier toner manufacturing. The B-329 complex includes storage facilities for solid and liquid hazardous wastes. These include drum, tank and trailer/lugger offloading and staging areas. There have been a number of spills in the MIA-329 area that have contaminated the groundwater. In the 1990's, Kodak subsequently reconstructed and upgraded the liquid waste storage tanks and transfer station system at B-329. Kodak has also implemented several interim corrective measures to control and recover contaminated groundwater in this area.

Numerous subsurface utilities underlie MIA-329, including sewer, water, electric, and gas. MIA-

329 process wastewater is discharged to the Kodak Park industrial sewer. A storm water sewer passes east-west through MIA-329, exiting to the west, where it discharges to a tributary of Paddy Hill Creek.

In 1998, Kodak completed a RCRA Facility Assessment for Kodak Park. The assessment identified solid waste management units (SWMUs) subject to corrective action requirements. To administer corrective action, SWMUs were grouped into investigation areas, based on geographic and operational concerns. This Statement Of Basis is for the SWMU grouping MIA-329. This grouping includes the 18 SWMUs listed in Table 1 (see Figure 2 for SWMU locations).

The RCRA Facility Investigation for MIA-329 was completed in 1998. Kodak completed a Corrective Measures Study (CMS) in 2000. In the CMS, Kodak evaluated potentially applicable remedial alternatives. Kodak had already implemented interim corrective measures for the groundwater, so it was assumed that those measures would be a component of the final corrective measures. The NYSDEC has reviewed the CMS report and is soliciting public comment on the tentative selection of a final remedy to address conditions at MIA-329.

Facility Investigations

The RCRA Facility Investigation (RFI) for MIA-329 was completed in 1998. The investigation area contains 18 solid waste management units (SWMUs) listed in Table 1. Subsurface investigations in MIA-329 were conducted in a number of phases, between 1989 and 1999.

Subsurface Conditions/Groundwater

The field investigations initially focused on the north fence line of KPM, and were implemented to determine if off-site groundwater contaminant migration was occurring in the overburden and upper bedrock. Additional subsurface investigations were subsequently implemented to more fully assess the upper and lower bedrock in the MIA-329 area. A total of approximately 35 wells have been installed in and near the MIA-329 area.

The investigations identified a number subsurface zones that have contrasting hydrogeologic properties. In order of increasing depth, these include:

- Overburden - Unconsolidated materials, primarily glacially derived sands, silts, and clays and in some cases fill material including construction/demolition debris and boiler ash. The water table generally occurs in this interval.

- Top-of-Rock - The uppermost bedrock, typically moderately to highly fractured sandstone/siltstone of variable thickness but generally on the order of 15-20 feet. The top-of-rock and overburden are collectively referred to as the upper flow zones.

- Intermediate Grimsby - Sandstone/siltstone with relatively few fractures, exhibiting generally low hydraulic conductivity. This unit functions as an aquitard and is not considered a flow zone for groundwater.

- Grimsby/Queenston (GQ) - Interval of moderately fractured (conductive) bedrock occurring within approximately 15 feet above or below the contact between the Grimsby Sandstone and the Queenston Shale. The GQ and the underlying Queenston are collectively referred to as the lower bedrock flow zones.

- Queenston Shale - Interbedded siltstones and shales with no discernible horizontal interval of elevated hydraulic conductivity. This zone was not investigated within MIA-329, but was for the Kodak Park section KPW, located to the east.

Figure 3 shows the vertical relationship between these zones in the MIA-329 area. Figures 4, 5, and 6 show the groundwater potentiometric surface and general flow directions for overburden, top-of-rock and Grimsby/Queenston, respectively. For the overburden and top-of-rock zones, groundwater flow diverges in the vicinity of B-329, with a portion of the flow going towards the northwest and a portion flowing towards the east. These figures are based on water level measurements taken when the bedrock trench MCS segments were operating, so the MCS segments are influencing groundwater flow directions.

The principal groundwater contaminants are volatile and semi-volatile organic compounds (VOCs and SVOCs). Figures C-2 and C-3 show total volatile organic contaminant concentrations for the top-of-rock and Grimsby/Queenston flow zones, respectively. Contaminant concentrations are currently highest on the east side of B-329. Very low levels of contamination were detected in the GQ flow zone. Also groundwater flow rates for the GQ zone are very low. For these reasons, the underlying Queenston was not investigated.

MIA-329 has a history of numerous releases of chemicals to the environment, mostly related to chlorinated solvents used in the B-329 coating operation. Kodak has reviewed groundwater data against criteria commonly used to screen for the likely presence of dense non-aqueous phase liquid (DNAPL). Based on that evaluation, Kodak has concluded that it is likely that DNAPL may have been present in this area, at least historically. Methylene chloride and 1,2-dichloroethane concentrations from samples collected prior to 1993 suggest potential DNAPL, but more recent data does not. Contaminated soils were excavated and removed from the site during the Storage Tank Improvement Program (STIP) upgrade activities. Much of this work took place on the south side of B-329 in the area of releases.

Soils

Soil characterization has been conducted for various reasons in MIA-329. In addition to soil sampling specifically for the RFI, Kodak has tested soil during well installations, for tank and transfer station closures and upgrades, and for other routine site activities. The overburden ranges in thickness from about 17 feet to greater than 36 feet, with the thickest deposits located

in the northeastern portion of the study area. The investigations have identified three types of unconsolidated deposits in KPM: imported fill, lacustrine deposits and glacial till. The fill, consisting of sand, silt, gravel, mixed with minor amounts of wood, bricks, cinders, slag and glass is the uppermost deposit and ranges in thickness upwards to 20 feet. The lacustrine deposit is next and contains relatively coarse-grained sands and gravels, likely derived from reworking of the underlying glacial till. The glacial till is discontinuous in the study area and generally consists of dense, poorly sorted granular material (sand, silt, gravel with little clay). Till is absent in the eastern portion of the site.

As evaluated in the CMS report, the soil quality data set includes 69 samples collected from 42 locations within MIA-329. Soils in the area were relatively clean, with few detections of contaminants at levels significantly above the Department's comparison values. Soil quality results are discussed in more detail in the Summary of Facility Risks, below.

Summary of Facility Risks

Baseline Exposure Scenarios

As part of the CMS report, a screening level risk assessment (SLRA) was conducted to identify potential contaminants within and from MIA-329 that may pose human health or ecological risks. The assessment also identified receptors and pathways to evaluate the potential risk present from the identified contaminants. For a potential environmental risk to exist, a contaminant needs to be present above concentrations that can cause an adverse effect, a receptor must be present, and an exposure pathway must be complete from the contaminant to the receptor. These three components must all exist simultaneously for a potential risk to exist. However, all three components coexisting does not pre-suppose a risk is present, only that the potential for a risk is present.

Soils

The tiered screening process used NYSDEC Technical Administrative Guidance Memorandums (TAGM) 4046 and 3028 comparison values and USEPA guidance documents to identify contaminants that may pose human health or ecological risks. TAGM 3028 was used to identify contaminants posing potential direct ingestion hazards under a residential use scenario. The next step in the screening was used to identify contaminants posing potential direct ingestion hazards under a industrial/commercial use scenario.

As a result of the screening process under a residential use scenario, the following metals were retained for further evaluation: arsenic, berylluim, chromium and lead. There were no VOC exceedances at this screening step. Therefore, no VOCs were retained for further screening analysis. For the SVOCs, benzo(a)anthracene and benzo(a) pyrene were the only constituents retained for further screening analysis.

After the next step in screening, considering industrial/commercial use scenario, the only constituents retained for further screening analysis were the following metals: arsenic, chromium and lead. Values for arsenic exceeded comparison values for a number of soil samples. Concentrations of arsenic elevated above the comparison values does not appear to be related to solid waste management units in the B-329 area, but rather a site wide issue. The data suggests that regional background soil levels in the Rochester area for arsenic are commonly above the comparison values. This has been observed in other areas of Kodak Park and comparison areas located remote from Kodak Park. The maximum arsenic concentration at MIA-329 was 10 parts per million. Arsenic was not further evaluated as this level is within the typical background range for the area. Chromium and lead each had only one sample that exceeded its respective industrial/commercial comparison value. The lead sample location is from under an existing building (B-329) and is not accessible, so there is no complete exposure pathway. The chromium exceeded is also from under an existing building (B-349) and is not accessible, so there is no complete exposure pathway.

The conclusion of the screening level risk assessment for soils is that are no complete exposure pathways under current conditions. Although the facility is an active industrial site, buildings, related structures and pavement cover soils in the area of interest in MIA-329. In the future there is potential for worker exposure during excavation activities. Such exposures would be of limited duration and would rarely occur. The duration and frequency of exposure under current conditions and anticipated future conditions are very low.

The reasonably anticipated future use of MIA-329 is also industrial. This facility is listed in the registry of *Inactive Hazardous Waste Disposal Sites in New York State* that is published by the NYSDEC as Site Code 828082. The facility is also under federal hazardous waste management facility permit, and has applied for a NYSDEC 6NYCRR Part 373 hazardous waste management facility permit. Due to these circumstances, use of MIA-329 for purposes other than industrial are not expected or likely.

Even though the soils do not appear to pose an unacceptable risk via the direct contact/ingestion pathway, to reduce potential exposures to site soils, Kodak has recommended continued use of institutional controls. To limit potential exposure associated with subsurface excavations, Kodak has developed and implemented a soils excavation master plan. This plan imposes conditions, including health and safety provisions, that must be followed during the excavation and management of subsurface materials (soil) at the site.

Groundwater

Groundwater in the vicinity of MIA-329 is generally contaminated above New York State Groundwater Standards or other relevant comparison criteria, that are typically based on protection of drinking water quality. Reference values used for MIA-329 included NYSDEC TAGM 3028 "groundwater action levels" and NYSDEC TOGS 1.1.1 criteria for groundwater.

Groundwater at and in the vicinity of MIA-329 is not used as a drinking water source, due to

availability of publicly supplied water, and the generally low yield and hardness of the groundwater in this area. Therefore, there is no complete direct ingestion exposure pathway associated with the groundwater exceedances.

Kodak installed and has been operating a groundwater Migration Control System (MCS) for MIA-329 since 1995. Kodak also operated pumping wells near the B-329 courtyard contaminant source area prior to the installation of the MCS. Recent monitoring results have shown significant decreases in contaminant concentrations from levels observed historically. To help evaluate current conditions in the groundwater flow system, Kodak used a computer flow model to help understand flowpaths and fate of groundwater in the vicinity of MIA-329. This evaluation showed that although the MCS appears to be effective in containing the groundwater plume so it doesn't migrate or expand, some groundwater within the containment area may be infiltrating into a storm sewer that passes through the area, providing a potential mechanism for contaminants to migrate off-site. The storm sewer discharges to the west of MIA-329, to a surface water drainage system that connects with Paddy Hill Creek.

This potential exposure pathway was evaluated in the SLRA included in the MIA-329 CMS report, using a computer groundwater flow model. This assessment was subsequently revised in an addendum to the MIA-329 CMS that Kodak issued in response to NYSDEC comments. The model was used to estimate the rate of groundwater discharge into the storm sewer, and also to determine the portion of flow from the overburden and the bedrock zones. Even though recent groundwater quality results show significant decreases in contaminant concentrations, historic groundwater quality information for each flow zone was used to assign a conservative contaminant concentration to these flows and in turn provide a contaminant flux rate for the discharge into the storm sewer. This flux rate was used to calculate a concentration for the groundwater infiltrating into the storm sewer pipe and for the discharge into the to the drainage ditch. The effluent concentrations were then compared to NYSDEC ambient water quality criteria (per NYSDEC TOGS 1.1.1). This evaluation showed that iron, aluminum and silver were the only constituents potentially exceeding the comparison values for the infiltratging groundwater. The iron and aluminum are naturally occurring constituents in the area. Based on flow estimates for the drainage ditch upstream of the storm sewer discharge, mixing in the receiving water would reduce the iron and silver concentrations to levels below the surface water comparison values. Based on the modeled loading estimates, aluminum could marginally exceed the surface water comparison value (calculated concentration of 0.2 mg/l versus TOGS value of 0.1 mg/l). It should be noted that the data used for both aluminum and silver is biased towards the maximum historic value, a concentration that does not reflect current trend of significant decreases in concentrations. Taking this into consideration, it is unlikely that concentrations would be greater than the comparison values upon discharge into Paddy Hill Creek. In addition, it should be noted that Kodak has monitored silver at the outfall to Paddy Hill Creek as a requirement of storm water management permit. This testing has shown that the level of silver in this discharge has consistently been below the permit limit, which is based on the ambient water quality criteria.

The conclusion of the SLRA is that no unacceptable risks were identified, and no additional risk

management measures are needed for mitigative purposes. However, property use restrictions may be necessary to limit any future use of the site to industrial/commercial purposes. Also, to ensure the management of potential risk at MIA-329, the following actions need to be performed:

- Maintenance of the paved/covered surfaces in areas of I/C soil screening level exceedances to ensure that surface soils remain covered and not easily accessible;
- Continued monitoring of the storm sewer outflow to Paddy Hill Creek;
- Continued use and enforcement of institutional controls (soils management plan); and,
- Continued operation and maintenance of the B-329/349 groundwater MCS, area sewers, associated MIA-329 groundwater monitoring systems and implementation of appropriate property use restrictions.

Remedial Goals

With the nature and extent of site contamination characterized and the potential risks identified, remedial goals were established. The following goals have been identified:

1. Soils - Reduce exposure potential by utilizing the soils management plan (Excavation Master Plan II) for subsurface activities conducted in MIA-329 and by imposing property use notices so that future owners are aware past uses of this area, and restricting future use of this area as long as soils concentrations exceed residential use comparison values. Inspect and maintain paved/covered surfaces in areas of I/C screening level exceedances to ensure that surface soils remain covered and not easily accessible.

2. Groundwater -

   A. Control migration of contaminated groundwater to protect human health and the environment. This includes preventing the expansion of the contaminant plume in the upper flow zones, precluding off-site migration and exposure due to the groundwater plume.

   B. Continued groundwater quality testing within the plume to monitor potential impacts associated with groundwater discharging to the storm sewer. If groundwater concentrations increase above the values used in the SLRA, additional monitoring of the storm water for constituents of concern would be warranted. This monitoring could trigger additional actions to reduce groundwater discharge into the storm sewer.

   C. Long-term operation of the groundwater migration control system (MCS) to reduce the contaminant mass in MIA-329, and the eventual restoration of groundwater quality in this area. Since the implementation of the B329/349 MCS, groundwater contaminant concentrations have been reduced significantly. The MCS shall remain in operation until such time as Kodak can demonstrate to the Department's satisfaction that any residual contamination will not result in an

exceedance of the groundwater quality criteria at the point of exposure.

Remedial Actions to Date

Kodak has taken a number of actions to control groundwater contamination at MIA-329. These have included eliminating potential sources of contamination, such as the upgrade/replacement of tank-storage facilities, as well as collection and treatment of groundwater. In the 1990s, Kodak completed an upgrade of the storage tank facility at B-329 (9 underground storage tanks were addressed), located in the courtyard area on the south side of B-329, as part of the Storage Tank Improvement Program. Tank upgrades were also completed at B-349 (2 underground storage tanks were addressed). The tanks and associated piping were replaced by a new tank system, providing secondary containment of possible spills, including tank leak detection systems.

In the early 1980s Kodak installed and operated a groundwater recovery well near the B-329 courtyard. This overburden/top-of-rock interface pumping well initially recovered highly contaminated groundwater, but was not effective in controlling and containing the groundwater plume. In 1995, Kodak replaced this pumping well with the B329/349 MCS. The MCS consists of two fractured bedrock groundwater recovery trenches. Comparisons between the 1991/1992 results (Figure C-1) and 1998 results (Figure C-2) show significant reductions in top-of-rock contaminant concentrations, indicating that the interim measures that Kodak has taken have improved conditions in the MIA-329 area. For the top of rock zone, in 1991/1992, the maximum total VOC concentration was over 300 parts per million. For the 1998 data set, the maximum total VOC concentration was 0.412 parts per million, considerably lower than the level observed historically.

Evaluation of Alternatives

In the Corrective Measures Study two remedial alternatives were evaluated. Both included the same action for the soils. Alternative 1 included adoption of the existing interim corrective measures for groundwater as the final measure. Alternative 2 included the components of Alternative 1 with the addition of a groundwater extraction system in the B-329 courtyard area for removal of contaminant mass. Both alternatives provide comparable containment of the groundwater contamination. Alternative 2 would be expected to initially remove contaminant mass more rapidly than Alternative 1. However, over the long-term (30-year) contaminant mass removal for the two alternatives would not be expected to differ significantly. Alternative 2 would likely reduce potential impacts associated with discharge of contaminated groundwater to the storm sewer, by intercepting some contaminants before they could migrate towards the storm sewer. However, as discussed above, potential impacts associated with discharge of contaminated groundwater to the storm sewer under Alternative 1 are negligible. In comparing cost and expected benefit, Alternative 2 is substantially more costly than Alternative 1 (by a factor of 1.7) but does not provide a significantly different level of benefit in terms of protection of human health and the environment.

Summary of Proposed Corrective Action

For groundwater in the overburden/top-of-rock (upper) flow zones, the goal is prevention of offsite groundwater migration from MIA-329 (containment that precludes further expansion of the plume in this zone). This will be accomplished by active pumping from the B329/349 MCS and through passive infiltration of groundwater to the industrial sewer system. This will eliminate potential future risk to off-site residents associated with contaminant exposure from groundwater migration. It will also remove contaminant mass from the subsurface environment in MIA-329. This should eventually result in decreasing contaminant concentrations in the groundwater, although levels would be expected to remain above New York State groundwater criteria for an extended period of time.

The remedy will include a groundwater monitoring program to ensure that the implemented measures continue to meet their design objectives. This program will provide a means of identifying and correcting problems that may develop in the future, and will also provide future information about the potential for contaminated groundwater to discharge to the storm sewer. The program will also provide data that can be used to aid in the design of enhancements to the remedy that may be needed in the future. Based on the investigations, the primary need is to control the migration of contaminated groundwater. Facility upgrades that Kodak has implemented for the tank systems and transfer stations have reduced the potential for future releases to the environment in this area. Monitoring results indicate that the interim corrective measures have been providing effective control for the groundwater.

The actions for the groundwater will also address any potential contaminants leaching from soils, so the only exposure associated with soils that needs to be considered is direct contact/ingestion. These exposures will be controlled through periodic inspection and maintenance of soil cover in areas where industrial/commercial screening criteria were exceeded, and through use of an approved soils management plan (Excavation Master Plan II) that specifies the procedures and controls, including health and safety requirements, that must be followed when conducting excavation activities within Kodak Park. The excavation plan specifies routine procedures designed to minimize potential exposures associated with soil excavation activities. The proposed remedy was selected with the understanding that the area is in industrial use, and that the reasonably anticipated future use of this area is also industrial. To ensure this, property use restrictions will be placed on the MIA-329 investigation area.

The proposed remedy for MIA-329 includes:

- continued operation of the existing B329/349 groundwater MCS. This system includes two "trenches", linear zones in the bedrock, where the rock has been purposefully fractured to enhance the collection of groundwater. The trenches extend approximately 25 feet into the upper bedrock, and are each equipped with a single pumping well. The trench north of B-329 is approximately 200 feet long and is oriented east-west. The other trench located to the east of B-329 is approximately 150 feet long and is oriented north-south. Groundwater is discharged to the industrial sewer for treatment at Kodak's Kings Landing Wastewater Purification Plant (KLWPP), located next to the Genesee River in KPE.

- a groundwater monitoring program to assess the effectiveness of the remedy.

- an operation and maintenance plan for the groundwater recovery systems. This plan specifies routine monitoring, maintenance, and reporting requirements to ensure that the systems continue to operate as designed.

- an inspection and maintenance plan for paved/covered surfaces in areas of industrial/commercial soil screening level exceedances to ensure that surface soils remain covered and not easily accessible.

- administrative controls to address potential exposure to contaminated soils/groundwater and limiting MIA-329 to commercial/industrial use.

The remedy that the Department is proposing be implemented for MIA-329, is also the alternative that was recommended in the Corrective Measures Study Report that Kodak submitted. This report and related environmental investigation reports are available for review at the NYSDEC Region 8 office located in Avon and at the Kodak Park Neighborhood Information Center located in Rochester.

Evaluation of the Proposed Remedy

The proposed remedy was evaluated by the NYSDEC for technical feasibility, implementability, and short-term and long-term effectiveness with respect to the remedial goals identified above. The proposed remedy is technically feasible, relies on routinely available equipment and engineering practices and has to a substantial degree already been implemented and shown to be effective in the MIA-329 area, through implementation of interim corrective measures. Key elements of the MCS have been in operation since 1995. Performance monitoring has demonstrated the MCS's ability to contain and control groundwater in the MIA-329 area. The operational history for the MCS has shown it to be reliable, with very few incidents requiring extended shutdowns.

The total 30-year costs for the proposed remedy are estimated to be $1.4 million (net present value cost @ 5% is approximately $746,000). The Corrective Measures Study provides a breakdown of these costs. Since the groundwater MCSs have already been constructed, capital costs associated with initial construction were not included in the estimate.

The NYSDEC has determined that the proposed remedy satisfies the selection criteria and recommends that this remedy be implemented as the final corrective measure for MIA-329. The proposed remedy adequately addresses potential threats to the environment and human health, associated with MIA-329. It has also been demonstrated to be an effective, reliable remedy based on operating records for the interim corrective measures.

Public Participation

NYSDEC solicits public comment on the proposed action before making a final determination about selection of a remedy for MIA-329. The NYSDEC will issue a responsiveness summary if comments are received during the comment period.

Documents about the proposed remedy selection have also been placed in local document repositories. Copies of this Statement of Basis, the Fact Sheet, the RFI Report, the Corrective Measures Study were made available for public review.

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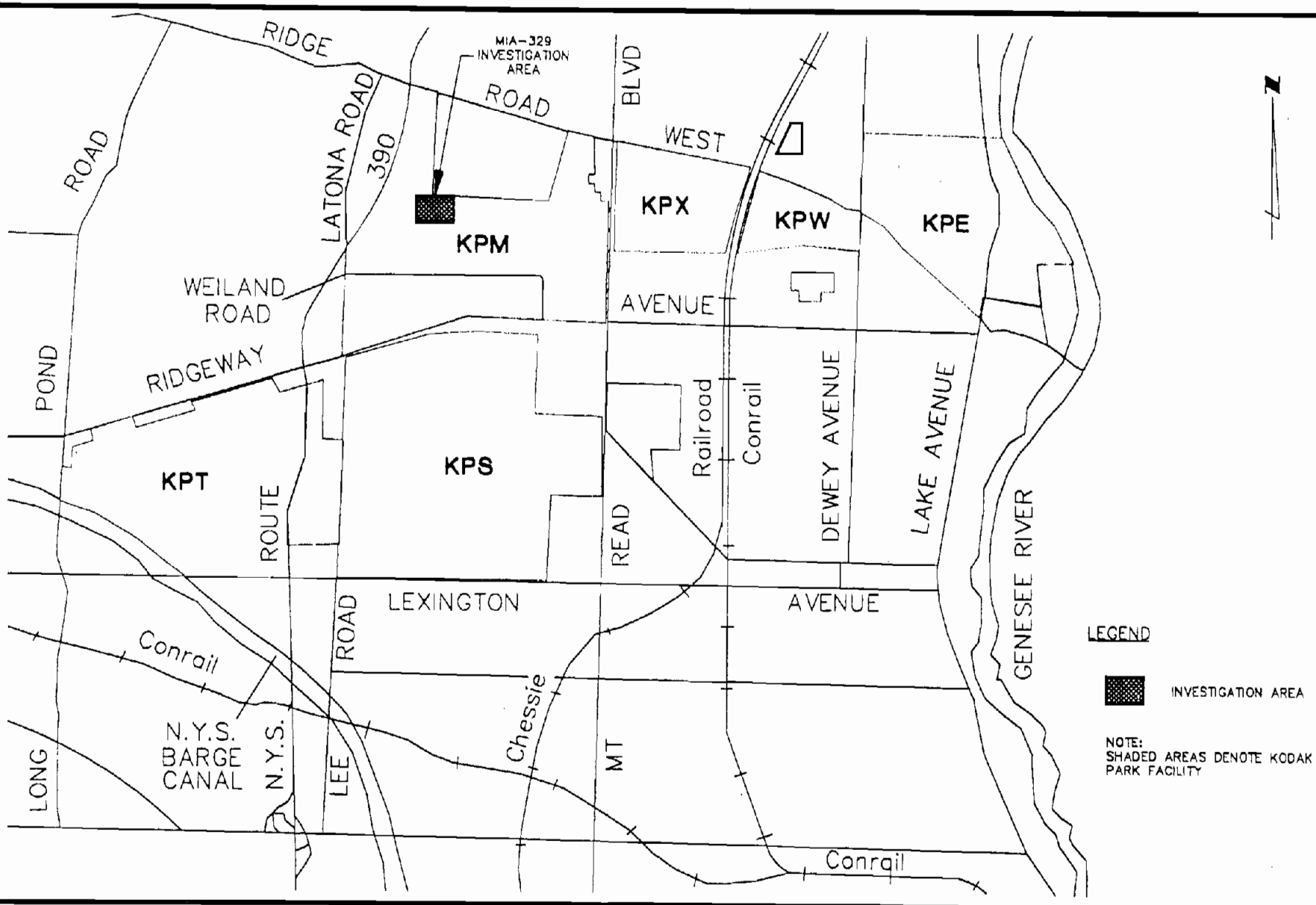
file: lmt\kpm\draft MIA-329 statement of basis December 2002.wpd

TABLE 1*
SWMU DESCRIPTION SUMMARY
MIA-329 CMS
KODAK PARK, ROCHESTER, NEW YORK

Unit ID	Building	Unit Type	Status
M-107	329	Lugger Pad w/Catch Tank	□
M-108	329	Marshaling Area	□
M-109	329	Silver Recovery Unit	□
M-110	Sewer	Tank Trap (Removed)	■
M-111	329	Storage Tanks	■
M-121	349	Marshaling Area	□
M-122	349	Trap Tank	□
M-145	329	Sump	■
M-150	329	Nine USTs (Removed)	■
M-155	349	Two USTs (Removed)	□
M-157	329	Release Site	■
M-182	349	Marshaling Area	□
M-193	349	Release Site	■
M-199	329	Release Site	□
M-200	329	Release Site	■
M-238	329	Release Site	■
M-239	Sewer	Release Site	□
M-240	349	Release Site	■

Key:

■ Further Action
□ No Further Action
* Modified from Kodak MIA-329 RCRA Facility Investigation Report Table 1-1, Blasland, Bouck & Lee, 1998



CLIENT/PROJECT

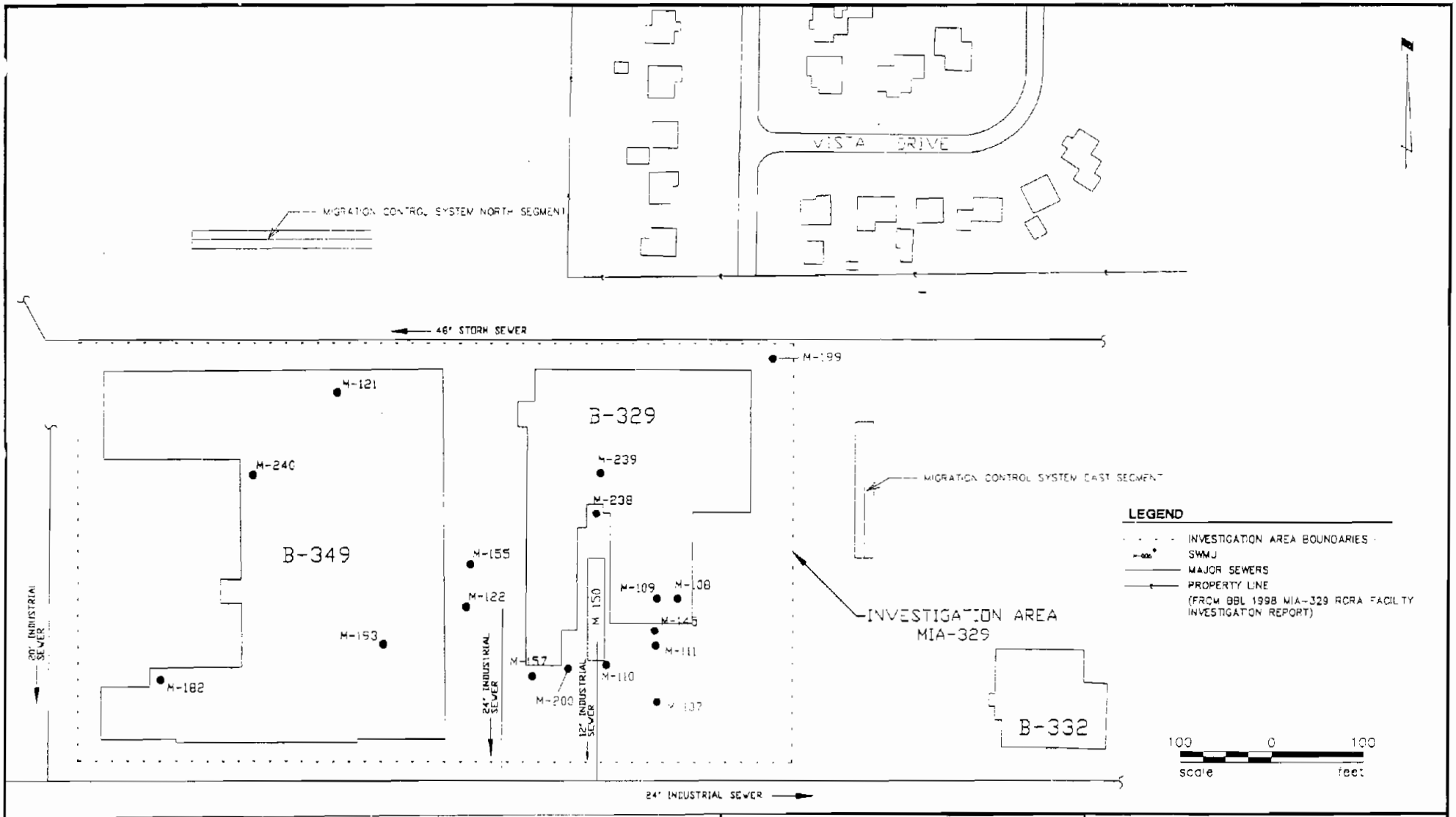
EASTMAN KODAK COMPANY
KODAK PARK HSE DIVISION
GROUNDWATER QUALITY SECTION

Golder Associates Buffalo, New York

TITLE

MIA-329
CORRECTIVE MEASURES STUDY
SITE LOCATION MAP

DRAWN	CHECKED	REVIEWED	DATE	SCALE	FILE NO.	JOB NO.	DWG NO.	FIGURE
BEC	DJM	DJM	1/18/00	NA	993-9224	993-9224	KOD019	1

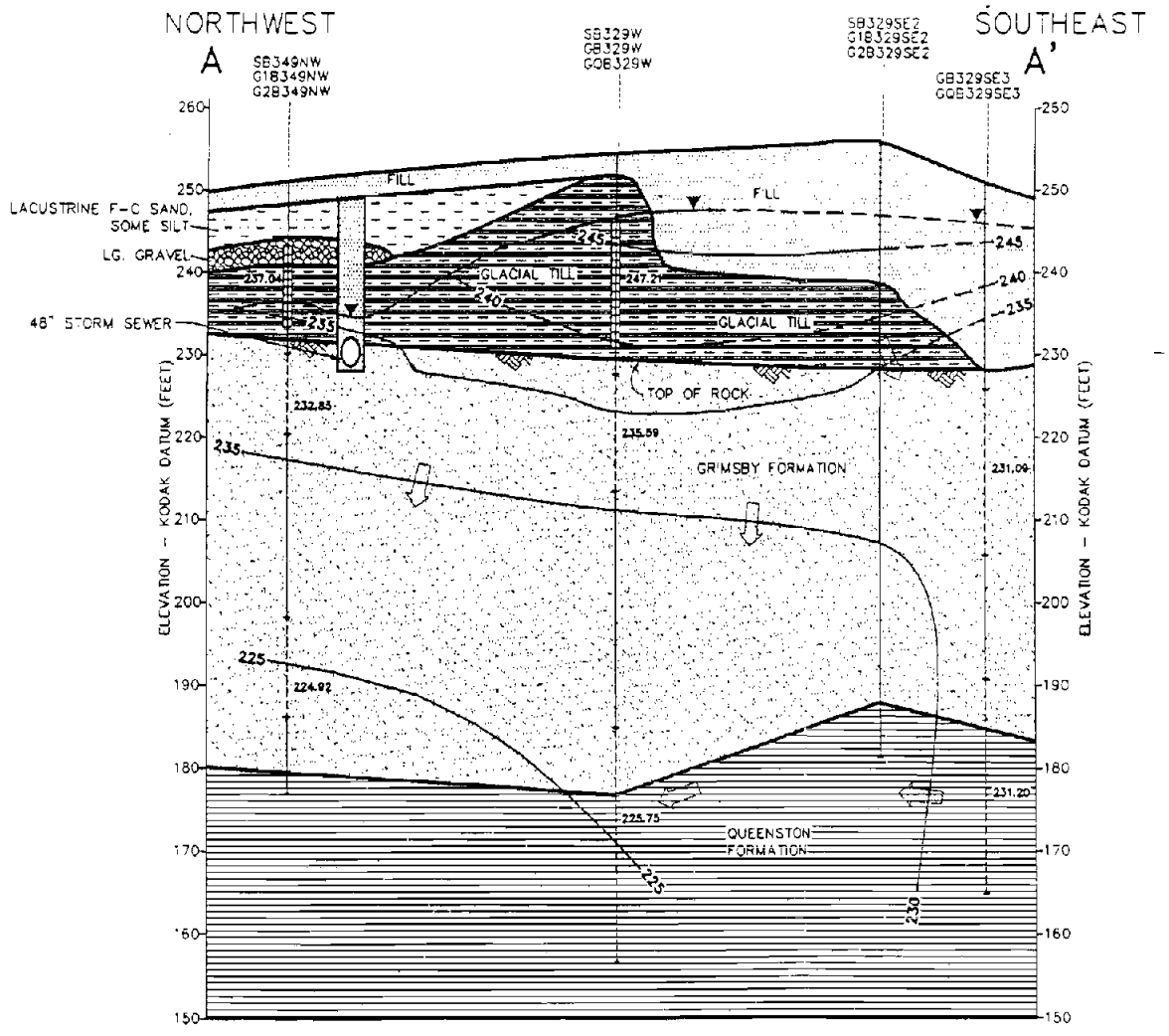


Golder Associates Buffalo, New York

CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

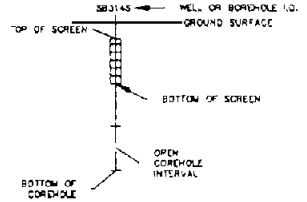
TITLE: INVESTIGATION AREA LOCATION MAP

DRAWN	LPG	DATE 2/2/00	JOB NO. 993-9224
CHECKED	DCW	SCALE AS SHOWN	DWG. NO. KOD-018
REVIEWED	DJM	FILE NO. 993-9224	FIGURE No. 2

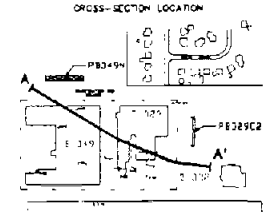


LEGEND

- 230 — GROUNDWATER ELEVATION IN FEET (KODAK DATUM)
- 238.03 GROUNDWATER ELEVATION IN FEET (KODAK DATUM)
- ▼ WATER TABLE
- GROUNDWATER FLOW DIRECTION
- FILL MATERIAL
- SAND AND SILT (LACUSTRINE)
- GRAVEL
- GLACIAL TILL
- SANDSTONE
- SHALE



CROSS-SECTION LOCATION



(FROM BBL 1998 MIA-326 RCRA FACILITY INVESTIGATION REPORT)

150 0 150
scale feet

VERTICAL EXAGGERATION 10:1

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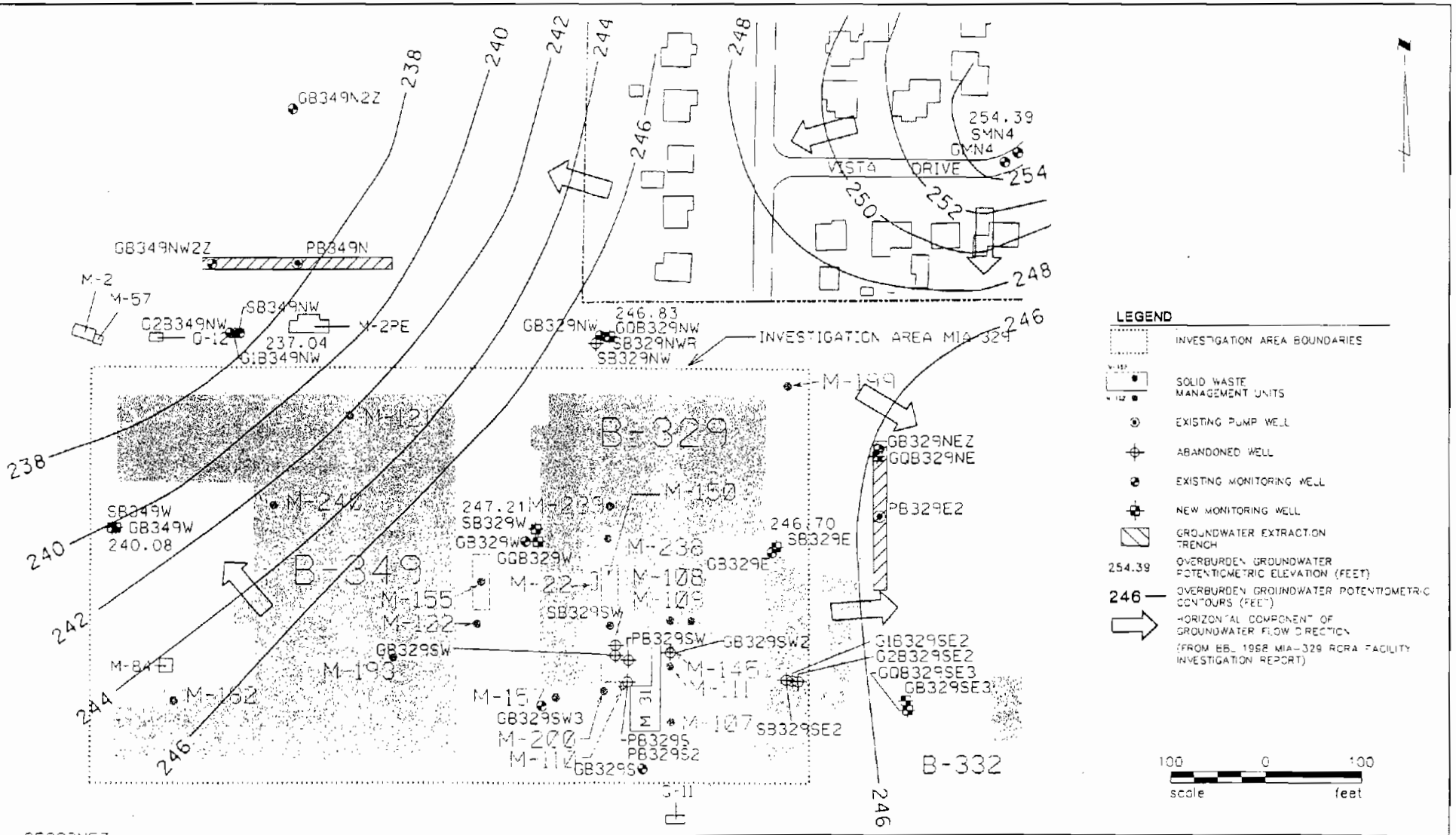
CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

TITLE: GEOLOGIC CROSS-SECTION OF MIA-329

DRAWN: LPG	DATE: 2/1/00	JOB NO.: 993-9224	
CHECKED: DCW	SCALE: AS SHOWN	DWG. NO.: KOD-014	
REVIEWED: DJM	FILE NO.: 993-9224	FIGURE NO.: 3	



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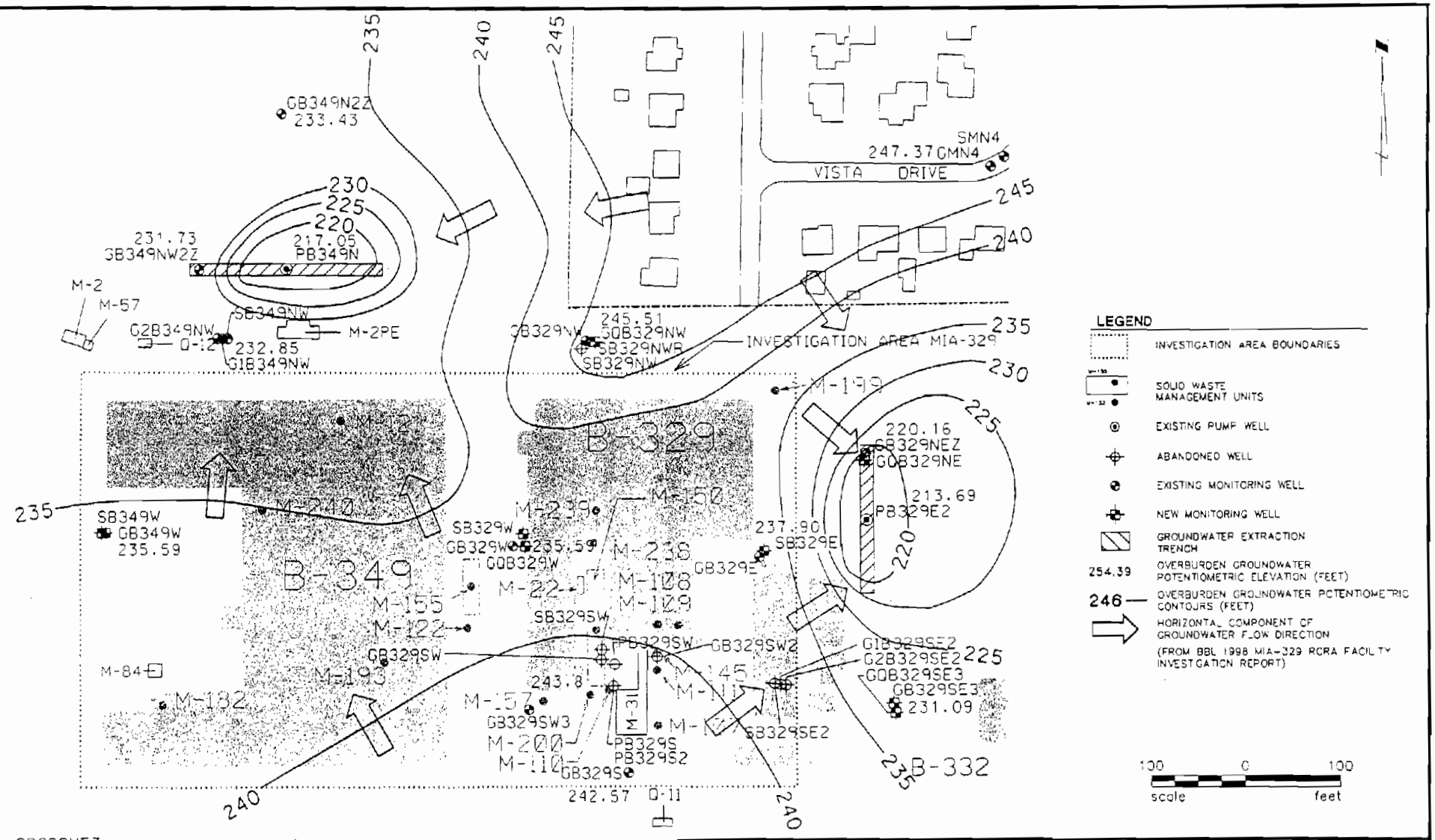
CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

TITLE: OVERBURDEN GROUNDWATER CONTOUR MAP APRIL 29-30, 1998

DRAWN	LPG	DATE 2/1/00	JOB NO. 993-9224
CHECKED	DCW	SCALE AS SHOWN	DWG NO. KOD-015
REVIEWED	DJM	FILE NO 993-9224	FIGURE NO. 4



LEGEND

- INVESTIGATION AREA BOUNDARIES
- SOLID WASTE MANAGEMENT UNITS
- EXISTING PUMP WELL
- ABANDONED WELL
- EXISTING MONITORING WELL
- NEW MONITORING WELL
- GROUNDWATER EXTRACTION TRENCH
- 254.39 — OVERBURDEN GROUNDWATER POTENTIOMETRIC ELEVATION (FEET)
- 246 — OVERBURDEN GROUNDWATER POTENTIOMETRIC CONTOURS (FEET)
- HORIZONTAL COMPONENT OF GROUNDWATER FLOW DIRECTION (FROM BBL 1998 MIA-329 RCRA FACILITY INVESTIGATION REPORT)

100 0 100
scale feet

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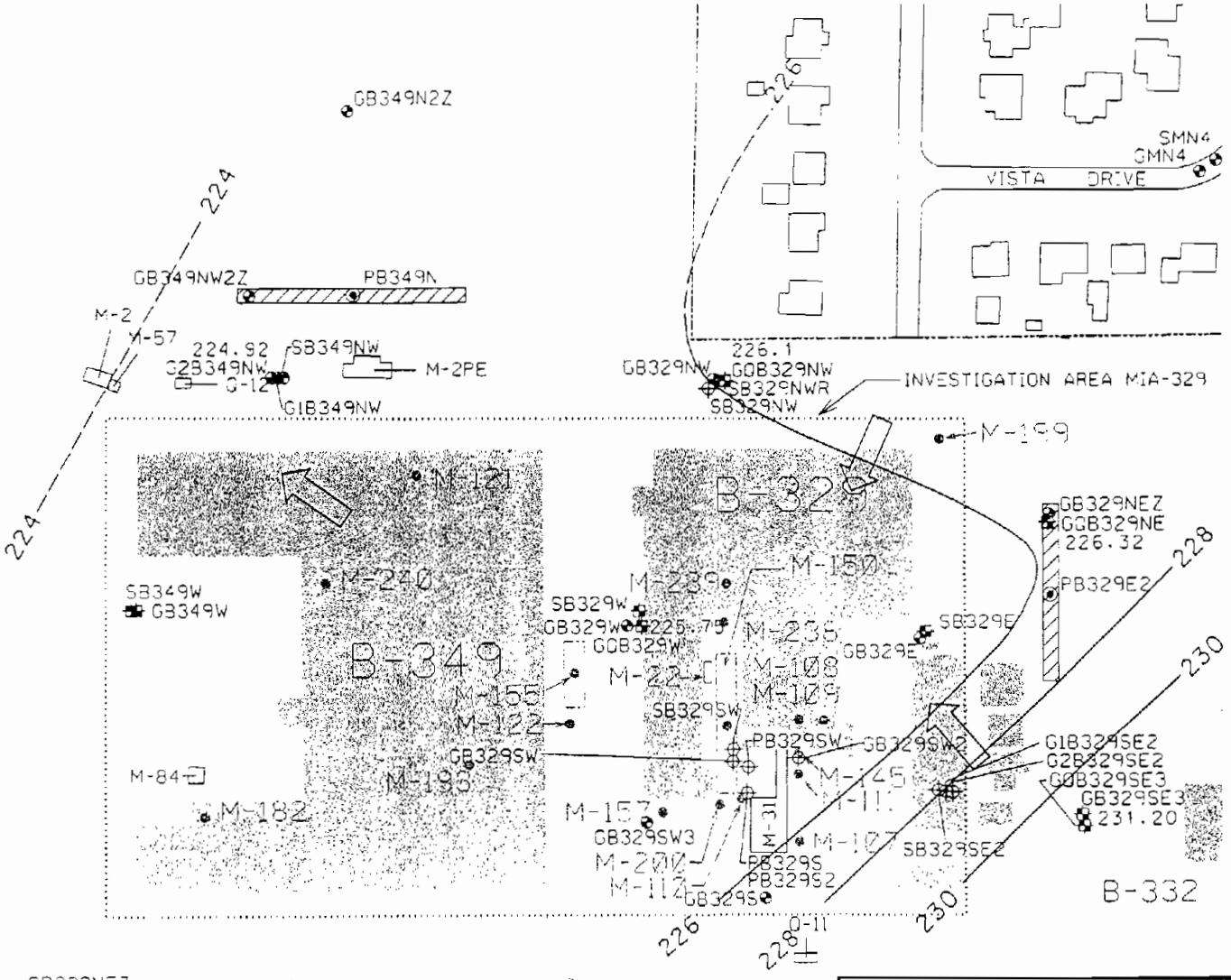
CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

TITLE: TOP-OF-ROCK GROUNDWATER POTENTIOMETRIC CONTOUR MAP APRIL 29-30, 1998

DRAWN: LPG	DATE: 2/1/00	JOB NO.: 993-9224
CHECKED: DCW	SCALE: AS SHOWN	DWG. NO.: KOD-016
REVIEWED: DJM	FILE NO.: 993-9224	FIGURE NO.: 5



LEGEND

- INVESTIGATION AREA BOUNDARIES
- SOLID WASTE MANAGEMENT UNITS
- EXISTING PUMP WELL
- ABANDONED WELL
- EXISTING MONITORING WELL
- NEW MONITORING WELL
- GROUNDWATER EXTRACTION TRENCH
- 254.39 — OVERBURDEN GROUNDWATER POTENTIOMETRIC ELEVATION (FEET)
- 246 — OVERBURDEN GROUNDWATER POTENTIOMETRIC CONTOURS (FEET)
- HORIZONTAL COMPONENT OF GROUNDWATER FLOW DIRECTION (FROM B&L 1998 MIA-329 RCRA FACILITY INVESTIGATION REPORT)

100 0 100
scale feet

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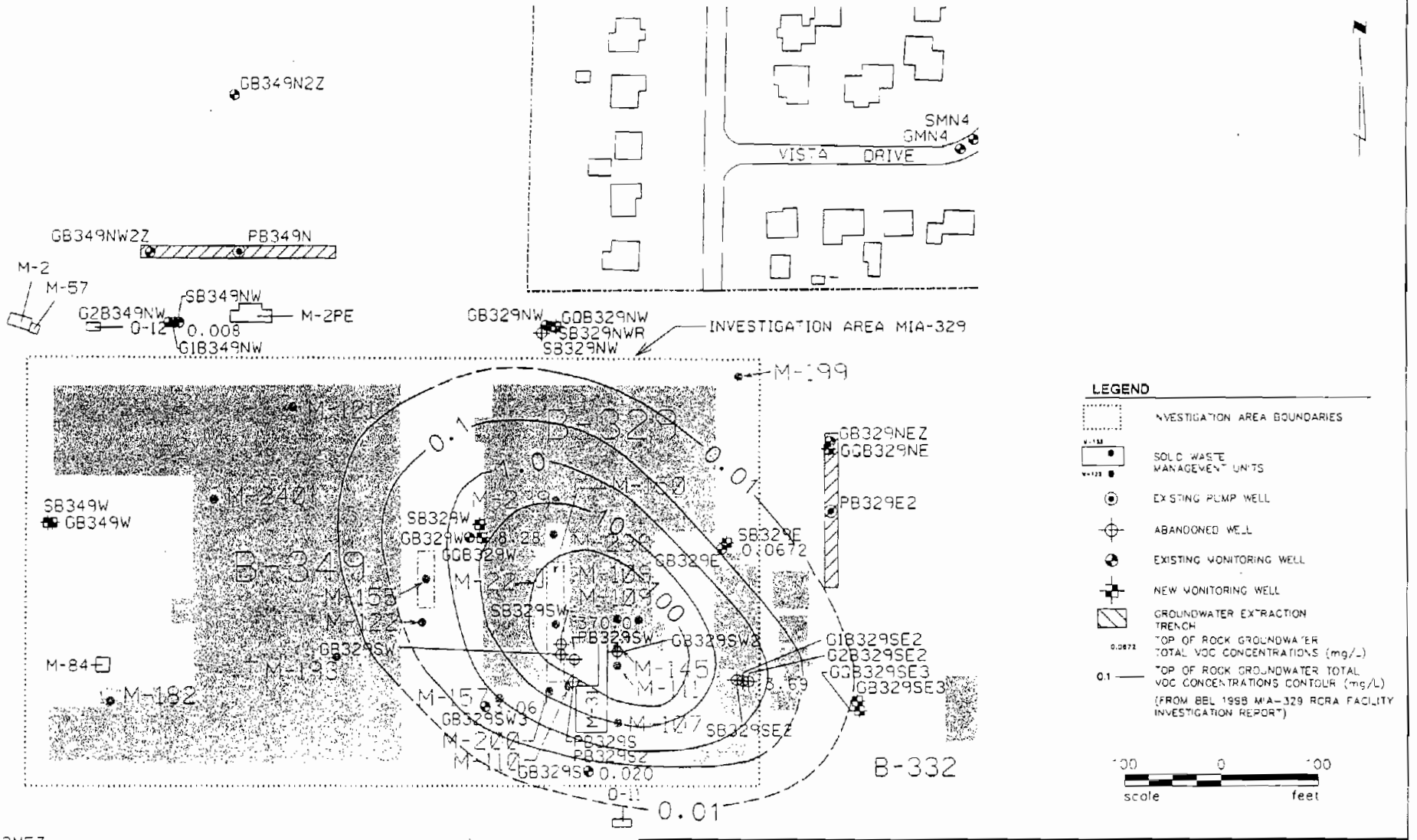
CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

TITLE: GRIMSBY-QUEENSTON GROUNDWATER POTENTIOMETRIC CONTOUR MAP APRIL 29-30, 1998

DRAWN: LPG	DATE: 2/1/00	JOB NO: 993-9224	
CHECKED: DCW	SCALE: AS SHOWN	DWG. NO.: KOD-017	
REVIEWED: DJM	FILE NO: 993-9224	FIGURE NO.: 6	



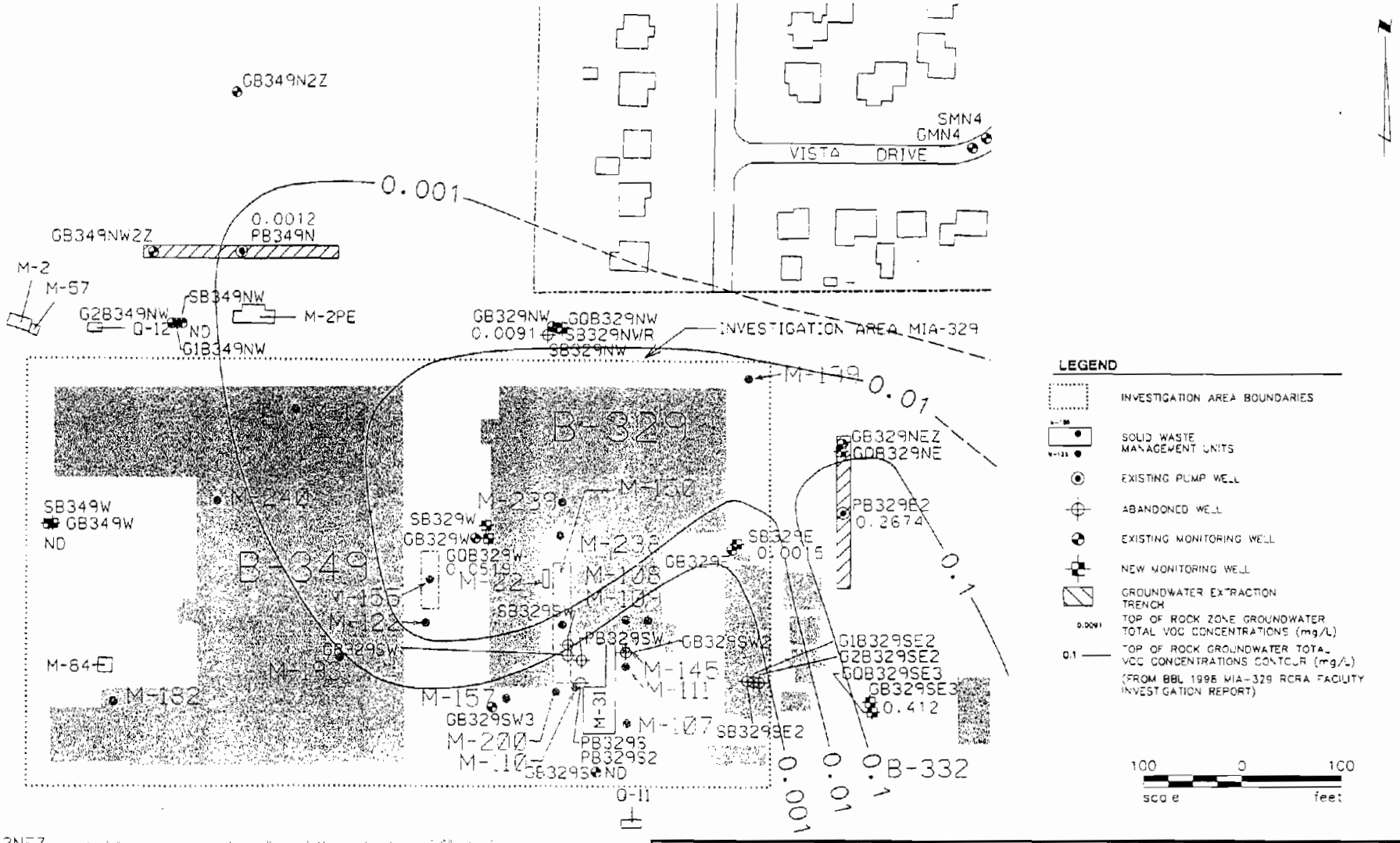
Golder Associates Buffalo, New York

TITLE: TOP-OF-ROCK GROUNDWATER QUALITY TOTAL VOC CONCENTRATIONS 1991/1992

CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

DRAWN	LPG	DATE 2/8/00	JOB NO. 993-9224
CHECKED	DCW	SCALE AS SHOWN	DWG. NO. KOD-020
REVIEWED	DJM	FILE NO. 993-9224	

Figure 7



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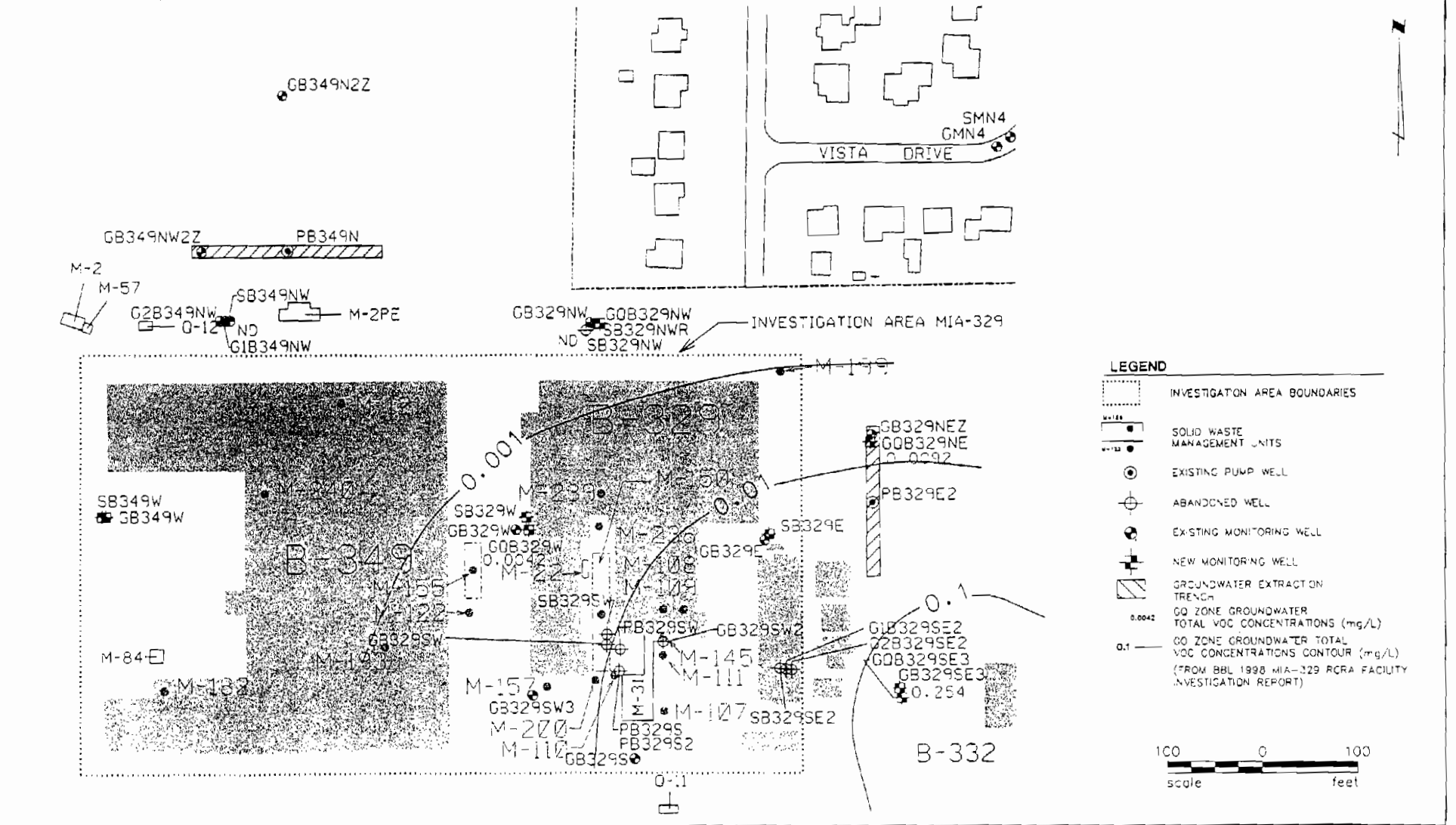
CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

TITLE: TOP-OF-ROCK GROUNDWATER QUALITY TOTAL VOC CONCENTRATIONS APRIL 1998

DRAWN	LPG	DATE	2/8/00
CHECKED	DCW	SCALE	AS SHOWN
REVIEWED	DJM	FILE NO.	993-9224
JOB NO.	993-9224	DWG. NO.	KOD-021

Figure 8



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CLIENT/PROJECT: MIA-329 CORRECTIVE MEASURES STUDY
KODAK PARK CORRECTIVE ACTION PROGRAM
EASTMAN KODAK COMPANY
ROCHESTER, NEW YORK

TITLE: GQ ZONE GROUNDWATER QUALITY
TOTAL VOC CONCENTRATIONS APRIL 1998

DRAWN	LPG	DATE 2/8/00	JOB NO. 993-9224
CHECKED	DCW	SCALE AS SHOWN	DWG. NO. KOD-022
REVIEWED	DJM	FILE NO. 993-9224	

Figure 9