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Bureau of Hazardous Waste &
Radiation Management
Division of Solid & Hazardous Materials

 **NPEC Inc.** 3800 Dewey Avenue, #317 • Rochester, NY 14616-2579

September 5, 2008

Regional Air Engineer
New York State Department of Environmental Conservation
Region 8 Office
6274 East Avon-Lima Rd.
Avon, NY 14414

Director, Bureau of Hazardous Waste and Radiation Management
Division of Solid & Hazardous Materials
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7258

**Re: Hazardous Waste Management Facility Part 373 Permit for Kodak Park
DEC Permit No. 8-2614-00205/00104; Eastman Kodak Company, Kodak
Park Corrective Action Program – Report on Investigation Area
XIA-202/208 Corrective Measures Implementation Plan**

Gentlemen,

Please find attached the report on “Investigation Area XIA-202/208 Corrective Measures Implementation Plan; Kodak Park, Rochester, New York”. The report is being submitted as a requirement of the Corrective Action Module within Kodak Park’s Part 373 Hazardous Waste Management Facility Permit. The report describes the implementation of the NYSDEC approved Final Corrective Measures for the XIA-202/208 investigation area.

Should you have any questions regarding the attached report, please contact me at 585-588-2117.

Very truly yours,


Quantum Management Group, Inc.

Attachment

INVESTIGATION AREA XIA-202 / 208
CORRECTIVE MEASURES IMPLEMENTATION PLAN

Kodak Park
Rochester, NY

September 2008

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



David P. Stoklosa
Director - Kodak Rochester Facilities
Eastman Kodak Company

9/5/08
Date

**INVESTIGATION AREA XIA-202 / 208
CORRECTIVE MEASURES
IMPLEMENTATION PLAN
KODAK PARK
ROCHESTER, NEW YORK**

Submitted by:

*Eastman Kodak Company
Building 56, 5th Floor, Kodak Park
1669 Lake Avenue
Rochester, New York 14652-6259*

September 2008

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1.0 INTRODUCTION

This document presents the Corrective Measures Implementation (CMI) Plan for Kodak Park Investigation Area XIA-202/208. This report is submitted as part of Eastman Kodak Company's (Kodak's) Resource Conservation and Recovery Act (RCRA) Corrective Action program for individual solid waste management units (SWMUs) and groups of SWMUs (termed Investigation Areas) within Kodak Park and as a requirement of Kodak Park's NYCRR Part 373 Hazardous Waste Management Facility Permit #8-2614-00205/10104.

XIA-202/208, shown on Figure 1, has been the subject of a RCRA Facility Investigation (RFI) (Golder 2002) and a Corrective Measures Study (CMS) (Golder 2004). In October 2006, the NYSDEC issued a Statement of Basis (NYSDEC 2006), based on the CMS Report, for the selection of the final remedy for soils and groundwater in XIA-202/208. This CMI Plan presents the plan for implementation of this selected remedy.

2.0 XIA-202 / 208 FINAL CORRECTIVE MEASURES

Based on the evaluations presented in the XIA-202/208 CMS Report, the final corrective measures selected in NYSDEC's Statement of Basis for XIA-202/208 are to maintain existing conditions, and provide additional protection from exposure to surficial soil in areas of screening level exceedences. These corrective measures involve the following existing or additional activities within XIA-202/208:

- Reliance on the existing XIA-202/208 area sewer systems to provide hydraulic control of contaminated groundwater;
- Groundwater and storm water quality monitoring in XIA-202/208 to assess the effectiveness of the corrective measures (remedy);
- Placement of a protective soil cover in areas identified as having surficial soil screening level exceedences to prevent exposure to contaminated soil (engineering control);
- Maintenance of existing asphalt soil covers in other portions of XIA-202/208 (engineering control);
- Administrative / institutional controls applied to XIA-202/208 to address potential exposure to contaminated soil and groundwater, including:
 - Site access restrictions
 - Site-use limitation to commercial / industrial activities, using deed restriction or similar measure
 - Inspection and maintenance plans for protective soil cover systems
 - Restrictions preventing future use of groundwater for potable water
 - Vapor intrusion assessment (to indoor air) for new construction or change in use of existing structures
 - Implementation of Kodak Park Excavation Master Plan II and related project-specific health & safety protocols, and
- Annual certification that the administrative / institutional and engineering controls are in place and remain effective.

Each of the components which comprise the final corrective measures is currently being implemented as part of Kodak's routine operational practices. The components of this remedy will continue to be implemented/maintained for a presumed corrective action performance monitoring period of 30 years.

3.0 IMPLEMENTATION OF XIA-202/208 FINAL CORRECTIVE MEASURES

The following sections describe the implementation of the final corrective measures for the XIA-202/208 investigation area.

3.1 XIA-202 / 208 Area Sewer Systems

XIA-202/208 contains a network of sewer lines that are in operation. This network of sewer lines indirectly serves as a groundwater capture mechanism as groundwater infiltration occurs into these structures. Kodak will continue to utilize these sewers as part of the final remedy.

3.2 Groundwater and Storm Water Quality Monitoring

As part of Kodak's corrective action requirements, the Kodak Park Groundwater Sampling and Analysis Plan (KPGSAP, Kodak 2002) was developed to monitor subsurface conditions at Kodak Park. Implementation of the corrective measures for XIA-202/208 will include a continuation of groundwater quality monitoring for wells currently monitored under the KPGSAP within KPX and in the vicinity of XIA-202/208 (Figure 2). Water quality monitoring of the 48-inch storm sewer underlying a portion of XIA-202/208, will also be conducted according to the respective KPGSAP element. Reporting, sampling frequency, and analytes are as specified in the KPGSAP.

3.3 Placement of Protective Soil Covers

Protective soil cover systems have been installed to prevent exposure to contaminated soil in two areas of XIA-202/208 identified as having surficial soil screening level exceedences. Both cover systems include a geotextile fabric marker layer, overlain by a minimum of 12 inches of clean soil, 6 inches of topsoil, and a vegetated surface. The cover systems were constructed according to design plans previously submitted to NYSDEC (Kodak 2005, and Kodak 2007). The installed cover areas are identified in Figure 3.

3.4 Administrative / Institutional Controls

The following administrative / institutional controls will be implemented as part of the XIA-202/208 corrective measures.

3.4.1 Site Access Restrictions

XIA-202/208 is located within the Kodak Park security perimeter. Access to this area is limited by fencing and controlled access points. Only Kodak-authorized personnel are allowed within this area.

3.4.2 Property Use Restrictions

A "Notice of Contaminated Site" has been filed for a portion of the KPX Section of Kodak Park within the Monroe County Clerk's Office in the Liber of Deeds of Monroe County, New York. The notice encompasses the XIA-202/208 Investigation Area and acknowledges that residual soil and groundwater contamination remains on the property, and that the NYSDEC has determined that the property is suitable for, and is restricted to, use for commercial and/or industrial purposes until adequate remediation has been completed as approved by the NYSDEC. The Notice of Contaminated Site is provided as Appendix A.

3.4.3 Controls for Soils – EMP II, Health & Safety Plans (HASPs), and Protective Covers

Kodak's current Excavation Master Plan II (EMP II, Kodak 1999) provides guidance for addressing health, safety, and environmental concerns for routine soil excavation activities within Kodak Park. The soil excavation activities covered in the EMP II include routine excavations and corrective action projects. Routine excavations are defined in the EMP II as maintenance, repairs, facility upgrades and construction projects where soil is excavated. Under the XIA-202/208 CMI, the EMP II will continue to set forth the approach and decision-making criteria Kodak will use to excavate, backfill, transport, redistribute, characterize, treat, and store excavated material resulting from those activities.

In addition, project-specific HASPs will be developed for appropriate excavation activities in XIA-202/208. The HASPs will consider potential soil and contaminant exposure risk and detail protective measures for project personnel.

The protective soil cover areas for the investigation area (pre-existing and installed as part of the XIA-202/208 remedy) will be annually inspected to assess the cover integrity. The cover areas will be considered as being compromised if there are

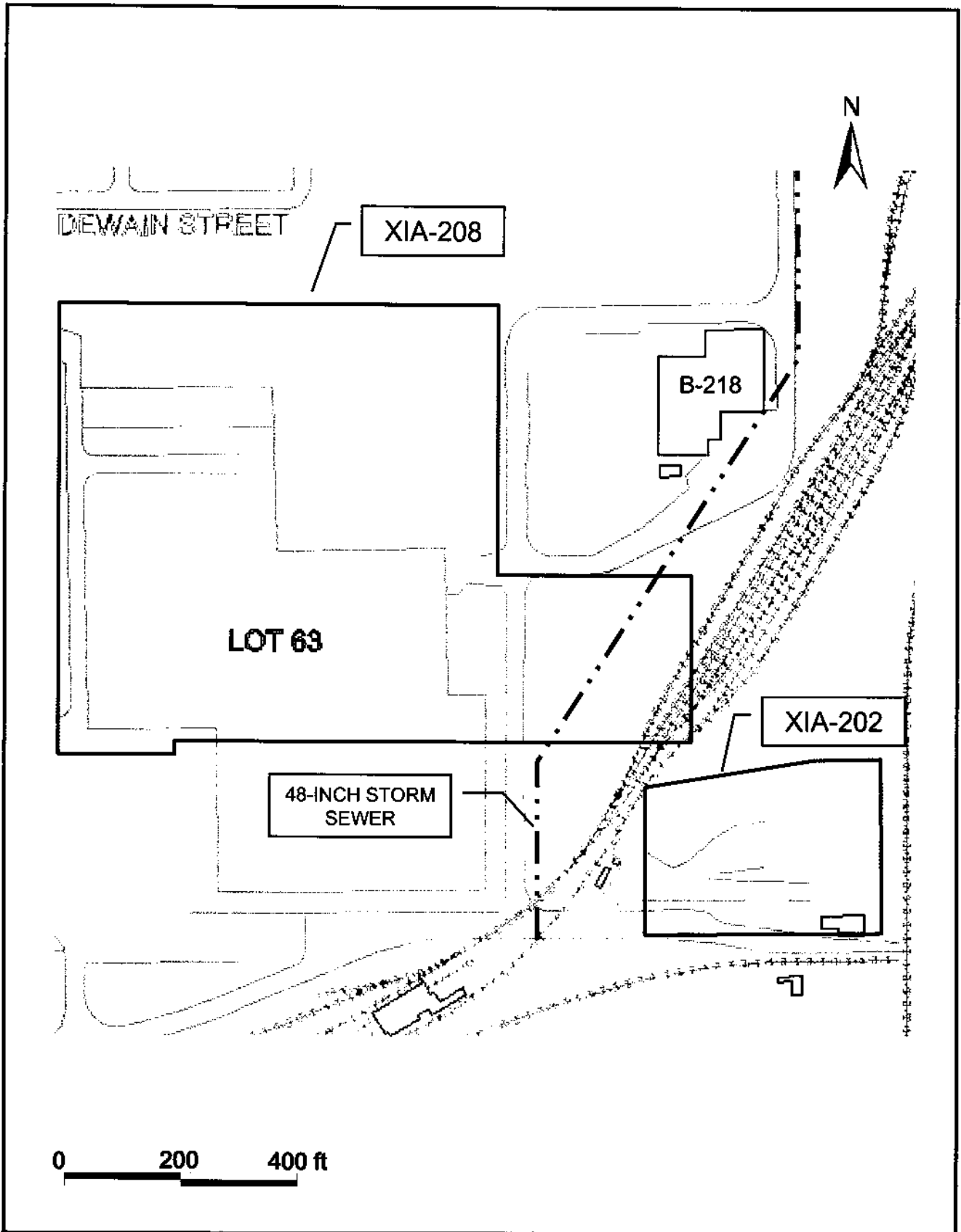
3.5 Implementation and Reporting

Each of the components which comprise the final corrective measures is currently being implemented as part of Kodak's routine operational practices. Semi-annual reports are prepared and submitted to the NYSDEC regarding groundwater monitoring under KPGSAP and groundwater remediation systems operation. Activities monitored under EMP II are reported annually in a summary report to the NYSDEC. Additionally, Kodak submits an annual summary report that documents (along with other items) site-wide groundwater monitoring, groundwater remediation system operation, deed notifications, and protective soil cover system maintenance. This annual document submittal also provides certification by Kodak that administrative / institutional controls are in-place and continue to be effective.

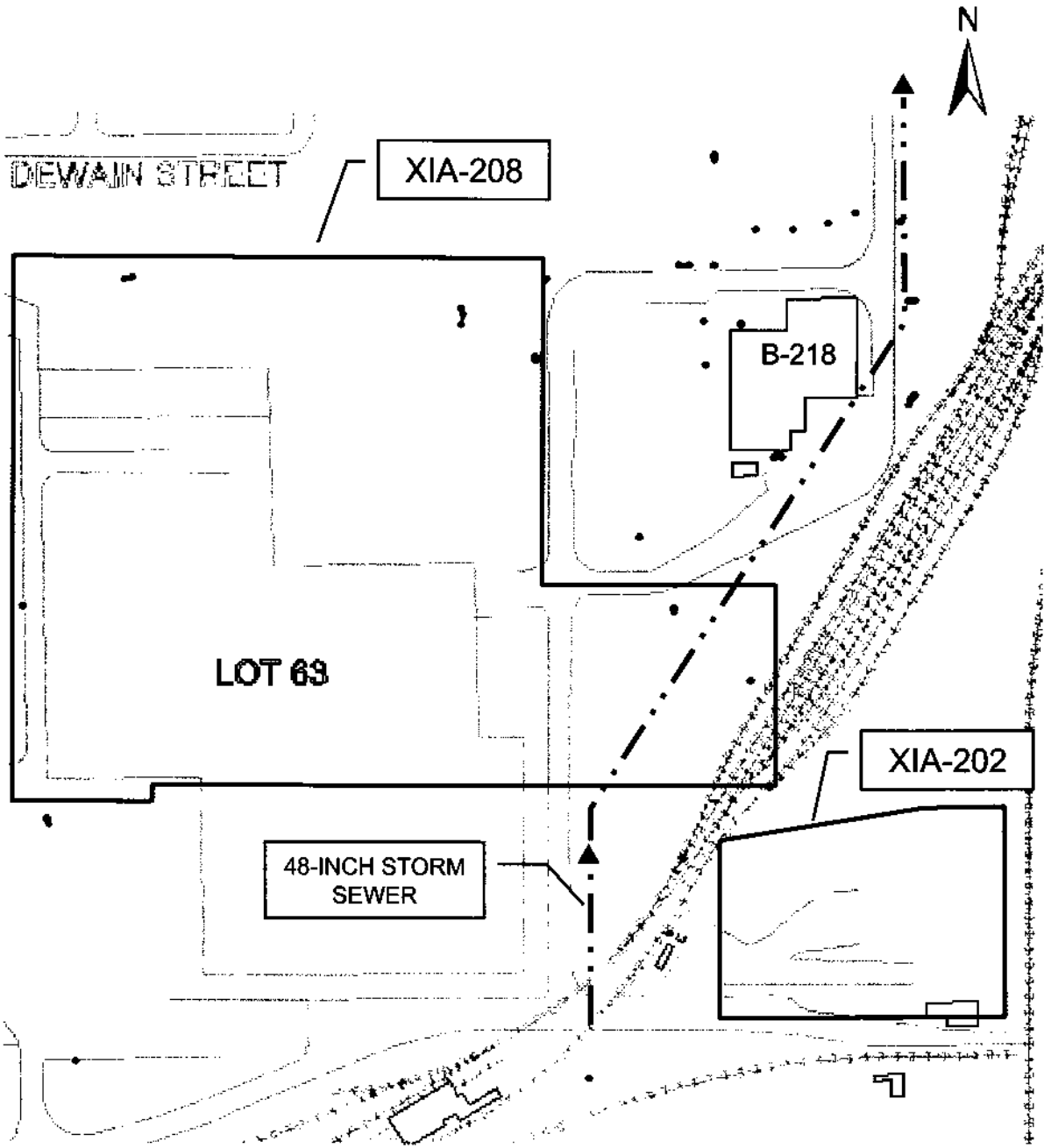
4.0 REFERENCES

- Eastman Kodak Company, 1999, "Excavation Master Plan II, Kodak Park Facility, Eastman Kodak Company, Rochester, New York, Revised, June 1999".
- Eastman Kodak Company, 2002, "Kodak Park Groundwater Sampling and Analysis Plan, Eastman Kodak Company, Kodak Park Facility, Rochester, New York, Revised January 2002".
- Eastman Kodak Company, 2005, "Addendum to Kodak Park Investigation Area XIA-202/208 Corrective Measures Study; Proposed Remedial Alternative 7 – Maintain Existing Hydraulic Controls/Protective Soil Cover System of Former B-208 Salvage Yard/Protective Asphalt Covering of Current 90-Day Storage Area".
- Eastman Kodak Company, 2007, "Kodak Park Investigation Area XIA-202/208 - Corrective Measures Implementation Design Package for SWMU X-071 (90-Day Bulk Storage Area)".
- Golder Associates Inc., 2002, "XIA-202/208 RCRA Facility Investigation Report, Kodak Park Corrective Action Program, Eastman Kodak Company, Rochester, New York".
- Golder Associates Inc., 2004, "XIA-202/208 Corrective Measures Study Report, Kodak Park Corrective Action Program, Eastman Kodak Company, Rochester, New York".
- NYSDEC, Division of Solid and Hazardous Materials, 2006, "Statement of Basis for Corrective Measures Selection Investigation Areas MIA-308, MIA-317, MIA-333, XIA-202/208 and SE-KPE, Kodak Park - Rochester New York, Monroe County", October 27, 2006.

FIGURES



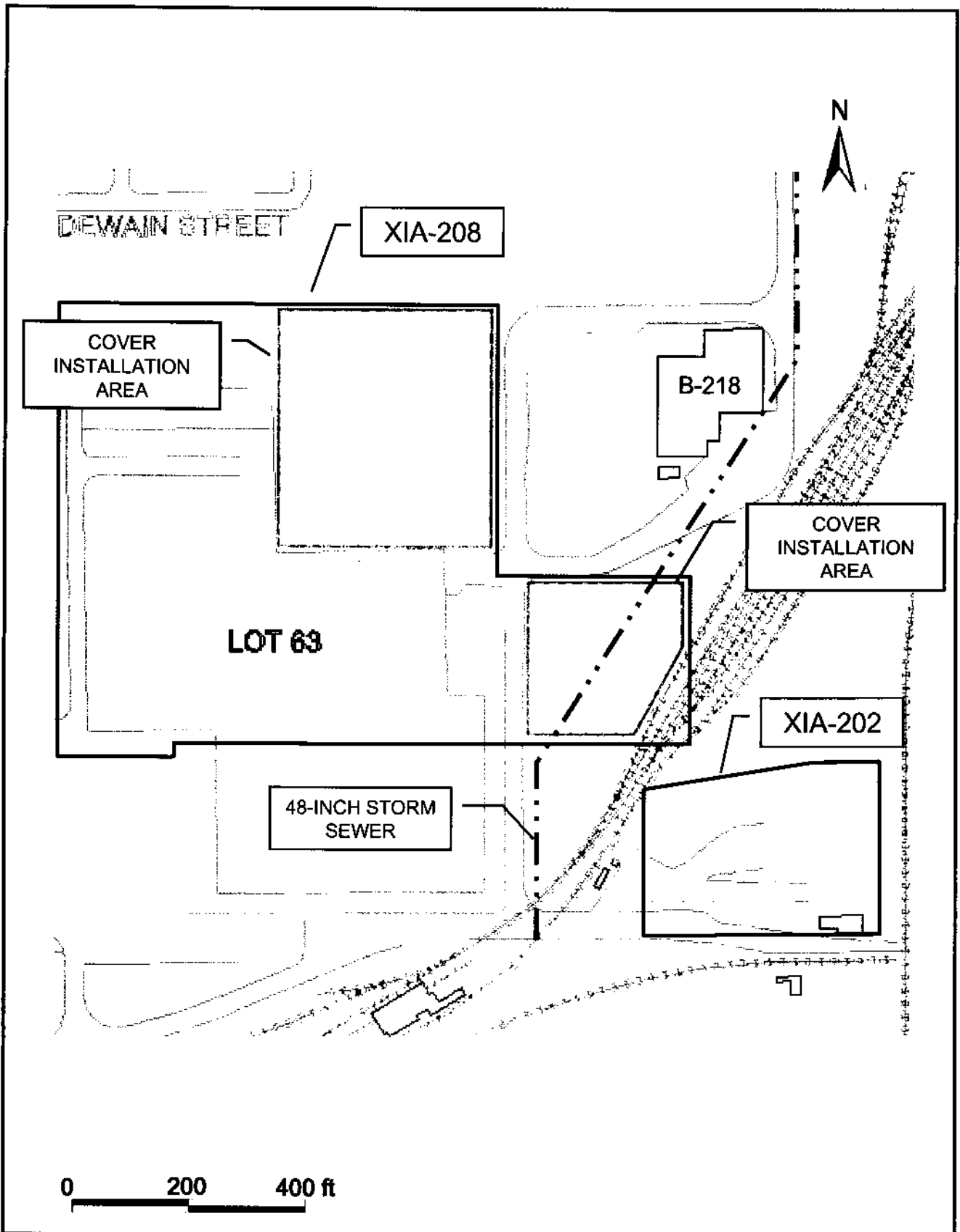
NPEC Inc.	LOCATION MAP	DRAWN D.SHEVLIN	FIGURE 1
	XIA-202/208 CORRECTIVE MEASURES	DATE 9/4/2008	
	IMPLEMENTATION PLAN	FILE NAME xia-202 208 cmi plan figs.ppt	



0 200 400 ft

- KPGSAP WELL LOCATION
- ▲ KPGSAP STORM SEWER LOCATION

NPEC Inc.	KPGSAP MONITORING LOCATIONS NEAR XIA-202/208	DRAWN D.SHEVLIN	FIGURE 2
	XIA-202/208 CORRECTIVE MEASURES IMPLEMENTATION PLAN	DATE 9/4/2008	
		FILE NAME xia-202 208 cmi plan figs.ppt	



NPEC Inc.	PROTECTIVE SOIL COVER INSTALLATION AREAS XIA-202/208 CORRECTIVE MEASURES IMPLEMENTATION PLAN	DRAWN	D.SHEVLIN	FIGURE 3
		DATE	9/4/2008	
		FILE NAME	xia-202 208 cmi plan figs.ppt	

Appendix A

Notice of Contaminated Site

MONROE COUNTY CLERK'S OFFICE



Return To:

BOX 242

Index DEEDS

Book 10453 Page 0627

No. Pages 0005

Instrument NOTICE

Date : 4/30/2007

Time : 4:17:00

Control # 200704301014

EASTMAN KODAK COMPANY

EASTMAN KODAK COMPANY

Employee ID NB40

MORTGAGE TAX

FILE FEE-S	\$	19.00	MORTGAGE AMOUNT	\$.00
FILE FEE-C	\$	8.00	BASIC MORTGAGE TAX	\$.00
REC FEE	\$	15.00	SPEC ADDIT MTG TAX	\$.00
	\$.00	ADDITIONAL MTG TAX	\$.00
	\$.00	Total	\$.00
	\$.00			
	\$.00			
	\$.00			
	\$.00			
	\$.00			
Total:	\$	42.00			

STATE OF NEW YORK
MONROE COUNTY CLERK'S OFFICE

TRANSFER AMT

WARNING - THIS SHEET CONSTITUTES THE CLERKS ENDORSEMENT, REQUIRED BY SECTION 317-a(5) & SECTION 319 OF THE REAL PROPERTY LAW OF THE STATE OF NEW YORK. DO NOT DETACH OR REMOVE.	TRANSFER AMT \$.00
	TRANSFER TAX \$.00

Cheryl Dinolfo
Monroe County Clerk



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INDEXED

STATE OF NEW YORK)
)
) :SS.:
)
COUNTY OF MONROE)

2007 APR 30 PM 6:17

3

NOTICE OF CONTAMINATED SITE

KNOW ALL MEN BY THESE PRESENTS THAT:

Pursuant to the requirements of the New York State Department of Environmental Conservation ("NYSDEC"), this document is hereby filed in Monroe County Clerk's Office in the Liber of Deeds of Monroe County, New York.

I

This notice pertains to that portion of the tract of land (hereinafter, the "Property") identified by the shaded area illustrated on the map attached hereto as Exhibit "A", which is incorporated herein. The Property is located in portions of the area bounded generally to the North by West Ridge Road, to the West by Mt. Read Blvd., to the South by Wheatland Street and to the East by Rail Road, in the City of Rochester, Monroe County, New York, and consists of portions of the parcels identified by the following Tax Map Parcel Numbers: 090.230-0001-009.001 and 090.240-0001-002. The Property is the location of former manufacturing facilities the operation of which resulted in certain releases of hazardous substances into the soil and groundwater. Residual subsurface contamination remains at the Property.

II

Cleanup levels established for the Property in the Final Corrective Measures approved by the NYSDEC were based on current and future use of the site for commercial and/or industrial purposes. Without limitation of any other permissible uses, the Property is suitable for use for commercial and/or industrial purposes. The Final Corrective Measures require that use of the Property be restricted to commercial and/or industrial purposes unless and until the Property is further remediated in accordance with a NYSDEC-approved corrective action plan.

The Final Corrective Measures approved for this site reduce site risks to meet protection requirements for the site conditions at the time of this filing. However, persons who will be conducting subsurface construction activities such as, but not limited to, the excavation of soils, installation or repair of subsurface utilities, installation of foundation piers, groundwater extraction, or other such activity may encounter the soils, soil vapors, or groundwater which have been affected by the releases. The owner of the Property at the time of any future subsurface construction activities must comply with all environmental, worker protection and other laws, rules and regulations then applicable to the Property.

WCLP

R+R: Box 242

III

The current owner and operator of the Property and the facilities thereon is Eastman Kodak Company, whose address is 343 State Street, Rochester, New York 14650. More specific information regarding the condition of the Property may be obtained from the agents or assigns of Eastman Kodak Company.

IV

This deed is not a representation or warranty by the NYSDEC as to the suitability of the Property for any particular use or purpose, nor does it constitute any guarantee by the NYSDEC that additional remediation will not be required in the future. Further information concerning this matter may be found in files and reports which are kept on file by NYSDEC for public inspection at its office located at 625 Broadway, Albany, NY 12233.

EXECUTED this 25th day of April, 2007.

EASTMAN KODAK COMPANY

By: Theodore D. McJannet

STATE OF NEW YORK)

:SS.:

COUNTY OF MONROE)

On the 25th day of April, 2007, before me personally appeared Theodore D. McJannet to me known, who, being duly sworn, did depose and say that he/she resides at in Rochester, NY; that he/she is the Vice President of Eastman Kodak Company, the corporation described in, and which executed, the above Notice of Contaminated Site; and that he/she signed his/her name thereto by authority of the Board of Directors of such corporation.

Andrew J. Wallace
Notary Public

ANDREW J. WALLACE
Notary Public, State of New York
No. 02WA6009004
Qualified in Schenectady County
Commission Expires 06/22/10

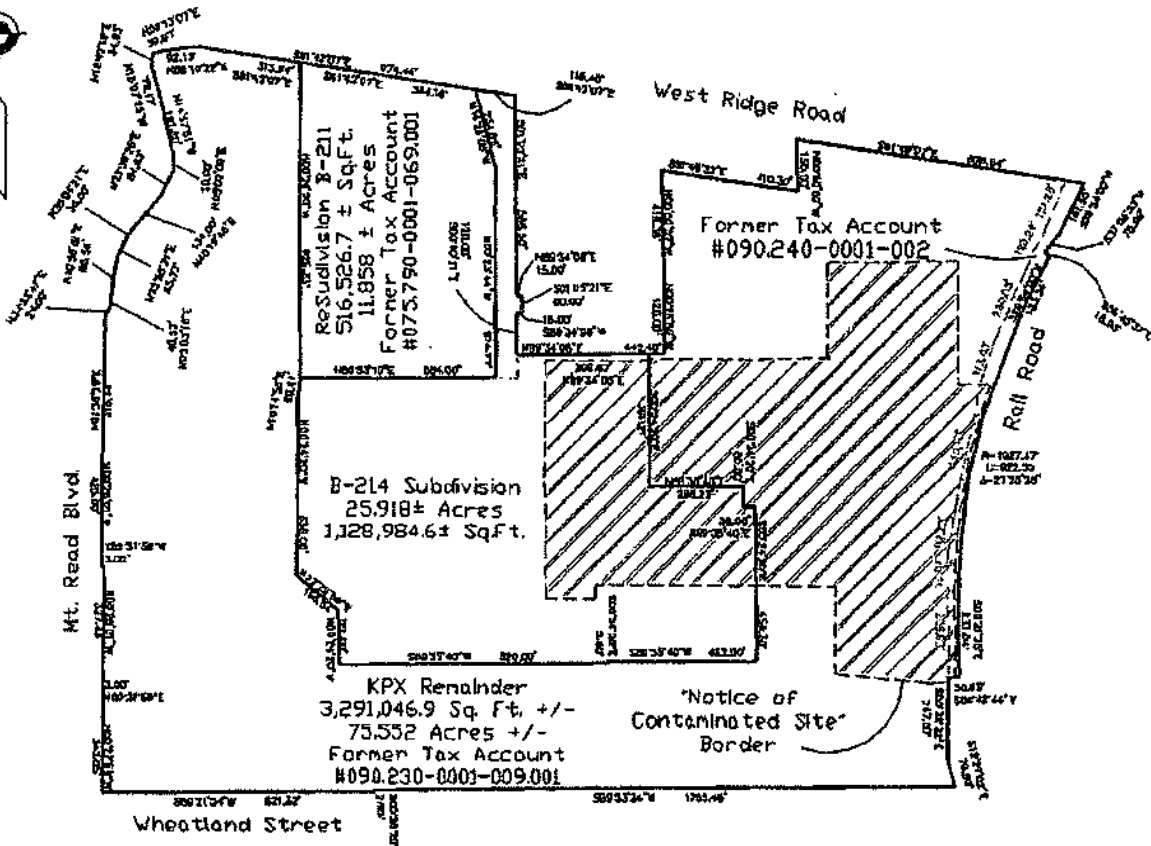
[Notice of ConSite]

EXHIBIT "A"

Notice of Contaminated Site

Client Eastman Kodak Company

Street West Ridge Road City Rochester, Monroe County, N.Y.



Documents and Settings\ireeman\Local Settings\Temporary Internet Files\KLD\20060808 09 job 07-002 B-214 Sale to scale.dwg, 4/26/2007 12:18:25 PM, ireeman

<p>REvised 04/26/07</p> <p>UNAUTHORIZED ALTERATION OR ADDITION TO THIS SURVEY MAP IS A VIOLATION OF SECTION 7209, SUB-DIVISION 2, OF THE N.Y.S. EDUCATION LAW.</p>	<p>Scale 1"=500'</p> <p>Date 4-25-07</p> <p>Drawn By R.D.C.</p> <p>Checked By E.J.P.</p>	<p>PASSERO ASSOCIATES, P.C. ARCHITECTS-ENGINEERS-SURVEYORS</p> <p>100 LIBERTY POLE WAY, ROCHESTER NY 14604 (716) 225-1100</p> <p>ARCHITECTURE ENGINEERING SURVEYING LANDSCAPE ARCHITECTURE</p>	<p>Job No. 20060808_08A</p>
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