

**Site Management Plan**  
**Eastman Business Park Section S (EBP-S)**



## **Introduction**

This Site Management Plan (SMP) is applicable to the area delineated on the attached Figure 1. The area is land that was owned by Eastman Kodak Company and is located within the Town of Greece and the City of Rochester, Monroe County, New York. The intent of the SMP is to minimize potential exposures that could arise during future use of the site due to residual contamination and to ensure that future site use does not impair the remedial program being implemented for portions of the site.

This SMP includes general requirements that are applicable across the entire area delineated on Figure 1. It further includes additional requirement for an area, indicated on Figure 2, known to be impacted by releases from historic operations. These operations contaminated groundwater in the vicinity of Solid Waste Management Unit (SWMU S-091), and resulted in a chlorinated solvent contaminant plume that extends downgradient in an east-northeast direction. The requirements to perform corrective action and remediate contamination for SWMU S-091 is part of Kodak's Part 373 Hazardous Waste Management Permit (DEC Permit No. 8-2614-00205/00104) and will be retained by Kodak.

The SMP outlines requirements that must be followed related to environmental conditions and provides for routine reporting/certification to the New York State Department of Environmental Conservation (NYSDEC). The SMP may only be modified with NYSDEC approval.

## **Site History**

Kodak began development of the Eastman Business Park Section South (EBPS) area in the late 1960s and development continued through the 1980s. EBPS is located within the Town of Greece and the City of Rochester, Monroe County, New York. The primary land uses have included: warehousing and shipping, coal storage, light manufacturing, chemical storage, and industrial refrigeration. Underground water, natural gas, electric, and sewer lines underlie some portions of the property, along with overhead piping infrastructure providing compressed air; potable water; Kodak process water, chilled water (for cooling), electric, and low-pressure steam to buildings in the area. Sanitary sewers in the area discharge to the Monroe County Division of Pure Waters sanitary sewer network. Within this parcel of property there are open areas of undeveloped property, some of which are heavily wooded.

There is one existing building located within the area (B-511) along with the footprint/slab of two former buildings that were previously demolished (B-503 & B-506). These buildings are described below.

Building 511 (B-511) is located in the southwest corner of the property and was constructed in 1967. Building 511 has a footprint size (sq ft) of approximately 9,776 and houses equipment supplying refrigeration to buildings in EBPS.

The former Building 503 location is currently a vacant concrete slab (no sewer connection). B-503 was demolished in 2005. Prior to demolition B-503 was used primarily for the storage of

pallets. Additionally, it was used for purchased materials and equipment, and Kodak internal equipment rental storage. The building was constructed in 1971, had a footprint size (sq ft) of 20,033, and was prefabricated metal on concrete.

Building 506 was used for storage of equipment and building supplies (often excess equipment removed from other buildings). Building 506 was demolished in 2004 such that all that remains today is a concrete slab (no sewer connection). The building had been constructed in 1969 (metal on concrete) and had a footprint size (sq ft) of 20,000. Landscaping equipment was stored in the area. An area south of the former B-506 location had been used for the storage of gravel, construction & demolition debris including road millings and broken pieces of asphalt (all have since been removed). Additionally there was an outside container storage area (cinder surfaced area) identified as SWMU-12.

Shed S-26 was built in 1974 and was an open-sided, elevated platform structure located immediately southeast of B-502. It was used for raw material/chemical storage and was demolished in 2007. As has been noted spills & releases from this storage area have resulted in groundwater contamination with the plume being designated as the “restricted area” in this SMP and associated easement (see Figure 2).

#### SOLID WASTE MANAGEMENT UNITS

In 1998, Kodak completed a RCRA Facility Assessment for Kodak Park. The assessment identified SWMUs subject to corrective action requirements. Kodak has identified the following SWMUs related to this parcel of property:

| ID    | INVESTIGATION AREA | UNIT TYPE | GENERAL DESCRIPTION            | BUILDING NUMBER | LOCATION NOTES                 | OPERATIONAL STATUS | CORRECTIVE ACTION STATUS |
|-------|--------------------|-----------|--------------------------------|-----------------|--------------------------------|--------------------|--------------------------|
| S-007 | UNGROUPED          | WP        | Wood Chipping Operation        | B-503           | B-503 Southeast                | INACTIVE           | NFA                      |
| S-008 | UNGROUPED          | CS        | SWMU-12 Drum Storage (Closed)  | B-506           | South of B-506                 | INACTIVE           | NFA                      |
| S-010 | UNGROUPED          | TS        | Solid Waste Transfer / Storage | B-506           | Center, Inside                 | INACTIVE           | NFA                      |
| S-032 | UNGROUPED          | MA        | Marshaling Area                | B-511           | West, Inside                   | INACTIVE           | NFA                      |
| S-039 | UNGROUPED          | RS        | Release Site                   | B-511           | Southwest Corner               | SPILL              | NFA                      |
| S-070 | UNGROUPED          | RS        | Release Site                   | B-511           | North side of B-511            | SPILL              | NFA                      |
| S-091 | S-091              | RS        | Release Site                   | B-502           | Immediately North of Shed S-26 | SPILL              | FA                       |

As indicated in the Table above, SWMU S-091 requires further action and has been the subject of a Corrective Measures Study (dated April 30, 2012). Upon remedy selection by NYSDEC, Kodak will complete a Corrective Measures Implementation Plan and initiate remedial measures in accordance with an approved schedule. Kodak has completed some interim remedial measures at this location that included a nano-scale zero valent iron injection program (NZVI) in 2006 with follow-up monitoring. Although the results of the injection program showed a reduction in concentration of contaminants at the suspected source location other monitoring wells showed levels that were little changed triggering the need for a CMS/CMI. The corrective action requirements for the “restricted area” (SWMU S-091) are specified in and will be dictated through Kodak’s Part 373 RCRA Permit (NYSDEC Permit # 8-2614-0020/00104).

The RCRA Facility Investigations (RFIs) and Corrective Measures Studies (CMSs) for SIA-502/605 were completed in 2004 and 2007, respectively. In the CMS report Kodak reviewed site conditions and made recommendations for long-term care of SIA-502/605 (see SIA-502/605 RCRA Facility Investigation (RFI) Report (Golder, 2004) and SIA-502/605 Corrective Measures Study Report (Golder, 2007)). During the subsurface investigation programs, a number of soil and aqueous samples were collected from SIA-502/605 and adjacent areas for laboratory analysis, providing for a conceptual model of the site geology and hydrogeology to be developed along with an existing soil and groundwater/surface water analytical database to be created to characterize site conditions. This information was summarized in the SIA-502/605 reports. Aside from the S-091 area, the only part of the SIA-502/605 that required remedial action (SWMU S-030) was located outside and to the west of the EBP-S area, and is outside of the scope of this SMP.

### **Institutional Controls**

A series of Institutional Controls are required to prevent potential exposure to any possible remaining contamination at the site. Management requirements include:

1. Non-interference with Corrective Measures:

The Site owner will ensure that site development activities will not interfere with, or otherwise impair or compromise remedial measures in the “restricted” area (SWMU S-091) as required by NYSDEC.

2. Environmental Easement & SMP:

Compliance with the Environmental Easement (including access arrangements) and this SMP by the Declarant and the Declarant’s successors and assigns;

3. Site Use Restrictions:

a. Property Class:

The property may only be used for commercial or industrial use unless a higher use is approved by the NYSDEC and reflected in an amendment to the Environmental Easement;

b. Groundwater Use:

No person shall use groundwater underlying the property without treatment rendering it safe for drinking water or industrial purposes, as appropriate, unless the user first obtains permission to do so from the Department or relevant agency;

c. General Excavation and Management of Soils Generated Outside of the Identified “Restricted Area” (SWMU S-091)

Any future activities on the property that may disturb remaining contaminated material must be conducted in accordance with this SMP;

The Site owner and parties performing work are responsible for the safe performance of all intrusive work, the structural integrity of excavations and structures that may be affected by excavations. Any excess soil generated from an excavation must be managed in accordance with all applicable regulations and good engineering practices. It should be noted that based on the available data and existing knowledge of site conditions, there is no currently known contamination outside of the “restricted area.” Available soil data shows that contaminant concentrations are below restrictions outlined in the Part 375 SCOs and/or the NYSDEC has granted a “No Further Action” for soils on the EBP-S parcel.

In the event that previously unidentified contaminant sources are found during subsurface excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition. Sampling and chemical analysis will be performed as necessary to determine the nature of the material and proper handling and/or disposal method. In the event that unknown and/or unexpected contamination is identified during site work it will be promptly communicated by phone to NYSDEC’s regional contact person listed below.

d. Excavation Requirements Specific to the “Restricted Area” (SWMU S-091)

If soil is generated via an excavation in the “restricted area” that is in contact with groundwater, any water resulting from dewatering activities will be managed in accordance with applicable regulations. Any excess soil generated at SWMU S-091 will be placed on an impervious surface and covered and/or containerized. An organic vapor analyzer will be used during the excavation to screen for potential VOCs. Based on readings obtained a determination will be made on the need for sampling and analysis prior to off-site disposal at an approved facility. Any excess soil generated from an excavation must be managed in accordance with all applicable regulations and good engineering practices.

Notifications

The Site owner shall notify the NYSDEC project manager 15 days in advance of any planned excavation activities in the “restricted” area.

At least 15 days prior to the start of any activity in the "restricted area" (SWMU S-091) that is anticipated to encounter remaining contamination via excavated soil that is in contact with groundwater, the site owner or their representative will notify the Department. Currently, this notification will be made to:

Mr. Bart Putzig  
Regional Hazardous Waste Remediation Engineer  
New York State Department of Environmental Conservation  
Region 8 Office  
6274 East Avon-Lima Rd.  
Avon, NY 14414  
bxputzig@gw.dec.state.ny.us  
(585) 226-5349

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for site re-grading, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control,
- A summary of environmental conditions anticipated in the work areas, including the nature and concentration levels of contaminants of concern, and potential presence of grossly contaminated media;
- A schedule for the work, detailing the start and completion of all intrusive work,
- A summary of the applicable components of the excavation requirements for the "restricted area" from the Site Management Plan.
- A statement that the work will be performed in compliance with this Site Management Plan and 29 CFR 1910.120,
- The contractor's health and safety plan will be available on-site for review if desired
- Identification of disposal facilities for potential waste streams,
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

Simple excavations may only require compliance with a portion of the Excavation Controls specified below. For example, excavation of a small volume of soil from above the water table that is directly loaded for off-site disposal would not require the stockpiling or fluids management provisions of this section.

### **Excavation Controls**

#### **Soil Screening**

Visual, olfactory and instrument-based soil screening will be performed by a qualified environmental professional during all remedial and development excavations into known or potentially contaminated material (remaining contamination). Soil screening will be performed when the invasive work is done



in the “restricted area” (SWMU S-091) in which soil that is in contact with groundwater is expected to be impacted.

#### Stockpile Methods

Any soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

Stockpiles will be kept covered at all times with appropriately anchored tarps and will be routinely inspected and damaged tarp covers will be promptly replaced.

Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC.

#### Materials Excavation and Load-Out

A qualified environmental professional or person under their supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The owner of the property and its contractors are solely responsible for safe execution of all invasive and other work performed under this Plan. The presence of utilities and easements on the site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash will be operated on-site. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

#### Materials Transported Off-Site

All transport of materials will be performed in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Material transported by trucks exiting the site will be secured with covers and if loads contain wet material capable of producing free liquid liners will be used.

Trucks will be washed prior to leaving the site as necessary and wash waters will be collected and disposed of properly.

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.

#### Materials Disposal Off-Site

All soil/fill/solid waste excavated and removed from the restricted area will be transported and disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from the restricted area will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate. Actual disposal quantities and associated documentation will be reported to the NYSDEC in conjunction with the periodic review certification (see Section 5 below).

#### Materials Reuse On-Site

At this time it is not anticipated that any excavated material that came into contact with groundwater from the restricted area would be reused on-site.

#### Cover System Restoration

There are no cover requirements in the restricted area.

#### Backfill from Off-Site Sources

It is not anticipated that there will be a need for any off-site backfill material in the restricted area. If the need ever arose the site owner will ensure that materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d).



Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

#### Stormwater Pollution Prevention

It is not anticipated that there will be any excavations or construction projects of a size in the restricted area that would trigger the need for procedures for stormwater pollution prevention. As such, one is not being proposed here.

#### Community Air Monitoring Plan

The air in the vicinity of all locations where intrusive work will be performed that will disturb significant quantities of soil shall be monitored for volatile organic compounds, and airborne particulates (dust) in accordance with NYSDEC DER-10 and New York State Department of Health (NYSDOH) generic Community Air Monitoring Plan (CAMP).

Exceedances of action levels listed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers.

#### Odor Control Plan

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, these measures will include: limiting the area of open excavations and size of soil stockpiles; shrouding open excavations with tarps and other covers; and using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include direct load-out of soils to trucks for off-site disposal; use of chemical odorants in spray or misting systems; and, use of staff to monitor odors in surrounding neighborhoods. If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting/filtering systems.

#### Dust Control Plan

Dust suppression will be achieved through the use of an on-site water truck for wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.

Gravel will be used on roadways to provide a clean and dust-free road surface. On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

#### Soil Vapor Intrusion (SVI) Evaluation:

The potential for vapor intrusion must be evaluated for any new buildings developed on the property and any potential impacts that are identified must be mitigated;

Prior to the construction of any new buildings on the EBP-S Site either a SV evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure or a SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for any follow-up action if deemed necessary.

4. Notification of change in use

The NYSDEC must be notified in writing at least 60 days prior to any change in the use (including ownership) of the site or the responsibility for implementing this SMP. Such notification will include a certification that the prospective purchaser or the new responsible party has been provided with a copy of this SMP; and

5. Inspection, reporting and certification of compliance:

The Site owner must submit to NYSDEC a written statement that certifies, under penalty of perjury, that for each institutional control identified for the site all of the following statements are true:

- The institutional control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with the site management plan for this control;
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- Use of the site is compliant with the environmental easement.

- The information presented in the report is accurate, complete and consistent with the requirements of this SMP.

This periodic review certification will be made annually until such time that an alternate frequency is required by the by the NYSDEC, and will include the following statement:

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner's Designated Site Representative] (and if the site consists of multiple properties): [and I have been authorized and designated by all site owners to sign this certification] for the site.

Currently, this certification will be directed to:

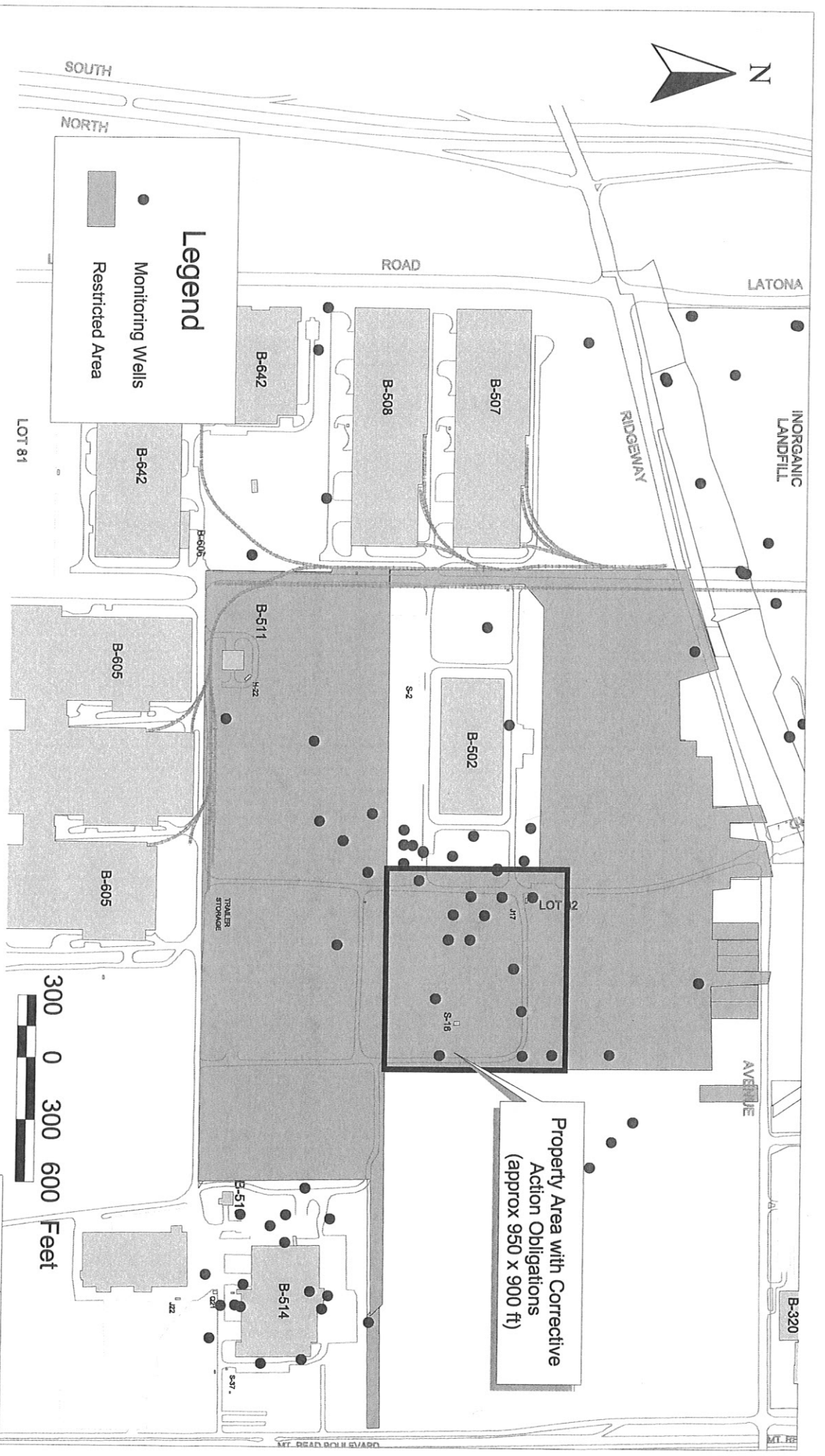
Lawrence Thomas, Project Manager  
NYSDEC-Division of Environmental Remediation  
625 Broadway, 12th Floor  
Albany, New York 12233-7017  
E-mail: lxthomas@gw.dec.state.ny.us  
(518) 402-9813

Included with each certification will be a facility contact name, telephone number and address.

# Figures

KODAK PARK  
 CORRECTIVE ACTION PROGRAM  
 EASTMAN KODAK COMPANY  
 ROCHESTER, NEW YORK

Eastman Business Park - South



Property Area with Corrective  
 Action Obligations  
 (approx 950 x 900 ft)

DRAWN: \_\_\_\_\_  
 DATE: \_\_\_\_\_  
 APP'D: \_\_\_\_\_  
 FILENAME: \_\_\_\_\_  
 PROJECT FOLDER: \_\_\_\_\_

**Figure 2**

EASTMAN KODAK COMPANY

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15