



August 12, 1999

Mr. Abdool H. Jabar
Environmental Engineer
RCRA Compliance Branch
U.S. Environmental Protection Agency, Region II
290 Broadway
New York, NY 10007-1866

Subject: RCRA 3007 Information Request

Dear Mr. Jabar:

On July 13, 1999, Eastman Kodak Company received a RCRA 3007 Information Request from the Agency. The request is related to the RCRA Compliance Evaluation Inspection that was conducted on May 25 through May 27, 1999, at the Kodak Park facility located in Rochester New York.

Attached please find Kodak's responses to the questions contained in the information request. For the purpose of clarity, the USEPA question is stated in **Bold** type followed by the Kodak response. Also included is the required certification for the answers provided, appropriately signed by a corporate officer.

Kodak appreciates your willingness to meet on the issues identified in this response, and will be awaiting possible meeting dates from you. If you have any questions please do not hesitate to contact Mr. David Rice at (716) 477-1300.

Very truly yours,

Joan F. Berner
Site Issues Group Leader
KP Environmental Services

JFB/DAR

*Kodak Park Environmental Services
Health, Safety, and Environment
Eastman Kodak Company, Rochester, New York 14652-6263*



KODAK ANSWERS TO EPA REQUEST FOR INFORMATION

- 1. During the inspection, it was stated that Eastman Kodak has elected to use the alternative standard 40 CFR 265.1061 to monitor its valves that are subject to RCRA Air Emissions Subpart BB regulations. The facility informed EPA on January 8, 1997 that it has elected to comply with the alternative standard and that the performance test was completed on December 2-5, 1996. However at the time of the inspection, there were no records to indicate that the performance test on valves associated with Building 120 were completed.**

Please indicate:

- (a) How many valves subject to the RCRA Air Emissions-Subpart BB are associated with Building 120.**

Kodak response:

Kodak has identified 260 valves associated with the B-120 hazardous waste management unit that are regulated by Subpart BB under RCRA. Applicability of Subpart BB for this unit was not originally recognized/identified in December 1996. The notification in January 1997 was made based upon our mistaken belief that we had identified all hazardous waste management units to which Subpart BB was newly applicable. With respect to the units Kodak identified, testing was completed during the week of December 2-5.

(With respect to additional hazardous waste management units that became newly subject to 40 CFR 265 Subpart BB, it is our understanding that all valves in each hazardous waste management unit that elects to comply with the alternate standard must be monitored within one week, but the testing can be performed during different weeks for each hazardous waste management unit. Initial testing, however, was required to be complete by the compliance date of December 6, 1996.)

- (b) Were these valves monitored during the week of December 2-5, 1996 as was stated in your letter that was sent to EPA stating that you had elected to comply with 40 CFR 265.1061.**

Kodak response:

As indicated above, applicability at B-120 was inadvertently overlooked, so that monitoring was not completed until September 17, 1997.

- (c) If the monitoring was done during the week of December 2-5, please provide the necessary documentation demonstrating this.**

Kodak response:

Please see responses to items (a) and (b) above.

(d) Facility-wide, are there any other valves that are subject to Subpart ^{CC}CC and should have been monitored on December 2-5, 1996 but were not. If the answer is yes, how many were not monitored and where are they located.

Kodak response:

Kodak believes that USEPA meant to request information on any other valves that are subject to Subpart BB and should have been monitored on December 2-5, 1996 but were not, instead of Subpart CC as stated in the USEPA request/letter. Kodak confirmed this with you in a telephone conversation on August 3, 1999, and is responding accordingly.

Kodak has currently identified the following valves:

As was the case at B-120 Distilling Department, applicability was not originally recognized at B-322 (which is another part of the same Distilling Department), and therefore there were 134 valves associated with that hazardous waste management unit that were not monitored by December 6, 1996.

The following locations have identified a few additional valves subsequent to completing initial monitoring on December 2-5, 1996.

B-119 - 27 valves
B-148 - 15 valves
B-302 - 6 valves
B-304 - 2 valves
B-325 - 2 valves

Please note that Kodak has requested a meeting with EPA to discuss Kodak's response to the question above in greater detail.

(2) During the inspection, there were two tank wagons located outside Building 119 that were used to transport hazardous waste with more than 500 ppm organics. At the time of the inspection, the facility representative indicated that Kodak is complying with Container Storage Level 2, Option 2. There were no records to indicate that monitoring as required by the regulation was done. Please indicate:

(a) Were these tank wagons monitored as required?

Kodak response:

At the time of the inspection the two tank wagons located outside Building 119 were not monitored as required, but since that time the required monitoring has been completed.

(b) If monitoring was done, please provide the necessary documentation demonstrating this.

Kodak response:

Attached, please find the monitoring results. (Attachment I)

- (c) Facility-wide, are there any other containers following Container Storage Level 2, Option 2 that were not monitored as required by the regulation. If the answer is yes, how many were not monitored and where are they located.**

Kodak response:

The following containers have been identified:

<u>Location</u>	<u>Number of containers</u>
B-120/322	1
B-119	4
B- 148	1
B-302	5
B-322	2
B-325	2
B-329	7
B-351	2

All of the above containers that are currently in service have subsequently had monitoring completed as required.

- 3. During the inspection, it was discovered that there were pumps in hazardous waste service in Buildings 303 and 119 which were not marked and were not monitored as required by the regulations.**

Please indicate:

- (a) How many pumps are in hazardous waste service in Buildings 303 and 119? Facility-wide, are there any more pumps in hazardous waste service that are not marked and monitored? If yes, how many and where are they located?**

Kodak response:

Kodak has not had the interpretation that the pumps that you are referring to in Buildings 303 and 119 are in hazardous waste service. Kodak has contacted EPA to arrange for a meeting, and as agreed with you during a telephone conversation with Mr. David Rice of Kodak on August 3, 1999, Kodak and EPA will discuss this matter at that meeting.

However, facility-wide Kodak has identified 8 pumps, that are not subject to the issue raised above, that were not marked and monitored as required by regulation.

(b) Provide a list of all of the pumps which were not marked and monitored, the location and type. If the facility is claiming that some of the pumps are in hazardous waste service for less than 300 hours, provide the documentation to demonstrate this.

Kodak response:

As indicated above, with respect to the pumps that EPA identified as being in hazardous waste service, Kodak will be meeting with EPA to discuss this further.

The eight additional pumps that Kodak identified, include:

TYPE	LOCATIION
6 Portable diaphragm pumps	Building 119 J-wing
1 Portable pump	Building 119
1 Portable diaphragm pump	Building 304 (215 Blender area)

Documentation demonstrating that the pumps in Building 119 J-wing were in service less than 300 hours per year, is enclosed. (Attachment II)

The additional pump in building 119 was recently put into service for infrequent transfers, due to equipment problems. It is expected to be utilized for less than 300 hours per year. It has been marked and the hours of usage will be recorded.

Attachment I

Drawn By R. NOHE
Engineer
Approved

ENGINEERING DIVISION

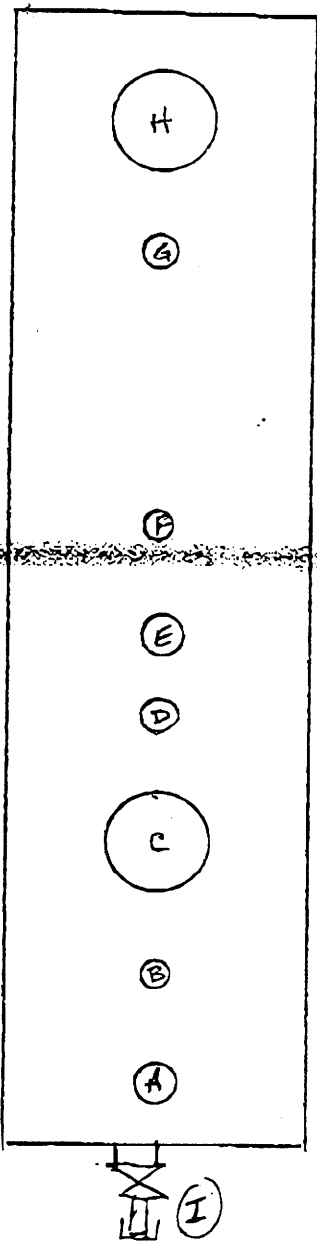
EASTMAN KODAK CO KODAK PARK DIV

Bldg No 119
Location TRAILERS
Date 5-27-99

TITLE B-119 HAZARDOUS WASTE TANK TRAILER #5746A
(first 28 characters will appear on aperture card)

classification

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TAG #	DESCRIPTION	BASIC-GROUND PPM	READ PPM	ADJ. TOTAL PPM
263	A. 4" FILL	4	4	0
264	B. 1" FILL SHUT OFF	4	4	0
265	C. 22" MANWAY	4	20	16
266	D. 3" MESH TAPE	4	4	0
267	E. 4" RUMBLE DISC	4	4	0
268	F. 2" VENT	4	4	0
269	G. 3" BLANK FLANGE	4	4	0
270	H. 22" MANWAY	4	18	14
1196	I. 2" BOTTOM VALVE	2	2	0

8/9/99
E. H. H. H.
METER #
3345578

DATE: 5-27-99
METER # 083416
MONITOR Russell H. Nohe

ATTACHMENT I

Drawn By R. NOHE
Engineer
Approved

ENGINEERING DIVISION

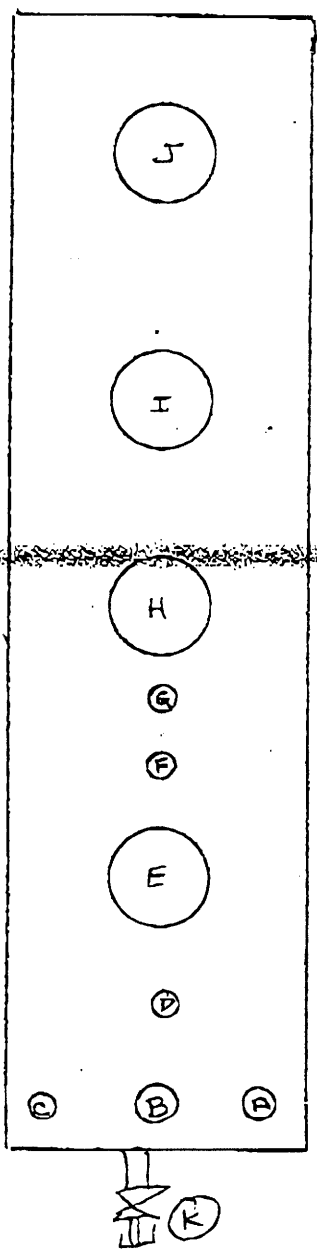
EASTMAN KODAK CO .KODAK PARK DIV

Bldg No 119
Location TRAILERS
Date 5-27-99

TITLE B. 119 HAZARDOUS WASTE TANK TRAILER # S762A
(first 28 characters will appear on aperture card)

classification

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TAG #	DESCRIPTION	BACK-GROUND PPM	READ-ING PPM	ADJ. TOTAL PPM
271	A. 3" METRITAPE	4	25	21
272	B. 4" FILL	4	6	2
273	C. 4" FILL SHUTOFF	4	10	6
274	D. 2" VENT	4	5	1
275	E. 22" MANWAY	4	15	11
276	F. 2" RUPTURE DISC	4	4	0
277	G. 1 1/4" FLANGE, BLANK	4	4	0
278	H. 22" MANWAY	4	9	5
279	I. 22" MANWAY	4	15	11
280	J. 22" MANWAY	4	12	8
197	K. 7" RADIATION	2	2	0

8/9/99
Randy H. Nohe
METER # 334557B

DATE: 5-27-99
METER #: 083416
MONITOR: Randy H. Nohe

ATTACHMENT II

SubPart BB <300 Hour Exemption

J Wing B119 (SPPU/CDD) Portable Pumps and Piping

Approximate number of portable pumps - 6

Waste volume SPPU J Wing 1/1/99 through 5/26/99 - 22,000 gallons

Annualized waste volume- $(52 \text{ wk}/20.4 \text{ wk}) * 22,000 \text{ gal} = 56,100 \text{ gal/year}$

Approximate pumping rate - 20 gpm

Approx. Purge /drain time after pumping - ~20 minutes

Approximate volume/ pumpout - ~200 gallon

Pumpouts/year = $56,100 \text{ gal.}/200\text{gal}/\text{pumpout} = 281 \text{ pumpouts/year}$

Pump time/ pumpout = $200 \text{ gal}/20 \text{ gpm} = 10 \text{ minutes /pumpout}$

Total time / pumpout = $10 \text{ min.} + 20 \text{ min.} = 30 \text{ min/pumpout}$

Total time/year = $(281\text{pumpouts}/\text{year} * 30 \text{ min}/\text{pumpout})/60\text{min}/\text{hr} = 141 \text{ hr/year}$

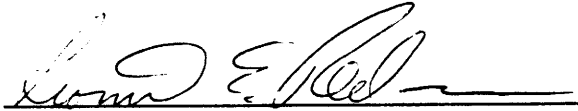
Total HW duty time is less than 300 hours for all portable pumps/equipment. (This even includes waste that is sent to the luggers through the AFD pump)

Thus, any individual portable pump and piping will also be less than 300 hours in HW duty.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic, unless otherwise indicated. I am aware that there are significant penalties for submitting false information.

Leonard E. Redon
Director, Rochester Area Operations
Vice President, Eastman Kodak Company



8/12/99

Date

Subpart BB Meeting with USEPA and Eastman Kodak Company
September 7, 1999

AGENDA

Introductions

Purpose of Meeting

Exclusion for Manufacturing Process Units (261.4(c))

Definition of Hazardous Waste Tank/Container System

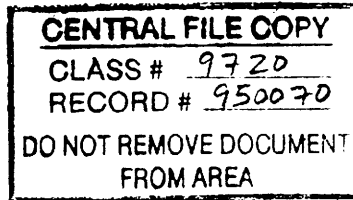
Diagrams of Synthetic Chemicals Division Process Equipment

Other issues

Exclusion for Manufacturing Process Units (261.4(c))

“Hazardous wastes which are exempted from certain regulations. A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, *a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste-treatment-manufacturing unit, is not subject to regulation under parts 262 through 265*, 268, 270, 271, and 124 of this chapter or to the notification requirements of section 3010 of RCRA until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials.”

- The identified pumps are a part of the process equipment that may be used to pump product, material for recovery or hazardous waste.
- Material is managed as a hazardous waste when it leaves the manufacturing process unit.
- Throughout the time that regulations have applied Kodak has consistently identified this point in correspondence with the agencies.
- The manifold is the point at which Kodak has identified the hazardous waste tank system as beginning and the manufacturing process unit as ending and no prior agency interactions have identified the tank system as extending beyond the manifold.



Certified Mail # Z 074 562 964
Return Receipt Requested

July 11, 1995

Ms. Jeanne M. Fox
Regional Administrator, Region II
(Attn: Mr. Andrew Bellina)
United States Environmental Protection Agency
290 Broadway, 22nd Floor
New York, NY 10007-1866

Dear Ms. Fox:

Subject: Notification of intent to comply with alternate standards
for valves in light liquid service. (40 CFR Part 264.1061)
Eastman Kodak Company Hazardous Waste Management Facility
USEPA ID Number NYD980592497

Eastman Kodak Company (Kodak) operates a Hazardous Waste Management Facility at the Kodak Park Site located in Rochester, New York. The facility consists of a hazardous waste incinerator, tank and container storage, as well as a miscellaneous treatment unit.

The HWMU-07 storage tank system located at Building 218 has recently been upgraded under the Kodak Park Storage Tank Improvement Program (STIP). This STIP project included the installation of three new double-wall storage tanks and associated ancillary equipment in accordance with the Class 2 RCRA permit modification request approved on January 20, 1995. The upgraded HWMU-07 tank system is subject to TSD Air Emission Standards for Equipment (40 CFR Part 264, Subpart BB). This letter serves as notification to USEPA that Kodak has elected to comply with the alternate standards for valves in light liquid service, as specified in 40 CFR 264.1061.

Purpose of Meeting

- USEPA RCRA Compliance Evaluation Inspection of Kodak Park May 25 through May 27, 1999 and the July 13, 1999, USEPA Information Request.

Attachment 1, Item #3

“During the inspection, it was discovered that there were pumps in hazardous waste service in Buildings 303 and 119 which were not marked and monitored as required by the regulations.”

- Historically Kodak has not interpreted these pumps as being regulated by Part 265.
- Point at which manufacturing process unit ends and hazardous waste system begins
- A change in interpretation could have a significant impact on Kodak Park operations:
 - Large number of pumps and valves involved
 - Secondary containment issues under Subpart J Tank Systems