

*Alliance for Democracy
Citizens' Environmental Coalition
Great Lakes United
The Green Party of Monroe County
The Kandid Coalition
National Sludge Alliance*

Daniel A. Carp, CEO
Eastman Kodak
343 State Street
Rochester, New York 14650

June 17, 2002

Dear Mr. Carp:

Over a year ago, the international community took strong action against chemical assaults to our health and environment when more than a hundred governments adopted the Stockholm Convention on Persistent Organic Pollutants (POPs). This treaty aims to ultimately eliminate a class of the most problematic chemical substances known to science, including ultra-toxic dioxins and furans.

The same Convention identifies the incineration of waste as a major source of dioxins and furans and in fact recommends the use of substitute techniques and technologies to avoid the generation of these poisons. This renders incineration as an untenable waste management option – particularly for countries which have signed the treaty, like the United States.

The elimination goal of the Convention underscores the obligation of Eastman Kodak to ensure that priority is given to alternative waste management programs (e.g. reduction, reuse and recycling) and clean production systems, rather than dirty end-of-pipe measures which are clearly failing to protect the public from various toxic threats.

Today is the first day of the 6th Session of the Intergovernmental Negotiating Committee on the Stockholm Convention on POPs in Geneva. In conjunction with this event, we are delivering over 2,000 postcards to you from New York citizens calling on your company to make a commitment to a clean environment by 1) Phasing out and shutting down Kodak's hazardous waste incinerators; 2) Installing ambient air monitors to inform people when toxic emissions enter neighborhoods; and 3) Funding an independent investigation into the childhood brain cancer cases in the Rochester area.

To assist Kodak in moving towards non-incineration technologies and a clean production manufacturing facility, Citizens' Environmental Coalition, with the help of technical experts, has researched the waste streams entering Kodak's Building 218 and 95 hazardous waste incinerators. From our research, we have found that viable and safe alternatives do exist to incineration, despite claims recently made by your company in your recent publication, "Kodak responds to the special interest environmental groups". A preliminary review of the waste codes of chemicals that Kodak incinerates (NYSDEC Part 373 application, SWIMS data) shows that according to EPA's recently released "Potential Applicability of Assembled Chemical Weapons Assessment Technologies to

RCRA Waste Streams and Contaminated Media,” much of the waste currently incinerated at Kodak Park can be destroyed by one of the EPA identified ACWA technologies.

Upon evaluating the 24 largest waste streams entering Kodak’s Building 218 incinerator, we learned that 18 of these waste streams are classified as “hazardous.” Of these eighteen waste streams, fifteen (see attached) contain waste that may be able to be destroyed by non-incineration alternative technologies that were identified in the EPA’s report. While some of these technologies are still in the development stages, Kodak and the New York State Department of Environmental Conservation should take the lead in evaluating the effectiveness of using these various technologies to eliminate the waste streams entering Kodak’s incinerators.

We recommend that Kodak and the NYS DEC consider the following technologies as an interim solution to address the ongoing production of hazardous waste at Kodak Park:

Eco Logic’s Gas Phase Chemical Reduction Technology

This technology has been developed as an alternative to incineration for hazardous wastes. It is a chemical reduction technology that uses hydrogen gas at elevated temperatures (850 to 900 degrees Celsius) to treat wastes. The absence of free oxygen in the reactor minimizes dioxin formation and water acts as a hydrogen donor and heat transfer agent to enhance the reaction. Hydrogen reacts with chlorinated organic compounds, yielding primarily methane and hydrogen chloride. This technology has been reported to have a high destruction efficiency. All emissions and residues can be captured for assay and reprocessing if needed. This technology has been tested at laboratory, demonstration, and full commercial scales on a wide variety of organic wastes. Eco Logic has portable demonstration systems in Japan and Canada. They have operated one commercial full-scale stationary system in Australia, and completed a full-scale demonstration of the system at a GM facility in St. Catharines, Ontario. Vender info: *ELI EcoLogic Int’l / (519) 856-9591 / www.eco-logic-intl.com.*

AEA Silver II™ Technology

This technology uses an electrochemical oxidation process, based on the use of reactive silver created by applying an electric current to a solution of nitric acid and silver nitrate. This technology operates at a fairly low temperature and pressure and has a high destruction efficiency. All emissions and residues can be captured for assay and reprocessing. AEA reports that dioxins and dibenzofurans are not produced by the process. This technology has been used to destroy general industrial wastes, chlorinated hydrocarbons, hydrocarbons, mixed PCBs, and oils and hydraulic fluids; nuclear industry wastes; explosives; and fuels. It is still in the pilot-scale phase of development. Vender info: *AEA Technologies / (412) 655-1200 / www.aeat-prodsys.com.*

CerOx Process

This new technology uses electricity to treat and convert hazardous organic waste streams into carbon dioxide and water. This occurs by the oxidation of the liquid organics that are processed through two liquid and gas phase reactors. This technology can treat chlorinated solvents, dioxins, mixed wastes, metals, etc. There is a demonstration unit at the University of Nevada, and is currently under consideration for destruction of chemical agent neutral waste. Vender info: *CerOx / www.cerox.com.*

Supercritical Water Oxidation Technology

This technology has been developed by the Foster Wheeler Development Corporation and General Atomic, and is a high temperature and pressure process of hydrothermal oxidation which treats organic

wastes, where the wastes become highly soluble. This can be used to treat chlorinated solvents, aqueous waste streams, sludges, and contaminated soils. High destruction efficiencies have been reported for this technology. It has been used in several demonstration testing programs, but has not been implemented at the full scale. Vender info: *Commodore Applied Technologies / (212) 308-5800 / www.commodore.com.*

Our concerns go beyond the emissions leaving the top of the smokestack. We have recently learned that there was a fairly significant explosion at Kodak's Building 218 hazardous waste incinerator on Thursday May 30, 2002. From our understanding, this blew a trap access door off the kiln and dumped the air stream untreated into the surrounding community. This has raised many concerns. How long was this air stream releasing contaminants into the environment before it was shut? How much and what chemicals were released? At the time, there was a Department of Environmental Conservation (DEC) monitor elsewhere at the plant, but Kodak didn't notify the monitor of this explosion and release until much later in the day. Why didn't Kodak immediately notify the monitor of the release so that the monitor could assess the situation? We feel that this recent explosion underscores the need for a full-time monitor at Kodak's Building 218 hazardous waste incinerator in addition to ambient air monitors around Kodak Park.

The time has come for Kodak to implement alternatives to incineration. We appreciate your attention to this critical issue and look forward to your response.

Sincerely,

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Enclosures

CC: Hillary Clinton, US Senator
Chuck Schumer, Senator
George Pataki, Governor
John J. LaFalce, Congress member
Thomas Reynolds, Congress member
Louise Slaughter, Congress member
Elliot Spitzer, Attorney General
Erin Crotty, DEC Commissioner
James Alesi, Senator
Richard Dollinger, Senator
George Maziarz, Senator
Michael Nozzolio, Senator
Susan John, Assemblymember
Joseph Mosello, Assemblymember
David Gantt, Assemblymember
Joseph Robach, Assemblymember
Joseph Errigo, Assemblymember
Chalres Nesbitt, Assemblymember
David Koon, Assemblymember
Richard Brodsky, Assemblymember
Joseph Morelli, Assemblymember
Monroe County Legislature
Mayor William A. Johnson, City of Rochester
Supervisor John T. Auberger, Town of Greece
Rochester City Council
Ray Basso, EPA, Branch Chief
Jim Reidy EPA, Section Chief, NY Section
Wilfredo Palomino, EPA Project Manager
Thomas Marriott, DEC Region 8
Peter Lent, DEC Region 8
Pradeep Jangbari, DEC Region 8
Mark Domagala, DEC Region 8
James Lansing, DEC Region 8
Ed Miles, DEC Region 8
Bernette Schilling, DEC Region 8

Building 218 High Volume Waste Streams:

Fifteen of the eighteen highest volume¹, discrete hazardous waste streams contain elements or compounds that could be managed by alternative technologies identified in the EPA's "Potential Applicability of Assembled Chemical Weapons Assessment Technologies to RCRA Waste Streams and Contaminated Media."²

Trap Tank Residue Absorbed in Green Z

EPA Code	Name
F003	Non-Halogenated Solvents
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Chemically Contaminated Waste – West

EPA Code	Name
D030	2,4 Dinitrotoluene
D036	Nitrobenzene
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents
U041	Epichlorohydrin

Chemically Contaminated Waste – North

EPA Code	Name
D008	Lead
D030	2,4 Dinitrotoluene
D036	Nitrobenzene
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents
U170	p-Nitrophenol

Chemically Contaminated Waste – Polymers

EPA Code	Name
D030	2,4 Dinitrotoluene
D036	Nitrobenzene
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents
U067	Ethane, 1,2-dibromo -
U162	Methyl methacrylate (I, T)
U169	Nitrobenzene (I, T)

Spent Glycols and Alcohols from Polyester

EPA Code	Name
F003	Non-Halogenated Solvents

Bulk Waste from B119 JWING DEV.

EPA Code	Name
F003	Non-Halogenated Solvents
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Bulk Solvent Waste from Bldg. 148

EPA Code	Name
D030	2,4 Dinitrotoluene
D036	Nitrobenzene
F003	Non-Halogenated Solvents

F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents
U169	Nitrobenzene (I, T)

Silver Bearing Spent Solvents

EPA Code	Name
F003	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Burner Solvent – Low Chlorinated (B-120)

EPA Code	Name
F003	Non-Halogenated Solvents

Bulk Solvent Waste from Bldg. 119

EPA Code	Name
D030	2,4 Dinitrotoluene
D036	Nitrobenzene
F003	Non-Halogenated Solvents
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Non-Recoverable Spent Solvent

EPA Code	Name
F003	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Steamer Tars – Syn Chem System

EPA Code	Name
F003	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Bulk Solvent Waste from B301-304, 305

EPA Code	Name
D030	2,4 Dinitrotoluene
D036	Nitrobenzene
F003	Non-Halogenated Solvents
F004	Non-Halogenated Solvents
F005	Non-Halogenated Solvents
U169	Nitrobenzene (I, T)

Mixed Waste Solvents

EPA Code	Name
F003	Non-Halogenated Solvents
F005	Non-Halogenated Solvents

Bulk Solvent Waste (SAVEALL T-101)

EPA Code	Name
F003	Non-Halogenated Solvents
U069	Dibutyl phthalate

¹October 25, 2001 Letter from Tracy Karatas, Health Safety and Environment Dept. at Eastman Kodak, to Peter Lent, DEC Regional Permit Administrator, in regard to Kodak's permit to operate emission unit U00008.

²Environmental Protection Agency, "Potential Applicability of Assembled Chemical Weapons Assessment Technologies to RCRA Waste Streams and Contaminated Media." Pages 3-5 and 3-6.

Other Waste Streams at Building 218 and 95:

Although not present in the highest volume discrete waste streams, the following hazardous elements and compounds have been documented in other waste streams³. As with the previous set of wastes, each of these wastes could reportedly be managed by alternative technologies.

EPA Code	CAS Number	Name(s)
D009	7439-97-6	Mercury
D010	7782-49-2	Selenium
D016	94-75-7	2,4-D
D017	93-72-1	2,4,5-TP (Silvex)
P016	542-88-1	Dichloromethyl ether
P020	88-85-7	Methane, oxybis[chloro-Phenol, 2-(1-methylpropyl)-4,6-dinitro-88-85-7 Dinoseb
P039	298-04-4	Phosphorodithioic acid, O,O-diethyl S-[2-(ethylthio)ethyl] ester
P040	297-97-2	Disulfoton
P041	297-97-2	Phosphorothioic acid, O,O-diethyl O-pyrazinyl ester
P041	311-45-5	O,O-Diethyl O-pyrazinyl phosphorothioate
P041	311-45-5	Diethyl-p-nitrophenyl phosphate
P044	311-45-5	Phosphoric acid, diethyl 4-nitrophenyl ester
P044	60-51-5	Phosphorodithioic acid, O,O-dimethyl S-[2-(methylamino)-2-oxoethyl] ester
P047	60-51-5	Dimethoate
P047	534-52-1	4,6-Dinitro-o-cresol, & salts
P048	534-52-1	Phenol, 2-methyl-4,6-dinitro-, & salts
P048	51-28-5	Phenol, 2,4-dinitro-
P066	51-28-5	2,4-Dinitrophenol
P066	16752-77-5	Ethanimidothioic acid, N-[[methylamino]carbonyl]oxy]-,methyl ester
P067	16752-77-5	Methomyl
P067	75-55-8	1,2-Propylenimine
P071	75-55-8	Aziridine, 2-methyl-
P071	298-00-0	Methyl parathion
P077	298-00-0	Phosphorothioic acid, O,O,-dimethyl O- 4-nitrophenyl) ester
P077	100-01-6	p-Nitroaniline
P081	100-01-6	Benzenamine, 4-nitro-
P081	55-63-0	Nitroglycerine (R)
P085	55-63-0	1,2,3-Propanetriol, trinitrate (R)
P085	152-16-9	Octamethylpyrophosphoramidate
P089	152-16-9	Diphosphoramidate, octamethyl-
P089	56-38-2	Parathion
P094	56-38-2	Phosphorothioic acid, O,O-diethyl O-(4-nitrophenyl) ester
P094	298-02-2	Phosphorodithioic acid, O,O-diethyl S-[(ethylthio)methyl] ester
P097	298-02-2	Phorate
P097	52-85-7	Famphur
P109	52-85-7	Phosphorothioic acid, O-[4-[(dimethylamino)sulfonyl]phenyl] O,O-dimethyl ester
P109	3689-24-5	Tetraethyldithiopyrophosphate
P111	3689-24-5	Thiodiphosphoric acid, tetraethyl ester
P111	107-49-3	Tetraethyl pyrophosphate
P111	107-49-3	Diphosphoric acid, tetraethyl ester

³Eastman Kodak Part 373 Permit Application, Table A4.

P119 7803-55-6 Ammonium vanadate
 7803-55-6 Vanadic acid, ammonium salt
 U017 98-87-3 Benzal chloride
 98-87-3 Benzene, (dichloromethyl)-
 U020 98-09-9 Benzenesulfonic acid chloride (C,R)
 98-09-9 Benzenesulfonyl chloride (C,R)
 U025 111-44-4 Ethane, 1,1'-oxybis[2-chloro
 111-44-4 Dichloroethyl ether
 U027 108-60-1 Dichloroisopropyl ether
 108-60-1 Propane, 2,2'-oxybis[2-chloro-
 U035 305-03-3 Chlorambucil
 305-03-3 Benzenebutanoic acid, 4-[bis(2-chloroethyl)amino]-
 U038 510-15-6 Benzeneacetic acid, 4-chloro-alpha-(4-chlorophenyl)-alpha-hydroxy-, ethyl ester
 510-15-6 Chlorobenzilate
 U042 110-75-8 Ethene, (2-chloroethoxy)-
 110-75-8 2-Chloroethyl vinyl ether
 U058 50-18-0 Cyclophosphamide
 50-18-0 2H-1,3,2-Oxazaphosphorin-2-amine, N,N-bis(2-chloroethyl)tetrahydro-, 2-oxide
 U069 84-74-2 Dibutyl phthalate
 84-74-2 1,2-Benzenedicarboxylic acid, dibutyl ester
 U085 1464-53-5 2,2'-Bioxirane
 1464-53-5 1,2:3,4-Diepoxybutane (I,T)
 U087 3288-58-2 O,O-Diethyl S-methyl dithiophosphate
 3288-58-2 Phosphorodithioic acid, O,O-diethyl S-methyl ester
 U088 84-66-2 Diethyl phthalate
 84-66-2 1,2-Benzenedicarboxylic acid, diethyl ester
 U105 121-14-2 Benzene, 1-methyl-2,4-dinitro-
 121-14-2 2,4-Dinitrotoluene
 U106 606-20-2 2,6-Dinitrotoluene
 606-20-2 Benzene, 2-methyl-1,3-dinitro-
 U115 75-21-8 Ethylene oxide (I,T)
 75-21-8 Oxirane (I,T)
 U118 97-63-2 Ethyl methacrylate
 97-63-2 2-Propenoic acid, 2-methyl-, ethyl ester
 U144 301-04-2 Acetic acid, lead(2+) salt
 301-04-2 Lead acetate
 U150 148-82-3 Melphalan
 148-82-3 L-Phenylalanine, 4-[bis(2-chloroethyl)amino]-
 U151 7439-97-6 Mercury
 U171 79-46-9 Propane, 2-nitro- (I,T)
 79-46-9 2-Nitropropane (I,T)
 U181 99-55-8 Benzenamine, 2-methyl-5-nitro-
 99-55-8 5-Nitro-o-toluidine
 U234 99-35-4 1,3,5-Trinitrobenzene (R,T)
 99-35-4 Benzene, 1,3,5-trinitro-
 U237 66-75-1 Uracil mustard
 66-75-1 2,4-(1H,3H)-Pyrimidinedione, 5-[bis(2-chloroethyl)amino]-
 U240 \194-75-7 2,4-D, salts & esters
 \194-75-7 Acetic acid, (2,4-dichlorophenoxy)-, salts & esters

All EPA Codes and CAS Numbers were obtained through the Electronic Code of Federal Regulation: http://www.access.gpo.gov/nara/cfr/cfrhtml_00/Title_40/40cfr261_00.htm