DRAFT

United States Environmental Protection Agency | Office of the Administrator [Mail Code 1101] | October 1999 (http://www.epa.gov)

EPA Project XL: ~~Eastman Kodak Company~~

WHAT IS PROJECT XL?

Project XL, which stands for "e**X**cellence and **L**eadership," is a national initiative that tests innovative ways of achieving better and more cost-effective public health and environmental protection. The experience and lessons learned from Project XL will assist EPA in redesigning its current regulatory and policy-setting approaches. Project XL encourages testing of cleaner, cheaper, and smarter ways to attain environmental results superior to those achieved under current regulations and policies. It also requires greater involvement by stakeholders, i.e., the people and organizations affected by EPA's decisions. It is vital that each XL project test new ideas with the potential for wide application and broad environmental benefits. As of October 1999, fifteen pilot projects are being implemented and about thirty-five additional experiments are in negotiation. Project XL offers a tremendous opportunity for everyone to think "outside the box" of our current system and to find solutions to obstacles that limit environmental performance.

SUMMARY OF THE KODAK PROJECT

EPA regulations require that prospective manufacturers wait 90 days after submitting a pre-manufacture notice (PMN) before beginning manufacture of a new product. Often, EPA completes its review of the PMN after 28 days. Kodak intends to use EPA's pollution prevention framework (P2 framework) in the development of its products to ensure that its products are as environmentally benign as possible. As a result, Kodak expects that EPA will generally complete its review of Kodak's chemicals in 28 days. Kodak therefore proposes that, in cases where EPA's review is completed in 28 days, it be allowed to begin manufacture after 45 days, rather than 90 days.

SUPERIOR ENVIRONMENTAL PERFORMANCE

Kodak proposes to use the P2 framework in the development of its products, thereby developing more environmentally benign products. Kodak also proposes to share its expertise in the use of the P2 framework with other companies to encourage greater use of the framework. Kodak would do this by working with scientific and technical staff at other chemical companies and stakeholders, reaching out to business audiences, and contacting senior managers in other organizations to provide information on the management structure that would aid in the implementation of the P2 framework in their companies. Kodak will also complete an environmental cost accounting study and a management study to facilitate its discussions with business audiences and senior managers. Increased use of the P2 framework during the research and development phases of chemical development will move environmental decisions up from the end of the pipe and will increase the development of more environmentally-friendly chemicals.

In exchange for the environmental benefits discussed above, Kodak requests relief from the requirement that it wait 90 days after submission of the PMN

before beginning manufacture of new chemicals. Kodak proposes that, where EPA completes its review of a chemical in 28 days, Kodak be permitted to begin manufacture of the chemical 45 days after the PMN is submitted.

REGULATORY FLEXIBILITY

Kodak has an active Community Advisory Council located in Rochester, New York. The Community Advisory Council will be involved in the development of the project. Kodak plans to use the Community Advisory Council to involve stakeholder groups such as citizens and others interested in the development of the XL proposal. Kodak also plans to actively solicit the participation of other stakeholders. Kodak has a web site and a regular neighborhood newsletter which it plans to use to solicit community involvement in the project.

STAKEHOLDER INVOLVEMENT

- Can using an environmental screening tool early-on in the research and development process reduce the environmental risk of the chemicals produced?
- How can a company influence its peers to adopt more environmentally beneficial practices?
- Can EPA encourage companies to develop and manufacture more environmentally beneficial products by providing flexibility that other products are not eligible for?

APPROACHES TO BE TESTED

CONTACTS

Kodak:	John O'Donoghue, 716-588-4741
EPA Region 2:	Aleksandra Dobkowski-Joy, 212-637-3676
EPA/XL HQ:	Nancy Birnbaum, 202-260-2601

FOR ELECTRONIC INFORMATION

More information about Project XL is available on the Internet at http://www.epa.gov/ProjectXL, or via Project XL's Information Line at 202-260-5754.