

US EPA ARCHIVE DOCUMENT

# Memorandum

To: Attendees at IP-2 Meeting, Boston, 11-09-99  
From: George Frantz  
Re: Draft meeting summary  
Date: December 8, 1999

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## Attending/Participating:

Facilitator: Ellissa Tonkin, Office of Alternative Dispute Resolution, EPA-NE  
Steve Groves, Jeff Pike, Neil Hanson, IP-Jay  
Mark Perez, Don Anderson (by phone), EPA, Office of Water; Nina Bonnelycke, EPA-OPR  
Anne Leiby, Chris Rascher, Dave Cochrane, George Frantz, EPA-NE  
Mindy Lubber, Deputy Regional Administrator, and Tom D'Avanzo, Co-Mgr, Assistance & P2

The following is a summary of items agreed upon at the meeting:

*Technical Partnership* -the concept was agreed upon as part of the XL project, but in the future will be referred to as the Collaborative Process team or group. This relates back to the Federal Energy Regulatory Commission (FERC) stakeholder process that IP undertook with great success for all parties.

*Performance Goals* -COD -26 kg/ kkg of unbleached kraft pulp. Color -25 kg/kkg of unbleached kraft pulp. (The number for color was provided by Chuck Kraske of IP after the meeting as agreed during the meeting. Production basis is air-dried tons.) These goals are long-term averages. The goals are not a requirement, but goals which the company pledges to attempt to reach, with the assistance of the Collaborative process team. While it was discussed that language could be inserted to the effect that the COD number is a "stretch" goal, whereas the color limit is more of a "leap," the IP/EPA team is revisiting the characterization of the numbers based on new data provided by IP.

*Current Permit Limits* -COD: 50.7 kg/kkg unbleached ADMT (air-dried metric ton) monthly average and 75 kg/kkg as a daily max. (Note that the value of 75 kg/kkg as a daily max was agreed upon tentatively during the meeting, and IP subsequently confirmed the team's estimate as a valid daily max.) These are more or less the same numbers as suggested in the proposal, although accepting the 50.7 number as a monthly average will be more stringent than accepting it as a yearly average, as IP originally proposed. Color: At the meeting, participants agreed that further evaluation of the Abaseline@ color limit is needed to translate the originally proposed 60 kg/kkg unbleached ADMT (air-dried metric ton) color yearly average to reflect the units, time basis, and monitoring requirements used in the State of Maine color mandate (or the Town of Jay mandate, whichever is more stringent). Information subsequently provided by IP indicates that the State of Maine and the Town of Jay share the same color requirements (including monitoring). IP will evaluate data and determine appropriate quarterly color average limits applicable to the mill that mirrors current color mandates, and information is due back to EPA on 11/29/99.

*Future Permit Limits* -these numbers will be determined by analysis of 12 months of operating data from IP-Jay following implementation of all the XL effluent improvement projects. Limits for COD will be listed in the permit as a monthly average and a daily max. The methodology for determining end color limits will be revisited by EPA and IP to ensure the frequency of monitoring and reporting and the time basis for the limits are appropriate for the effluent color discharge (i.e. does another process for regulating color discharge exist other than the State of Maine color mandate?).

*Additional discussion and agreement relating to permit limits:*

**COD** - Performance goals and baseline permit limits are currently expressed in kg/kkg (production basis). When the COD limits (both baseline and end) are placed in the permit, values will be expressed as lbs/day (pollutant mass basis). For purposes of permit compliance, IP will be reporting effluent data to the permit authority in lbs/day. For the purposes of Project XL, IP will then also report daily production data such that the conversion from lbs/day to kg/kkg can be made.

**Color** - The current color mandates that IP is complying with are expressed in lbs/day (pollutant mass basis). The proposed Project XL color limit and performance goals are expressed in kg/kkg (production basis). Baseline color permit limits will reflect the same procedures as the current color mandates, therefore effluent data will be expressed as lbs/day. The method and basis for expressing the end color permit limits will be determined once the most appropriate process is agreed upon (i.e. State of Maine mandate vs. other potential methodologies). For the purposes of Project XL, IP will then also report daily production data such that the conversion from lbs/day to kg/kkg can be made.

**Conclusions:** For both color and COD, permit compliance is based on effluent data reported in lbs/day. Conversion from lbs/day to kg/kkg requires only the reporting of daily production, a value that is already monitored by the mill. Therefore, it would be useful for IP to supply daily production data for use in evaluating progress in Project XL.

*Project Timeline* - Attendees agreed on the following timeline for the project: One year for the collaborative process to vet the list of effluent improvement projects; two years to implement the projects; and one year to collect monitoring data for the purposes of calculating the new permit limits. IP will start during the first year to implement those projects that all parties agree are obvious candidates.

*Provisions for soft landing* - One principle that was clearly enunciated by EPA is that, where a company has participated in good faith in an XL project, which for whatever reason does not work out, that company will not be penalized by EPA. An important aspect is that the company must have been in compliance with the terms of the FPA. Specific language will be developed for insertion in the FPA.

*Incentives* - as a reward for achieving more stringent goals set forth in the program. While EPA has not committed to offering further incentives, more work needs to be done on this area. IP mentioned that "feel good" measures were certainly valid and appreciated, but they would like something that could be appreciated by IP Corporate or reflected in sales, such as approval for the use of the EPA ELP and/or Project XL logo on every roll of paper they produce. This was not intended to reflect any endorsement, but to acknowledge that IP is a participant in these voluntary initiatives with EPA. Another suggestion was that an educational program be developed for inclusion in school curricula which would focus on some of the positive environmental steps taken by IP and other mills to benefit the environment. The company also mentioned that they were recently awarded Star program status in OSHA's VPP program. Under that program, IP-Jay is exempt from regularly scheduled inspections because of the (audited) excellence of their safety program.