

US EPA ARCHIVE DOCUMENT

Progress to date 1stQ2001: A Six Month Backward Looking View

Kodak's Use of the P2 Framework

- In the first six months since the FPA was signed, Kodak reviewed materials that were possible candidates for commercialization using the P2 Framework. Of the materials that could have been commercialized, 24% were dropped early in the product development process. Drop considerations are based on a variety of factors including potential health and/or environmental issues. Of the materials that were carried through to commercialization as PMN, LVE, or LOREX submissions to EPA, all (100%) were cleared by the Agency through standard review processes. Although the Kodak Project XL project allows Kodak to receive a reduction in the time to commercial materials through simultaneous submission of a PMN and Test Market Exemption, no reduction was requested because use of the P2 Framework early during product development made the reduction in clearance time unnecessary.
- With each PMN submission, Kodak included copies of the computerized P2 Framework analysis print outs for review by EPA staff.

Communication and Outreach

Reports completed and distributed

Ochsner, M. Pollution Prevention and Risk Reduction: Case studies of best practice companies, Department of Urban Studies and Community Health, Rutgers University, N J.

Votta T.J. and White A.L. Design for Competitive Advantage: The business benefits of the EPA Pollution Prevention Assessment Framework in new product development, Tellus Institute, Boston, MA.

Newspaper articles

Ireland C. *Kodak pioneers chemical software: Company, EPA pact will help save money, time in judging risk*, Democrat and Chronicle, Section B, Page 1, for September 15, 2000, Rochester, NY.

Kosseff, J. *Photography and Technology: Chemical recyclers embracing innovation amid glut in silver*, Investor's Business Daily, Section A, Page 8, for February 2, 2001.

Anon. *First TSCA Project XL is with Kodak*, Chemical Regulation Reporter, Vol. 24, page 1669, 2000, Washington, DC.

Other news articles: A group of national newspaper chains has also been provided with information that can be used to develop stories on the P2 Framework and Kodak's use of the Framework. Whether these contacts will result in publications is highly dependent on the needs of the publishing organizations.

Kodak web sites with P2 and Project XL information

<http://www.kodak.com/country/US/en/corp/environment/99CorpEnviroRpt/hseInvestmentsEPA.shtml>

<http://www.kodak.com/country/US/en/corp/annualReport00/corpInfo/hse/hse.shtml>

Research studies about to be published

Work on the following project was begun in the third quarter of 2000. The report is expected to be sent to Congressional sponsors in March 2001 and to be made available to the public in the second quarter of 2001. While the focus of the report is pollution prevention and the GAO staff was briefed on the P2 Framework, the extent to which the report will include coverage of the P2 Framework will be determined independently by the authors of the report.

Hartnett M., Elstein S., and Luehr, S. Research topic area include: legislative actions that promote or inhibit pollution prevention, Interviews held October 23, 2000, Expected report public release date second quarter 2001, General Accounting Office, Washington, DC.

Six Month Forward Looking View

Using P2 Framework

Kodak anticipates analyzing an equivalent number of new materials using the P2 Framework.

Conferences/Presentations

- American Industrial Hygiene Conference. (June 5, 2001; New Orleans, LA) Forum on Cost Effective Applications of Exposure Modeling and Exposure Assessment and OSHA Compliance.

Kodak is drafting a poster on Project XL for submission for consideration for presentation at the 2001 SETAC Meeting in November.

Kodak to present paper on its experience using P2 Framework
EPA to present paper on P2 Framework as framework developer

- Presentation by J. O'Donoghue to the Community Advisory Panel of the NIEHS (National Institute for Environmental Health Sciences) Environmental Health Sciences Center, School of Medicine and Dentistry, University of Rochester. June 2001.
- EPA Workshop on Use of the P2 Framework for State Environment Agencies and Industry. Summer 2001. Kodak to assist EPA in presentations on the use of the P2 Framework.
- Public Stakeholder Meeting: Kodak will hold a meeting in Rochester in June to provide an over view of the project results to community leaders. As a follow-up to the meeting, an Update article (Kodak's neighborhood newsletter) will include a progress report on Project XL activities.
- Kodak is working with a Congressional staff member to develop a review of pollution prevention activities for members of Congress.

Publications

- Kodak and EPA to work with Professor Oshsner to complete peer review of her study and prepare it for publication. The timeframe for completion of this activity is related to Dr. Oshner's schedule.

Other Outreach Activity Related to Kodak's Use of the P2 Framework

Living With TSCA 1999 and 2000: Kodak made presentations on the Kodak-EPA Technology Transfer Project and, use and application of the P2 Framework at Living With TSCA Conferences in 1999 and 2000. Living With TSCA is a major annual forum for industry-EPA dialogue regarding key issues associated with industrial chemicals under TSCA. The conference is sponsored by EPA and major trade associations associated with industrial chemicals. The conferences were opportunities to encourage a broad variety of companies, from a variety of industry sectors, to apply the P2 Framework in product development efforts.

Globe 98: Kodak presented a paper on the P2 Framework and discussed risk reduction opportunities associated with application of the P2 Framework at GLOBE 98. GLOBE is a bi-annual international conference focused on pollution prevention and risk reduction issues.

The GLOBE conference was a forum for informing the international scientific and business community regarding the benefits afforded by the P2 Framework.

QSAR 98: Kodak presented a paper at QSAR 98, the paper describes the P2 benefits of the P2 Framework and discussed the optimal points in the product development cycle for application of the Framework toward P2 outcomes. The QSAR conference series is a forum for information sharing relating to advances in the use and application of structure activity relationships, such as those employed in the P2 Framework.

National P2 Workshops: Kodak presented the keynote address and actively participated in several P2 Framework national workshops sponsored by EPA at state and regional locations. Among other issues, Kodak described the application of the P2 Framework in risk screening, demonstrated specific pollution prevention and risk reduction outcomes resulting from use of the P2 Framework. Industry sectors participating in the workshops include:

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| machine tooling | automotive supply | synthetic rubber |
| consumer products | industrial laundry | plastics |
| pharmaceuticals | products | paints and coatings |
| electronics | specialty chemicals | photochemicals |
| dyes and pigments | automotive fuel | aerospace |
| fabric finishing agents | additives | mining |
| pulp and paper | waste management | |
| industrial chemicals | microprocessors | |
| | military applications | |

Supporting State P2 Programs:

Waste Watch Conference: Kodak presented a joint paper with the EPA on P2 Technology Transfer at the 1997 Waste Watch Conference in Woods Hole, MA. The EPA, state P2 programs, and public interest groups interested in promoting P2 at state and local community levels sponsored this conference. The presentation focused on how states could become involved in promoting design for the environment activities through P2 Technology Transfer.

NYS DEC P2 Conference: Kodak gave a paper at the 12th Annual Pollution Prevention Conference sponsored by the New York State Department of Environmental Conservation. Kodak’s paper discussed the risk reduction benefits afforded by the P2 Framework in product development efforts.