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EPA

Project XL:
International Paper
Effluent Improvements

WHAT IS PROJECT XL?

Project XL, which stands for "eXcellence and Leadership," is a nation-wide EPA initiative that tests innovative ways of achieving better and more cost-effective public health and environmental protection. EPA is using the lessons learned from Project XL to redesign its 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. Simultaneously, the program also strives to improve accountability to stakeholders. EPA's intention is that each project should test new ideas with the potential for wide application and broad environmental benefits. As of May 2000, twenty-five pilot projects are in place and approximately thirty additional projects are in various stages of development.

SUMMARY OF THE INTERNATIONAL PAPER PROJECT

Under this XL project, the International Paper Androscoggin Mill (IP-Androscoggin) in Jay, Maine, will receive a waiver from certain Best Management Practices (BMPs) under the Clean Water Act (CWA). In exchange for this regulatory flexibility, IP-Androscoggin will implement a series of effluent improvement projects tailored specifically to the mill's operations that will reduce effluent discharges more than what is expected through implementation of the BMPs alone. IP will also accept numeric limits in their water quality permit corresponding to the expected improvements in effluent quality. Two key features of the project are that:

! The effluent improvement projects for the mill will be designed and selected by a Collaborative Process Team that includes representatives from IP, EPA, the Maine Department of Environmental Protection, the Town of Jay, and other stakeholder groups

! The mill's effluent discharge permit will be revised twice during the project: Once at project onset to include numeric limitations for color and chemical oxygen demand (COD) that guarantee sustained environmental performance at current levels; and a second time at the conclusion of the project to capture any performance improvements deriving from the XL project.

SUPERIOR ENVIRONMENTAL PERFORMANCE

IP's Effluent Improvement XL Project, EPA's 26th Final Project Agreement, was signed on June 29,

2000.

FLEXIBILITY

Replacing generic BMP requirements with targeted, facility-specific effluent improvement projects and with new permit limits is expected to reduce the mill's discharge levels of several key pollutants to approximately half of current levels. Specifically, the mill currently discharges its effluent with chemical oxygen demand (COD) at approximately 47 kg/kkg (kg per air-dried metric ton of pulp production) and color at approximately 60 kg/kkg. Analysis performed on facility operations and these parameters predicts that through the XL Project, these levels will be reduced to approximately 26 kg/kkg and 25 kg/kkg, respectively. A reduction of this magnitude is unlikely to occur without the XL Project, and ultimately these effluent improvements will contribute to improved ambient water quality downstream in the Androscoggin River.

Existing federal regulations under the CWA require pulp and paper mills to implement certain BMPs, including installing and maintaining various operating procedures and infrastructure within the facility; monitoring, data gathering, and reporting; and carrying out several other activities designed to prevent leaks and spills of spent pulping liquor, soap and turpentine that might end up in a mill's final effluent. IP claimed in their project proposal that current practices at their Androscoggin Mill, including existing spill prevention procedures and process control technologies, are advanced enough that further implementation of the required BMPs as detailed under the CWA is unlikely to result in significant improvements to the mill's final effluent. EPA's assessment of the proposal confirmed this claim, and gave rise to the Agency's support for the waiver.

STAKEHOLDER INVOLVEMENT

Stakeholder involvement is a key ingredient of any successful XL project. For this project, IP contacted stakeholders early on in project development and has requested their input on a continual basis. This project has a unique feature that guarantees continued input by including stakeholders on the collaborative process team that is to assess the effluent improvement projects.

APPROACHES TO BE TESTED

! The ability of tailored effluent improvement projects to improve environmental performance at a pulp and paper mill beyond what would be expected though compliance with existing CWA BMPs

! The use of the water quality permit to capture environmental improvements on an on-going basis rather than merely to serve as a guarantee against performance backsliding

! The use of a collaborative process with participants from outside parties to optimize a company's environmental performance

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FOR ELECTRONIC INFORMATION

More information about International Paper's Effluent Improvement XL Project or about the XL Program in general is available at <http://www.epa.gov/projectxl>.