

US EPA ARCHIVE DOCUMENT



Project XL: Kodak P2 FRAMEWORK



WHAT IS PROJECT XL?



Project XL, which stands for “eXcellence and Leadership,” is a national initiative that tests innovative ways of achieving better and more cost-effective public health and environmental protection. The information and lessons learned from Project XL are being used to assist the U.S. Environmental Protection Agency (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, in conjunction with greater accountability to stakeholders. It is vital that each project tests new ideas with the potential for wide application and broad environmental benefits. As of September 2000, thirty-two pilot experiments are being implemented and over twenty additional projects are in various stages of development.

WHAT IS THE P2 FRAMEWORK?

The Pollution Prevention (P2) Framework is a set of chemical screening methods that EPA’s Office of Prevention, Pesticides and Toxic Substances (OPPTS) developed to screen chemicals and products for risk in cases where data are missing or limited. OPPTS developed the P2 Framework to help screen pre-manufacture notifications (PMN) for new chemical substances that are submitted to the Agency under Section 5 of the Toxic Substances Control Act (TSCA). TSCA requires that prospective manufacturers (or importers) wait 90 days after submitting a PMN before they can begin to manufacture (or import) a new chemical substance. Within that 90-day period, the Agency must evaluate the report and identify potential risks of the new chemical substance. The P2 Framework has allowed the Agency to screen new chemical substances quickly in the absence of data.

SUMMARY OF THE KODAK XL PROJECT

Kodak manufactures cameras, scanners, film, and photographic paper and chemicals. As a leader in new technology development in the imaging industry, Kodak registers many new chemical substances with the EPA each year. Under this project, Kodak’s facility in Rochester, NY, will use the P2 Framework and seek administrative flexibility to manufacture PMN chemicals for commercial test marketing 45 days, rather than 90 days after notification to EPA. Kodak will use the P2 Framework during the early stages of product development, allowing them to improve the environmental performance of products while reducing costs, saving time, enhancing competitive advantage, and decreasing potential liability. Kodak also will conduct a series of innovative actions to demonstrate to other stakeholders how the P2 Framework can help develop products that are both environmentally and economically sustainable. This XL project, EPA’s 32nd, was signed on September 14, 2000.

SUPERIOR ENVIRONMENTAL PERFORMANCE

By using the P2 Framework, Kodak will be able to develop products and processes that are innovative, cleaner, and safer for the environment, in less time, while operating manufacturing and waste handling processes at higher levels of environmental performance.

FLEXIBILITY

Under the Toxic Substances Control Act (TSCA), a prospective manufacturer must wait 90 days after submitting a pre-manufacture notice (PMN) before beginning to manufacture a new product. EPA often concludes its review of the PMN after 28 days for chemicals that are identified as “low risk” Through its use of the P2 Framework, Kodak expects that EPA generally will complete its review of Kodak’s PMN chemicals within 28 days or less. Kodak therefore proposes that, in cases where EPA’s review of

Kodak's PMN is completed in 28 days, it be allowed to begin manufacture after 45 days rather than 90 days. The shortened 45-day waiting period will be available only for chemicals for which EPA has no further concerns.

STAKEHOLDER INVOLVEMENT

Public meetings were held to inform the general public about this XL project and invite their comments and participation. Kodak will work with its Active Kodak Park Community Advisory Council to involve citizens and others interested in this project. Kodak also publishes a bi-monthly update, in which they will notify stakeholders about the status of the XL project and encourage participation.

APPROACHES TO BE TESTED

- Will use of the P2 Framework early in the design and development of chemical substances result in products that are safer and better for the environment?
- Will shorter EPA review periods for chemicals identified as low-risk products reduce costs, decrease potential liability, and improve market share-resulting in a competitive advantage for companies?

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FOR ELECTRONIC INFORMATION

More information about the Kodak XL Project, or the Project XL Program, is available on the Internet at <http://www.epa.gov/projectxl> under "Information on Specific XL Projects," or via Project XL's Information Line at 202-260-5754.