INLAND EMPIRE PAPER COMPANY

Papermakers since 1911.

Company Background

- Manufacturing paper products in Millwood since 1911
- Own and manage 121,000 acres of timberland in Eas
- Plan

Circles of Sustainability

Federal Regulations

SUBCHAPTER R - TOXIC SUBSTANCES CONTROL ACT, PART 761

- Manufacturing and processing of PCBs was banned under TSCA in 1979

- …pigments that contain 50 ppm or greater PCB may be processed, distributed in commerce, and used in a manner other than a totally enclosed manner until January 1, 1982*…40 C.F.R. § 761.3 (g), Reserved after 1999*

- The concentration of inadvertently generated PCBs in products leaving any manufacturing site or imported into the United States must have an annual average of less than 25 ppm, with a 50 ppm maximum" *40 C.F.R. § 761.3 (1)*

PCB Regulatory Paradox

Reference	PCB Concentration (ppm)	Magnitude Difference
Federal TSCA Allowance	50 (max.)	----
EPA/WA Current HHWQC	0.000000007	7,142,857,143
Spokane Tribal WQS	0.00000000137	38,461,538,462

IEP's Effluent	0.0000024	20,833,333

PCBs in Pigments

From Hu and Hornbuckle, 2010

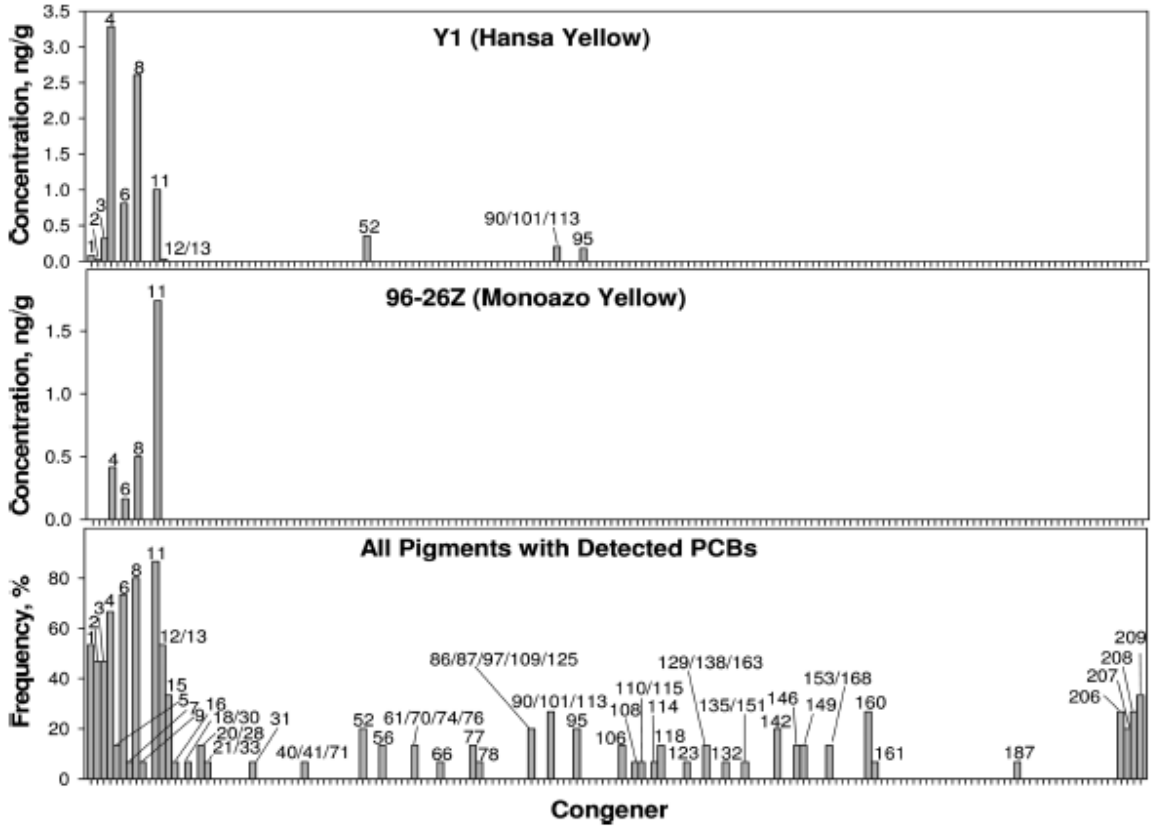
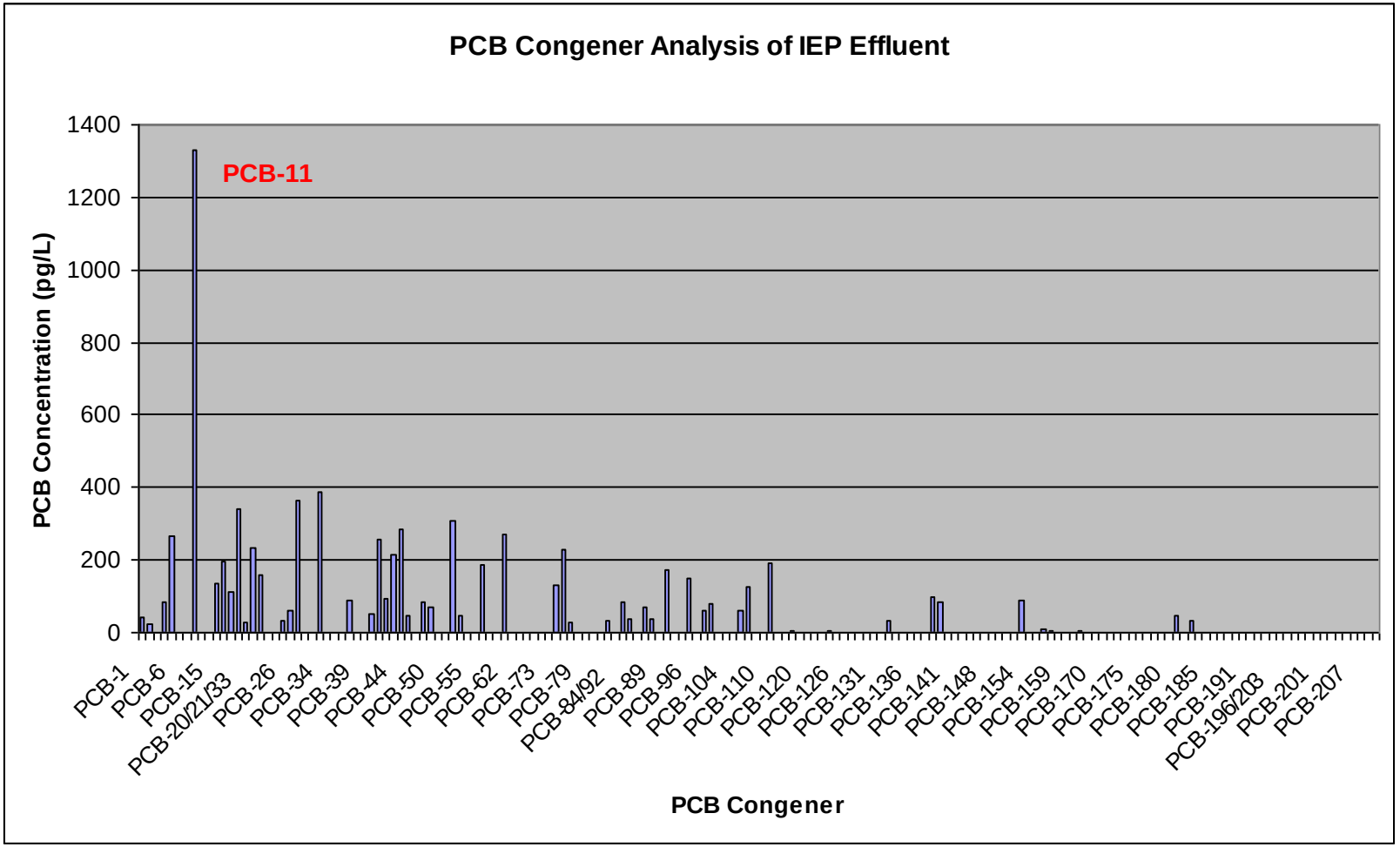
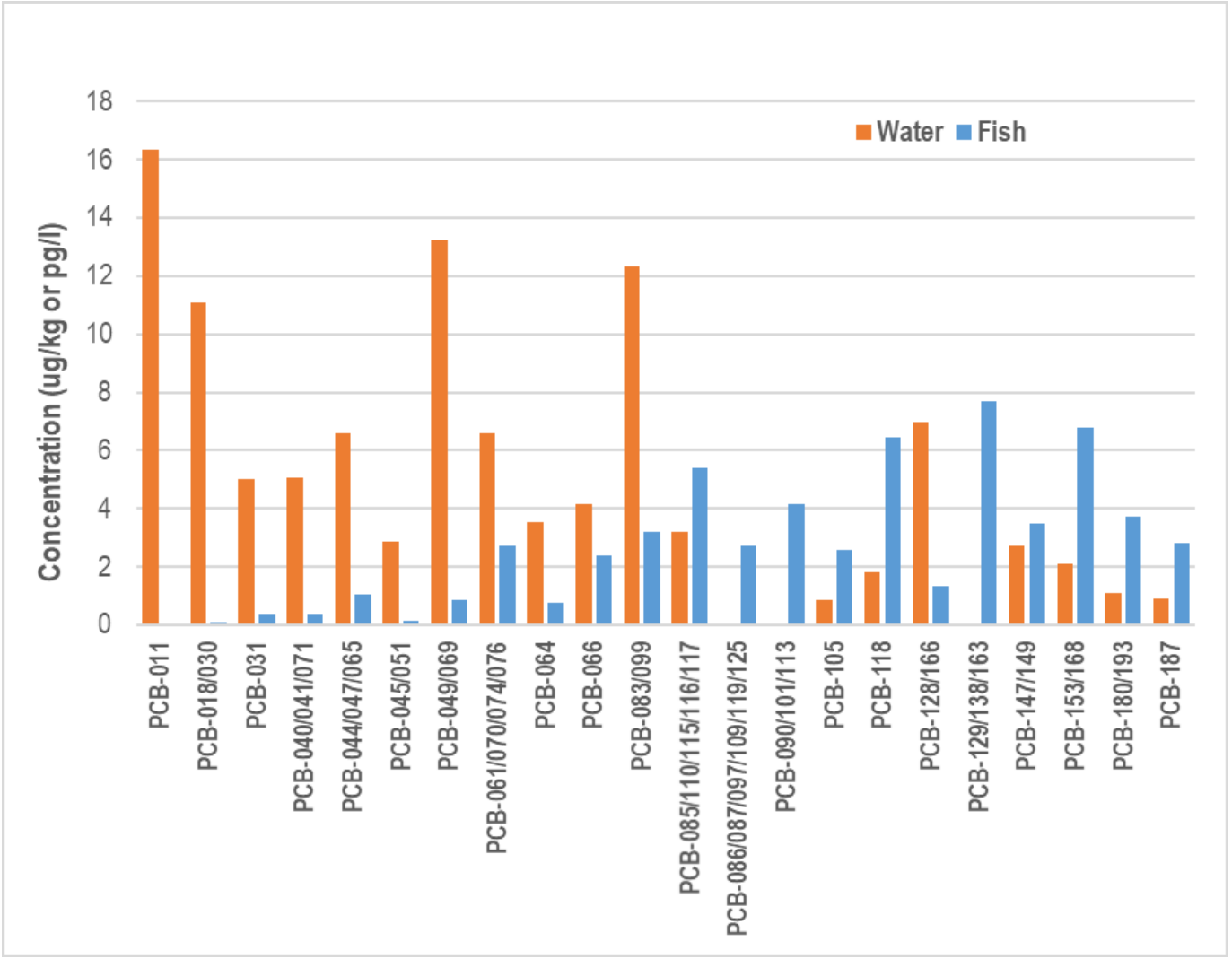


FIGURE 2. Examples of PCB profiles in paint pigments (top two plots) and the frequency of congener detection in the 15 pigments with detected PCBs (bottom plot).

PCB Analysis at IEP



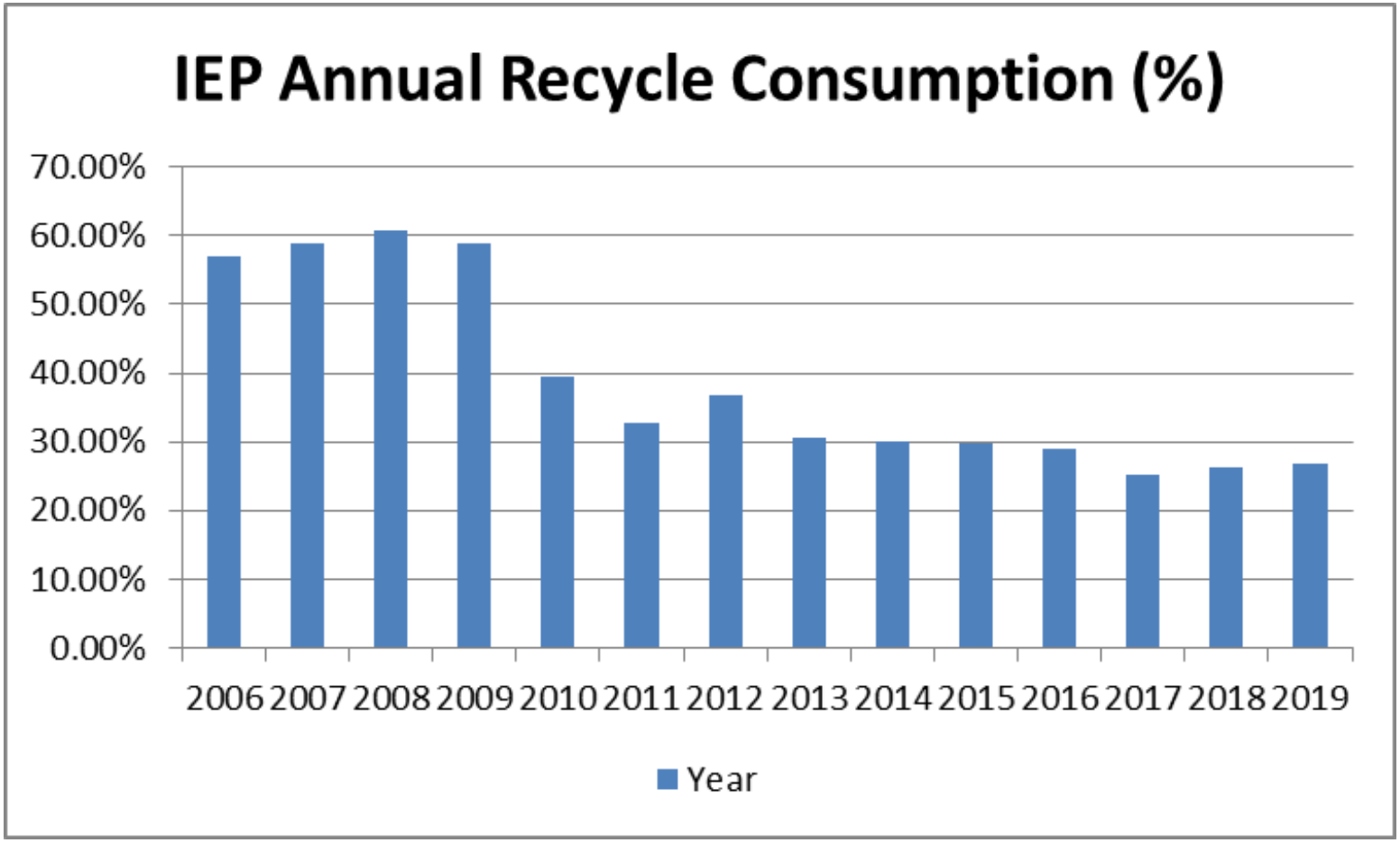
Water column dominated by PCB-11 But Not Fish!



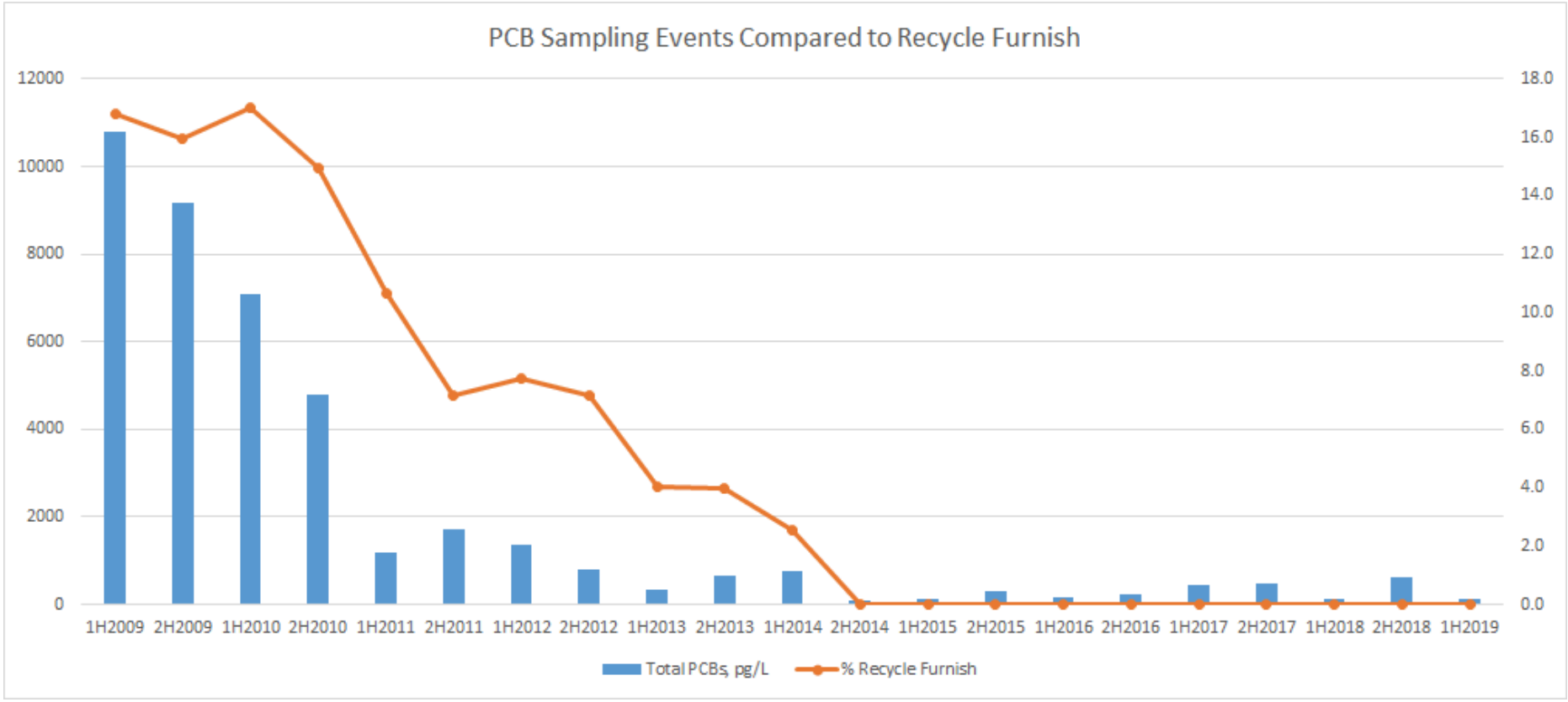
IEP BMP's

– Very limited due to primary source from inadvertent generation in inks and pigments:

- Investigate TSCA/iPCB Strategies to reduce or eliminate source
- End-of-pipe removal
  - No known technologies to attain WQS
- Elimination of Recycling
  - Have not Solved the Problem!


IEP Annual Recycle Consumption (%)
70.00%
60.00%
50.00%
40.00%
30.00%
20.00%
10.00%
0.00%
2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019
Year

Ponderay Newsprint



Solutions?

- Technical:
  - Use/Develop alternative (non-chlorinated) products
  - Use/Develop products w/reduced levels of PCBs
  - Develop new end-of-pipe treatments
  - Other Technical Solutions?

Solutions?

- Regulatory/Policy:
  - Perform risk assessment of iPCB congeners
  - Do not regulate lower congener PCBs
  - Regulate only the 12 Dioxin like PCBs
  - Establish lower TSCA thresholds
  - Rulemaking to bring CWA & TSCA regulations on PCBs into conformity, if environmental or health risk is demonstrated
  - Provide NPDES permit Offsets/Exclusions for iPCBs
  - Encourage End-Users to use lower or non-chlorinated containing products (Publishers, Printers, Packaging, State's, etc.)
  - Incentivize competitive marketing advantage with use of non-PCB containing products
  - Other Regulatory/Policy Solutions?


Questions?