

form ltr.  
Drew.

March 30, 1994

Mr. Italo Cappabianca  
1216 West 26th Street  
Erie, Pennsylvania 16508

Dear Mr. Cappabianca,

Like many Americans, I am concerned about the environmental problems we are facing today. I have a great respect for the EPA and the job that it is doing, however, there are proposed regulations currently being considered for the pulp and paper industry that have me concerned. That concern is too stringent of regulations that could have a tremendous economic impact on the Erie, Pennsylvania area.

International Paper/Erie Mill is one of the largest employers in the Erie area. They made a commitment to the community to meet or exceed all EPA regulations because of the fact that they are located in a highly populated residential area. They have kept the promises they made. In the early 1970's, Hammermill Paper invested more than \$5 million to help finance the construction of a "state of the art" waste treatment plant and has spent several million additional dollars on upgrades over the years. They have built and maintain a dedicated pipeline to the waste water treatment plant that handles only their wastewater. No residential, commercial or industrial customers use this pipeline except Hammermill. They, in essence, have created their own miniwastewater treatment plant through this dedicated line.

International Paper/Erie Mill is constantly working on upgrades within their plant to improve conditions. The requirement to substitute chlorine dioxide for elemental chlorine in the pulp bleaching process is something they have been doing. The EPA's requirement to also add oxygen delignification to the process is totally unnecessary since the Erie Mill is already at non-detectable levels of dioxin and has been for several years.

My feeling is that the EPA should be the policing agency regarding what levels are acceptable but I do not believe they have more expertise than the industry itself to actually tell the industry the best way to achieve these acceptable levels.

If Hammermill/Erie Mill is forced to make these changes, in all likelihood the money will not be there to do so. This means that the Pulp Mill will have to shut down with 250 people losing their jobs. Approximately fourteen (14) people at the Erie Wastewater Treatment Plant will lose their jobs because they are employees dedicated to monitoring the Hammermill pipeline. The Erie Mill would be forced to buy their pulp and should this prove to be uneconomical, we face the possibility of the entire Mill shutting down.

I do not want the EPA to back down entirely on this problem because it could be a serious situation elsewhere.

All I am asking is that the EPA listen to the alternative proposals presented by the Pulp and Paper Industry before making any final decisions on enforcing these new regulations.

We will be watching the outcome of your deliberations. As a resident of Erie, Pennsylvania and as a subcontractor for Hammermill/Erie Mill, our very existence depends on your keeping an open mind to the Pulp and Paper Industry alternative proposal.

Sincerely yours,

*Sandra J. Seald*  
2925 McKee Rd  
Erie, PA 16586

# INTERNATIONAL PAPER

**HOLLY B. KINSEY**  
REGIONAL PUBLIC AFFAIRS MANAGER

19 1/2 NORTH FOURTH STREET  
HARRISBURG PA 17101  
PHONE 717 233 3527

February 21, 1994

TO:	The Honorable Buzz Andrezeski	cc:	Brad Biggar
	The Honorable Linda Sebko-Jones		Ed Leslie
	The Honorable Karl Boyes		Ann Miller
	The Honorable Italo Cappabianca		
	The Honorable James Merry		
	The Honorable Tom Scrimenti		

FROM: Holly Kinsey (FAX FAX)

**RE: PROPOSED EPA REG (CLUSTER RULE) DEVASTATING IMPACT TO ERIE MILL**

Post-It™ brand fax transmittal memo 7671	From	Holly
	To	Cappabianca
	Co.	
	Dept.	
	Phone #	
	Fax #	

In the next few days, you are likely to see/read media reports regarding EPA's proposed "Cluster Rulemaking" and the potential devastating impact to International Paper's Erie mill.

The "Cluster Rule" (combined air and water regulations for the pulp and paper industry) is the biggest issue facing International Paper and the most costly rule EPA has ever written. Conservative estimates of the proposed rule's capital costs to International Paper are anticipated at more than \$1.5 billion.

International Paper supports the cluster rule approach to environmental regulation but is seriously concerned about EPA's approach with specific proposals in the rule. The proposal is expected to result in significant job loss and pulp & paper mill closures around the country.

Last week, Erie mill management began informing mill employees about the impact of the proposed rule. This week, we will continue contacting appropriate officials requesting their support for a more reasonable, environmentally beneficial, cost-effective rule. The public comment period closes on April 15 with the final rule expected in the Fall of 1995.

Please contact me if you have any questions. I will send you more details in the future, but I wanted to make you aware of this issue prior to your reading it in the paper.



*ERIE COUNTY LEGISLATIVE DELEGATION*  
of the  
Pennsylvania General Assembly

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**A. Buzz Andrezeski**  
*State Senator, 49th District*

**Linda Bebko-Jones**  
*Representative, 1st District*

**Karl W. Boyes**  
*Representative, 3rd District*

**Italo S. Cappabianca**  
*Representative, 2nd District*

**James R. Merry**  
*Representative, 5th District*

**Thomas J. Scrimenti**  
*Representative, 4th District*

March 9, 1994

Carol M. Browner, Administrator  
Office of Administration  
Waterside Mall  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Administrator Browner:

The International Paper Company's Erie pulp and paper mill has provided gainful employment to thousands of Pennsylvania citizens for 96 years. In our two decades of public service, we believe that the mill has taken their environmental responsibilities very seriously. In the 1970's, the facility's management, at the urging of EPA and in conjunction with the city of Erie and the Erie Sewer Authority, helped modernize Erie's publicly owned treatment plant to provide additional primary, secondary and final treatment of the Erie mill's wastewater. Since the original \$5 million capital contribution to the POTW, the mill has participated in several upgrades of the POTW on a cost share basis.

On December 17, 1993 your agency proposed regulations that would require pulp and paper facilities to meet final effluent parameters before the waste water leaves their property. This proposed regulations, known as the Cluster Rule, would also require that elemental chlorine be substituted with chlorine dioxide and oxygen delignification our understanding that International Paper's Erie mill invested in excess of \$30 million in the past five years on state-of-the-art environmental controls which among other achievements resulted in reducing dioxin emissions to less than detectable levels.

Recent data, collected after EPA assembled its data base in 1990/1991, indicate that all objectives of the Cluster Rule can be achieved if the industry substitutes chlorine dioxide for elemental chlorine and that oxygen delignification is totally unnecessary. Even though the Erie facility is below detectable levels of dioxin in its effluent (measured in parts per quadrillion), the company has indicated it will remove elemental chlorine from its bleach plants, including the facility at Erie. Thus, we urge EPA to consider this data and accept the industry's alternative approach which would result in \$3.8 billion savings in capitol costs to the industry as a whole.

Secondly, we also urge EPA to modify its position on fence-line compliance to accommodate those mills that rely on off-site treatment plants like the Erie mill. For those mills which have invested millions of dollars to construct, upgrade and operate a POTW, it is senseless to require them to build a second treatment plant on-site. For the Erie mill alone, such construction would cost approximately \$20 million causing the local community



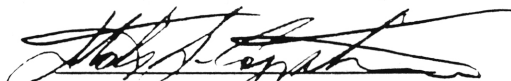
Carol M. Browner. Administrator  
March 9, 1994  
Page 2


to operate and upgrade the POTW without the financial assistance of International Paper.

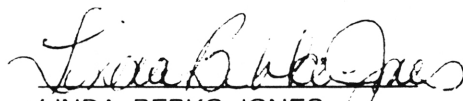
If the Cluster Rule is implemented in its present form, the total cost of compliance for the Erie mill, according to these costs, many which are unnecessary and could be amended, the pulping operation at Erie would close displacing approximately 250 employees.

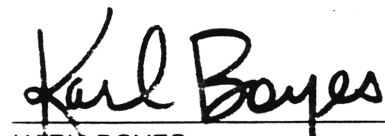
On behalf of the Erie Delegation to the Pennsylvania General Assembly, we petition the Environmental Protection Agency to give serious consideration to the concerns raised in this letter. Finally, we request the opportunity to meet with you and your representatives in Washington before the April 15 public comment deadline to further discuss the issue. Thank you for your consideration.


Sincerely,

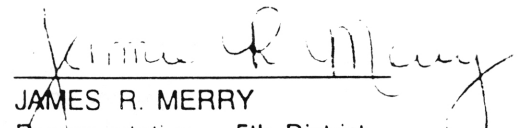
  
ITALO S. CAPPABIANCA  
Representative - 2nd District

  
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State Senator - 49th District

  
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Representative - 1st District

  
KARL BOYES  
Representative - 3rd District

  
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**House of Representatives**  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

COMMITTEES

FEDERAL-STATE RELATIONS, CHAIRMAN

**From:** Rep. Italo S. Cappabianca  
**To:** Members of the Erie Delegation  
**Date:** March 24, 1994  
**Re:** April 13th Meeting with EPA about the International Paper Plant

In response to our request to meet with Environmental Protection Agency officials about the IP/Hammermill plant situation, the EPA has agreed to meet with members of the Erie delegation in **Washington on April 13th at 2 pm**. Because the EPA has announced its intention to close the opportunity to make comments on these proposed regulations after April 15th, I urge you to attend this meeting to express your concern about the new EPA regulations and possible job losses at the IP/Hammermill.

For more information about transportation to the meeting or if you have any questions, please contact Dan Ocko at my Harrisburg office at 717-787-4358.

## Hammermill Papers



EDWARD K. LESLIE  
MANAGER  
ENVIRONMENT, HEALTH & SAFETY

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ERIE, PA 16533  
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FAX 814 870 6598

April 21, 1994

State Representative Italo Cappabianca  
Second Legislative District Office  
1216 West 26th Street  
Erie, PA 16508

Dear Representative <sup>Italo</sup> Cappabianca:

I wanted to take a moment to thank you for the support and assistance you have provided to International Paper regarding our common concern the impact the Cluster Rule could have on the Erie mill and surrounding community. The grassroots campaign, letters of concern from the Erie delegation and your personal appearance at the EPA last week, certainly have helped raise the issues to a level that it appears that EPA will consider alternative approaches to the currently proposed draft regulation. I'd also like to pass on my thanks to Dan Ocho for his assistance in this matter.

There is much that remains to be done in future months to modify this regulation to assure that it provides environmental protection as well as economic stability. I'm confident that by continued support of our legislators that these objectives can be realized.

Very truly yours,

Edward K. Leslie, Manager  
Environment, Health & Safety

EKL/pp