



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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JAN 22 2007

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY & OCCUPATIONAL
HEALTH)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT)

SUBJECT: Significant Noncompliance (SNC) in Clean Water Act (CWA)

The Environmental Protection Agency (EPA) measures the Department's CWA compliance by their significant non-compliance (SNC) determination for about 55 major DoD wastewater permits. These SNC determinations apply to both data reporting and effluent limits. For FY2004 and FY2005, EPA indicated that DoD facilities not in SNC were 79% and 73%, respectively. This trend must reverse itself.

Recently, the DoD Components have worked with EPA's Federal Facility Enforcement Office to improve issues associated with EPA's database, DoD's effluent discharges, and resolve non-compliance at installations. Improvements have been made. To keep this effort moving forward, I am setting a goal of zero SNCs. Therefore, I am asking each DoD Component with CWA SNCs to identify their root causes and develop an overall action plan to eliminate existing, and prevent future SNCs. In addition, I am requesting that each DoD Component with installations in CWA SNC for FY06, provide me a briefing (separate from the Environmental Management Reviews) on the root cause and remedy for each installation in non-compliance. Please provide your action plan and briefing within 60 days.

My point of contact for this effort is Mr. Ed Miller who can be reached at (703) 604-1765 or e-mail at Edmund.Miller@osd.mil.

Alex A. Bechler
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Assistant Deputy Under Secretary of Defense
(Environment, Safety and Occupational Health)

Attachment:
As stated

cc: DASAF(ESOH)
D. Kling (EPA - FFEO)

