



United States Environmental Protection Agency

Ongoing Strategies to Reduce the Rate of NPDES SNC at Federal Facilities & Potential Broader Application

EPA-State SNC National
Compliance Initiative
Symposium II

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Topics Covered

- Background on federal facilities in SNC
- Strategies currently underway & in the queue
- Discussion: Useful ways to share information with Regions/States
- Lessons learned & broader application possibilities
- Questions

Federal Facilities in SNC

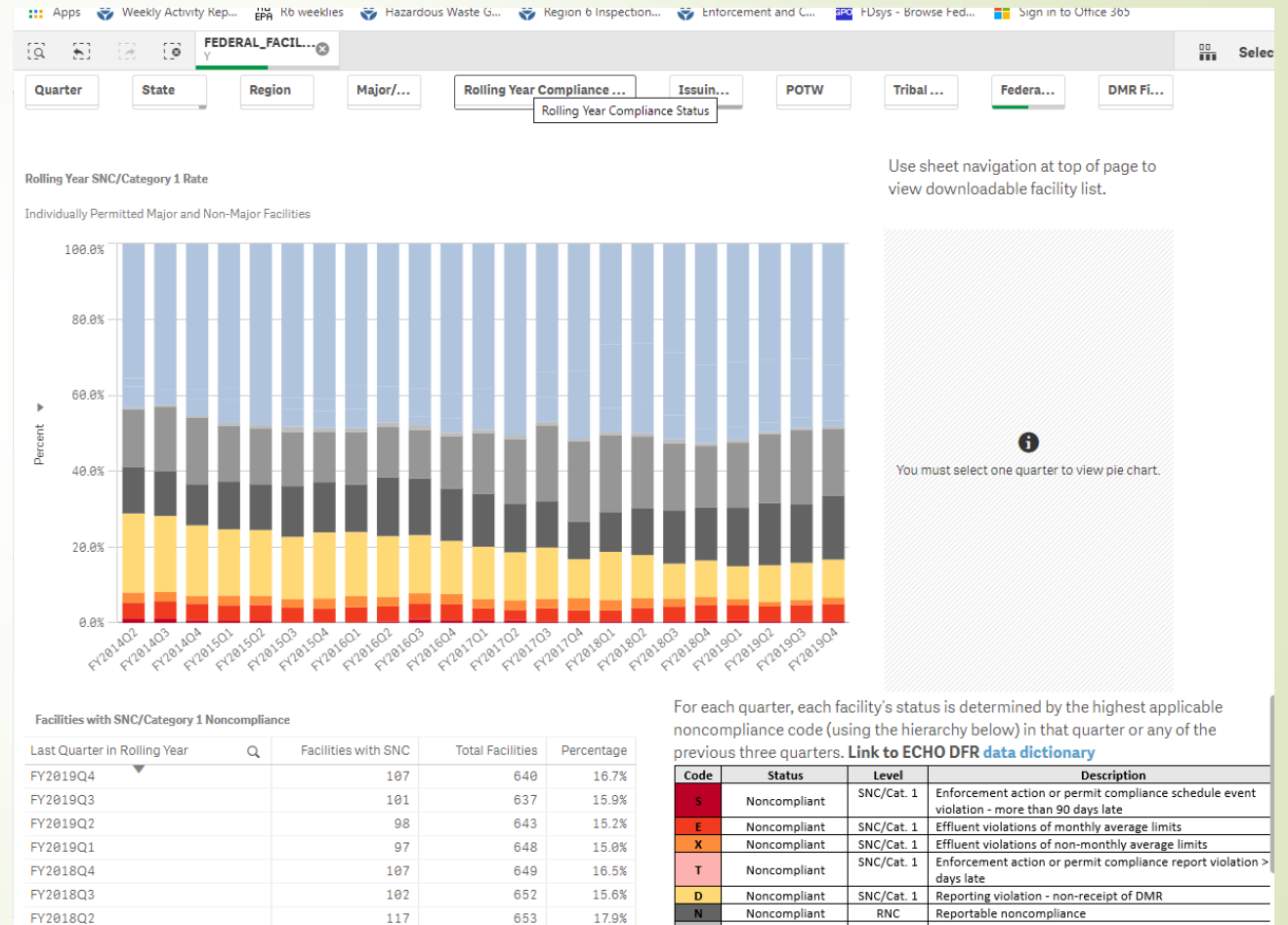
- Approximately 650 federal facilities with individual NPDES permits, and over 16% are in SNC with their permits (based on 4-quarter rolling rate)
- Why are federal facilities important in this NCI?
 - Federal agencies should be leaders in environmental compliance
 - Hold federal agencies accountable to same standard of environmental compliance as other members of the regulated community
 - Unique challenges

Federal Facilities in SNC

- **Goals of NCI:**
 - 1) Reduce by half the national SNC baseline rate of 29.4% by the end of FY 2022, AND
 - 2) Assure that the worst SNC violators are timely and appropriately addressed
- Same goal for federal facilities
- Baseline rate for federal facilities is:
 - 15% for 1-quarter rate
 - 23.59% for 4-quarter rolling rate

Federal Facilities in SNC

- For FY19Q4, the 4-quarter rolling rate was **16.7%** (107 federal facilities in SNC)
- For FY19Q4, the 1-quarter rate was **8.7%** (57 federal facilities in SNC)
- Slight uptick in rate from previous quarters



Work Underway to Reduce SNC Rate

- Continue EPA-state quarterly meetings to discuss SNC rate, root causes, and strategies to reduce SNC rate
- Identify most serious SNC violators and how EPA or states will address, including enforcement
- Improve data completeness and accuracy
- Share best practices for addressing SNC
- Deliver compliance alerts and webinars to the regulated community

Work Underway to Reduce SNC Rate at Federal Facilities

- Engage with Federal Agency HQs to discuss facilities in SNC and how to address noncompliance
- Evaluate federal facilities in SNC every 6 months, identify recurring facilities, and reengage Federal Agencies as appropriate
- Address data issues, as well as specific federal facilities in SNC
- Develop compliance bulletins for federal facilities and post to [FedCenter.gov](https://www.fedcenter.gov)
- Assist regions/states in addressing SNC at federal facilities

Next Steps/Evolving Strategies

Discussion: Useful Ways to Share Information with Regions/States

Lessons Learned and Possible Broader Application of Strategies

- Sending letters to federal agency HQs twice per year has been a successful strategy
 - Received immediate responses from HQs
 - Assigned designated points of contact at HQs
 - HQs formally directed their facilities to return to compliance
 - Calls/meetings to discuss status and corrective actions planned/taken, including where facilities reached out to states to correct data or seek assistance
 - Federal Agency HQs have expressed appreciation for the letters, as they bring the facilities to HQs' attention
 - In subsequent quarters, certain facilities discussed were no longer in SNC

Lessons Learned and Possible Broader Application of Strategies Continued

- Potentially could work in situations where:
 - There are multiple state facilities under the same state agency HQs that are in SNC
 - There are multiple private facilities under same corporate umbrella that are in SNC

Questions?

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