OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON DC 20301-3000

ACQUISITION AND
TECHNOLOGY

JUN. 21 2000

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY & OCCUPATIONAL HEALTH)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT & SAFETY)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(ENVIRONMENT, SAFETY & OCCUPATIONAL HEALTH)
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: EPCRA Toxic Release Inventory (TRI) Reporting for Calendar Year 1999

In late May 2000, the Environmental Protection Agency published a new guidance document entitled "EPCRA 313 Questions and Answers Addendum for Federal Facilities, Revised 1999 Version." The document contradicts existing DoD policy and guidance in several areas, and this could create a dilemma for those preparing TRI reports at the installation level. Therefore, I want to clarify DoD's position for calendar year 1999 TRI reports.

DoD Components should use existing DoD guidance published in 1995, 1997, 1998, and 2000 in putting together their calendar year 1999 TRI reports. DoD Components may refer to EPA guidance as needed. However, where EPA guidance and DoD guidance do not agree, DoD Components shall follow DoD guidance.

If, during an EPCRA inspection, issues arise over the differences between DoD and EPA guidance, the DoD facility should elevate the issue through their chain of command and inform the appropriate DoD Regional Environmental Coordinator. DoD will work with the EPA headquarters to resolve any differences under Executive Order 13148 or any other appropriate process.

My point of contact for this matter is Mr. Eric Spillman at (703) 604-1732, or e-mail at spillmer@acq.osd.mil.

Sherri W. Goodman
Deputy Under Secretary of Defense
(Environmental Security)