



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY, AND OCCUPATIONAL HEALTH)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(ENVIRONMENT, SAFETY, AND OCCUPATIONAL HEALTH)
STAFF DIRECTOR, DEFENSE LOGISTICS AGENCY (DS-E)

SUBJECT: Revisions to Knowledge-Based Corporate Reporting System (KBCRS) Defense
Environmental Restoration Program (DERP) Data Templates and Reopened Sites

High quality DERP data is important to ensure the information we use to support our internal and external reporting requirements is accurate and complete. In addition, we need to collect the appropriate performance and financial information necessary for program analysis and oversight.

To that end, the KBCRS Data Subcommittee, which includes representatives from your offices, continues to conduct an in-depth review of data fields and reporting requirements. The purpose of the review is to identify data elements that are out of date, are no longer required, or need clarification to ensure consistent reporting. Attachment 1 contains the list of KBCRS changes the Subcommittee agreed to during this year's review and the timeline for making the changes in the data transmission templates.

One topic the Subcommittee discussed at length was data quality and the challenges related to reporting reopened sites in KBCRS. Attachment 2 memorializes the preferred approach for tracking reopened sites in KBCRS.

We will all benefit from this effort and will be better equipped to report our cleanup progress both internally and externally. I want to thank your staff for their hard work over the last several months to continue to improve our data quality. My point of contact is Ms. Deborah Morefield, at (703) 571-9067 or deborah.a.morefield.civ@mail.mil.


Maureen Sullivan

Director, Environment, Safety, and Occupational Health

Attachments:
As stated

**Changes to the Knowledge-Based Corporate Reporting System (KBCRS)
Data Transmission Templates**

Changes for the end of Fiscal Year (FY) 2013 Installation/Site Submittal Due in November 2013:

1. Delete these tables from KBCRS:
 - a. Cleanup Activities/Progress Table (CLEANREP)
 - b. Land Use Control (LUC) Funding Table (LUC_FND)
 - c. Property Transfer/Lease Table (PROP_TRN_LSE)
 - d. Base Realignment and Closure (BRAC) Cleanup Plan (BCP) Abstract Funding Table (BCP_FND)
 - e. BCP Abstract Narrative Table (BCP_NARR)
 - f. BCP Abstract Sub-narrative Table (BCP_SUB_NARR)
 - g. BCP Abstract Sub-narrative Summary Table (BCP_SUB_TYPE)
 - h. BCP Abstract Summary Area Table (BCP_TYPE)
 - i. BCP Abstract Budget Activity Table (FNDINFO_BDGACT)
 - j. Funding Eligibility Table (FNDINFO_ELIG)
2. Delete the funding eligibility field (fndinfo_elig_cd) from the Site Table (ENV_REST_SITE).
3. Delete the field that captures the name of the organization responsible for the LUC after the sites achieve remedy in place/response complete (luc_riprc_mgt_nm) from the LUC Description Table (LUC_DESC).
4. Update the description of the parcel identifier field (envst_parcel_id) in the LUC Site Table (LUC_ENVST) to “Indicates the parcel ID associated with the site.”
5. Add “Master Plan” and “LUC Implementation Plan” to the LUC Document Type Table (P_LUC_DOC_TYPE).
6. Delete “None” from the LUC Restriction Table (P_LUC_RESTRICT).

Change for the FY 2015 President’s Budget Backup Data Submittal Due in January 2014:

Add a new primary table (CTC_CHG) and a new reference table (P_CTC_CHG) to support the Cost-to-Complete (CTC) Update Procedure, which will be included in the next update to DoD Manual 4715.20. The CTC Update Procedure requires the DoD Components to report CTC changes of 10 percent or greater at a site from the prior year estimate (\$25,000 minimum, excluding inflation and work completed), and the reasons for the changes, in the Defense Environmental Restoration Program information system¹.

¹ We will add these tables to KBCRS for the January 2014 submittal but we will not begin enforcing the requirement until the January 2015 submittal.

Changes to the Knowledge-Based Corporate Reporting System (KBCRS) Data Transmission Templates

Changes for the Mid-Year 2014 Submittal Due in August 2014:

1. Add a field to the Site Table (ENV_REST_SITE) to indicate whether the DoD Components are addressing multiple media under one site (mult_media_cd).
2. Add a field to the Phase Table (PHASES) to identify sites that do not have a defined end date for the remedial action operation and/or long-term management phases (rmdyactn_indef_cd).
3. Add a new primary table (ENVST_DD) to accommodate reporting of estimated and actual record of decision/decision document signature dates.
4. Add a new primary table (LUC_DOCUMENT) to accommodate reporting of multiple document types for a single LUC.
5. Add a new primary table (PHASES_REMEDY) to accommodate reporting of multiple remedies at a site during a single phase.
6. Delete the remedy type field (rmdyactn_rmdy_cd) from the Phase Table (PHASES).
7. Delete the LUC document field (luc_doc_type_cd) from the LUC Description Table (LUC_DESC).

Preferred Approach for Tracking Reopened Sites in the Knowledge-Based Corporate Reporting System (KBCRS)

- If a DoD Component reopens a site to conduct additional studies and/or cleanup, the DoD Component removes the original remedy in place (RIP) and response complete (RC) dates. The DoD Component reports projected RIP and RC dates for the site based on the time needed to complete the additional studies and/or cleanup. In addition, the DoD Component reports all original phase dates, as well as new phase dates to reflect the additional work that is required. For example:
 - At Site 1, the DoD Component conducted a site inspection (SI) from 2001 to 2002; remedial investigation/feasibility study (RI/FS) from 2002 to 2004; remedial design (RD) from 2004 to 2005; remedial action construction (RA-C) from 2005 to 2007; and remedial action operation (RA-O) from 2007 to 2012. The site achieved RIP in 2007 and RC in 2012.
 - The DoD Component reopens Site 1 because additional studies and cleanup are required in the RI/FS and RA-C phases, respectively. The DoD Component reports the following data in KBCRS:
 - The original SI dates (2001 – 2002).
 - The original RI/FS dates (2002 – 2004).
 - The new start and end dates for the additional studies as a separate RI/FS phase.
 - The original RD dates (2004 – 2005).
 - The original RA-C dates (2005 – 2007).
 - The new start and end dates for the additional cleanup as a separate RA-C phase.
 - The original RA-O dates (2007 – 2012).
 - The estimated RIP date, based on the estimated completion of the new RA-C phase.
 - The estimated RC date, also based on the estimated completion of the new RA-C phase because additional work in the RA-O phase is not required.
- If a site in the long-term management (LTM) phase requires an explanation of significant differences (ESD) or a record of decision (ROD) amendment, the DoD Component does not report the additional work as part of the LTM phase. Instead, the DoD Component reopens the site and removes the original RIP and RC dates as necessary. The DoD Component reports the additional work in the appropriate phase and reports projected RIP and RC dates based on the time needed to complete the additional studies and/or cleanup. If a site in the RA-O phase requires an ESD or ROD amendment, the DoD Component may report the additional work as part of the RA-O phase.
- This preferred approach is effective beginning with the Mid-Year 2014 KBCRS data submittal.