



OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

NOV 01 2012

ACQUISITION,
TECHNOLOGY
AND LOGISTICS

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 Data Templates and Site Tracking

High quality Defense Environmental Restoration Program 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 needed for program analysis and oversight.

To that end, the KBCRS Data Workgroup, which included representatives from your offices, conducted an in depth review data fields and reporting requirements. The purpose of the review was to identify data elements that are out of date, are no longer required, or needed clarification to ensure consistent reporting. In addition, the Workgroup identified four special categories of sites not consistently tracked or reported in KBCRS that affect DoD's reporting of cleanup progress.

The list of KBCRS data element changes the Workgroup agreed to for the end of Fiscal Year 2012 KBCRS data submission is provided at Attachment 1. Some of these changes include removing fields and tables related to the Military Munitions Response Program (MMRP) from the KBCRS data templates. Even though we are removing many MMRP fields and tables from KBCRS, you need to continue tracking all of the data elements listed in Appendix A of the Munitions Response Site Prioritization Protocol Primer, April 2007, in your individual data systems.

The Workgroup developed a site tracking methodology for the four special categories of sites, provided at Attachment 2. The approach identifies how to flag and submit your data to ensure an accurate inventory of sites. We will implement this tracking methodology for the mid-year 2013 KBCRS data submission.

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 five months to improve our data quality. My points of contact are Ms. Deborah Morefield, at (703) 571-9067 or Deborah.Morefield@osd.mil; and Mr. Vic Wieszek, at (703) 571-9061 or Victor.Wieszek@osd.mil.

Maureen Sullivan

Director, Environmental Management

**Changes to KBCRS Data Submission
Starting end of Fiscal Year 2012**

1. *Installation Table (INST, Table 4.5.1)*: Update the description for the environmentally-affected acres field (ENV_AFF_ACRE_QY) to “Represents the acreage associated with the area(s) where cleanup activities (other than long-term management [LTM]) are underway or planned for the future at each site that has not achieved RC. As cleanup is completed, the acreage should decrease. This information supports Section 2831 of the National Defense Authorization Act (NDAA) for FY2006, which amended section 2907 of the Base Realignment and Closure Act to report annually on the status of BRAC Round 2005 actions”
2. *Munitions Response Area (MRA) Table (MRA_AREA, Table 4.5.5)*:
 - a. Update the description for the MRA identifier field (MRA_ID) to “The identifier that uniquely identifies an MRA.” Note: this change applies to all other data tables that include this field.
 - b. Update the description for the MRA Name field (MRA_NM) to “The name that describes an MRA.” Note: the group did not discuss this change but it is necessary for consistency with the MRA identifier field.
 - c. Delete the range status field (RNG_STATUS_CD).
 - d. Delete the field used to indicate whether an MRA is associated with a range that meets the definition of an “other than operational range” (MRA_RANGE_CD).
3. *Site Table (ENV_REST_SITE, Table 4.5.7)*:
 - a. Require either an estimated remedy in place (RIP) date (ENVST_EST_RIP_YMDT) or an actual RIP date (ENVST_RIP_YMDT) for each site.
 - b. Delete the field used to indicate whether a site is an area of concern (AOC_CD).
 - c. Delete the field used to indicate whether natural resources, cultural resources, and/or environmentally-sensitive resources are impacted by a munitions response site (MRS) (MMR_ENV_IMP_CD).
 - d. Update the description for the field used to track the reason for addressing an MRS out of sequence (MRSPP_SEQUENCE_CD) to indicate that the DoD Components must enter this data, as appropriate, upon completion of the site inspection phase, rather than the remedial investigation/feasibility study phase.
 - e. Update the description for the field used to identify the reason for changing an MRS’s relative priority based on the Quality Assurance (QA) Panel’s recommendation (MRSPP_QA_RSN_CD). The revised description will clarify that the DoD Components should report changes the QA Panel makes to an MRS’s relative priority each reporting year.
4. *Land Use Control (LUC) Restriction Table (LUC_RESTRICT, Table 4.5.15)*: Add a system-generated sequence number field to this table to allow the DoD Components to report multiple records for the “Other” LUC restriction (LUC_RESTRICT_CD=98).
5. *Military Munitions Response Program (MMRP) Classification Table (MMR_CLASS, Table 4.5.16)*: Delete this table.

**Changes to KBCRS Data Submission
Starting end of Fiscal Year 2012**

6. *MMRP Characteristics Table (MMR_CHAR, Table 4.5.17)*: Delete all fields in this table except the installation identifier (INS_ID), DoD Component identifier (COMP_ID), site identifier (ENV_SITE_ID), fund source (FUND_SRC_CD), MRA identifier (MRA_ID), and total MRS acreage (MRS_TOT_ACRE_QY).
7. *MMRP Ordnance Table (MMR_ORD, Table 4.5.18)*: Delete this table.
8. *Media and Contaminant Tables (RR_MEDIA, Table 4.5.25 and RR_MEDIA_CONT, Table 4.5.26)*: Specific to MRSs, instead of requiring media and contaminant data for all MRSs except those with an alternative rating of “Evaluation Pending,” require media and contaminant data for all MRSs except those with an alternative rating of “Evaluation Pending” or an alternative rating of “No Known or Suspected Hazards.” Note: this change was in the mid-year 2012 data templates.
9. *Base Realignment and Closure (BRAC) Cleanup Plan Subordinate Reference Table (BCP_SUB_TYPE, Table 7.1)*: Replace the “UXO” (unexploded ordnance/ordnance or explosives) value with “MEC” (munitions and explosives of concern).
10. *Fund Information Appropriation Reference Table (FNDINFO_APPR, Table 7.10)*: Delete the “AMMO” (ammunition procurement) value.
11. *Fund Information Budget Activity Reference Table (FNDINFO_BDGACT, Table 7.11)*: Delete the “UXO” (funding and cost requirements related to UXO) value.

Knowledge-Based Corporate Reporting System (KBCRS) Site Tracking Methodology and Supporting Documentation for Four Special Categories of Sites

1. Sites that have transferred or that will transfer out of the Department of Defense (DoD) control where DoD no longer conducts cleanup.

- The DoD Components will not declare response complete (RC) at sites that transfer, along with cleanup responsibility, out of DoD control until the sites achieve the cleanup objectives.
- For sites on DoD property that have not achieved RC and that have transferred or that will transfer out of DoD control where DoD no longer conducts the cleanup:
 - The DoD Components will flag each site on property they have already transferred by reporting the date the site transferred, rather than reporting the site at RC.
 - The DoD Components will flag each site on property that will transfer in the future, prior to achieving RC, by reporting the date the site transfers, rather than reporting the site at RC. The DoD Components will implement this approach upon transfer of the property. Until that time, the DoD Components will continue to track the phases each site is in as cleanup progresses.
 - The DoD Components will report the transfer dates for these sites in all future KBCRS submissions. Once these flagged sites achieve RC, the DoD Components may report the RC dates in addition to the transfer dates; however, the DoD Components will not remove the transfer dates once the sites achieve RC.
 - The Office of the Deputy Under Secretary of Defense (Installations & Environment)/ Environmental Management Directorate (ODUSD(I&E)/EM)) will exclude sites flagged with transfer dates, and that do not have RC dates, when calculating progress toward cleanup goals. ODUSD(I&E)/EM will include sites with transfer dates and RC dates when calculating progress toward cleanup goals.
- For sites that have achieved cleanup objectives on property that has transferred or that will transfer out of DoD control where DoD no longer conducts the cleanup, the DoD Components will continue to report the RC dates in KBCRS. ODUSD(I&E)/EM will include these sites when calculating progress toward cleanup goals.
- ODUSD(I&E)/EM will modify the KBCRS Site table to include a new field for the transfer date. This field will inform ODUSD(I&E)/EM why sites that have not achieved RC do not have a cost-to-complete (CTC) estimate.

2. Sites cleaned up under performance based contracts (PBCs).

- The DoD Components will not declare RC at sites being cleaned up under a PBC until the sites achieve the cleanup objectives. The DoD Components will continue to track the phases the sites are in as cleanup progresses, and will not combine the schedules for multiple sites into one “placeholder” site. The DoD Components will also track long-term management (LTM) requirements at each site, as applicable, once the site achieves RC.

Knowledge-Based Corporate Reporting System (KBCRS) Site Tracking Methodology and Supporting Documentation for Four Special Categories of Sites

- The DoD Components will not create “placeholder” sites to track obligations and CTC estimates for sites being cleaned up under a PBC. The DoD Components will track the obligations and CTC for each site.
 - For PBCs awarded after FY2011, the DoD Components will stop using “placeholder” sites. Instead, the DoD Components will track the schedules, obligations, and CTC estimate for each individual site being cleaned up under a PBC.
 - For PBCs awarded prior to FY2012:
 - The DoD Components may continue to use “placeholder” sites to track obligations and CTC estimates. ODUSD(I&E)/EM will modify the KBCRS Site table to include a field with pick list options, one option being “Site Cleaned Up Under PBC.” The DoD Components will select this option for each site being cleaned up under a PBC. This indicator will inform ODUSD(I&E)/EM why sites with ongoing cleanup do not have a CTC estimate.
 - The DoD Components will use the “NS” (Site Never Existed) site type code for existing “placeholder” PBC sites that are not actual sites. ODUSD(I&E)/EM will exclude these sites from the inventory for reporting purposes, and will not track them against Defense Environmental Restoration Program (DERP) performance goals.
 - The DoD Components will reopen sites that have not met the cleanup objectives but were reported as RC because they are tracking the cleanup progress under an existing “placeholder” site.
3. **Sites where a DoD Component cannot obtain rights of entry (ROE) that are necessary to complete a phase.**
- The DoD Components will report sites in the current phase at the time of ROE refusal, as well as the entire remaining CTC estimate for the current and future anticipated phases.
 - ODUSD(I&E)/EM will modify the KBCRS Site table to include a field with pick list options, one option being “Right of Entry Refused.” The DoD Components will select this option for each site where they cannot obtain ROE to complete a phase to inform ODUSD(I&E)/EM why a phase appears to last for several years. ODUSD(I&E)/EM will exclude sites in KBCRS with the designation “Right of Entry Refused” when calculating progress toward cleanup goals.
 - For sites in KBCRS with the designation “Right of Entry Refused,” the DoD Components will contact the property owner(s) at least every five years in an attempt to obtain the ROE necessary to complete the current phase. In the case of Formerly Used Defense Sites, the U.S. Army Corps of Engineers will request ROE from property owners when conducting interim risk management. If/when a DoD Component obtains the necessary ROE to proceed with the current phase, it will remove the “Right of Entry Refused” designation from KBCRS.

Knowledge-Based Corporate Reporting System (KBCRS) Site Tracking Methodology and Supporting Documentation for Four Special Categories of Sites

4. **Non-DoD Owned, Non-Operational Defense Sites (NDNODS)**. The Army's NDNODS fall into three categories:
- a. NDNODS that will achieve site closeout at the completion of the site inspection (SI) phase.
 - The Army will keep these sites in the inventory and report them as having achieved RC, with no LTM requirements and no CTC, in KBCRS. The Army will also report the Quality Assurance (QA) Panel-approved Munitions Response Site Prioritization Protocol (MRSPP) scores in KBCRS. ODUSD(I&E)/EM will track these sites against DERP performance goals.
 - The Army will also continue reporting the completed SI phase, as well as site names that include the "NDNODS" designation, in all future KBCRS submissions.
 - b. NDNODS that will require a remedial investigation and possibly remedial actions upon completion of the SI. For NDNODS determined to be DERP eligible, the Army will conduct the appropriate cleanup actions. For those NDNODS determined to be ineligible for the DERP:
 - The Army will continue reporting the NDNODS in KBCRS, and use the "FA" (Site Funded Under Another Program) site type code for these sites. The Army will continue reporting site names that include the "NDNODS" designation in KBCRS.
 - ODUSD(I&E)/EM will exclude these NDNODS from the site inventory for reporting purposes, and will not track them against DERP performance goals.
 - The Army will continue reporting the MRSPP score and the acreage associated with these NDNODS in accordance with DoD Manual 4715.20; however, ODUSD(I&E)/EM will exclude the NDNODS acreage from the total DoD MRS acreage.
 - If additional phases beyond the SI phase become DERP eligible in the future, the Army will change the site type codes from "FA" to the correct site type codes (e.g., "SR" [Small Arms Range]). The Army will also report all required fields for the DERP-eligible MRSs, to include updated QA Panel-approved MRSPP scores. At this point, ODUSD(I&E)/EM will include the NDNODS in the site inventory for reporting purposes.
 - c. NDNODS where the Army cannot obtain ROE to complete the SI.
 - The Army will keep these sites in the SI phase and report the CTC for the SI only. The Army will continue reporting site names that include the "NDNODS" designation in KBCRS.
 - ODUSD(I&E)/EM will modify the KBCRS Site table to include a field with pick list options, one option being "Right of Entry Refused." The Army will select this option for each NDNODS where it cannot obtain ROE to inform ODUSD(I&E)/EM why the SI phase appears to last for several years. ODUSD(I&E)/EM will exclude sites in

Knowledge-Based Corporate Reporting System (KBCRS) Site Tracking Methodology and Supporting Documentation for Four Special Categories of Sites

KBCRS with the designation “Right of Entry Refused” when calculating progress toward cleanup goals.

- The Army will contact the property owner(s) at least every five years in an attempt to obtain ROE. If/when the Army obtains ROE, it will remove the “Right of Entry Refused” designation from KBCRS, complete the SI phase, and follow the process in step a or step b above, depending on the results of the SI.

Effective Date: ODUSD(I&E)/EM will implement the procedures outlined in this methodology for the mid-year 2013 KBCRS submission.