Control Number: [redacted]

JUSTIFICATION REVIEW DOCUMENT
FAR Part 6 Justification and Approval
for Other than Full and Open Competition

Program/Equipment: The Department of War (DoW) requires data management tools and support services, such as patches and upgrades, user support, and training for the Environmental Management System Support (EMSS) Formerly Used Defense Sites Chemical (FUDSChem) data processing system.

Authority: Title 10 United States Code (U.S.C.) §3204(a)(1) as implemented by Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) Part 6.103-1(c)(2)(ii) – Only one responsible source and no other supplies or services will satisfy agency requirements.

Period of Performance (POP): 19 June 2026 – 18 March 2027

Amount: [redacted]

Prepared by: [redacted]

Contracting Officer: Robert Marsh [redacted]
Contract Officer, FTI-GEN
Email: robert.g.marsh@usace.army.mil

Technical: [redacted]

Requirement: [redacted]

Controlled by: Army.
Controlled by: USACE - CEHNC
CUI Category: General Procurement and Acquisition
Distribution/Limited Dissemination Control: *FEDCON*
POC: Robert Marsh, [redacted]

Requirement: EMSS FUDSChem
Control Number: [redacted]

Center/District Reviews

Reviews: I have reviewed this justification and find it adequate to support the justification for other than full and open competition.

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Requirement: EMSS FUDSChem
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1. **Requiring Activity:** U.S. Army Corps of Engineers (USACE), Environmental & Munitions Center of Expertise (EM CX), Environmental Engineering and Geology Division (EMG); located at 1616 Capitol Ave, Omaha, NE 68102.

2. **Contracting Activity:** U.S. Army Corps of Engineers (USACE), Huntsville Engineering and Support Center (CEHNC); located at 300 Secure Gateway SW, Redstone Arsenal, AL 35808.

3. **Description of Action:** The purpose of this justification is to obtain approval for a [redacted] contract with Environmental Synectics, LLC (CAGE: 1MXU9) located at 301 Richards Blvd, Sacramento, CA 95811. This contract will be for a 9 month period of performance from 19 June 2026 to 18 March 2027 for the the Environmental Management System Support (EMSS) Formerly Used Defense Sites Chemical (FUDSChem) data processing system. The North American Industry Classification System (NAICS) code will be 541620 – Environmental Consulting Services. The contract will be fully funded using Fiscal Year (FY) 2026 Military FUDS Operations & Maintenance (O&M) funds.

4. **Description of Supplies/Services:** This requirement is to provide data management tools and support services, such as patches and upgrades, user support, and training for the Formerly Used Defense Sites Chemical (FUDSChem) data processing system. It is a browser-based application for the purpose of storage, analysis, and reporting of FUDS chemical data. The work for this requirement falls under the Defense Environmental Restoration Program – FUDS (DERP-FUDS). Technical expertise and knowledge in environmental remediation and restoration is required to support the continuing maintenance and development of FUDSChem. The FUDS Program performs environmental sampling, chemical analysis, and munitions and explosives of concern investigations at FUDS to direct clean-up decisions and planning for properties and projects. The data, inclusive of location data, field and laboratory data, and Military Munitions Response data, may be processed and reviewed via the FUDSChem system which is external to the government firewall and accessible to contractors. Upon government acceptance and approval of data managed in FUDSChem, final data packages are submitted to the Enterprise Chemistry (EChem) system located behind the government firewall which acts as the official repository of the final chemical data for FUDS. The mission of this work effort is to supply data of a known quality to EChem.

5. **Authority Cited:** Title 10 U.S.C. §3204(a)(1) as implemented in RFO 6.103-1(c)(2)(ii) which provides that supplies and services may be deemed as available from only one source when awarding a follow-on contract for the continued development or production of a major system or highly specialized equipment and, for DoD, NASA, and the Coast Guard, for the continued provision of highly specialized services, would result in unacceptable delays in fulfilling the agency's requirements.

6. **Reason for Authority Cited:**

   a. **Background**: Due to unforeseen circumstances to include regulatory changes implemented in the RFO, the need for additional market research based on capability statements received in response to a Request for Information (RFI), and Environemntal Center of Expertise (EMCX) and FUDS budgeting concerns affecting the ability to define the magnitude of the scope of the follow-on contract, CEHNC has experienced delays in awarding the follow-on Environmental Management Support Services (EMSS) III contract. These delays were further impacted by a short procurement administrative lead time (PALT) and the requirement for a 30-day transition period to allow sufficient time for phase in of a new contractor to ensure continuity of support. The 52.217-8 extension in the FUDS/EMSS GSA order 47QTCA19D009A W912DY20F0651 expired on 16 March 2026. A 90-day contract, W912DY26PA009, was awarded to ensure continuity of services and prevent any disruption to mission-critical operations. This contract will expire on 18 June 2026. As a result, a 9-month contract was required to ensure continuity of services and prevent any disruption to mission-critical operations as the EMCX and FUDS programs finalize their future

budget and by extension the scope of the follow-on requirement. The 9-month period of performance will be 19 June 2026 – 18 March 2027.

b. **Justification**: The incumbent, Environmental Synectics, is capable of providing uninterrupted services during this interim period without substantial duplication of cost or unacceptable delays. Environmental Synectics possesses the institutional knowledge, system access, security authorizations, and technical familiarity necessary to maintain operations while USACE completes acquisition planning, prepares solicitation documentation, and awards the competitive follow-on EMSS III contract. Environmental Synectics has demonstrated its expertise and capability in fulfilling complex technical requirements, specifically in relation to the maintenance and enhancement of the FUDSChem data processing system and maintenance and support of the EChem data transfer mechanism.

   In FY24 Environmental Synectics also supported USACE in the award and execution of the Army Environmental Command (AEC) Environmental Data Management System (EDMS), ensuring that the system met the critical needs of USACE's immediate requirement for a secure, web-based EDMS. This effort demonstrates Environmental Synectics' ability to deliver comprehensive environmental system support services, including system implementation, operational support, and mission-focused solutions tailored to customer requirements.

c. **Alternatives**: This Justification and Approval request is to award a bridge contract for 9 months of service with the incumbent. There are no feasible alternatives to this justification that would not result in a lapse in services. The only alternative is to pursue the competitive follow-on award for EMSS III and have for the EMCX and FUDS programs to experience a lapse in these critical services.

d. **Impact if not approved**: The current contract is set to expire on 18 June 2026. If not approved, the customer will experience a break in service resulting in a freeze of the FUDSChem data portal. Without active EMSS system maintenance, helpdesk support, and automated data validation, USACE project teams and laboratories will be unable to upload, process, or verify critical chemistry data and ongoing remedial investigations will stall.

   Samples collected in the field have strict regulatory holding times. If the data cannot be uploaded and validated through the FUDSChem data portal, critical environmental data may become invalid, forcing costly resampling efforts. While the program is paused, environmental contaminants such as Per- and Polyfluoroalkyl Substances (PFAS) continue to spread expanding the cleanup footprint, increasing remediation costs, and prolonging exposure risks to neighboring communities.

7. **Efforts to Obtain Competition:** The previous GSA Order for EMSS II, 47QTCA19D009A W912DY20F0651, was solicited as a small business set-aside on the GSA Multiple Award Schedule (MAS). Only one proposal was received from Environmental Synectics. During market research efforts for the follow on contract, EMSS III, a Request for Information (RFI) set aside for small businesses was posted on GSA MAS from 11 May 2026 – 15 May 2026. Ten responses were received.

   Due to the urgent nature of this work, as explained above, and the requirement for a 30 day transition period, the Government does not have sufficient time to properly engage with ten potential vendors to determine whether they possess the technical capabilities, resources, and capacity necessary to meet the Government's requirements and meet the customer's immediate need without mission failure. The Government is concurrently developing a new, long-term acquisition strategy for the follow-on requirement. The additional time will allow the Government to properly engage with, evaluate, and vet competitive vendors to determine their capability to meet the Government's requirements.

8. **Actions to Increase Competition:** The Government determined that only one responsible source is capable of meeting the Government's requirements within the required timeframe and technical constraints. To promote competition for future acquisitions, the Government will conduct comprehensive market research sufficiently in advance of the next requirement.

9. **Market Research:** In accordance with (IAW) Army FAR Supplement (AFARS) 5139.170-90(a), the Computer Hardware Enterprise Software and Solutions (CHESS) program is the mandatory source for all Commercial Off-The-Shelf Information Technology (IT) hardware and software, and commercial IT services. These contracts were awarded under the Federal Acquisition Streamlining Act (FASA) and Clinger-Cohen Act, which requires prime contractors be provided a fair opportunity to be considered for delivery orders and are structured as Indefinite Delivery/Indefinite Quantity (ID/IQ) contracts using delivery orders for acquisition of a full range of IT purchases. These contracts are available to the Army, Department of Defense, and other Federal Agencies. The Government wide point of entry, www.SAM.gov, and GSA MAS was were also used for market research purposes.

   Market research was conducted from 24 June 2025 – 18 July 2025, when the option to extend services IAW RFO 52.217-8 was exercised, which resulted in 1 potential source for this acquisition. On 24 June 2025, a Request for Information (RFI), Reference No. 536232, was posted on CHESS which is the mandatory source for IT acquisitions to 48 vendors identified under ITES-3S via small business set aside. The RFI closed on 8 July 2025. No responses were received. A CHESS statement of non-availability (SONA) (Request No. 216818174) was received on 21 July 2025. As part of the initial market research for EMSS III, an RFI was posted on GSA MAS from 11 May 2026 – 15 May 2026. The RFI on GSA MAS resulted in responses from 10 small businesses.

   Internet searches of Required Sources of Supplies/Services, AbilityOne and UNICOR, conducted on 18 July 2025 resulted in 0 potential sources from listed sources.

   After careful consideration of the above, the Contracting Officer determined that no other sources are able to meet the agency's contractual needs in a timely manner. Due to the technical expertise of the staff required as well as the urgency, it is not possible for another contractor to take over and execute this work on short notice with no transition period. The request for nine months of service is reasonably calculated to support the program requirements until the long term follow-on contract is in place.

10. **Interested Sources:**

   The incumbent, Environmental Synectics, expressed interest in supporting this effort. In addition, the contractors listed below have also expressed interest and will be considered for the future acquisition.

Table 1: GSA RFI Results

Contractor	Type
Dreamcatchers Consulting, LLC	American Indian Owned, SB
Frontier Acquisitions, LLC	SB
Integrated Technology Solution Group, LLC	8(a)
Management Solutions	SB
MySys, Inc.	SB
Obsidian Global, LLC	SB
Plateau Software, Inc.	SB
Project Manager USA, Inc.	8(a)
Reliant Global Technology, Inc.	SB

11. **Other Facts:**

   a. Procurement history: CEHNC has procured FUDSChem services in previous years. Contract number and dates of the last several contracts are below.

Table 2: Procurement History

Contract Number	Contractor	Procurement Method	Amount	Period of Performance
GS35F0251N/ W912DY15F0268	Environmental Synectics, Inc.	GSA Order/SB set-aside	$4.3M	17 Sep 2015 - 16 Sep 2020
47QTCA19D009A/ W912DY20F0651	Environmental Synectics, Inc	GSA Order/HUBZone SB set-aside	$6.5M	17 Sep 2020 – 16 Mar 2026
W912DY26PA009	Environmental Synectics, Inc.	Sole Source	$237K	19 Mar 2026 – 18 Jun 2026

b. The competitive status of these actions: Previous acquisitions were solicited as small business set-asides on GSA MAS except for the currently active contract. The current contract is a 3-month bridge that was solicited as sole source.

c. Authority previously cited if less than full and open competition was used: Contract W912DY26PA009 was awarded sole source under RFO 12.102(a), for acquisitions valued at or below the simplified acquisition threshold (SAT).

d. If a justification was prepared to support the procurement made before this one, a summary of the contents of paragraph 7 of the justification for that procurement and an explanation of the results: An RFO part 12 Memorandum for Record (MFR) was prepared as justification for the current 90 day contract due to the contract value being below the simplified acquisition threshold. The Contracting Officer considered the following when selecting Environmental Synectics for award--their proven track record in successfully delivering similar solutions and their longstanding collaboration with USACE; their demonstrated expertise and capability in fulfilling complex technical requirements specifically in relation to the development and implementation of secure and fully functional data management systems; and their previous support of AEC EDMS which ensured the system met the critical needs of USACE's requirement for a secure, web-based environmental data system.

e. If any prior contract for this requirement was accomplished using full and open competition, include a detailed explanation of the changed circumstances causing this action to now limit the sources: The previous two GSA orders for this requirement (EMSS and EMSS II) were accomplished as small business set asides (full and open competition after the exclusion of sources). In both acquisitions, Environmental Synsectics was the only vendor to submit a proposal. Initial market research conducted for EMSS III identified at least ten potentially interested vendors; however, the Government determined that additional time would be required to adequately vet vendor capabilities and complete the necessary acquisition activities. Additionally, if a new vendor were selected, a transition period would be necessary to ensure continuity of operations and avoid disruption to mission requirements.

f. An explanation of any unusual patterns that may be revealed by the history, e.g., several consecutive, urgent buys: There are no unusual patterns.

g. An explanation of protests received, if applicable, and actions taken in response to the protest. No protests have been received.

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12. **Technical Certification:** I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

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[redacted]

13. **Requirements Certification:** I certify that the supporting data under my cognizance, which are included in the justification, is accurate and complete to the best of my knowledge and belief.

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[redacted]

14. **Fair and Reasonable Price Determination:** I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable. Basis for fair and reasonable price determination will be conducted through historical prices, a cost/price analysis comparison of commercially available prices, and the independent government estimate. In accordance with RFO 15.403-2(b)(3) certified cost and pricing data will not be required as a commercial item is being acquired.

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Robert Marsh
Contracting Officer

15. **Contracting Officer Certification:** I certify that this justification is accurate and complete to the best of my knowledge and belief.

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Robert Marsh
Contracting Officer

16. Approval

Based on the foregoing justification, I hereby approve the procurement of EMSS FUDSChem database support services on an other than full and open competition basis pursuant to the authority of 10 U.S.C. 3204(a)(1), as implemented in RFO 6.103-1(c)(2)(ii), Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements. The estimated value of the new contract is [redacted] with a PoP of 19 June 2026 – 18 March 2027. The approval is subject to the availability of funds and provided that the supplies and/or service herein described have otherwise been authorized for this acquisition.

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ROBERT MARSH
Contracting Officer