



# governmentattic.org

*"Rummaging in the government's attic"*

Description of document: **National Archives and Records Administration (NARA) regulations: "Security for NARA Holdings," 2006, and "Archival Storage Standards," 2002**

Requested date: 08-January-2008  
Appealed date: 13-March-2009

Released date: 05-March-2009  
Appeal release date: 23-April-2009

Posted date: 16-September-2009

Titles of documents National Archives and Records Administration (NARA) NARA 1572, January 14, 2006, SUBJECT: Security for NARA Holdings (redacted)  
NARA 1571, Archival Storage Standards, February 15, 2002 (Released under appeal)

Source of document: FOIA Officer  
National Archives and Records Administration  
NGC-Room 3110  
8601 Adelphi Road  
College Park, MD 20740  
Telephone: (301) 837-FOIA (3642)  
FAX: (301) 837-0293  
Email: [foia@nara.gov?subject=FOIA Request](mailto:foia@nara.gov?subject=FOIA Request)

The governmentattic.org web site ("the site") is noncommercial and free to the public. The site and materials made available on the site, such as this file, are for reference only. The governmentattic.org web site and its principals have made every effort to make this information as complete and as accurate as possible, however, there may be mistakes and omissions, both typographical and in content. The governmentattic.org web site and its principals shall have neither liability nor responsibility to any person or entity with respect to any loss or damage caused, or alleged to have been caused, directly or indirectly, by the information provided on the governmentattic.org web site or in this file. The public records published on the site were obtained from government agencies using proper legal channels. Each document is identified as to the source. Any concerns about the contents of the site should be directed to the agency originating the document in question. GovernmentAttic.org is not responsible for the contents of documents published on the website.



# *National Archives and Records Administration*

8601 Adelphi Road  
College Park, Maryland 20740-6001

March 5, 2009

Re: Freedom of Information Act Request NGC09-046

This is in response to your Freedom of Information Act (FOIA) request of January 8, 2009, for "a copy of descriptive documents concerning the NARA 'Treasure Vault' and its purposes and history." Your request was received in this office on January 13, 2009, and assigned tracking number NGC09-046. We apologize in our delay in responding to you.

NARA does not have a specific "Treasure Vault." A number of NARA facilities have specially protected areas that house records or materials that have been identified as needing a higher level of control. These specially protected areas have been referred to as "vaults" or "treasure vaults" in some NARA issuances.

For your information, we have provided you with NARA 1572, Part 2, that discusses Security for NARA holdings. There are 12 pages responsive to your request. Eight pages are being withheld in part and released in part pursuant to 5 U.S.C. 552(b)(2)(high), "risk of circumvention," and/or 5 U.S.C 552 (b)(2)(low), "internal matters of a trivial nature," and are included with redactions. The remaining four pages are being released to you in full and are included in this request.

If you are not satisfied with our action on this request, you have the right to file an administrative appeal. Address your appeal to the Deputy Archivist (ND), National Archives and Records Administration, College Park, Maryland 20740. Your appeal should be received within 35 calendar days of the date of this letter and it should explain why you think this response does not meet the requirements of the FOIA. Both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." All correspondence should reference the tracking number NGC09-046.

Please let us know if we may be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Olin".

JAY OLIN  
Deputy FOIA Officer  
Office of General Counsel

Enclosures

# **National Archives and Records Administration**

---

NARA 1572  
January 14, 2006

**SUBJECT:** Security for NARA Holdings

**TO:** Office Heads, Staff Directors, ISOO, NHPRC, OIG

**Purpose of this transmittal memo.** This transmits a directive that outlines the policy on security for NARA holdings, including those needing special protection, and procedures that staff must use to implement the policy.

**Why are we issuing this directive?** This directive informs staff, particularly in the Office of Records Services—Washington, DC (NW), the Office of Regional Records Services (NR), and the Office of Presidential Libraries (NL), of measures NARA must take to protect materials in the National Archives of the United States.

**Cancelled directives.** This directive cancels ARCHIVES 1400, CHGE 4, Chapter 8, Part 4.

ALLEN WEINSTEIN  
Archivist of the United States

Attachment

# **National Archives and Records Administration**

---

**NARA 1572**  
January 14, 2006

**SUBJECT:** Security for NARA Holdings

## **1572.1 What is the purpose of this directive?**

This directive specifies NARA's policy on security for NARA holdings, especially archival materials needing special protection, and the procedures for implementing the policy.

## **1572.2 What are the authorities for this directive?**

18 U.S.C. 2071, 44 U.S.C. 2107, 44 U.S.C. 2111, 44 U.S.C. 2111note, 44 U.S.C. 2112, 44 U.S.C. 2118, 44 U.S.C. 2202, 44 U.S.C. 2207, 44 U.S.C. 2905(a), and 44 U.S.C. 3106.

## **1572.3 What NARA holdings are covered by this directive?**

a. This directive covers Federal records, Presidential and Vice Presidential records, Nixon Presidential historical materials, and donated historical materials, including artifacts, in the National Archives of the United States regardless of their location. This directive also covers records of the U.S. Senate, U.S. House of Representatives, Architect of the Capitol, and the U.S. Supreme Court that NARA maintains and preserves.

b. This directive does not apply to classified national security information. Other NARA policy directives and guidance apply to the access and handling of classified national security information, records of concern, or the handling of incumbent Presidential gifts. These include: Interim Guidance 202-1, NARA Information Security Program; Interim Guidance 1600-3, Access to Archival Materials in the Context of Concern about Terrorism; Interim Guidance 1600-5, Access to Materials Containing Classified Information in NARA Research Rooms by Non-Governmental Persons; Life Cycle Controls for Presidential Artifacts; and our regulations at 36 CFR part 1275.

## **1572.4 Responsibilities**

a. All staff working with NARA holdings are responsible for properly securing them during storage and use.

(1) Staff must report the compromise of holdings storage areas or the discovery of theft, damaged, missing, or vandalized holdings to their immediate supervisor.

(2) The supervisor determines, generally within 24 hours, whether to further report compromise of storage space, theft, damage, or vandalism to the division and office level in the Washington, DC, area, or their equivalents in the regional archives and Presidential libraries. Before reporting further, supervisors must try to determine the following:

(a) Have the materials been misfiled when placing them back in the stack after use?

(b) Are the materials being used in a research room, awaiting reproduction in a copying area, on exhibition, undergoing conservation treatment, or in an office area to show to a special visitor or group?

(c) Could the materials have been placed in a parallel file by mistake?

(d) In the case of physical damage to materials, was vandalism involved? Or did an accident occur on the part of staff, researchers, or other users?

(3) Managers must report suspected theft or vandalism to the Office of Inspector General (OIG) as indicated in NARA 1202, Office of the Inspector General - Investigations.

b. The Office of Presidential Libraries (NL), Office of Regional Records Services (NR), and Office of Records Services--Washington, DC (NW):

(1) Develop and implement standard operating procedures for each records storage area where materials requiring special protection are kept.

(2) Nominate selected staff for background checks required to access vaults or other specially protected areas and train the staff in the handling and storage of materials under special protection.

(3) Ensure that research rooms are staffed with personnel who have been trained to enforce NARA's holdings use regulations in 36 CFR 1254, Using Archival Records and Donated Historical Materials.

(4) Notify on site security personnel and the Security Management Branch (NASS) security staff of the possible theft.

(5) Notify the OIG immediately of any reports relating to suspected theft or vandalism.

(6) Provide background information about the holdings to OIG or other investigatory body on request, in accordance with all governing statutory authorities.

(7) Take appropriate disciplinary action in the cases where staff have compromised or damaged holdings.

c. The Space and Security Management Division (NAS) manages physical security and background checks through the personnel security officer in the Security Management Branch (NASS).

d. In the Washington, DC, area:

(1) Access Programs (NWC) manages NW custodial control of textual stack areas, including stack space management, with the exception of those for the Center for Legislative Archives (NWL). NWL manages its own stack areas in The National Archives Building (Archives I). The Special Media Archives Services Division (NWCS) provides that function for the stack areas storing primarily special media archives. The Electronic and Special Media Records Services Division (NWME) oversees control of electronic media storage areas.

(2) The Nixon Presidential Materials Staff (NLNS) manages the custodial control of all Nixon Presidential Historical Materials including textual, audiovisual, and specially compartmented information facility (SCIF) areas in the National Archives at College Park (Archives II). The Presidential Materials Staff (NLMS) manages textual, audiovisual, electronic artifact, and SCIF areas in NLMS control in Archives I.

e. Presidential library and staff directors (NL) and regional archives directors (NR) oversee management of archival storage space at their facilities. For holdings that require special protection beyond the facility's capacity, the director consults with the office head and NAS for assistance.

f. NR and NW as appropriate also ensure that NARA's affiliated archives comply with this directive.

**PART 1. GENERAL HOLDINGS PROTECTION REQUIREMENTS**

**1572.5 What are the minimum requirements for securing holdings when they are not in use?**

(b)(2) [Redacted]

**1572.6 What are the minimum requirements for securing classified holdings when not in use?**

(b)(2) [Redacted]

**1572.7 What are the minimum requirements for controlling holdings when they are removed from secure storage locations?**

(b)(2) [Redacted]

**1572.8 What are the minimum requirements for securing holdings when they are in use by persons other than NARA staff?**

a. Before using any original holdings, researchers must apply to conduct research as

indicated in Interim Guidance 1600-4, Research Application Procedures. Some exceptions may be made for non-NARA users who are accessing holdings for ongoing government business or the representatives of a former or incumbent President, but such researchers must fulfill other governing statutory or regulatory requirements.

b.

[REDACTED]

(b)(2)

c.

[REDACTED]

(b)(2)

d.

[REDACTED]

(b)(2)

e. NARA's holdings protection requirements for other institutions that borrow NARA holdings are found in NARA 1701, Loans of Holdings in NARA's Physical and Legal Custody.

**PART 2. SPECIAL PROTECTION REQUIREMENTS**

**1572.9 Is it ever necessary to take protective measures beyond the general holdings protection requirements?**

(b)(2)

[REDACTED]

**1572.10 Who determines what non-classified holdings need special protection?**

Managers of custodial units are responsible for making the final determinations about which holdings in their custody require special protection based on the recommendations of knowledgeable archivists on their staffs.

**1572.11 What are the characteristics of holdings needing special protection?**

a. To decide whether holdings would benefit from special protection, knowledgeable archival staff generally consider whether the holdings are:

- (1) Especially vulnerable to theft;
- (2) In extremely fragile condition; or
- (3) Likely targets of vandalism.

b. Some examples of holdings that have been determined to need special protection are: some museum items in Presidential libraries; and, the patent for the electric light bulb, George Washington's account book as Commander in Chief of the Continental Army, and the rough order log and night order book of the USS Missouri among the holdings of NW.

**1572.12 How do we store and handle holdings needing special protection?**

a. The methods of storing holdings needing special protection vary with the nature of the facility and the clearance levels of the staff. The methods include the use of separate stacks or vaults.

(b)(2) b. [REDACTED]

c. [REDACTED]

(b)(2) (1) [REDACTED]

(2) [REDACTED]

(3) [REDACTED]

(b)(2) d. [REDACTED]

e. Limit access to areas containing materials requiring special protection to authorized individuals.

**1572.13 What physical controls are imposed on specially protected materials areas?**

(b)(2) a. [REDACTED]

(b)(2) b. [REDACTED]



c.

[Redacted]

(1)

[Redacted]

(2)

[Redacted]

(3)

[Redacted]

(4)

[Redacted]

d.

[Redacted]

e.

[Redacted]

1572.14 How does NW conduct systematic inspections?

a.

[Redacted]

b.

[Redacted]

c.

[Redacted]

d.

[Redacted]

(b)(2)

e.

[REDACTED]

f.

[REDACTED]

**1572.15 How does NR conduct systematic inspections?**

(b)(2)

a.

[REDACTED]

(b)(2)

b.

[REDACTED]

(b)(2)

c.

[REDACTED]

(b)(2)

d.

[REDACTED]

(b)(2)

e.

[REDACTED]

**1572.16 How do the Presidential libraries conduct inspections?**

Presidential libraries contain an extremely high volume of materials having direct association with a former president. The materials have a limited exposure to researchers and staff compared to Washington, DC, area holdings.

(b)(2)

a.

[REDACTED]

(b)(2)

b.

[REDACTED]

(b)(2)

**1572.17 How does NARA control access to specially protected materials areas?**

[REDACTED]

(b)(2)

**1572.18 How is staff access to specially protected holdings areas controlled?**

a.

[REDACTED]

(b)(2)

b.

[REDACTED]

(b)(2)

c.

[REDACTED]

(b)(2)

**1572.19 How do we monitor use of a specially protected holdings area?**

a.

[REDACTED]

(b)(2)

b.

[REDACTED]

(b)(2)

c.

[REDACTED]

**1572.20 May holdings needing special protection be taken to a research room or staff office?**

a. Whenever feasible, it is NARA policy to furnish copies in place of originals when holdings needing special protection are requested for research. LICON chiefs or other designated staff are expected to review requests made by researchers to examine original holdings needing special protection in place of copies and determine whether or not compliance is consistent with holdings protection guidance.

b. Managers may make exceptions under special circumstances on a case-by-case basis and may delegate this to the supervisor of the unit having custody of the holdings. Rare instances when access may be allowed require that a staff member with access to items needing special protection be present at all times while a researcher briefly consults such items. Consultation must be as brief as possible to limit the item's exposure to light and physical handling and limit opportunities for theft or vandalism. If managers have any question about an item's stability, consult the Document Conservation Laboratory (NWT-D) or NWT-S for NW holdings, NWT-L for Presidential library holdings, or NWT-R for Regional Records Services holdings before providing holdings needing special protection to a researcher.

c. Designated staff, at the discretion of the manager, may show items needing special protection to groups or visitors as part of educational or other outreach programs. Such exposure must be limited. Examples of groups and visitors that may fall into this category are participants in the Modern Archives Institute, records personnel from other agencies, and archivists or curators from other institutions and countries.

**1572.21 How are records created by this directive maintained under the NARA records schedule?**

Use the following file numbers for the functions and records described in this directive:

a. File no. 1442-2, "Records Storage and Security Files: Documents created in controlling the physical location of accessioned records and donated materials..." for:

(1)

[REDACTED]

(b)(2)

(a)

[REDACTED]

(b)

[REDACTED]

(b) (2) (c) [REDACTED]

(b) (2) (2) [REDACTED]

(3) Inspecting specially protected materials areas. Records may include:

(b) (2) (a) [REDACTED]

(b) (2) (b) [REDACTED]

(b) (2) (c) [REDACTED]

(b) (2) b. [REDACTED]

(b) (2) (1) [REDACTED]

(b) (2) (2) [REDACTED]

(b) (2) (3) [REDACTED]

(b) (2) c. [REDACTED]

(b) (2) d. File no. 1420, "Research Room Reference Service Files" – for documenting removal of holdings for reference use by researchers and other non-NARA staff. [REDACTED]

(b) (2) e. File no. 113-3, "Offices' Performance Reports: Feeder reports, which may be prepared quarterly, for office heads by heads of field units..." – for reporting results of museum inventories in Presidential libraries and Presidential Materials Projects. [REDACTED]

f. Records documenting thefts, vandalism, or other compromises of items stored in specially protected materials areas (subpars. 1572.4b(3) and 1572.20c), are unscheduled and must **not** be destroyed until the Archivist approves dispositions on an SF 115, Request for Records Disposition Authority. Organizations involved in these incidents (i.e., managers of specially protected areas, OIG, NAS, NGC), maintain the records in secure files until the Records Officer provides notification of the approved disposition(s).



# *National Archives and Records Administration*

8(b)(6)01 Adelphi Road  
College Park, Maryland 20740-(b)(6)001

APR 23 2009

## Re: Freedom of Information Act Appeal NGC09-017A

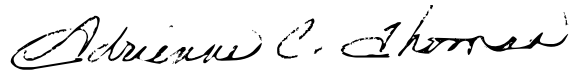
This is in response to your Freedom of Information Act (FOIA) appeal of March 13, 2009.

In your initial request of January 8, 2009, you asked for copies of descriptive documents concerning the NARA "Treasure Vault" and its purpose, content and history. In our reply of March 5, 2009, we provided you with a redacted copy of NARA 1572, "Security for NARA Holdings." We withheld eight pages of NARA 1572 under both parts of 5 USC 552(b)(2), which protects from disclosure records related solely to the internal personnel rules and practices of an agency. Specifically, six pages were withheld in part under the "high 2" aspect of exemption (b)(2), which relates to internal agency matters where disclosure would risk circumvention of a legal requirement. One page was withheld in part under the "low 2" aspect of exemption (b)(2), which relates to internal agency matters in which the public could not reasonably be expected to have an interest. The final page contains portions withheld in part under both the "low 2" and "high 2" aspects of exemption (b)(2). You are appealing the (b)(2) withholdings.

In Crooker v. Bureau of Alcohol, Tobacco & Firearms, 670 F.2d 1051, 1073-74 (D.C. Cir. 1981), the D.C. Circuit fashioned a two-part test for determining which sensitive materials are exempt from disclosure under the "high 2" aspect of exemption (b)(2). This test requires both: (1) that the document be "predominantly internal," and (2) that its disclosure "significantly risks circumvention of agency regulations or statutes." We believe NARA 1572 has met the threshold requirement of being "predominately internal." Turning our analysis to the second part of the test, we carefully examined the contents of NARA 1571, with an eye toward "foreseeable harm," as outlined in Attorney General Holder's FOIA Memorandum of March 19, 2009, and subsequent guidance from the Department of Justice (DOJ) and have determined that there is no "significant risk" of circumvention for those portions of NARA 1571 withheld under the "high 2" aspect of exemption (b)(2). Further, based on existing case law and DOJ guidance, the "low 2" exemption is simply aimed at relieving the administrative burden of assembling and maintaining for public inspection records in which the public could not reasonably be expected to have an interest (See Department of Air Force v. Rose, 425 U.S. 352 (1976)). There is no administrative burden in reproducing the two pages of NARA 1571 withheld in part under the "low 2" aspect of

exemption (b)(2). Accordingly, I am reversing the initial determination and releasing NARA 1571 in full. Please see enclosed copy.

Sincerely,

A handwritten signature in cursive script that reads "Adrienne C. Thomas".

ADRIENNE C. THOMAS  
Deputy Archivist

Enclosure





Thursday, April 16, 2009

[www.nara-at-work.gov](http://www.nara-at-work.gov)

## NARA 1571, Archival Storage Standards

February 15, 2002

Word version of directive

Transmittal memo

Supplement - Architecture and Design Standards for Presidential Libraries

- What is the purpose of this directive?
- What is the authority for this directive?
- Definitions
- Responsibilities
- To what NARA archival facilities does this policy apply?
- What are the general structural standards for NARA archival facilities?
- What standards must be followed to protect against water damage?
- What are the general heating, ventilation, and air conditioning (HVAC) requirements?
- What are the temperature and humidity standards?
- What are the limits for air pollutants (particulate and gases)?
- What air handling and filtration systems are required?
- What finishes are permitted in records areas?
- What finishing materials are prohibited in areas where records are used or stored?
- What materials may be used in records storage areas and records areas, and how is their suitability determined?
- Are carpeting and wall coverings permitted?
- What are the requirements for lighting?
- What are the requirements for pest and vermin control?
- What are the general fire-safety requirements for archival facilities?
- What are the smoke detection system requirements?
- What are the requirements for automatic sprinklers?
- What are the security requirements for archival facilities?
- How should the building condition be monitored and maintained?
- How often should building condition surveys be conducted?
- What other facility use policies contribute to appropriate archival storage conditions?
- Appendix A - Temperature and Relative Humidity Standards for Archival Records
- Appendix B - Air Pollutant Limits

### **1571.1 What is the purpose of this directive?**

This directive establishes structural, environmental control, fire safety, preservation, and security standards for appropriate archival storage conditions in NARA archival facilities.

### **1571.2 What is the authority for this directive?**

The authorities for this directive are

a. 44 U.S.C. 2109, which makes the Archivist of the United States responsible for the preservation of records or other documentary material transferred to the Archivist's legal custody. Appropriate storage conditions are an essential component of a strategy for preservation of archival records.

b. 44 U.S.C. 2112 and 2903, which make the Archivist responsible for custody, control and operation of certain buildings, land, and space.

c. 44 U.S.C. 2112(a)(2), which requires the Archivist to promulgate architectural and design standards for new and existing Presidential libraries.

### 1571.3 Definitions

For purposes of this directive, the following definitions apply

a. **Archival facility** means

- (1) A NARA-owned or leased facility used to store archival records;
- (2) A GSA-owned or leased facility used by NARA to store archival records; or
- (3) A Presidential library acquired by agreement in accordance with 44 U.S.C. 2112(a)(1)(B)(i).

b. **Archival records** means

- (1) Federal records, Presidential historical materials, Presidential records, and donated historical materials transferred to the legal custody of NARA; and
- (2) Supreme Court records and the records of Congress that have been deposited in NARA's physical custody.

c. **Facility manager** means the program official who is responsible for facility management activities within that building.

d. **Records area** means a records storage area, a designated processing area, an exhibit area, or a preservation (conservation, duplication, microfilm, digital imaging) laboratory. The term covers areas where records may be kept for extended periods.

e. **Records storage area** means an area containing archival records that is enclosed by four firewalls, the floor, and the ceiling. The term includes general stack areas, vaults, and storage areas for exhibits and museum objects, but does not include reference space, staff offices, public spaces (e.g., restrooms and lobbies) or processing areas.

f. **Research room** means a room in which researchers may use original records and for which they must be issued a researcher identification card.

### 1571.4 Responsibilities

a. **Space and Security Management Division (NAS)**

(1) Conducts periodic building condition surveys as outlined in [par. 1571.23](#) and assists the program offices in establishing and maintaining a system-wide facility improvement and renovation program;

(2) In coordination with other NARA offices, establishes architectural and design standards for all leased and NARA-owned facilities;

(3) Furnishes professional and technical advice on the design and construction of archival storage facilities; and

(4) Acts as project manager for archival facility design and construction projects.

b. **Preservation Programs (NWT)** conducts an integrated, scientific preservation program, including

(1) Developing and recommending long-range preservation plans and policy for archival records, coordinating with the Office of Presidential Libraries (NL) and the Office of Regional Records Services (NR), as necessary;

(2) Writing specifications for and providing quality assurance testing of those materials used to prolong the useful life of records (e.g., folders and boxes) and of materials that will be used in the proximity of records (e.g. paint, adhesives and finishes, carpeting, pesticides, and cleaning supplies);

(3) Monitoring environmental conditions of archival facilities;

(4) Administering integrated pest management programs;

(5) Providing technical advice and consultant services on specialized storage requirements to NL, NR, and the Office of Records Services - Washington, DC (NW);

(6) Furnishing professional and technical preservation assistance; and

(7) Reviewing the design and construction of archival storage facilities for records preservation issues.

c. **Presidential library directors** administer the day-to-day facilities management program of the library in coordination with the NL, and major renovation and restoration projects in coordination with NL and the Office of Administrative Services (NA).

d. **Regional administrators and facility directors** administer the day-to-day facility management programs of the regions in coordination with NR.

e. **Facilities and Materiel Management Services Division (NAF)** is responsible for the day-to-day facility management program of the National Archives Building and the National Archives at College Park (Archives II).

#### **1571.5 To what NARA archival facilities does this policy apply?**

a. This policy applies to all new NARA archival facilities occupied by NARA on or after October 1, 2001, except new space leased for archival programs on a short-term basis while a permanent archival facility is being built or renovated. Additional facility specifications that are not directly related to appropriate storage conditions for archival records may be included in supplements to this directive.

b. New space leased on a short-term basis must meet the facility standards for storage of permanent Federal records specified in 36 CFR Part 1228, Subpart K.

c. To the extent feasible and financially practicable, existing NARA archival facilities should conform to these standards when the facility is renovated or otherwise significantly modified. If the facility cannot be brought into conformance with every standard, NA and the affected program office determine what mitigating action will be taken to minimize threats to the holdings. For example, if piping within a storage area cannot be removed, a mitigating action, such as frequent inspections, may be identified. Mitigating actions must be coordinated with NWT and approved by the Archivist.

d. All NARA archival facilities must have an Integrated Pest Management program (see par. 1571.17) and must enforce the facility policies specified in par. 1571.24.

e. All NARA archival facilities must comply with pars. 1571.14 and 1571.15 when selecting and installing new furnishings and materials, including carpet, in the facility and par. 1571.12 when painting records storage areas.

#### **1571.6 What are the general structural standards for NARA archival facilities?**

a. The facility must be designed in accordance with regional building codes to provide protection from building collapse or failure of essential equipment from earthquake hazards, tornadoes, hurricanes, and other potential natural disasters.

b. The facility must be constructed with non-combustible materials and building elements, including roofs, walls, columns, and floors.

c. A floor load limit must be established for the records storage area by a licensed structural engineer. The limit must take into consideration the weight of the specific type(s) of archival records to be stored, height and type of the

shelving or storage equipment, the width of the aisles, the configuration of the space, etc. The allowable load limit must be posted in a conspicuous place and must not be exceeded.

d. The architectural and engineering design team for the facility must include and work closely with a preservation specialist, who has experience in developing archival storage facilities and has been approved by NARA. The plans for the facility must be reviewed by NWT at each submission stage.

#### **1571.7 What standards must be followed to protect against water damage?**

a. **Location of facility.** The archival facility must be sited a minimum of five feet above and 100 feet from any 100 year flood plain area, or be protected by an appropriate flood wall that conforms to local or regional building codes.

b. **Roof.** The facility must ensure that the roof membrane does not permit water to penetrate the roof. Place nothing on the roof that may cause damage to the roof membrane, including equipment. Do not install skylights or sloped glazed windows in areas where records are regularly present. Avoid roof penetrations, including vents, over these areas. However, automatic roof vents, designed solely to vent in the case of a fire, with a temperature rating at least twice that of the sprinkler heads, may be used over records storage areas.

#### **c. Piping.**

(1) Do not run piping (except fire protection sprinkler piping and storm water roof drainage piping) through records storage areas.

(2) If drainage piping from roof drains must be run through records storage areas, the piping must be run to the nearest vertical riser and must include a continuous seamless gutter sized and installed beneath the lateral runs to prevent leakage into the storage area. Vertical pipe risers in records storage areas must be fully enclosed by shaft construction with appropriate maintenance access panels.

#### **d. Location of records within the facility.**

(1) Do not store records below grade. Cave/underground facilities may be exempted from the requirement to store records above ground if the facilities

(a) Meet the other standards in this directive;

(b) Demonstrate long-term low risk to records because of water, fire, or structural threats; and

(c) Are granted a waiver from a specific standard by the Archivist.

(2) Store records at least 3 inches from the floor surface.

(3) NWT and NAS must review plans to place records shelving equipment along an exterior wall in advance.

(4) No fountains, pools, or standing water are allowed over or adjacent to areas where records are stored, processed, used, or exhibited.

e. **Water detection system.** If special considerations indicate concerns with possible water damage in records storage areas, consult with NWT on the advisability of installing a water detection system.

#### **1571.8 What are the general heating, ventilation, and air conditioning (HVAC) requirements?**

a. Archives storage areas, processing areas, and preservation laboratories must be served from separate HVAC systems. All other areas of the building may share the same HVAC system. HVAC equipment must not be mounted on the roof of a new facility.

b. Air handling units serving records storage and processing areas must provide sufficient air exchanges to maintain requirements for temperature, relative humidity, and pollutant control. The number of air exchanges are determined by the planned size of the room, volume of records, volatile organic compounds coming off the records, occupancy, etc.

c. The records storage areas of the facility must be kept under positive air pressure especially in the areas adjacent to the loading dock. Loading docks must have an air supply and exhaust system that is separate from the remainder of the facility.

d. Areas where records are used, processed, stored, or exhibited must be isolated from sources of pollutants and particulates, such as the loading dock, machine rooms, or areas where woodworking or painting take place. Doors to the record areas must not open directly onto the loading dock, machine rooms, locations where woodworking or painting takes place, or other similar areas. The air intakes and returns must be designed such that lower quality air and environment cannot affect the records areas, and must have direct venting to the outdoors.

#### **1571.9 What are the temperature and humidity standards?**

a. Appendix A specifies the **maximum** acceptable temperatures in areas where records are stored, and the **maximum** acceptable temperature set point for areas where records are exhibited, processed, or used. Appendix A also specifies the acceptable range for relative humidity in areas where records are stored, processed, exhibited, or used. Use cooler temperature and drier relative humidity set points whenever possible, as these conditions extend the life and significantly enhance the preservation of the records. Coordinate the selection of temperature and relative humidity set points with NWT.

b. The standards specified in Appendix A must be maintained 24 hours per day, 365 days per year, unless otherwise stated. Once a set point is programmed, daily fluctuations must not exceed 5° F and/or 5 percent relative humidity. Relative humidity levels represented in a range indicate minimum and maximum set points. Seasonal movement between these set points must not exceed 5% per month while staying within the +/-5% daily band restriction.

c. Seasonal relative humidity drift in actual operation of the system to reconcile energy efficiency and external climate extremes in certain geographical locations and with certain building types may occur. The building should be designed to accommodate the environmental requirements in a highly energy efficient manner.

d. Temperature and relative humidity conditions in records areas must be continuously monitored and must be recorded at intervals that are frequent enough, and in a sufficient number of locations to demonstrate and confirm compliance with the standard. The facility manager must maintain the HVAC systems and integrated monitoring equipment according to manufacturer's specifications. The facility manager is responsible for monitoring the temperature and relative humidity conditions in the facility following NWT guidance and specifications, and ameliorating problems as they develop. Report ongoing problems to NWT and NAS.

#### **1571.10 What are the limits for air pollutants (particulate and gases)?**

Appendix B specifies the maximum allowed levels of particulates and gases in records storage areas, processing areas, exhibit areas, and research rooms. The facility manager is responsible for monitoring for pollutants in the facility at intervals frequent enough to demonstrate and confirm compliance with the standard, following NWT guidance and specifications. The facility manager is responsible for maintaining particulate and gas filtration systems according to manufacturer's specifications and ameliorating problems as they develop. Report ongoing problems to NWT and NAS.

#### **1571.11 What air handling and filtration systems are required?**

The following filtration systems are required in the air handling unit for the records storage and processing areas:

a. **Gas-phase filtration system.** The gas phase filtration system must control effectively gas phase contaminants including, aromatic, aliphatic, oxygenated hydrocarbons, chlorinated hydrocarbons, and inorganic acid/basic compounds. The operation of the air purification system may be a combination of chemisorption, adsorption, and catalytic processes. The system must be designed to allow periodic monitoring of the filter performance by providing sampling ports or access to the filter ports.

b. **Particulate filtration system.** The particulate filtration system for archival records storage and processing areas must have a Minimum Efficiency Reporting Rating (MERV) of 14 or greater based on ASHRAE 52.2, "Methods of Testing General Ventilation Air Cleaning Devices for Removal Efficiency by Particle Size." To extend the service life of

the system, it may be desirable to install preliminary filters with lower MERV ratings. A pressure drop measurement system or other equipment must be provided to determine when the filters need to be changed

c. **Humidification control system.** The air handling units must be designed for both humidification and dehumidification. Humidification must be achieved by a clean steam injection system (such as an electronic steam humidifier), an atomized air system using clean water, or equivalent system located down stream of the gas filtration system. The design of the system must ensure that the system does not generate or harbor microorganisms.

#### **1571.12 What finishes are permitted in records areas?**

a. Use a water-based latex paint for painting walls and ceilings. All concrete block walls in the storage area must be primed and painted to prevent dust.

b. Use a low volatile organic compound (VOC) acrylic membrane curing compound for the concrete floors of the records storage areas, after which apply a floor epoxy. Limit the VOC off-gassing of any epoxy and floor coatings in any area where records are processed, used, stored, or exhibited to less than 0.1 part per million by restricting the use of toluene and xylene in the floor coating mix.

c. Use a powder-coating system to paint all painted metal shelving surfaces (including map cases, museum cabinets, etc.) used within all records areas. The powder-coating polymer must be a polyester epoxy hybrid or best equivalent available that passes NWT-conducted or independent lab tests for hardness, coating stability, bending, coating adhesion, and coating durability. The paint must not exceed the off-gassing limits specified in Appendix B. Do not apply powder coating to the metal surfaces onsite in the storage area.

d. If ceiling pipe or exterior stack wall metal panels are to be painted, use an acrylic water reducible primer covered by two latex paint coats.

#### **1571.13 What finishing materials are prohibited in areas where records are used or stored?**

The following materials are not permitted in the areas where records are used, processed, exhibited and stored, including vaults, but may be used in other areas of the facility. For renovated facilities, this paragraph does not apply to previously installed or applied materials.

- a. Cellulose nitrate lacquers and adhesives;
- b. Polyurethane products, including paints, varnishes, and foams;
- c. Acid-curing silicone sealants and adhesives;
- d. Sulfur containing materials that could release SO<sub>2</sub>;
- e. Pressure sensitive adhesives that release VOCs;
- f. Unstable chlorine polymers (PVCs);
- g. Formaldehyde emitting compounds, such as might be found in particle boards;
- h. Vinyls; and
- i. Oil-based paints and varnishes.

#### **1571.14 What materials may be used in records storage areas and records areas, and how is their suitability determined?**

a. Finishing materials, such as paints, finishes, fabrics, carpeting, and floor and wall coverings, used in areas where records are processed, stored, or exhibited for any purpose, must be approved by NWT. NWT may need to test or direct the testing of materials to determine suitability and render approval. Sufficient time to undertake testing must be incorporated into planning and construction schedules.

b. Cleaning supplies used in areas where records are regularly present should be selected carefully to minimize potential damage to records. NWT will provide more specific guidance on how to select appropriate products, and

types of products or specific products whose use is restricted or prohibited.

#### **1571.15 Are carpeting and wall coverings permitted?**

Carpeting, vinyl tiles, and wall coverings are not permitted in the records storage areas, but may be used in other parts of the archival facility. Carpeting, vinyl tiles and wall coverings that minimize off gassing of VOCs must be used in areas where records are regularly present.

#### **1571.16 What are the requirements for lighting?**

##### **a. Records storage areas.**

(1) Normal light levels must not exceed 500 Lux measured 36 inches above the floor level. Ultraviolet (UV) filtration on emergency lighting is required so that UV radiation below 400 nanometers in wavelength does not exceed 75m W/lumen and 75 mW per square meter of surface area.

(2) Where records are not protected by an enclosure:

(a) UV filtration as specified in subpar. a(1) is required on all lights.

(b) Lights in the storage areas that are not required for safety must be off when work is not taking place. Systems (e.g. motion detectors, timers, etc.) should be incorporated to ensure that light exposure to the holdings is minimized.

b. **Processing areas.** Lighting levels for normal office space may be used. UV filtration is required so that UV radiation below 400 nanometers in wavelength does not exceed 75m W/lumen and 75 mW per square meter of surface area.

c. **Exhibit areas.** Lighting must have the capability of full control for light levels 0-200 lux. UV filtration is required so that UV radiation below 400 nanometers in wavelength does not exceed 75m W/lumen and 75 mW per square meter of surface area.

d. **Research rooms.** Lighting levels for normal office space may be used. UV filtration is required so that UV radiation below 400 nanometers in wavelength does not exceed 75m W/lumen and 75 mW per square meter of surface area.

#### **1571.17 What are the requirements for pest and vermin control?**

The archival facility must have an Integrated Pest Management (IPM) program as defined in the Food Protection Act of 1996 (Section 303, Public Law 104-170, 110 Stat. 1512). The facility manager is responsible for monitoring and amelioration of problems as they develop. Report problems to NWT.

#### **1571.18 What are the general fire-safety requirements for archival facilities?**

a. NARA archival facilities must comply with requirements and recommended practices specified in NFPA 232-2000, Standard for the Protection of Records unless a requirement in this directive is more stringent.

b. Do not install mechanical equipment containing motors rated in excess of 1 HP within records storage areas.

c. Do not install high-voltage electrical distribution equipment (i.e., 13.2kv or higher switchgear and transformers) within records storage areas.

d. Penetrations in the walls must not reduce the specified fire resistance ratings.

e. Provide a redundant source of primary electric service, such as a second primary service or an appropriately rated emergency generator to ensure continuous, dependable service to the fire alarm and fire protection systems. Manual switching between sources of service is acceptable.

f. Do not store hazardous materials, including records on cellulose nitrate film, in records storage areas. Records on cellulose nitrate film may include still photographic negatives, still photographic transparencies, x-rays, motion picture film and microfilm. Nitrate motion picture film and nitrate sheet film may be stored in separate areas that meet

the requirements of the appropriate NFPA standard, NFPA 40 (1997), Standard for the Storage and Handling of Cellulose Nitrate Motion Picture Film, or NFPA 42 (1997), Code for the Storage of Pyroxylin Plastic.

**1571.19 What are the smoke detection system requirements?**

a. The archival facility must have an approved, supervised automatic smoke detection system providing full-building coverage. Smoke detection systems must meet the requirements of NFPA 72, National Fire Alarm Code, and must be maintained in accordance with NFPA 72, Part H.

b. Locate smoke detection devices to provide a 99 percent reliability of detecting the origin of the fire in less than 5 minutes. Use photoelectric-type detectors in records storage areas.

**1571.20 What are the requirements for automatic sprinklers?**

a. All records storage and adjacent areas must be protected by a professionally designed automatic sprinkler system that is designed to limit the maximum anticipated loss from any single fire event to a maximum of 300 cubic feet of records destroyed. Sprinkler systems for records storage areas must be separately zoned from other building areas.

b. A wet sprinkler system, installed in accordance with NFPA 13, Standard for the Installation of Sprinkler Systems, must be used except as provided in subpar. c.

c. Clean agent systems that comply with NFPA 2001, Standard on Clean Agent Fire Extinguishing Systems, or pre-action sprinkler systems must be used in cold-storage rooms and other areas subject to temperatures below 40°F, and may be used in records storage vaults and museum storage areas. These systems also may be used in computer rooms and electrical and telephone closets.

**1571.21 What are the security requirements for archival facilities?**

a. The facility must comply, at a minimum, with the security specifications for a Level III facility as defined in the Department of Justice, U. S. Marshals Service report Vulnerability Assessment of Federal Facilities dated June 28, 1995. A copy of the specifications is provided in Appendix A to 36 CFR Part 1228. NAS designates facilities that require higher level security specifications.

b. The facility must have an anti-intrusion alarm system to protect against unauthorized entry.

c. The facility must enforce controls on access to records storage areas.

d. Special security measures may be required for records storage vaults to comply with information security requirements or to protect materials of high intrinsic or monetary value.

**1571.22 How should the building condition be monitored and maintained?**

The facility manager must ensure that

a. Schedules are developed for maintenance and calibration of control system devices for all major building systems in accordance with manufacturers' recommendations;

b. Scheduled maintenance is performed promptly; and

c. Schedules are reviewed and updated annually.

**1571.23 How often should building condition surveys be conducted?**

To ensure that archival facilities subject to this directive meet the standards, NAS should conduct (or contract for) building condition surveys according to the following schedule:

a. **New facilities.** Once before acceptance of a new archival facility, at two years, and again when 10 years old. After 10 years, follow the schedule for existing facilities. If any "punch-list" items are identified in the inspection before acceptance, NAS must monitor correction/completion of those items.

b. **Existing facilities.** Every 5 years. When an existing facility is renovated or significantly modified, the 5-year cycle



begins again in the fiscal year following completion of the renovations or modifications. A pre-acceptance inspection is performed for building renovations. If any "punch-list" items are identified in the inspection before acceptance, NAS must monitor correction/completion of those items.

**1571.24 What other facility use policies contribute to appropriate archival storage conditions?**

a. Prohibit smoking, eating, and drinking in all areas in which records are stored, exhibited, or used.

b. In facilities that have records processing areas, prohibit processing records and photocopying in the records storage areas. To ensure that records are subjected to the best environmental conditions available, retain them in processing areas for as short a time as possible.

[Appendix A - Temperature and Relative Humidity Standards for Archival Records](#)

[Appendix B - Air Pollutant Limits](#)

(The appendixes are available in Word 97 format. You can choose "Open it" to view the file(s). To retrieve, click on "Attachment" and choose "Save it to disk" and click on "OK." Save the file(s) to your preferred directory. Once the file (s) is saved, open it in Word to view.)

---

Page URL: [http://www.nara-at-work.gov/nara\\_policies\\_and\\_guidance/directives/1500\\_series/nara1571.html](http://www.nara-at-work.gov/nara_policies_and_guidance/directives/1500_series/nara1571.html)

---

The U.S. National Archives and Records Administration  
8601 Adelphi Road, College Park, MD 20740-6001 • Telephone: 1-86-NARA-NARA or 1-866-272-6272