



Marianne Mason <marianne.mason@nara.gov>

Fwd: Request for Emergency Destruction of Records47 messages

Laurence Brewer <laurence.brewer@nara.gov>

Wed, Mar 4, 2020 at 5:04 PM

To: "Cote, Darin" <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, "Kabrel, Jack" <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

A new FRED case from EPA.

----- Forwarded message -----

From: **Ellis, John** <Ellis.john@epa.gov>

Date: Wed, Mar 4, 2020 at 3:22 PM

Subject: Request for Emergency Destruction of Records

To: Laurence Brewer <laurence.brewer@nara.gov>

Hello Laurence,

Attached is a letter requesting Emergency Destruction of Records that are a menace to the health and safety of EPA personnel.

I look forward to your response.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

Laurence Brewer, CRM

Chief Records Officer for the U.S. Government

National Archives and Records Administration

Laurence.Brewer@nara.gov

Office: (301) 837-1539

Cell (b) (6)
Blog: [Records Express](#)



 **Emergency Destruction of Records OW2020-03-04-153128.pdf**
3119K

Darin Cote <darin.cote@nara.gov> Thu, Mar 5, 2020 at 8:19 AM
To: Laurence Brewer <laurence.brewer@nara.gov>
Cc: Marianne Mason <marianne.mason@nara.gov>, "Kabrel, Jack" <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

Thanks Laurence,

We'll get working on this. Team, let's plan on discussing this as part of our meeting tomorrow.

Best

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov> Thu, Mar 5, 2020 at 9:44 AM
To: Darin Cote <darin.cote@nara.gov>
Cc: "Kabrel, Jack" <jack.kabrel@nara.gov>

Here's the link to the dossier on NARA@work. The series cited is permanent.
https://work.nara.gov/archives_and_records_mgmt/records-control-schedules/independent-agencies/rg-0412/dossiers/daa-0412-2013-0010.pdf

[Quoted text hidden]

—
Anne Mason, CA
Office of the Chief Records Officer, Operations Research and Support Team
Archives Specialist
301-837-3502
marianne.mason@nara.gov

Darin Cote <darin.cote@nara.gov> Thu, Mar 5, 2020 at 9:48 AM
To: Anne Mason <marianne.mason@nara.gov>
Cc: "Kabrel, Jack" <jack.kabrel@nara.gov>

Thanks Anne,

Can you share with the appraisal archivist?

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov> Thu, Mar 5, 2020 at 9:49 AM
To: Darin Cote <darin.cote@nara.gov>

Will do.

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov> Thu, Mar 5, 2020 at 9:53 AM

To: Carla Simms <carla.simms@nara.gov>

Cc: Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>

Hi Carla,

Our team wanted to loop you in on a request for Emergency Disposal we received from the EPA. In the email chain below you'll see a link to the letter from the EPA outlining the situation and a link to the records schedule for the series that is damaged. Let us know if you have any questions. Thanks,

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Tue, Mar 10, 2020 at 11:08 AM

To: ellis.john@epa.gov

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.
3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?
4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

NARA will be coordinating our response with our Preservation Programs staff and possibly a couple of other NARA units as well. We may want to call you for follow up and to see if you have questions about the process. Let us know if you think a conference call would be helpful for you and we'll set up a WebEx session. Since I'm based in College Park, Maryland, it would also be possible for me to come to EPA for a meeting or to assess the records.

Meanwhile, if anything has changed since your initial letter to NARA please let us know so that we may update our case file information. Also, please do not hesitate to contact us with any questions.

Thanks in advance for this information.

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

[Quoted text hidden]



Emergency Destruction of Records OW2020-03-04-153128.pdf

3119K

Darin Cote <darin.cote@nara.gov>

Tue, Mar 10, 2020 at 11:11 AM

To: Anne Mason <marianne.mason@nara.gov>

Great job Anne!

Darin Côté

Electronic Records Policy Analyst

Policy and Program Support Team (ACPP)
Office of the Chief Records Officer
National Archives and Records Administration
w 817.551.2003 c (b) (6)



[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>
To: Darin Cote <darin.cote@nara.gov>

Tue, Mar 10, 2020 at 11:15 AM

I cribbed a bit from Preston. He was always good at being diplomatic.

[Quoted text hidden]

Darin Cote <darin.cote@nara.gov>
To: Anne Mason <marianne.mason@nara.gov>

Tue, Mar 10, 2020 at 11:17 AM

Work smarter not harder, right? You covered all the bases. The only thing I considered was whether we should loop Lisa and/or Laurence w/a cc. I'm trending toward no at this juncture. Thoughts?

Darin Cote
Electronic Records Policy Analyst
Policy and Program Support Team (ACPP)
Office of the Chief Records Officer
National Archives and Records Administration
w 817.551.2003 (b) (6)



[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>
To: Darin Cote <darin.cote@nara.gov>
Cc: Jack Kabrel <jack.kabrel@nara.gov>

Tue, Mar 10, 2020 at 11:21 AM

I thought about that and decided to wait until we had a response from EPA, but am happy to loop them in if you feel otherwise.

Also, just an FYI - Allison said Pamela is the lead for RX on Federal Agency assistance and FRED. Vicki Lee is the lead for ESF 11 for non-Feds. We probably should note that somewhere on our SOPs.

[Quoted text hidden]

Darin Cote <darin.cote@nara.gov>
To: Anne Mason <marianne.mason@nara.gov>
Cc: Jack Kabrel <jack.kabrel@nara.gov>

Tue, Mar 10, 2020 at 11:24 AM

Agree.

Darin Côté
Electronic Records Policy Analyst
Policy and Program Support Team (ACPP)
Office of the Chief Records Officer
National Archives and Records Administration
w 817.551.2003 (b) (6)



[Quoted text hidden]

Jack Kabrel <jack.kabrel@nara.gov>
To: Anne Mason <marianne.mason@nara.gov>
Cc: Darin Cote <darin.cote@nara.gov>

Tue, Mar 10, 2020 at 11:26 AM

I agree with all of this. Either way Lisa and Laurence will be looped in when the really important information starts coming in. That is good to note the various RX roles.
I'm curious if moldy records can be scanned and/or photographed for preservation. If these records are not duplicated elsewhere that might be the best preservation option. Did Pamela provide any quick bits of information regarding this issue?

Jack
Jack Kabrel
Jack.Kabrel@nara.gov
Archives Specialist
National Archives and Records Administration
Permanent Records Capture Section
Cc: (b) (6)

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>
To: Jack Kabrel <jack.kabrel@nara.gov>
Cc: Darin Cote <darin.cote@nara.gov>

Tue, Mar 10, 2020 at 11:31 AM

Pamela hasn't responded yet. I waited a bit to see if she had questions beyond what I already asked and then decided I should go ahead and contact EPA and we can ask more questions later if needed. Based on past communications, I get the feeling that there is not an expectation that they'll put on an out of office on their email. During my entire career I've always been in a position that I deal with people within and outside my agency that I always put it on.

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>
To: ellis.john@epa.gov
Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>

Thu, Mar 19, 2020 at 6:52 AM

Hello Mr. Ellis,

I know these are chaotic times, but do you have an idea when you will be able to provide additional information? It is difficult for NARA to make a decision when we don't have the info we need. Thanks,

[Quoted text hidden]

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Thu, Mar 19, 2020 at 8:43 AM

To: Anne Mason <marianne.mason@nara.gov>

Cc: Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Given the situation, would this advice be an alternative way to proceed?

When mold-affected records can't be remediated (eg cleaned, rehoused) immediately the standard practice is to stabilize the situation by getting active mold to go dormant. The least labor-intensive method to do this freezing, followed by storage in a low RH environment (preferably under 50%). This also removes the records from storage and work areas, and buys time for decisions while preventing further mold damage.

NARA can provide contacts with records recovery vendors we have used who have freezer storage facilities in this region, and can provide appropriate security for Federal records. They will also be able to provide both remediation and digital copying services if these are required in the future. Again, they have experience working with sensitive, restricted records for both Federal and private sector records. There will be a cost for transport and freezing/freezer storage, but otherwise with the delays and likely building closures with HVAC shutdowns the agency may end up with defacto records destruction.

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Ce (b) (6)
www.archives.gov

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Thu, Mar 19, 2020 at 8:49 AM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Cc: Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

I think that sounds good and well-worded Pamela. Thanks for the suggestion. Unless anyone objects, I'll send this along to EPA with a link to the contracting info on Preservation's website:

<https://www.archives.gov/preservation/records-emergency/contracting>

and let him know we're all still working, although largely from home, in has he has questions.

[Quoted text hidden]

Darin Cote <darin.cote@nara.gov>

Thu, Mar 19, 2020 at 8:49 AM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Cc: Anne Mason <marianne.mason@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Hi Pam,

Thanks for reaching out and for the sage advice. I agree that an interim solution that stabilizes the records may be best at this time. Jack, Anne and I have a meeting this morning to discuss this and other issues. We'll keep you posted on our next steps.

Thanks again,

Darin Coté
Electronic Records Policy Analyst
Policy and Program Support Team (ACPP)
Office of the Chief Records Officer
National Archives and Records Administration
w 817.551.2003 (b) (6)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF MISSION SUPPORT

March 4, 2020

Laurence Brewer,
Chief Records Officer for the U.S. Government
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740-6001

Dear Mr. Brewer:

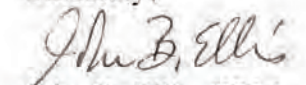
In accordance with 36 C.F.R § 1229.10, I am writing to request Emergency Destruction of Records because their physical condition makes them a menace to the health and safety of EPA personnel.

Sometime after business hours on Friday, November 29, 2019, a sprinkler head broke and saturated a large area on the sixth floor of the EPA West building. Unfortunately, 18 boxes containing records from a Water Quality Standards Rulemaking that were being prepared for transfer to the National Archives and Records Administration were in the immediate area and were badly damaged. These were permanent records, covered by Records Schedule DAA-0412-2013-0010-0001 - Item a. The inclusive dates of the records ranged from 1985 to 2000. See the attached inventory. Some of the information in the damaged records may be duplicated on other media that was not damaged.

The facilities staff took steps to fix the cause of the broken sprinkler and began to run fans to dry out the area and the boxes. Due to miscommunication between EPA Facilities and Office of Water staff, the boxes of records were not transferred to the contractor for restoration. There were discussions between EPA Facilities and GSA regarding the possible restoration of the records, but regrettably the records are now full of mold and have a strong odor. EPA's Director, Facilities Management and Services Division determined the records do not appear to be salvageable, and thus we are requesting immediate destruction of the records.

Please contact me if you have any questions.

Sincerely,


John B. Ellis, CRM
EPA Records Officer

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION
Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000
Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003
Records Schedule Materials REGS 1023a:

Box 1 of 18

1. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00001 -
00087. WWPD/WRPB - Water Quality.
Date. August 31, 2000.
2. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00221 -
00292. WWPD/WRPB - Water Quality.
Date. Sept. 19, 2000.
3. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00088 -
00150. WWPD/WRPB - Water Quality.
Date. Sept. 15, 2000.
4. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00151 -
00220. WWPD/WRPB - Water Quality.
Date. Sept. 18, 2000.
5. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00293 -
00411. WWPD/WRPB - Water Quality.
Date. Sept. 21, 2000.
2. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00770 -
00865. WWPD/WRPB - Water Quality.
Date. Sept. 29, 2000.
3. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00617 -
00687. WWPD/WRPB - Water Quality.
Date. Sept. 27, 2000.
4. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00688 -
00769. WWPD/WRPB - Water Quality.
Date. Sept. 28, 2000.
5. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00412 -
00454. WWPD/WRPB - Water Quality.
Date. Sept. 25, 2000.

Box 2 of 18

1. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #00455 -
00616. WWPD/WRPB - Water Quality.
Date. Sept. 26, 2000.

Box 3 of 18

1. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments #00866 - 00950. WWPD/WRPB.
Water Quality. Date. October 2, 2000.
2. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments #00951 - 01019. WWPD/WRPB
Water Quality. Date. October 3, 2000.
3. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments #01039 - 01118. WWPD/WRPB
Water Quality. Date. October 21, 2017.

[Should this be 2000 instead of 2017?]

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

Date. October 13, 2000.

4. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01020 - 01038. WWPD/WRPB Water Quality. Date. October 3, 2000.
5. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. FedEx. Emails, Misc. Date. October 10, 2000.
6. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments - Index. Administrative Record Kansas Promulgation. Date. November 16, 2000.
7. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01119 - 01163. WWPD/WRPB Water Quality. With Photo Copies. Date. October 10, 2000.
8. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01164 - 01248. Date, October 11, 2000.

Box 4 of 18

1. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01249 - 01310. WWPD/WRPB - Water Quality. Date. October 11, 2000.
2. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01311 - 01422. WWPD/WRPB - Water Quality. Date. October 12, 2000.
3. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01423 - 01541. WWPD/WRPB - Water Quality.

4. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01542 - 01634. WWPD/WRPB - Water Quality. Date. October 13, 2000.
5. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635 - 01745. WWPD/WRPB - Water Quality. Date. October 16, 2000.

Box 5 of 18

1. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01746 - 01799. WWPD/WRPB - Water Quality. Date. October 16, 2000.
2. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01800 - 01899. WWPD/WRPB - Water Quality. Date. October 16, 2000.
3. REGS 1023. State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01900 - 01949. WWPD/WRPB - Water Quality. Date. October 16, 2017.
[Should this be 2000 instead of 2017?]
4. REGS 1023. State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01950 - 01999. WWPD/WRPB - Water Quality. Date. October 18, 2000.
5. REGS 1023. State Program Authorization/Approval Files Kansas Promulgation - Public Comments #02000 - 02041. WWPD/WRPB - Water Quality. Date. October 24, 2000.

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION
Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000
Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003
Records Schedule Materials REGS 1023a:

EPA Kansas Water Quality Standards.
Dates: July 27, 2000 to October 13, 2000.

6. REGS 1023. State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635 -

- Exhibit R - Duplicate.
- KLA? Declarations Regarding Stream Designations - Documents. Date. April 16, 2003.
- Kansas Lower Republican, Declaration - Documents. Date. October 12, 2000.
- Smokey Saline: Attached - Declaration - Documents. Kansas Water Quality Standards. Date. October 11, 2000.
- Walnut: Declaration - Documents. Date. October 4, 2000.
- Cimarron: Declaration - Documents. October 4, 2000.
- Verdigris Declaration - Documents. Date. October 10, 2000.
- Neosho: Declaration - Documents. Date. October 10, 2000.
- Marais Des Cygne: Declaration Documents. Date. October 11, 2000.
- Missouri: Declaration Documents. Date. October 12, 2000.

Box List 6 of 18.

1. REGS 1023a: State Program
Authorization/Approval Files:
Promulgation - Public Comments
#01635 Exhibit FF - Original. Senator
Brownback. Senator Pat Roberts and
Kansas Secretary of Agriculture, Jamie
Clover Adams. Comments on Proposed

- Kansas Promulgation - Public Comments #01635 Exhibit FF - (Duplicate).
- Exhibit F: Photographs from the Sept. 13, 2000 Public Hearing in Topeka, Kansas. #01635 Exhibit F - Original w/2nd Duplicate.

2. REGS 1023a: State Program
Authorization/Approval Files
Kansas Promulgation - Public Comments
#01635 Exhibit EE - Original. Exhibit EE:
U.S. EPA Administrative Record
for Kansas Water Quality Standards
Proposed Rulemaking as of October 10,
2000.

- Kansas Promulgation - Public Comments #01635 Exhibit EE - 1 Duplicate.

3. REGS 1023a: State Program
Authorization/Approval Files
Kansas Promulgation - Public Comments
#01635 Exhibit E - Original. With
Audiotapes from the Question and Answer
Session at the Sept. 13, 2000 Public Hearing
In Topeka, Kansas.

- On Audiotape EPA Q&A tape 2. Sept. 13, 2000.
 - 2nd Audiotape EPA Q&A Sept. 13, 2000. 1 Duplicate.

4. REGS 1023a: REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments
#01635 Exhibit DD - Duplicate. Exhibit DD
Frequently Asked Questions About Water
Quality Standards Proposed for Kansas by
U.S. EPA (USEPA Region VII - Sept. 2000.

- REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635 Exhibit DD - 1 Duplicate.

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

Assessment, User Manual
(April 1987).

5. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments
#01635 Exhibit D - October 2, 2000 Letter
From Geoffrey H. Grubbs, Director of Office
of Science and Technology at the U.S. EPA
to Ms. Jamie Clover Adams, Secretary of
Kansas Department of Agriculture. Original.
 - Kansas Promulgation - Public
Comments #01635 Exhibit D -
3rd Duplicate.
6. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635
Exhibit CC - Original. Exhibit CC Draft
Implementation Guidance for Ambient
Water Quality Criteria for Bacteria - 1986,
U.S. EPA Office of Water, EPA-823D-00-
001. (Jan. 2000).
 - Kansas Promulgation - Public
Comment #01635 Exhibit - CC
1 Duplicate.
7. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635
C - Original. Exhibit C. Videotape of
August 29, 2000 Meeting in Topeka,
Kansas Between EPA, Kansas State
Officials and Agricultural Representatives.
 - Part of No. 7 (con't) Kansas
Farm Bureau - EPA Officials
And Kansas Legislators. August
29, 2000. 2nd Duplicate.
8. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635
Exhibit BB - Original. Exhibit BB Kansas
Use Attainability Analysis Procedures.
 - A Procedure for Conducting
Recreation Use Attainability
- Use Attainability Protocols
(April 7, 2000).
- Kansas Promulgation - Public
Comments #01635. Exhibit BB -
1 Duplicate.
9. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635
Exhibit B - Original. Exhibit B. Information
Regarding the Meeting Held Between the
EPA and the Kansas Congressional
Delegation and Members of the Kansas
Governor's Cabinet on August 29, 2000
in Topeka, Kansas.
 - July 11, 2000 Letter from
Kansas Legislators to Ms.
Carol Browner, U.S. EPA
Administrator.
 - New Article.
State, EPA at Odds over
Water Standards. Date,
August 30, 2000.
 - Kansas Promulgation - Public
Comments #01635. Exhibit B -
1 Duplicate.
10. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635
Exhibit AA - Duplicate. Exhibit AA.
Grassland Dynamics: Long Term
Ecological Research and Tall Grass
Prairie (1998).
 - Kansas Promulgation - Public
Comments #01635 Exhibit AA -
1 Original.
11. REGS 1023a: State Program
Authorization/Approval Files Kansas
Promulgation - Public Comments #01635
Exhibit A - Duplicate. Exhibit A.
Testimony Regarding the Affect the

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

Proposed Rules Will Have on Agricultural Operations.

1 Duplicate.

- Testimony of Janis Lee with photographs. #01635.
- Testimony of Alan Hess with photographs.
- Testimony of Jere White with photographs. Date. Sept. 13, 2017. 2nd Duplicate.
[Should this be 2000 instead of 2017?]

Box 7 of 18

1. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments: Of Uncertified Administrative Records Pursuant to the Uncertified Administrative Procedures Act PERMANENT. 1 piece of paper. Close Dates. 2003.
2. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635. Exhibit HH KDHE's Administrative Record for Promulgation of the 1994 Kansas Water Quality Standards. The Original copy in
 - Public Hearing Report - Kansas Water Quality Standards Kansas Administrative Regulations 28-16-28b Through 28-16-28f. Volume 1 of 3 Public Hearing Conducted. May 26, 1994 - El Dorado, Kansas. May 27, 1994 - Topeka, Kansas. Report Submitted by: Mark R. Bradbury Hearing Officer. Duplicate Copies.
3. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635. Exhibit H - Original. Photographs of the September 14, 2000. Public Hearing in Dodge City, Kansas.
 - Kansas Promulgation - Public Comments #01635. Exhibit H -

4. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635 Exhibit GG - Original. KDHE UAAs Demonstrating That Primary Contact Uses Are Not Attainable for Stream Segments in the Kansas Lower Republican Basin.
 - REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635 Exhibit GG - Duplicate.
5. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635. Exhibit G. Videotape of the September 13, 2000. Public Hearing in Topeka, Kansas.
 - Kansas Farm Bureau EPA Hearing Sept 13TH, 2000, Topeka, KS. 2ND Duplicate.

Box 8 of 18

1. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635 Exhibit N - Original. Testimony of Gale Hutton, Director of the Water, Wetlands and Pesticides Division of the U.S. EPA, Region VII for the Joint Hearing Before the Joint Health Reform Oversight Committee. Sept. 20, 2000.
 - Kansas Promulgation - Public Comments #01635 Exhibit N - 1 Duplicate.
2. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments #01635. Exhibit M - Original. Exhibit M. June 26, 2000 EPA Press Release Regarding Proposed Rulemaking. Date. July

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

26, 2000.

- Kansas Promulgation - Public Comments #01635 Exhibit M - Duplicate.
3. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01635 Exhibit L - Original. Exhibit L. Court Filings in Kansas Natural Resources Council, Inc. v. Browner, Civ. Action No. 99-23-2373 (J.W.L.) (d. Kan.)
- Court Docket for Kansas Natural Resource Council, Inc. v. Browner.
 - Complaint.
 - Answer.
 - Joint Motion for Entry of Consent.
 - Consent Decree.
 - Kansas Promulgation - Public Comments #01635 Exhibit L - 1 Duplicate.
4. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01635. Exhibit J. Evidence of Public Opposition to be the Proposed Rules.
- Photograph of Hearing Participants Signing A Petition Opposing The Proposed Rules.
 - Signed Petition of Individuals who Attended The Public Hearing That Oppose The Proposed Rules.
 - Kansas Promulgation - Comments #01635. Exhibit J - 1 Duplicate.
5. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01635 Exhibit K - Original. Exhibit K. Geographic Representation of the Public Hearing Participants that Oppose the Proposed Rules.
- Photographs of Individuals Identifying Geographic Locations On The Green Dot Map.
 - Geographic Locations Identified On The Green Dot Map.
 - Kansas Promulgation - Comments 01635 Exhibit K - 1 Duplicate.
6. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01635 Exhibit I - Original. Exhibit I Audiotape of the Questions and Answer Session at the Sept. 14, 2000 Public Hearing in Dodge City, Kansas.
- EPA Kansas Water Quality Standards Question & Answer Session. Sept 14, 2000. Dodge City, KS. Side 1 & 2.
 - Kansas Promulgation - Public Comments #01635 Exhibit I - Duplicate.
- Box 9 of 18
1. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments #01635 Public Comments Exhibit Q - Original.
- Kansas Promulgation - Public Comments #01635 Exhibit Q - Duplicate.
 - Kansas Promulgation - Public Comments #01635 Exhibit P - Original.
 - Kansas Promulgation - Public Comments #01635 Exhibit P - Duplicate.
 - Kansas Promulgation - Public Comments #01635 Exhibit O - Original.
 - Kansas Promulgation - Public Comments #01635 Exhibit O - Duplicate.

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION
Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000
Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003
Records Schedule Materials REGS 1023a:

2. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation –
Public Comments #01635 Exhibit R –
Original.

- Kansas Promulgation – Public Comments #01635 Exhibit S – Original.
- Kansas Promulgation – Public Comments #01635 Exhibit S – Duplicate.

3. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation –
Public Comments #01635 Exhibit T –
Original.

- Kansas Nonpoint Source Pollution Management Plan – 2000 Update. Kansas Department of Health & Environment. Date, May 2000.

Box 10 of 18

1. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation –
Public Comments #06135. Exhibit X
Federal and State Nonpoint Source
Programs.

- Report on BMP Implementation in The K-LR for the Governor's Water Quality Initiative. July 15, 1999.
- Governor's Water Quality Initiative; Trees for Clean Water (State of Kansas Water Office).
- State and Federal Water Programs- 1999; Program Descriptions, Authorities and Contacts (State of Kansas Water Office, February 1999.
- State Conservation Commission Nonpoint Source Programs.
- USDA Conservation Programs. Date, Oct. 9, 2000.

- Kansas Promulgation - Public Comments #01635 Exhibit X - 1 Duplicate.

2. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation -
Public Comments #01635. Exhibit W -
Duplicate. Report of Jonathan Jones, P.E.
and E. Robert Weinee, Ph.D. of Wright
Water Engineers, Inc., Regarding the
Proposal To Widely Apply Primary Contact
Recreation Numeric Standard for Fecal

Coliform in Kansas and Integrating
Nonpoint Sources into Antidegradation
Review. 1 Duplicate.

- Kansas Promulgation - Public Comments #01635 Exhibit W- Original. Original Copy.

3. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments #01635 Exhibit V - Original.
Letter from Oren Long to Ann Jacob at
The United States Environmental Protection
Agency, Region VII Regarding EPA's
Nonpoint Source Policy. Date. Sept. 18, 2000.

- Kansas Promulgation - Public Comments #01635 Exhibit V- 2nd Duplicate.

4. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments #01635 Exhibit U - Original.
Map of Surface Water Bodies Affected by
EPA's Proposed New Primary Contact
Recreation Designation. Original.

- Kansas Promulgation - Public Comments #01635 U - Duplicate.

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

5. REGS 1023a: State Program

Authorization/Approval Files Kansas

Promulgation – Public Comments # 01635

T - Original (slides)

1. Photo slides are copies of KDHE photo slides accompanying the use attainability analyses (“UAA’s) performed for or by KDHE, copies of which are also in Exhibit T.
2. The numbers written in the upper right-hand corner of the photo slides correspond to the numbers in the Upper right-hand corner of the UAAs.
3. The numbers in the upper left-hand corner of the photo slides written in Blue correspond with the photo sequence on the compact disc copies of the photo slides.
4. Also included are photo copies slides. The handwritten numbers on The slides on the photocopies sheets correspond to the handwritten number in the upper right-hand corner of the photo slides in the Exhibit.
5. Copies of KDHE photo slides 237-244 are not available.

- Exhibit T- CD#3
Compact Disk Frames
3-1 through 3-48.
KDHE Photo Slide
Numbers 121-128 and
256-295. Inside Black
Compact Box.
- Exhibit T - CD#2

Compact Disk Frames

2-1 through 2-120

KDHE Photo Slide

Numbers. 130-236 and
245-255. Inside White
Box.

- Exhibit T - CD#1
Compact Disk Frames
1-1 through 1-20
KDHE Photo Slide
Numbers 1-120. Inside
White Box.
- Exhibit T. Copies of
KDHE UAA Slides
Which are not copied
on to Compact Disk
Slide #237-244. 8^{1/2} x
11 White Envelope.
- Kansas Promulgation -
Public Comments #01635
Exhibit T - 2nd Duplicate.

Box 11 of 18

1. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments #01635 Exhibit Y - Original.
Date. October 8, 2000.

TO BE ADDED:

Box 12 of 18

Box 13 of 18

Box 14 of 18

1. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public
Comments Table 4. Kansas Water Quality
Standards Comment Response - Table 4.
Inside White Binder.
2. REGS 1023a: State Program Authorization/
Approval Files Kansas Promulgation - Public

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

Comments Table 7. Kansas Water Quality Standards Comments Response ¹—Table 6. Inside White Binder.

3. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Transcript of Proceedings. The Hearing Officer Bob Patrick, and a Panel Consisting of Ann Jacobs. Held at the Silver Spur Convention Center, Dodge City, Kansas. Copy. Date. Sept. 14th, 2000.

4. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Transcript of Proceedings. Water Quality Standards For Kansas. This Matter came on for hearing before Hearing Officer, Bob Patrick, and a panel consisting of Ann Jacobs, Gale Hutton, Pat Miller, Cheryl Crisler and Jeff Bryan. In city of Topeka, State of Kansas. Date 13th day of Sept. 2000. Inside Clear Top and Red Back Cover.

5. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments Table 3. Kansas Water Quality Standards Comment Response ¹—Table 3. Inside White Binder.

6. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Index To Public Comments. State Program Authorization/Approval Files. Administrative Record Kansas Promulgation. Inside White Binder.

7. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Comment Table 5. Kansas Water Quality Standards Comment Response ¹—Table 5. Inside White Binder.

Box 15 of 18

1. REGS 1023a: State Program Authorization/

Approval Files Kansas Promulgation - Public Comments. Memo. Kansas Triennial Review. Proposed Rulemaking for Water Quality Standards for Kansas - Action. Date October 12, 2000.

- Comments and Request of the Kansas Agriculture Coalition. Date. October 16, 2000. Documents.

2. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Photo Copies. (1) Use Attainability Analysis (UAA) For Primary and Secondary Contact Recreation. (2) Stream Field Observations. Date. May 7, 2003. Documents.

3. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Use Attainability Analyses (UAAs) 2001 - 2003 Reviews.

- Kansas 202 303(d) List - Floppy Diskette. (Surface Water Register Questions). Feb. 12, 2003.
- Kansas - Department of Health and Environment. Memo. UAAs Completed vs KLA Declarations. Date. April 16, 2003.

Box 16 of 18

1. REGS 1023a: State Program Authorization/ Approval Files Kansas Promulgation - Public Comments. Clean Water Act. Administrative Record For Final Promulgation Of Kansas Water Quality Standards. Extra Large White Binder. Volume 1. EPA-823-B-94-005a. August 1994.

- Administrative Record For Final Promulgation Of

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

Kansas Water Quality
Standards. Extra Large
White Binder. Volume 2.
Date. October 31, 1994.

Regulations for WQS for
Kansas. Inside a Medium
Brown Box. Date. October
4, 2000. 6 Documents.

Box 17 of 18

1. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. Kansas Department of Health & Environment. Clean Water Act. Administrative Record For Final Promulgation Of Kansas Water Quality Standards. Extra Large White Binder. Volume 5.

- REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. Date. Sept. 10, 2001.
- REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. Volume
- REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. Information & Response. Date. July 14, 2000.

2. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. Water Quality Standards for Kansas. Large White Binder. Volume 6. Date. July 11, 2000.
 - Fact Sheet: Summary of a Final Rule Withdrawing Certain Federal Water Quality Criteria Applicable to Rhode Island, Vermont the District of Columbia, Kansas and Idaho. EPA-823-F-00-005. March 2000.
 - Fact Sheet: Proposed Rule for Kansas Water Quality Standards. EPA-823-F-00-009. Date. June 2000.

3. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. The U.S. District Court For The District of Kansas. District Court Documents. Extra White Binder. Date. January 10, 2001.

Box 18 of 18

1. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments. Uncertified Administrative Records Pursuant to the Administrative Procedures Act. Permanent.

- Kansas Promulgation #01635 Cost Impact due to EPA July 3, 2000 Proposed

Box 18 of 18 (con't)

4. REGS 1023a: State Program Authorization/Approval Files Kansas Promulgation - Public Comments.

U.S. Geological Survey
National Water Information
System

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

```
# Retrieved: 2003-03-28 13:35:24
EST
#
# This file contains published
daily mean streamflow data.
#
# Further Descriptions of the
dv_cd column can be found at:
#
http://waterdata.usgs.gov/nwis/hel
p?codes_help#dv_cd
#
#
# This information includes the
following fields:
#
# agency      Agency Code
# site no     USGS station number
# dv dot      date of daily mean
streamflow
# dv_va       daily mean
streamflow value, in cubic-feet
per-second
# dv_cd       daily mean
streamflow value qualification
code
#
# Sites in this file include:
# USGS 06860000 SMOKY HILL R AT
ELKADER, KS
#
#
```

```
#
# U.S. Geological Survey
# National Water Information
System
# Retrieved: 2003-04-11 12:06:41
EDT
#
# This file contains published
daily mean streamflow data.
#
# Further Descriptions of the
dv_cd column can be found at:
#
http://waterdata.usgs.gov/nwis/hel
p?codes_help#dv_cd
#
```

```
#
# This information includes the
following fields:
#
# agency      Agency Code
# site no     USGS station number
# dv_dt       date of daily mean
streamflow
# dv_va       daily mean
streamflow value, in cubic-feet
per-second
# dv_cd       daily mean
streamflow value qualification
code
#
```

```
# Sites in this file include:
# USGS 06845000 SAPPAL C NR
OBERLIN, KS
#
#
agency      site no     dv_dt dv_va
           dv_cd
5s      15s    10d    12n    3s
```

Box 18 of 18 (con't)

1. Cost Impact Due to EPA, July 3, 2000
Proposed Regulations Water Quality
Standards for Kansas: Prepared by Kansas
Department of Health & Environment Bureau
of Water. Date October 4, 2000. (Document).

- State Program
Authorization/Approval
Files Kansas Promulgation -
Public Comments - 01633 -
Duplicate (Introduction).
- Exhibit 1: Audiotape of the
Questions and Answer Session at
the September 14, 2000. Public
Hearing in Dodge City Kansas.
Promulgation - Public Comments
01635 Exhibit 1 - Duplicate.
- Exhibit G: Videotape of the
September 13, 2000. Public
Hearing in Topeka, Kansas.

OFFICE OF SCIENCE AND TECHNOLOGY/STANDARDS AND HEALTH PROTECTION DIVISION

Water Quality Standards for Kansas; Proposed Rule 65 FR 41215, July 3, 2000

Water Quality Standards for Kansas; Final Rule, 68 FR 40427, July 7, 2003

Records Schedule Materials REGS 1023a:

State Program Authorization

Approval Files Kansas

Promulgation – Public

Promulgation – Public Comments

01635 Exhibit G – Duplicate.

- Exhibit E: Audiotapes from the Question and Answer Session at the September 13, 2000 Public Hearing in Topeka, Kansas. State Program Authorization Approval Files Kansas Promulgation – Public Comments 01635 Exhibit E-Duplicate.

- Exhibit C: Videotape of August 29, 2000 Meeting in Topeka, Kansas Between EPA, Kansas State Officials and Agricultural Representatives. State Program Authorization/Approval Files. Kansas Promulgation – Public Comments 01635 Exhibit C – Duplicate.

VII: and U. S. Environmental Protection Agency, Defendants.

SUMMONS IN A CIVIL CASE:

CASE NUMBER: 00 2555 GTV

2. **CLEAN WATER ACT:
ADMINISTRATIVE RECORD FOR
FINAL PROMULGATION OF KANSAS
WATER QUALITY STANDARDS:
VOLUME 6.**

- **EPA Fact Sheet**
Summary of a Final Rule
Withdrawing Certain Federal
Water Quality Criteria Applicable
to Rhode Island, Vermont, the
District of Columbia, Kansas and
Idaho. EPA-823-F-00-005. March
2000.

3. **CLEAN WATER ACT:
ADMINISTRATIVE RECORD FOR
FINAL PROMULGATION OF KANSAS
WATER QUALITY STANDARDS:
VOLUME 8. (District Court Documents)**

- **United States District Court:
DISTRICT OF KANSAS:** Kansas
Natural Resource Council, Inc, and
Sierra Club Plaintiffs. V. Carol
Browner, Administrator, EPA, Dennis
Grams – EPA Administrator, Region



[Quoted text hidden]

marianne.mason@nara.gov <marianne.mason@nara.gov>
To: pamela.najar-simpson@nara.gov, pamela.najar-simpson@nara.gov

Thu, Mar 19, 2020 at 8:52 AM

Your message

To: pamela.najar-simpson@nara.gov
Subject: Re: Request for Emergency Destruction of Records
Sent: 3/19/20, 8:43:20 AM AST

was read on 3/19/20, 8:52:26 AM AST

Darin Cote <darin.cote@nara.gov>
To: Anne Mason <marianne.mason@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>

Thu, Mar 19, 2020 at 8:54 AM

Anne,

That makes good sense. I'm sure Jack will agree. Feel free to let fly with that email at your earliest convenience. I think you'll also need to update the AC memo blotter so that Laurence and Julie know the status of FRED's response. We can discuss if necessary.

Talk to you both in a few minutes.

Darin Cote
Electronic Records Policy Analyst
Policy and Program Support Team (ACPP)
Office of the Chief Records Officer
National Archives and Records Administration
w 817.551.2003 c (b) (7)



[Quoted text hidden]

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
To: Darin Cote <darin.cote@nara.gov>
Cc: Anne Mason <marianne.mason@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Thu, Mar 19, 2020 at 9:10 AM

I should have started thinking this way sooner since 'stabilize the situation and the records' is what we preach for records emergency response at NARA, particularly at the warehouse storage facilities. When there are arguments about who provided resources (and/or pays for) response and recovery between NARA and GSA/landlords or even between

Program areas, RX always tries to at least get the records stabilized as much as possible. This is where the BPA makes such a big difference---we can get a vendor and do things like freeze wet records while the arguments continue...

Maybe we need to encourage agencies to think about stabilizing conditions and records as a first response step in planning, and when we get calls for advice during incidents. And when we get emergency disposal requests, add that to the questions we ask. Are you taking measures to ensure no ongoing damage is taking place?

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Ce (b) (6)
www.archives.gov

[Quoted text hidden]

Ellis, John <Ellis.john@epa.gov>

Thu, Mar 19, 2020 at 3:50 PM

To: Anne Mason <marianne.mason@nara.gov>

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Johnston, Robert" <Johnston.Robert@epa.gov>, "Reed, Khesha" <Reed.Khesha@epa.gov>, "Jefferson, Gayle" <Jefferson.Gayle@epa.gov>

Hello Anne,

EPA's responses to NARA's questions are in red below. Given the current condition of the records staff are not allowed in the area to take more recent photographs.

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.

The photos taken by FMSD are attached. The records were located in a secure conference room being prepped to send to NARA when they got damaged.

2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.

The boxes were severely damaged by the water. Due to miscommunications between facilities staff and the program office, no action was taken for several weeks and the boxes became consumed with visible mold and a strong odor. If action had been taken within the first few days of the flood, it is likely some of the documents were salvageable; however, given the time the boxes remained wet, the papers became fully saturated with water and are now consumed with mold and a strong odor.

3. You stated that some of the information contained in the damaged records may be duplicated on other media?

We are not sure exactly what may be duplicated. Much of the non-paper media was removed from the 18 boxes prior to the leak and was not damaged. Based on the descriptions on the labels the non-paper media contains photographs and recordings of public hearings on the proposed rule, exhibits submitted by the public and questions and answers (Q&As). Given the condition of the paper records, we are unable to review them to verify duplicated information.

How much of the information could be reconstructed from other sources? **Beyond what is on the non-paper media. We don't believe much of the record can be reconstructed.**

Is there info that is not captured elsewhere and is only contained in the damaged paper documents? **Yes, there is information that was only contained in the damaged paper documents and not captured elsewhere.**

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI? **No CUI was included in the records. PII may have been included. Some documents in the boxes included correspondence from members of the public. The documents contained names, street, cities and counties of residence. Full names, email addresses and home addresses may have been included.**

Please let me know if you have further questions or would like me to arrange a visit for you to see the records in the next couple of days.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: (b) (6)

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>

Sent: Thursday, March 19, 2020 6:53 AM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>

Subject: Re: Request for Emergency Destruction of Records

Hello Mr. Ellis,

I know these are chaotic times, but do you have an idea when you will be able to provide additional information? It is difficult for NARA to make a decision when we don't have the info we need. Thanks,

On Tue, Mar 10, 2020 at 11:08 AM Anne Mason <marianne.mason@nara.gov> wrote:

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.
3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?
4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Ellis, John <Ellis.john@epa.gov>
To: Anne Mason <marianne.mason@nara.gov>

Fri, Mar 20, 2020 at 2:13 PM

Hi Anne, I was checking to see whether you got my message yesterday?

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>
To: "Ellis, John" <Ellis.john@epa.gov>

Fri, Mar 20, 2020 at 2:45 PM

Yes, I did. Thanks for the information and pictures. It was very helpful.

I met this afternoon with the emergency destruction team and we'll be drafting a letter that we'll send up the chain for approval. It won't be finalized until it's approved, but I did want to let you know that we will be recommending that the

records not be destroyed. We'll include some recommendations for dealing with the records. If you find that the situation has changed since the photos were taken, let me know. I hope to get it approved quickly and I'll keep you posted. Let me know if you have any questions or want to discuss this further while we wait for the approval of the letter. Thanks,

[Quoted text hidden]

Ellis, John <Ellis.john@epa.gov>

Fri, Mar 20, 2020 at 2:57 PM

To: Anne Mason <marianne.mason@nara.gov>

Cc: "Johnston, Robert" <Johnston.Robert@epa.gov>, "Jefferson, Gayle" <Jefferson.Gayle@epa.gov>, "Reed, Khesha" <Reed.Khesha@epa.gov>

Hi Anne,

Do you have any immediate recommendations of a company that's equipped to come and move the records in their current condition. They will likely need to be repacked, as the current boxes are full of mold and falling apart. We need to get them out of the GSA space.

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Fri, Mar 20, 2020 at 3:24 PM

To: "Ellis, John" <Ellis.john@epa.gov>

Cc: "Johnston, Robert" <Johnston.Robert@epa.gov>, "Jefferson, Gayle" <Jefferson.Gayle@epa.gov>, "Reed, Khesha" <Reed.Khesha@epa.gov>

Our Preservation division has some info about contracting services and vendors on their website. It includes a list of contractors and some work statements that you can use. While NARA can't recommend any particular vendor, I've successfully worked with BMS Cat and Belfor in past projects that are similar to this.

<https://www.archives.gov/preservation/records-emergency/contracting>

One of our conservators has been included in the discussions about this and can assist. Pamela Najjar-Simpson at 301-837-0938 (b) (6) or via email at pamela.najar-simpson@nara.gov

She suggested, speaking from her experience, that you may want to initially contract for rehousing and reboxing and only deal with drying the records if they are indeed still wet when they get to the vendor's facility. If you write drying the records into the contract from the beginning, it may unnecessarily increase your costs.

[Quoted text hidden]

Jefferson, Gayle <Jefferson.Gayle@epa.gov>

Fri, Mar 20, 2020 at 3:28 PM

To: Anne Mason <marianne.mason@nara.gov>, "Ellis, John" <Ellis.john@epa.gov>

Cc: "Johnston, Robert" <Johnston.Robert@epa.gov>, "Reed, Khesha" <Reed.Khesha@epa.gov>, "Stewart, Neil" <Stewart.Neil@epa.gov>, "Myers, Kevin" <Myers.Kevin@epa.gov>, "Simbanin, Cynthia" <Simbanin.Cynthia@epa.gov>

All:

Kevin Myers will serve as your primary point of contact moving forward, and will be able to assist you in giving the contractor access to re-package and remove the documents from the building. Kevin is the EPA Building Manager for this space, and is cc'd on this email.

I'd like to be informed when the boxes of contaminated materials have been removed from the building, as I'd like to have them removed ASAP.

Gayle

Gayle L. Jefferson

Director

Facilities Management and Services Division (FMSD)

OA/OARM/USEPA

Main Number: (202)564-2030

Direct Number: (202)564-1630

Cell Number: (202) 309-8598

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

[Quoted text hidden]

Ellis, John <Ellis.john@epa.gov>
To: Anne Mason <marianne.mason@nara.gov>

Mon, Mar 23, 2020 at 11:43 AM

Hi Anne,

Thanks for the quick response. I think there still may be value in you coming to see the records before we try to get a restoration company.

Keep in mind the pictures I sent are two months old.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>**Sent:** Friday, March 20, 2020 3:24 PM**To:** Ellis, John <Ellis.john@epa.gov>**Cc:** Johnston, Robert <Johnston.Robert@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Mon, Mar 23, 2020 at 12:07 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Hi Pamela,

Below is what I'm drafting to send to John. Did you want to take a look at the records? You're more qualified to make an assessment to I am, but I think I could make a determination of salvageable versus not. Also, do you know who is still working at A2 who could help me get PPE? I need to go to A2 tomorrow, Tuesday, to do something anyway, so if you know people are around, please let me know.

Message to John:

(b) (5)

(b) (5)

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Mon, Mar 23, 2020 at 2:04 PM

To: "Ellis, John" <Ellis.john@epa.gov>

Hi John,

I agree that getting a better sense of the current situation would be helpful. The pictures you sent show records, that while damaged, are very recoverable. I've been involved in successful recovery of records that were in far worse condition. Do you know if the HVAC was turned off to the room where the records reside? If the HVAC was on, the relative humidity and climate control that most office spaces maintain would mean there's a decent chance the records are dry. If they're dry, the mold could be largely dormant.

(b) (5)

[Quoted text hidden]

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Mon, Mar 23, 2020 at 2:15 PM

To: Anne Mason <marianne.mason@nara.gov>

Hi Anne

I forwarded your request for PPE to Allison Olson asking if RXC could provide something for you. I know some of the Conservation staff are working at A2, but as RX director she's better placed to know who will be there and where.

I'd be willing to take a look , but not able to get transport into dc this week as our single POV will not be available. Let me know if you can wait.

If you go ahead on you own, I think you'd know what to say as you noted.

Pamela

[Quoted text hidden]

Ellis, John <Ellis.john@epa.gov>

Mon, Mar 23, 2020 at 4:36 PM

To: Anne Mason <marianne.mason@nara.gov>

Cc: "Myers, Kevin" <Myers.Kevin@epa.gov>, "Johnston, Robert" <Johnston.Robert@epa.gov>

Hello Anne,

I hope you are having luck getting access to the Personal Protective Equipment (PPE). I checked with Kevin Myers, EPA's Facility Manager, to see whether they had any PPE that you could use for your visit and unfortunately they don't have any extra. Kevin will be your POC for getting access to the records. His email address and telephone numbers are myers.kevin@epa.gov, work: 202-564-3112 and mobile: 202-604-1798. While Kevin was available today, he is not certain about the next few days because there might be a mandatory shutdown of the facility coming soon.

Please let us know as soon as possible, when you have the PPE and can come assess the records. Time is of the essence.

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Tue, Mar 24, 2020 at 7:51 AM

To: "Ellis, John" <Ellis.john@epa.gov>

Cc: "Myers, Kevin" <Myers.Kevin@epa.gov>, "Johnston, Robert" <Johnston.Robert@epa.gov>

Hi John,

Unfortunately, NARA is now restricting site visits, so I will not be able to do an in-person visit at this time. I'm not sure when I would be able to make a site visit, but the likelihood is it could be several weeks or more.

Kevin and I had a brief conversation yesterday. He said the records were still damp in January when the pictures were taken. The good news is the HVAC was not shut off to that space. That means the records were in a controlled climate that will allow them to slowly dry out and they might even be dry by now. That will make recovery easier and less expensive. At this point, the information we have indicates that the records are recoverable. If you are able to get access to the space and find the situation with the records has deteriorated, let me know.

I plan on moving forward with the internal concurrence memo that recommends recovery to the Archivist. It will include the info EPA has provided such as the pictures and assessment of the situation. If the Archivist agrees with the recommendation, you will receive a memo from Laurence shortly thereafter.

[Quoted text hidden]

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Thu, Apr 2, 2020 at 9:05 AM

To: "Reed, Khesha" <Reed.Khesha@epa.gov>

Cc: "Ellis, John" <Ellis.john@epa.gov>, Marianne Mason <marianne.mason@nara.gov>

Khesha,

Would it be possible to have a telephone conversation so I can get a bit more background to be able to provide targeted information and advice? I'll reference any relevant information from our telephone conversation in my written response, but talking will be a more efficient way to get the options clear in my mind to help with the services you need, timeline/priorities, and cost comparisons with past NARA projects of similar scope.

I'm teleworking as is most of NARA, and free so far until 3:30pm today. I'm on leave tomorrow (Friday 3 April), but available 9:00am-3:00pm Monday and Tuesday.

Regards,
Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cel (b) (6)

www.archives.gov

On Wed, Apr 1, 2020 at 4:53 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Per Anne Mason, I am reaching out to your for assistance with the recovery of records. We had 18 boxes of papers (see attached pictures taken last week). I am not sure about the current condition of the records. My management would like a rough estimate on how much the recovery will cost before deciding how to proceed. Based on your experience, about how much would it cost to rehouse and rebox? And separately, about how much to dry if necessary? I am looking for a very rough, order of magnitude estimate. I will get detailed estimates from a contractor, if I am directed to proceed.

I appreciate any advice and information you can provide.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Division

Office of Science and Technology, Office of Water

202-566-0594

From: Anne Mason <marianne.mason@nara.gov>

Sent: Friday, March 20, 2020 3:24 PM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Johnston, Robert <Johnston.Robert@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

[Quoted text hidden]

Reed, Khesha <Reed.Khesha@epa.gov>

Thu, Apr 2, 2020 at 9:09 AM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Cc: "Ellis, John" <Ellis.john@epa.gov>, Marianne Mason <marianne.mason@nara.gov>

Sure. I am available now until 10AM or from 2:30 – 3:30PM today.

Let me know what time works best for you.

Khesha

202-407-0507

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Thu, Apr 2, 2020 at 10:05 AM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Cc: Lisa Haralampus <lisa.haralampus@nara.gov>

Thanks for looping me in Pamela. I'm happy to attend the meeting if you would like, although you definitely have more expertise in this area than I do so I'd likely be listening. I'm happy to take notes if you would like so you can focus on listening. I copied Lisa, who oversees the FRED process to make her aware that EPA plans on taking action.

[Quoted text hidden]

Lisa Haralampus <lisa.haralampus@nara.gov>

Thu, Apr 2, 2020 at 12:52 PM

To: Anne Mason <marianne.mason@nara.gov>

Cc: Darin Cote <darin.cote@nara.gov>

Hi Anne,

Thanks for letting me know that EPA is working on the issue but needs a lot more information about costs and safely moving forward before they can get a project started with a vendor.

I'd recommend we keep Allison Olsen in the loop too. At some point, EPA will be better off talking to vendors directly. I hope the resources on our website will help them with some basic market research.

- Lisa

[Quoted text hidden]

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Thu, Apr 2, 2020 at 12:56 PM

To: "Reed, Khesha" <Reed.Khesha@epa.gov>

Cc: "Ellis, John" <Ellis.john@epa.gov>, Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Khesha,

Thanks for the chance to clarify the scope of your project over the phone.

Project: 18 cubic feet of paper records in water-damaged boxes with what appears to be minor mold damage on some files.

General advice on contracting for records recovery services and references below can be found on the NARA website <https://www.archives.gov/preservation/records-emergency/contracting>

OPTION 1: Full records recovery using vendor services

I've provided vendor task/treatment recommendations based on the sample PWS on the NARA website, with ballpark cost estimates where possible. These are based on costs of similar projects with vendors under NARA Blanket Purchase Agreements, but should only provide guidelines. Vendors NARA has used with BPA contracts include Belfor, BMSCat, and Polygon but these are not the only competent service providers available. In this case since the records are dry/stable you have time to get multiple quotes without danger of further damage from delayed treatment, particularly if you are able to use Option 2.

1. Secure damaged boxes, and transport to/from vendor treatment facility (see Task 3 in the sample PWS on the NARA website): Cost subject to current business conditions, distance for transport, whether your agency uses all the records protection precautions NARA requires such as dedicated loads, and whether the vendor carries out the packing procedures describe below. Freezer/air-conditioned transport is not required.

* Agency staff must supervise loading. Produce a box-level inventory for tracking. Provide a version with box label/identification for the transport bill of lading with a copy sent to the vendor.

* Ensure all boxes are intact/can protect the records in transit, and close flaps. Tape shut if possible.

* Replace any boxes that are torn, or unable to be closed before transport.

* Confirm the inventory with the vendor and check on return.

2. Inspection, and remediation(cleaning) as required (see Task 11 in the sample PWS on the NARA website). The cost will be based on the level of cleaning that is required. These estimates are based on NARA BPA rates,

* Level 1 cleaning- \$45 cubic foot (per standard records box). From the photos it appears that this is the appropriate level, but during inspection the vendor may find some files that need Level 2 cleaning.

* Level 2 cleaning- \$95 cubic foot (per standard records box).

3. Reboxing of inspected and cleaned records (see Task 2 in the sample PWS on the NARA website). Labor costs for reboxing/labelling are usually included in inspection/cleaning, but clarify when the quote is provided..

* **All boxes** should be replaced as the old one may be contaminated.

* Ask for old box labels to be cut off and tucked into the box, and provide the vendor with instructions on how to label the new boxes.

* Vendor-supplied boxes average \$5-\$6.00 each, and usually the commercial records storage design with a separate lid. You may wish to provide standard records cartons when the vendor picks up the records to save this extra expense and possible need to rebox later.

Note: Vendors typically add overhead costs for project management, technical documentation etc.

OPTION 2: Combination of EPA and vendor services.

Interim rehousing and temporary storage by EPA, deferring remediation/cleaning until a later date (steps 2 and 3 above). The reboxed records will need to be stored in an air-conditioned space where the relative humidity stays below 60%.

.1. The primary health hazard with light mold **on records** is when it is disturbed and gets airborne and can be inhaled. A secondary health risk is getting mold particulates on hands, clothing and work areas where it could be disturbed/inhaled, transferred to other areas or even ingested. **This advice does not apply in the case of heavy, actively growing mold affecting large quantities of records and records boxes; or when mold has affected the surrounding space--- walls, floor coverings etc.**

2. PPE requirements and safe procedures for carrying out the packing steps listed in item 1 above include:

- * Use disposable gloves, lab coat/apron/sleeve covering to protect clothing. These are the hygiene precautions commonly used when carrying out any type of heavy cleaning. A dust mask is optional, but not necessary if correct precautions are taken. OSHA requirements are that staff using any respirator-type mask such as a 2-strap N95 must have been fit-tested.
- * Use sealable large rubbish bags to safely dispose of old boxes and used PPE.
- * All records boxes should be replaced.
- * Set up a work space to provide dirty, intermediate and clean spaces. It's more efficient to have a team of at least two people. One at the dirty end, one at the clean end.
- * Anyone working directly with the records in the dirty space needs to wear PPE, keep their face at least arms-length from the records (even if wearing a mask), and avoid disturbing the stack of files when moving them as little as possible.
- * Set up a records inventory ahead of time if possible.
- * **In the dirty space:** move the records to a new box in the intermediate space, cut the label off the old box if necessary and put it in the intermediate space, dispose of the old box in a rubbish bag.
- * **In the clean space:** close box flaps and tape shut (keeping face an arms-length from the records), transfer records label information to the new box, add a clear warning--Mold Damaged, update the inventory list..
- * Clean the dirty work area and dispose of all refuse at the end of the work session.
- * Wash hands, and change clothing as needed at the end of the work session.

Good luck with the project, and please contact me if you have any other questions or need clarification.

Regards,
Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: 301-974-4592
www.archives.gov

[Quoted text hidden]

Reed, Khesha <Reed.Khesha@epa.gov>

Thu, Apr 2, 2020 at 1:14 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Cc: "Ellis, John" <Ellis.john@epa.gov>, Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Thanks for the quick response. We will review this information and decide on a course of action. I will reach out to you if we have additional questions.

Khesha

[Quoted text hidden]

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Mon, Aug 3, 2020 at 2:07 PM

To: "Reed, Khesha" <Reed.Khesha@epa.gov>, Marianne Mason <marianne.mason@nara.gov>

Cc: Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Hi Khesha,
Good to hear you've got to Stage 2!

In the chaos of my email I seem to be missing the quotes attachment to the July 9 email

But NARA Records Management guidance is needed to respond to your questions:

1. Do the quotes seem appropriate? (b) (5)

2 (b) (5)

Apologies I missed responding to the July 9 email (b) (5)

Regards,

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: 301-974-4592
www.archives.gov

On Mon, Aug 3, 2020 at 10:01 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Our building will be entering Phase 2 for reopening this week. I'd like to get our records boxes picked up ASAP. Did you have a chance to review the estimates that I forwarded? I would appreciate your feedback.

Thanks,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

202-407-0507

From: Reed, Khesha
Sent: Thursday, July 9, 2020 4:08 PM
To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Subject: RE: FW: Request for Emergency Destruction of Records

Pamela,

Thanks for your assistance. I was finally able to work out a plan for our damaged records. I decided to go with Option 1 below. I received estimates from two companies (attached). I am waiting for a third estimate. Do these quotes seem appropriate?

When our building reaches Phase 2 of the reopening strategy, we can have contractors come in to pick up the boxes. Our facilities staff will oversee the loading. We have a box level inventory. Can the boxes be transferred directly to NARA after the recovery?

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Thursday, April 2, 2020 12:56 PM
To: Reed, Khesha <Reed.Khesha@epa.gov>
Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>; Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>

[Quoted text hidden]

[Quoted text hidden]

Reed, Khesha <Reed.Khesha@epa.gov>

Mon, Aug 3, 2020 at 5:37 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Marianne Mason <marianne.mason@nara.gov>

Cc: Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Pamela,

Thanks for your response. I am attaching the quotes again. I have never been through the recovery process. I was hoping that you could review the estimates and let me know if the contractors are missing any steps that they should include? I know that you can't specifically recommend one contractor over the other, but if the lower estimate doesn't include a needed step, I won't know.

I will work with my Records Management contact on the transfer procedures.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Protection Division

[Quoted text hidden]

2 attachments



EPA Washington DC June 2020v2.pdf
714K



Polygon Estimate for EPA Restoration Project - 18 Boxes 06-26-20.pdf
20K

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Tue, Aug 4, 2020 at 8:32 AM

To: "Reed, Khesha" <Reed.Khesha@epa.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Thanks for the clarification---the mandatory COR courses have me wary about contracting!

Two questions:

1. Did you send photos when you asked for quotes? Both vendors are assuming 'level one' cleaning which is what I would guess, but sometimes they may find things are worse once they get into the boxes.

2. After so many months the records should be dry. Do you know if they are? If you think so, you might ask about the need for vacuum-freeze drying and freezer storage, but I'll provide comments on both quotes below. Please note---these are questions not

BMSCat

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location?

It sounds like USPS/FedEx is planned for the return at least, but the same quote for both to and from the treatment facility.

2. There's a quote for a BMS packout, but based on the transport plans then do they expect you to arrange shipping? Unsure of the logistics.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer. Gamma irradiation will also do this (see #4). But ask about the context.

4. They propose using a 'microban' sanitizing treatment which as far as I am aware is an anti-fungal spray solution we don't recommend using on records. Our preferred treatment is gamma irradiation. I should also note that 'sanitizing' before cleaning would also make active mold go dormant like vacuum drying or freezing. Cleaning as well as sanitizing is recommended since the dormant mold 'debris' is a potential allergen, and mold spores are extremely resistant to any treatment that won't also cause immediate harm to paper.

This is the section in our BPA PWS about the subject. FYI

5.12 Task 12 – Disinfestation, Sanitization and Decontamination of Records

5.12.1 The Contractor will provide an outline of proposed treatment for insect infestation, mold and/or other biological or contaminant residues that are potentially harmful to records or the users of records.

5.12.2 The COR must pre-approve procedures: which may include freezing, anoxia, and irradiation. Treatment may be in combination with rehousing and surface cleaning procedures in sections 5.10 and 5.11.

5.12.3 The COR will normally only authorize the minimum effective gamma radiation dose for sterilization of 4.5 kilograys (kGy). Exposure levels of 10 kilograys (1 megarad) or higher are considered too high for paper-based records, accelerating paper aging processes by 50-100%.

5.12.4 Records that have received sanitizing or irradiation treatments must be appropriately labelled so they can be monitored and/or identified in the future.

Polygon

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location? The shipping charges sound like they plan to transport the records themselves, and I know they have at least 2 facilities within 2-3 hours of DC.

2. No quote for a pack-out, so they may assume you'll have the records ready to be moved, or with such a small amount see securing the boxes and getting them to the truck as part of the shipping charges. They have quoted for a Document Restoration Specialist, so this may be someone who will handle that as well overseeing Level 1 cleaning. Better to ask for details.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer and I see there's a charge for a month of freezer storage.

But as with BMSCat, irradiation will also stop active mold growth for more effective cleaning and is advised. Again, ask about the context.

4. Ask for the gamma irradiation requirements in 15.12.3 and 15.12.4 above to be in the contract for documentation.

Hope this helps. Let me know if you need any clarification (or the vendors do).

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Ce (b) (6)

www.archives.gov

[Quoted text hidden]

Darin Cote <darin.cote@nara.gov>

Fri, Aug 7, 2020 at 2:28 PM

To: Laurence Brewer <laurence.brewer@nara.gov>

Cc: Lisa Haralampus <lisa.haralampus@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>

Laurence,

Yes, we have, though not directly. I'll forward you correspondence that was forwarded to Lisa from Pamela Najar-Simpson, as EPA is working with her for remediation guidance. It appears that EPA is moving forward with the remediation efforts for the 18 boxes in question.

Best,

Darin Côté

Electronic Records Policy Analyst

Policy and Program Support Team (ACPP)

Office of the Chief Records Officer for the U.S. Government

National Archives and Records Administration

w 817.551.2003 c (b) (6)



On Fri, Aug 7, 2020 at 12:57 PM Laurence Brewer <laurence.brewer@nara.gov> wrote:

Sending you an email related to this one. I know we denied it on march 30. Any update since then or communication from EPA?

[Quoted text hidden]

Darin Cote <darin.cote@nara.gov>

Mon, Aug 10, 2020 at 9:20 AM

To: "Bergman, Hannah" <Hannah.Bergman@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, Laurence Brewer <laurence.brewer@nara.gov>, Margaret Hawkins <margaret.hawkins@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Allison Olson <allison.olson@nara.gov>, Evangela Wimbush-Jeffrey <evangela.wimbush-jeffrey@nara.gov>, "Rosen, Donald" <donald.rosen@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Najar-Simpson, Pamela" <pamela.najar-simpson@nara.gov>

Cc: "Ravanbakhsh, Arian" <Arian.Ravanbakhsh@nara.gov>

All,

Here is the email string capturing much of the conversation between NARA and EPA regarding the emergency destruction request.

Best,

Darin Côté

Electronic Records Policy Analyst

Policy and Program Support Team (ACPP)

Office of the Chief Records Officer for the U.S. Government
National Archives and Records Administration
w 817.551.2003 c (b) (5)



[Quoted text hidden]

 **Emergency Destruction of Records OW2020-03-04-153128.pdf**
3119K

Reed, Khesha <Reed.Khesha@epa.gov>

Wed, Aug 12, 2020 at 2:00 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Pamela,

Thank you for your feedback.

To answer your questions - I didn't share pictures with BMSCat or Polygon, but I told them that I expected that the documents would need level 1 cleaning. I don't know if the documents are dry for sure, but I expect that they are.

I also reached out to Belfor several times, but I did not receive a quote from them. I sent follow up questions to BMSCat and Polygon, but only got a response from Polygon. Based on responsiveness and services offered. I think I would like to go with Polygon. Please see their responses below and attached. Please let me know if you see any red flags.

I really appreciate your feedback.

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Marc Segal <marc.segal@polygongroup.com>

Sent: Tuesday, August 11, 2020 11:18 AM

To: Reed, Khesha <Reed.Khesha@epa.gov>
Subject: Re: Polygon Restoration Project

Hi Khesha,

We can certainly schedule the pick up for early next week. The \$600 shipping cost will cover the pick up and delivery of the documents. We can deliver the boxes to NARA or another facility within the D.C. area at no additional cost. If you like, I can note that on a revised quote.

Yes a Document Restoration Specialist will supervise the packout on site, transportation and cleaning of the records.

If the documents are dry and do not require drying, we will remove the drying and freezer stabilization costs from the invoice. If signs of mold are present on the documents, freezer stabilization may still be required to prevent further growth during the cleaning process. Without being inspected by our Restoration Specialists, it's impossible to say at this point if drying and freezing is necessary. I would hate to remove an item from the quote only to have to add it back later. Would you like me to note those items on a revised quote stating that "this cost will be removed if deemed unnecessary"? We do a lot of work for the EPA and NARA and have a great reputation of doing honest work. We'll only charge you for the services you absolutely need.

I will reach out to our operations manager and get the detailed info you requested on our gamma irradiation process. Would you like me to add those details to the revised quote as well?

Thank you!

Marc Segal

DOC Business Development Specialist

Polygon US Corporation



100 Naamans Rd #5L

Calymont, DE 19703

+1 800-422-6379

Mobile: +1 484-809-0181

Email: marc.segal@polygongroup.com

Website: <https://www.polygongroup.com/en-US/>

From: Marc Segal <marc.segal@polygongroup.com>

Sent: Tuesday, August 11, 2020 1:34 PM

To: Reed, Khesha <Reed.Khesha@epa.gov>

Subject: Re: Polygon Restoration Project

Hi Khesha,

As promised, here is the data on our gamma irradiation process that we provide through our business partner, Sterigenics who is a global leader in comprehensive sterilization solutions. Our typical processing threshold is 10-50 kGy which is something Sterigenics monitors and tests that it falls in that range after processing. I attached some brochures that provide detailed technical information on their Gamma Irradiation sterilization process. Polygon is a world leader in Document Restoration and Recovery providing services to the highest levels of government, businesses and industry. We partnered with Sterigenics, because they are able to meet the very high sterilization standards of our clients around the world.

Here is Sterigenics website describing their Gamma Irradiation process.

<https://sterigenics.com/technologies/gamma-irradiation/>

Let me know if you have any questions, thanks!

Marc Segal

DOC Business Development Specialist

Polygon US Corporation



100 Naamans Rd #5L

Calymont, DE 19703

+1 800-422-6379

Mobile: +1 484-809-0181

Email: marc.segal@polygongroup.com

Website: <https://www.polygongroup.com/en-US/>

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Sent: Tuesday, August 4, 2020 8:33 AM

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>; Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>

Subject: Re: FW: Request for Emergency Destruction of Records

Thanks for the clarification---the mandatory COR courses have me wary about contracting!

Two questions:

1. Did you send photos when you asked for quotes? Both vendors are assuming 'level one' cleaning which is what I would guess, but sometimes they may find things are worse once they get into the boxes.
2. After so many months the records should be dry. Do you know if they are? If you think so, you might ask about the need for vacuum-freeze drying and freezer storage, but I'll provide comments on both quotes below. Please note---these are questions not

BMSCat

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location?

It sounds like USPS/FedEx is planned for the return at least, but the same quote for both to and from the treatment facility.

2. There's a quote for a BMS packout, but based on the transport plans then do they expect you to arrange shipping? Unsure of the logistics.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer. Gamma irradiation will also do this (see #4). But ask about the context.

4. They propose using a 'microban' sanitizing treatment which as far as I am aware is an anti-fungal spray solution we don't recommend using on records. Our preferred treatment is gamma irradiation. I should also note that 'sanitizing' before cleaning would also make active mold go dormant like vacuum drying or freezing. Cleaning as well as sanitizing is recommended since the dormant mold 'debris' is a potential allergen, and mold spores are extremely resistant to any treatment that won't also cause immediate harm to paper.

This is the section in our BPA PWS about the subject. FYI

5.12 Task 12 – Disinfestation, Sanitization and Decontamination of Records

5.12.1 The Contractor will provide an outline of proposed treatment for insect infestation, mold and/or other biological or contaminant residues that are potentially harmful to records or the users of records.

5.12.2 The COR must pre-approve procedures: which may include freezing, anoxia, and irradiation. Treatment may be in combination with rehousing and surface cleaning procedures in sections 5.10 and 5.11.

5.12.3 The COR will normally only authorize the minimum effective gamma radiation dose for sterilization of 4.5 kilograys (kGy). Exposure levels of 10 kilograys (1 megarad) or higher are considered too high for paper-based records, accelerating paper aging processes by 50-100%.

5.12.4 Records that have received sanitizing or irradiation treatments must be appropriately labelled so they can be monitored and/or identified in the future.

Polygon

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location? The shipping charges sound like they plan to transport the records themselves, and I know they have at least 2 facilities within 2-3 hours of DC.
2. No quote for a pack-out, so they may assume you'll have the records ready to be moved, or with such a small amount see securing the boxes and getting them to the truck as part of the shipping charges. They have quoted for a Document Restoration Specialist, so this may be someone who will handle that as well overseeing Level 1 cleaning. Better to ask for details.
3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer and I see there's a charge for a month of freezer storage.

But as with BMSCat, irradiation will also stop active mold growth for more effective cleaning and is advised. Again, ask about the content.

4. Ask for the gamma irradiation requirements in 5.12.3 and 5.12.4 above to be in the contract for documentation.

Hope this helps. Let me know if you need any clarification (or the vendors do).

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cel (b) (6)

www.archives.gov

On Mon, Aug 3, 2020 at 5:40 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Thanks for your response. I am attaching the quotes again. I have never been through the recovery process. I was hoping that you could review the estimates and let me know if the contractors are missing any steps that they should include? I know that you can't specifically recommend one contractor over the other, but if the lower estimate doesn't include a needed step, I won't know.

I will work with my Records Management contact on the transfer procedures.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Sent: Monday, August 3, 2020 2:07 PM

To: Reed, Khesha <Reed.Khesha@epa.gov>; Marianne Mason <marianne.mason@nara.gov>

Cc: Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>

Subject: Re: FW: Request for Emergency Destruction of Records

Hi Khesha,

Good to hear you've got to Stage 2!

In the chaos of my email I seem to be missing the quotes attachment to the July 9 email

But NARA Records Management guidance is needed to respond to your questions:

1. Do the quotes seem appropriate? (b) (5)

2 (b) (5)

Apologies I missed responding to the July 9 email (b) (5)

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Ce (b) (6)

www.archives.gov

On Mon, Aug 3, 2020 at 10:01 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Our building will be entering Phase 2 for reopening this week. I'd like to get our records boxes picked up ASAP. Did you have a chance to review the estimates that I forwarded? I would appreciate your feedback.

Thanks,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

202-407-0507

From: Reed, Khesha

Sent: Thursday, July 9, 2020 4:08 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Subject: RE: FW: Request for Emergency Destruction of Records

Pamela,

Thanks for your assistance. I was finally able to work out a plan for our damaged records. I decided to go with Option 1 below. I received estimates from two companies (attached). I am waiting for a third estimate. Do these quotes seem appropriate?

When our building reaches Phase 2 of the reopening strategy, we can have contractors come in to pick up the boxes. Our facilities staff will oversee the loading. We have a box level inventory. Can the boxes be transferred directly to NARA after the recovery?

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Thursday, April 2, 2020 12:56 PM
To: Reed, Khesha <Reed.Khesha@epa.gov>
Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>; Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Thanks for the chance to clarify the scope of your project over the phone.

Project: 18 cubic feet of paper records in water-damaged boxes with what appears to be minor mold damage on some files.

General advice on contracting for records recovery services and references below can be found on the NARA website <https://www.archives.gov/preservation/records-emergency/contracting>

OPTION 1: Full records recovery using vendor services

I've provided vendor task/treatment recommendations based on the sample PWS on the NARA website, with ballpark cost estimates where possible. These are based on costs of similar projects with vendors under NARA Blanket Purchase Agreements, but should only provide guidelines. Vendors NARA has used with BPA contracts include Belfor, BMSCat, and Polygon but these are not the only competent service providers available. In this case since the records are dry/stable you have time to get multiple quotes without danger of further damage from delayed treatment, particularly if you are able to use Option 2.

1. Secure damaged boxes, and transport to/from vendor treatment facility (see Task 3 in the sample PWS on the NARA website): Cost subject to current business conditions, distance for transport, whether your agency uses all the records protection precautions NARA requires such as dedicated loads, and whether the vendor carries out the packing procedures describe below. Freezer/air-conditioned transport is not required.

- * Agency staff must supervise loading. Produce a box-level inventory for tracking. Provide a version with box label/identification for the transport bill of lading with a copy sent to the vendor.

- * Ensure all boxes are intact/can protect the records in transit, and close flaps. Tape shut if possible.

- * Replace any boxes that are torn, or unable to be closed before transport.

- * Confirm the inventory with the vendor and check on return.

2. Inspection, and remediation(cleaning) as required (see Task 11 in the sample PWS on the NARA website). The cost will be based on the level of cleaning that is required. These estimates are based on NARA BPA rates,

* Level 1 cleaning- \$45 cubic foot (per standard records box). From the photos it appears that this is the appropriate level, but during inspection the vendor may find some files that need Level 2 cleaning.

* Level 2 cleaning- \$95 cubic foot (per standard records box).

3. Reboxing of inspected and cleaned records (see Task 2 in the sample PWS on the NARA website). Labor costs for reboxing/labelling are usually included in inspection/cleaning, but clarify when the quote is provided..

* **All boxes** should be replaced as the old one may be contaminated.

* Ask for old box labels to be cut off and tucked into the box, and provide the vendor with instructions on how to label the new boxes.

* Vendor-supplied boxes average \$5-\$6.00 each, and usually the commercial records storage design with a separate lid. You may wish to provide standard records cartons when the vendor picks up the records to save this extra expense and possible need to rebox later.

Note: Vendors typically add overhead costs for project management, technical documentation etc.

OPTION 2: Combination of EPA and vendor services.

Interim rehousing and temporary storage by EPA, deferring remediation/cleaning until a later date (steps 2 and 3 above). The reboxed records will need to be stored in an air-conditioned space where the relative humidity stays below 60%.

.1. The primary health hazard with light mold **on records** is when it is disturbed and gets airborne and can be inhaled. A secondary health risk is getting mold particulates on hands, clothing and work areas where it could be disturbed/inhaled, transferred to other areas or even ingested. **This advice does not apply in the case of heavy, actively growing mold affecting large quantities of records and records boxes; or when mold has affected the surrounding space---walls, floor coverings etc.**

2. PPE requirements and safe procedures for carrying out the packing steps listed in item 1 above include:

* Use disposable gloves, lab coat/apron/sleeve covering to protect clothing. These are the hygiene precautions commonly used when carrying out any type of heavy cleaning. A dust mask is optional, but not necessary if correct precautions are taken. OSHA requirements are that staff using any respirator-type mask such as a 2-strap N95 must have been fit-tested.

* Use sealable large rubbish bags to safely dispose of old boxes and used PPE.

* All records boxes should be replaced.

- * Set up a work space to provide dirty, intermediate and clean spaces. It's more efficient to have a team of at least two people. One at the dirty end, one at the clean end.
- * Anyone working directly with the records in the dirty space needs to wear PPE, keep their face at least arms-length from the records (even if wearing a mask), and avoid disturbing the stack of files when moving them as little as possible.
- * Set up a records inventory ahead of time if possible.
- * **In the dirty space:** move the records to a new box in the intermediate space, cut the label off the old box if necessary and put it in the intermediate space, dispose of the old box in a rubbish bag.
- * **In the clean space:** close box flaps and tape shut (keeping face an arms-length from the records), transfer records label information to the new box, add a clear warning-:Mold Damaged, update the inventory list..
- * Clean the dirty work area and dispose of all refuse at the end of the work session.
- * Wash hands, and change clothing as needed at the end of the work session.

Good luck with the project, and please contact me if you have any other questions or need clarification.

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cel (b) (6)

www.archives.gov

On Thu, Apr 2, 2020 at 9:09 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Sure. I am available now until 10AM or from 2:30 – 3:30PM today.

Let me know what time works best for you.

Khesha

202-407-0507

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Thursday, April 2, 2020 9:06 AM
To: Reed, Khesha <Reed.Khesha@epa.gov>
Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Would it be possible to have a telephone conversation so I can get a bit more background to be able to provide targeted information and advice? I'll reference any relevant information from our telephone conversation in my written response, but talking will be a more efficient way to get the options clear in my mind to help with the services you need, timeline/priorities, and cost comparisons with past NARA projects of similar scope.

I'm teleworking as is most of NARA, and free so far until 3:30pm today. I'm on leave tomorrow (Friday 3 April), but available 9:00am-3:00pm Monday and Tuesday.

Regards,

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
[8601 Adelphi Road, Room 3400](#)
[College Park MD 20740](#)
tel: 301-837-0938 Ce (b) (6)
www.archives.gov

On Wed, Apr 1, 2020 at 4:53 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Per Anne Mason, I am reaching out to your for assistance with the recovery of records. We had 18 boxes of papers (see attached pictures taken last week). I am not sure about the current condition of the records. My management would like a rough estimate on how much the recovery will cost before deciding how to proceed. Based on your experience, about how much would it cost to rehouse and rebox? And separately, about how much to dry if necessary? I am looking for a very rough, order of magnitude estimate. I will get detailed estimates from a contractor, if I am directed to proceed.

I appreciate any advice and information you can provide.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Division

Office of Science and Technology, Office of Water

202-566-0594

From: Anne Mason <marianne.mason@nara.gov>

Sent: Friday, March 20, 2020 3:24 PM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Johnston, Robert <Johnston.Robert@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>

Subject: Re: Request for Emergency Destruction of Records

Our Preservation division has some info about contracting services and vendors on their website. It includes a list of contractors and some work statements that you can use. While NARA can't recommend any particular vendor, I've successfully worked with BMS Cat and Belfor in past projects that are similar to this.

<https://www.archives.gov/preservation/records-emergency/contracting>

One of our conservators has been included in the discussions about this and can assist. Pamela Najar-Simpson at 301-837-0938 (b) (6) or via email at pamela.najar-simpson@nara.gov

She suggested, speaking from her experience, that you may want to initially contract for rehousing and reboxing and only deal with drying the records if they are indeed still wet when they get to the vendor's facility. If you write drying the records into the contract from the beginning, it may unnecessarily increase your costs.

On Fri, Mar 20, 2020 at 2:57 PM Ellis, John <Ellis.john@epa.gov> wrote:

Hi Anne,

Do you have any immediate recommendations of a company that's equipped to come and move the records in their current condition. They will likely need to be repacked, as the current boxes are full of mold and falling apart. We need to get them out of the GSA space.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>

Sent: Friday, March 20, 2020 2:45 PM

To: Ellis, John <Ellis.john@epa.gov>

Subject: Re: Request for Emergency Destruction of Records

Yes, I did. Thanks for the information and pictures. It was very helpful.

I met this afternoon with the emergency destruction team and we'll be drafting a letter that we'll send up the chain for approval. It won't be finalized until it's approved, but I did want to let you know that

we will be recommending that the records not be destroyed. We'll include some recommendations for dealing with the records. If you find that the situation has changed since the photos were taken, let me know. I hope to get it approved quickly and I'll keep you posted. Let me know if you have any questions or want to discuss this further while we wait for the approval of the letter. Thanks,

On Fri, Mar 20, 2020 at 2:13 PM Ellis, John <Ellis.john@epa.gov> wrote:

Hi Anne, I was checking to see whether you got my message yesterday?

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Ellis, John
Sent: Thursday, March 19, 2020 3:50 PM
To: 'Anne Mason' <marianne.mason@nara.gov>
Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>; Johnston, Robert <Johnston.Robert@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>
Subject: RE: Request for Emergency Destruction of Records

Hello Anne,

EPA's responses to NARA's questions are in red below. Given the current condition of the records staff are not allowed in the area to take more recent photographs.

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.

The photos taken by FMSD are attached. The records were located in a secure conference room being prepped to send to NARA when they got damaged.

2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.

The boxes were severely damaged by the water. Due to miscommunications between facilities staff and the program office, no action was taken for several weeks and the boxes became consumed with visible mold and a strong odor. If action had been taken within the first few days of the flood, it is likely some of the documents were salvageable; however, given the time the boxes remained wet, the papers became fully saturated with water and are now consumed with mold and a strong odor.

3. You stated that some of the information contained in the damaged records may be duplicated on other media?

We are not sure exactly what may be duplicated. Much of the non-paper media was removed from the 18 boxes prior to the leak and was not damaged. Based on the descriptions on the labels the non-paper media contains photographs and recordings of public hearings on the proposed rule, exhibits submitted by the public and questions and answers (Q&As). Given the condition of the paper records, we are unable to review them to verify duplicated information.

How much of the information could be reconstructed from other sources? **Beyond what is on the non-paper media. We don't believe much of the record can be reconstructed.**

Is there info that is not captured elsewhere and is only contained in the damaged paper documents? **Yes, there is information that was only contained in the damaged paper documents and not captured elsewhere.**

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI? **No CUI was included in the records. PII may have been included. Some documents in the boxes included correspondence from members of the public. The documents contained names, street, cities and counties of residence. Full names, email addresses and home addresses may have been included.**

Please let me know if you have further questions or would like me to arrange a visit for you to see the records in the next couple of days.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>

Sent: Thursday, March 19, 2020 6:53 AM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Pamela Najjar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>

Subject: Re: Request for Emergency Destruction of Records

Hello Mr. Ellis,

I know these are chaotic times, but do you have an idea when you will be able to provide additional information? It is difficult for NARA to make a decision when we don't have the info we need. Thanks,

On Tue, Mar 10, 2020 at 11:08 AM Anne Mason <marianne.mason@nara.gov> wrote:

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.
3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?
4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

NARA will be coordinating our response with our Preservation Programs staff and possibly a couple of other NARA units as well. We may want to call you for follow up and to see if you have questions about the process. Let us know if you think a conference call would be helpful for you and we'll set up a WebEx session. Since I'm based in College Park, Maryland, it would also be possible for me to come to EPA for a meeting or to assess the records.

Meanwhile, if anything has changed since your initial letter to NARA please let us know so that we may update our case file information. Also, please do not hesitate to contact us with any questions.

Thanks in advance for this information.

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

----- Forwarded message -----

From: Laurence Brewer <laurence.brewer@nara.gov>

Date: Wed, Mar 4, 2020 at 5:05 PM

Subject: Fwd: Request for Emergency Destruction of Records

To: Cote, Darin <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Kabrel, Jack <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

A new FRED case from EPA.

----- Forwarded message -----

From: Ellis, John <Ellis.john@epa.gov>

Date: Wed, Mar 4, 2020 at 3:22 PM

Subject: Request for Emergency Destruction of Records

To: Laurence Brewer <laurence.brewer@nara.gov>

Hello Laurence,

Attached is a letter requesting Emergency Destruction of Records that are a menace to the health and safety of EPA personnel.

I look forward to your response.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

[1301 Constitution Ave., NW, Washington, DC 20460](#) | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

--

Laurence Brewer, CRM

Chief Records Officer for the U.S. Government

National Archives and Records Administration

Laurence.Brewer@nara.gov

Office: (301) 837-1539

Cell: (301) 974-4582

Blog: [Records Express](#)

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

2 attachments**Material-Considerations-Irradiation-Processing_WEB-v3.pdf**

660K

**Sterilization_Alternatives_Gamma_Radiation.pdf**

1186K

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Wed, Aug 12, 2020 at 2:30 PM

To: "Reed, Khesha" <Reed.Khesha@epa.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, "Olson, Allison" <allison.olson@nara.gov>

Hi Khesha,

Polygon's response addressed the comments I had on the quotes, and the amended quote should ensure you avoid unnecessary costs.

With the gamma irradiation, I'd ask for the gamma irradiation requirements in 15.12.3 and 15.12.4 I quoted above to be included in the contract for documentation.

If you plan to transfer the records to a NARA FRC in this region, if you are able to liaise with NARA about direct delivery then Polygon's offer will streamline things for you.

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Ce (b) (6)
www.archives.gov

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Anne Mason, CA

[Quoted text hidden]

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

8/27/2021

National Archives & Records Administration Mail - Fwd: Request for Emergency Destruction of Records

301-837-3502

marianne.mason@nara.gov

[Quoted text hidden]

Anne Mason <marianne.mason@nara.gov>

Wed, Aug 12, 2020 at 2:51 PM

To: "Brewer, Laurence" <laurence.brewer@nara.gov>, Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

Just an FYI. EPA is moving forward with a vendor for recovery.

[Quoted text hidden]

Fwd: Request for Emergency Destruction of Records

1 message

Anne Mason <marianne.mason@nara.gov>

Tue, Mar 10, 2020 at 11:08 AM

To: ellis.john@epa.gov

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.
3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?
4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

NARA will be coordinating our response with our Preservation Programs staff and possibly a couple of other NARA units as well. We may want to call you for follow up and to see if you have questions about the process. Let us know if you think a conference call would be helpful for you and we'll set up a WebEx session. Since I'm based in College Park, Maryland, it would also be possible for me to come to EPA for a meeting or to assess the records.

Meanwhile, if anything has changed since your initial letter to NARA please let us know so that we may update our case file information. Also, please do not hesitate to contact us with any questions.

Thanks in advance for this information.

--

Anne Mason, CA
Office of the Chief Records Officer, Operations Research and Support Team
Archives Specialist
301-837-3502
marianne.mason@nara.gov

----- Forwarded message -----

From: **Laurence Brewer** <laurence.brewer@nara.gov>

Date: Wed, Mar 4, 2020 at 5:05 PM

Subject: Fwd: Request for Emergency Destruction of Records

To: Cote, Darin <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Kabrel, Jack <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

A new FRED case from EPA.

----- Forwarded message -----

From: **Ellis, John** <Ellis.john@epa.gov>

Date: Wed, Mar 4, 2020 at 3:22 PM

Subject: Request for Emergency Destruction of Records
To: Laurence Brewer <laurence.brewer@nara.gov>

Hello Laurence,

Attached is a letter requesting Emergency Destruction of Records that are a menace to the health and safety of EPA personnel.

I look forward to your response.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

[1301 Constitution Ave., NW, Washington, DC 20460](#) | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091


.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

--

Laurence Brewer, CRM
Chief Records Officer for the U.S. Government
National Archives and Records Administration
Laurence.Brewer@nara.gov
Office: (301) 837-1539
Cell: (301) 974-4582
Blog: [Records Express](#)



 **Emergency Destruction of Records OW2020-03-04-153128.pdf**
3119K



Marianne Mason <marianne.mason@nara.gov>

Fwd: Request for Emergency Destruction of Records

Ellis, John <Ellis.john@epa.gov>

Thu, Mar 19, 2020 at 3:50 PM

To: Anne Mason <marianne.mason@nara.gov>

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Darin Cote <darin.cote@nara.gov>, Jack Kabrel <jack.kabrel@nara.gov>, "Johnston, Robert" <Johnston.Robert@epa.gov>, "Reed, Khesha" <Reed.Khesha@epa.gov>, "Jefferson, Gayle" <Jefferson.Gayle@epa.gov>

Hello Anne,

EPA's responses to NARA's questions are in red below. Given the current condition of the records staff are not allowed in the area to take more recent photographs.

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.

The photos taken by FMSD are attached. The records were located in a secure conference room being prepped to send to NARA when they got damaged.

2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.

The boxes were severely damaged by the water. Due to miscommunications between facilities staff and the program office, no action was taken for several weeks and the boxes became consumed with visible mold and a strong odor. If action had been taken within the first few days of the flood, it is likely some of the documents were salvageable; however, given the time the boxes remained wet, the papers became fully saturated with water and are now consumed with mold and a strong odor.

3. You stated that some of the information contained in the damaged records may be duplicated on other media?

We are not sure exactly what may be duplicated. Much of the non-paper media was removed from the 18 boxes prior to the leak and was not damaged. Based on the descriptions on the labels the non-paper media contains photographs and recordings of public hearings on the proposed rule, exhibits submitted by the public and questions and answers (Q&As). Given the condition of the paper records, we are unable to review them to verify duplicated information.

How much of the information could be reconstructed from other sources? Beyond what is on the non-paper media. We don't believe much of the record can be reconstructed.

Is there info that is not captured elsewhere and is only contained in the damaged paper documents? Yes, there is information that was only contained in the damaged paper documents and not captured elsewhere.

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI? No CUI was included in the records. PII may have been included. Some documents in the boxes included correspondence from members of the public. The documents contained names, street, cities and counties of residence. Full names, email addresses and home addresses may have been included.

Please let me know if you have further questions or would like me to arrange a visit for you to see the records in the next couple of days.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>

Sent: Thursday, March 19, 2020 6:53 AM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>

Subject: Re: Request for Emergency Destruction of Records

Hello Mr. Ellis,

I know these are chaotic times, but do you have an idea when you will be able to provide additional information? It is difficult for NARA to make a decision when we don't have the info we need. Thanks,

On Tue, Mar 10, 2020 at 11:08 AM Anne Mason <marianne.mason@nara.gov> wrote:

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.

3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]



NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION
8601 ADELPHI ROAD COLLEGE PARK, MD 20740-6001
www.archives.gov

Sent Via Email. No Hard Copy to Follow.

March 30, 2020

John Ellis
Agency Records Officer
Environmental Protection Agency
1301 Constitution Ave., NW
Mail Code 2821T
Washington, DC 20460
ellis.john@epa.gov

Dear Mr. Ellis:

On March 4, 2020, the National Archives and Records Administration (NARA) received a request for the emergency destruction of water damaged records. The U.S. Environmental Protection Agency (EPA) reported the records were damaged when a sprinkler head broke in the EPA West building in Washington, D.C. on November 29, 2019. The records got wet during the incident, and consequently, developed mold.

This letter is to notify you that, in accordance with 36 CFR, Part 1229.10, the Archivist of the United States has not approved your request for emergency destruction of 18 boxes of records from a Water Quality Standards Rulemaking, which are scheduled as permanent under Disposition Authority DAA-0412-2013-0010-0001. NARA is directing EPA to take action to remediate the damage.

If the mold is actively growing, NARA recommends EPA take steps to ensure the records are completely dry to stop any active mold growth. If mold is not actively growing and is dormant and the records can be stored in a stable low relative humidity environment, NARA recommends that the records be re-boxed with a mold warning label indicating the date and mold level. Depending on the severity of the mold, the records may need to be remediated before the records can be put back into use or transferred to the National Archives.

NARA's Preservation division has information on records recovery on their website:

<https://www.archives.gov/preservation/records-emergency/recovery>. NARA's Preservation division also has information on their website about contracting for these services, including sample Performance Work

Statements that could be used in contracts:

<https://www.archives.gov/preservation/records-emergency/contracting>.

NARA and other Federal agencies have used some of the vendors listed on the website to provide all of the recommended services described above, including transport to/from secure treatment facilities, drying wet records, re-boxing, mold remediation, digitization, and secure/documented records disposal. These vendors have facilities and protocols in place to provide security for Federal records, and control access to PII and sensitive information. Some may even have cleared staff available at some of their treatment facilities.

If you have any questions concerning this matter, please contact Anne Mason, member of the Essential Records team at marianne.mason@nara.gov or 301-837-3502 or, Carla Simms, appraiser for EPA at carla.simms@nara.gov or 301-837-1897.

Sincerely,

A handwritten signature in blue ink that reads "Laurence A. Brewer". The signature is written in a cursive, flowing style.

LAURENCE BREWER
Chief Records Officer
for the U.S. Government



Darin Cote <darin.cote@nara.gov>

New EPA Emergency Destruction of Records??

5 messages

Lisa Haralampus <lisa.haralampus@nara.gov>

Tue, Aug 4, 2020 at 12:43 PM

To: Darin Cote <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>, Allison Olson <allison.olson@nara.gov>, "Kabrel, Jack" <jack.kabrel@nara.gov>

Hi Pamela,

I saw your emails and I'm forwarding to the entire FRED team (Darin and Jack) so they have awareness and can help with any action you need from AC. I think Anne Mason may be on leave.

- Lisa

----- Forwarded message -----

From: **Pamela Najar-Simpson** <pamela.najar-simpson@nara.gov>

Date: Tue, Aug 4, 2020 at 8:33 AM

Subject: Re: FW: Request for Emergency Destruction of Records

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, Olson, Allison <allison.olson@nara.gov>

Thanks for the clarification---the mandatory COR courses have me wary about contracting!

Two questions:

1. Did you send photos when you asked for quotes? Both vendors are assuming 'level one' cleaning which is what I would guess, but sometimes they may find things are worse once they get into the boxes.

2. After so many months the records should be dry. Do you know if they are? If you think so, you might ask about the need for vacuum-freeze drying and freezer storage, but I'll provide comments on both quotes below. Please note---these are questions not

BMSCat

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location?

It sounds like USPS/FedEx is planned for the return at least, but the same quote for both to and from the treatment facility.

2. There's a quote for a BMS packout, but based on the transport plans then do they expect you to arrange shipping? Unsure of the logistics.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer. Gamma irradiation will also do this (see #4). But ask about the context.

4. They propose using a 'microban' sanitizing treatment which as far as I am aware is an anti-fungal spray solution we don't recommend using on records. Our preferred treatment is gamma irradiation. I should also note that 'sanitizing' before cleaning would also make active mold go dormant like vacuum drying or freezing. Cleaning as well as sanitizing is recommended since the dormant mold 'debris' is a potential allergen, and mold spores are extremely resistant to any treatment that won't also cause immediate harm to paper.

This is the section in our BPA PWS about the subject. FYI

5.12 Task 12 – Disinfestation, Sanitization and Decontamination of Records

5.12.1 *The Contractor will provide an outline of proposed treatment for insect infestation, mold and/or other biological or contaminant residues that are potentially harmful to records or the users of records.*

5.12.2 *The COR must pre-approve procedures: which may include freezing, anoxia, and irradiation. Treatment may be in combination with rehousing and surface cleaning procedures in sections 5.10 and 5.11.*

5.12.3 *The COR will normally only authorize the minimum effective gamma radiation dose for sterilization of 4.5 kilograys (kGy). Exposure levels of 10 kilograys (1 megarad) or higher are considered too high for paper-based records, accelerating paper aging processes by 50-100%.*

5.12.4 *Records that have received sanitizing or irradiation treatments must be appropriately labelled so they can be monitored and/or identified in the future.*

Polygon

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location? The shipping charges sound like they plan to transport the records themselves, and I know they have at least 2 facilities within 2-3 hours of DC.

2. No quote for a pack-out, so they may assume you'll have the records ready to be moved, or with such a small amount see securing the boxes and getting them to the truck as part of the shipping charges. They have quoted for a Document Restoration Specialist, so this may be someone who will handle that as well overseeing Level 1 cleaning. Better to ask for details.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer and I see there's a charge for a month of freezer storage.

But as with BMSCat, irradiation will also stop active mold growth for more effective cleaning and is advised. Again, ask about the cost.

4. Ask for the gamma irradiation requirements in 15.12.3 and 15.12.4 above to be in the contract for documentation.

Hope this helps. Let me know if you need any clarification (or the vendors do).

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: (b) (6)
www.archives.gov

On Mon, Aug 3, 2020 at 5:40 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Thanks for your response. I am attaching the quotes again. I have never been through the recovery process. I was hoping that you could review the estimates and let me know if the contractors are missing any steps that they should include?

I know that you can't specifically recommend one contractor over the other, but if the lower estimate doesn't include a needed step, I won't know.

I will work with my Records Management contact on the transfer procedures.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Sent: Monday, August 3, 2020 2:07 PM

To: Reed, Khesha <Reed.Khesha@epa.gov>; Marianne Mason <marianne.mason@nara.gov>

Cc: Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>

Subject: Re: FW: Request for Emergency Destruction of Records

Hi Khesha,

Good to hear you've got to Stage 2!

In the chaos of my email I seem to be missing the quotes attachment to the July 9 email

But NARA Records Management guidance is needed to respond to your questions:

1. Do the quotes seem appropriate? (b) (5)

2. (b) (5)

Apologies I missed responding to the July 9 email, (b) (5)

[REDACTED]

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Mon, Aug 3, 2020 at 10:01 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Our building will be entering Phase 2 for reopening this week. I'd like to get our records boxes picked up ASAP. Did you have a chance to review the estimates that I forwarded? I would appreciate your feedback.

Thanks,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

202-407-0507

From: Reed, Khesha
Sent: Thursday, July 9, 2020 4:08 PM
To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Subject: RE: FW: Request for Emergency Destruction of Records

Pamela,

Thanks for your assistance. I was finally able to work out a plan for our damaged records. I decided to go with Option 1 below. I received estimates from two companies (attached). I am waiting for a third estimate. Do these quotes seem appropriate?

When our building reaches Phase 2 of the reopening strategy, we can have contractors come in to pick up the boxes. Our facilities staff will oversee the loading. We have a box level inventory. Can the boxes be transferred directly to NARA after the recovery?

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Thursday, April 2, 2020 12:56 PM
To: Reed, Khesha <Reed.Khesha@epa.gov>
Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>; Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Thanks for the chance to clarify the scope of your project over the phone.

Project: 18 cubic feet of paper records in water-damaged boxes with what appears to be minor mold damage on some files.

General advice on contracting for records recovery services and references below can be found on the NARA website <https://www.archives.gov/preservation/records-emergency/contracting>

OPTION 1: Full records recovery using vendor services

I've provided vendor task/treatment recommendations based on the sample PWS on the NARA website, with ballpark cost estimates where possible. These are based on costs of similar projects with vendors under NARA Blanket Purchase Agreements, but should only provide guidelines. Vendors NARA has used with BPA contracts include Belfor, BMSCat, and Polygon but these are not the only competent service providers available. In this case since the records are dry/stable you have time to get multiple quotes without danger of further damage from delayed treatment, particularly if you are able to use Option 2.

1. Secure damaged boxes, and transport to/from vendor treatment facility (see Task 3 in the sample PWS on the NARA website): Cost subject to current business conditions, distance for transport, whether your agency uses all the records protection precautions NARA requires such as dedicated loads, and whether the vendor carries out the packing procedures describe below. Freezer/air-conditioned transport is not required.

- * Agency staff must supervise loading. Produce a box-level inventory for tracking. Provide a version with box label/identification for the transport bill of lading with a copy sent to the vendor.

- * Ensure all boxes are intact/can protect the records in transit, and close flaps. Tape shut if possible.

- * Replace any boxes that are torn, or unable to be closed before transport.

- * Confirm the inventory with the vendor and check on return.

2. Inspection, and remediation(cleaning) as required (see Task 11 in the sample PWS on the NARA website). The cost will be based on the level of cleaning that is required. These estimates are based on NARA BPA rates,

- * Level 1 cleaning- \$45 cubic foot (per standard records box). From the photos it appears that this is the appropriate level, but during inspection the vendor may find some files that need Level 2 cleaning.

- * Level 2 cleaning- \$95 cubic foot (per standard records box).

3. Reboxing of inspected and cleaned records (see Task 2 in the sample PWS on the NARA website). Labor costs for reboxing/labelling are usually included in inspection/cleaning, but clarify when the quote is provided..

- * **All boxes** should be replaced as the old one may be contaminated.

- * Ask for old box labels to be cut off and tucked into the box, and provide the vendor with instructions on how to label the new boxes.
- * Vendor-supplied boxes average \$5-\$6.00 each, and usually the commercial records storage design with a separate lid. You may wish to provide standard records cartons when the vendor picks up the records to save this extra expense and possible need to rebox later.

Note: Vendors typically add overhead costs for project management, technical documentation etc.

OPTION 2: Combination of EPA and vendor services.

Interim rehousing and temporary storage by EPA, deferring remediation/cleaning until a later date (steps 2 and 3 above). The reboxed records will need to be stored in an air-conditioned space where the relative humidity stays below 60%.

.1. The primary health hazard with light mold **on records** is when it is disturbed and gets airborne and can be inhaled. A secondary health risk is getting mold particulates on hands, clothing and work areas where it could be disturbed/inhaled, transferred to other areas or even ingested. **This advice does not apply in the case of heavy, actively growing mold affecting large quantities of records and records boxes; or when mold has affected the surrounding space---walls, floor coverings etc.**

2. PPE requirements and safe procedures for carrying out the packing steps listed in item 1 above include:

- * Use disposable gloves, lab coat/apron/sleeve covering to protect clothing. These are the hygiene precautions commonly used when carrying out any type of heavy cleaning. A dust mask is optional, but not necessary if correct precautions are taken. OSHA requirements are that staff using any respirator-type mask such as a 2-strap N95 must have been fit-tested.
- * Use sealable large rubbish bags to safely dispose of old boxes and used PPE.
- * All records boxes should be replaced.
- * Set up a work space to provide dirty, intermediate and clean spaces. It's more efficient to have a team of at least two people. One at the dirty end, one at the clean end.
- * Anyone working directly with the records in the dirty space needs to wear PPE, keep their face at least arms-length from the records (even if wearing a mask), and avoid disturbing the stack of files when moving them as little as possible.
- * Set up a records inventory ahead of time if possible.
- * **In the dirty space:** move the records to a new box in the intermediate space, cut the label off the old box if necessary and put it in the intermediate space, dispose of the old box in a rubbish bag.
- * **In the clean space:** close box flaps and tape shut (keeping face an arms-length from the records), transfer records label information to the new box, add a clear warning:-Mold Damaged, update the inventory list..
- * Clean the dirty work area and dispose of all refuse at the end of the work session.

- * Wash hands, and change clothing as needed at the end of the work session.

Good luck with the project, and please contact me if you have any other questions or need clarification.

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Thu, Apr 2, 2020 at 9:09 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Sure. I am available now until 10AM or from 2:30 – 3:30PM today.

Let me know what time works best for you.

Khesha

202-407-0507

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Sent: Thursday, April 2, 2020 9:06 AM

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>

Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Would it be possible to have a telephone conversation so I can get a bit more background to be able to provide targeted information and advice? I'll reference any relevant information from our telephone conversation in my written response, but talking will be a more efficient

way to get the options clear in my mind to help with the services you need, timeline/priorities, and cost comparisons with past NARA projects of similar scope.

I'm teleworking as is most of NARA, and free so far until 3:30pm today. I'm on leave tomorrow (Friday 3 April), but available 9:00am-3:00pm Monday and Tuesday.

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Wed, Apr 1, 2020 at 4:53 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Per Anne Mason, I am reaching out to your for assistance with the recovery of records. We had 18 boxes of papers (see attached pictures taken last week). I am not sure about the current condition of the records. My management would like a rough estimate on how much the recovery will cost before deciding how to proceed. Based on your experience, about how much would it cost to rehouse and rebox? And separately, about how much to dry if necessary? I am looking for a very rough, order of magnitude estimate. I will get detailed estimates from a contractor, if I am directed to proceed.

I appreciate any advice and information you can provide.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Division

Office of Science and Technology, Office of Water

202-566-0594

From: Anne Mason <marianne.mason@nara.gov>

Sent: Friday, March 20, 2020 3:24 PM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Johnston, Robert <Johnston.Robert@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>

Subject: Re: Request for Emergency Destruction of Records

Our Preservation division has some info about contracting services and vendors on their website. It includes a list of contractors and some work statements that you can use. While NARA can't recommend any particular vendor, I've successfully worked with BMS Cat and Belfor in past projects that are similar to this.

<https://www.archives.gov/preservation/records-emergency/contracting>

One of our conservators has been included in the discussions about this and can assist. Pamela Najjar-Simpson at 301-837-0938, (b) (6) or via email at pamela.najar-simpson@nara.gov

She suggested, speaking from her experience, that you may want to initially contract for rehousing and reboxing and only deal with drying the records if they are indeed still wet when they get to the vendor's facility. If you write drying the records into the contract from the beginning, it may unnecessarily increase your costs.

On Fri, Mar 20, 2020 at 2:57 PM Ellis, John <Ellis.john@epa.gov> wrote:

Hi Anne,

Do you have any immediate recommendations of a company that's equipped to come and move the records in their current condition. They will likely need to be repacked, as the current boxes are full of mold and falling apart. We need to get them out of the GSA space.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>
Sent: Friday, March 20, 2020 2:45 PM
To: Ellis, John <Ellis.john@epa.gov>
Subject: Re: Request for Emergency Destruction of Records

Yes, I did. Thanks for the information and pictures. It was very helpful.

I met this afternoon with the emergency destruction team and we'll be drafting a letter that we'll send up the chain for approval. It won't be finalized until it's approved, but I did want to let you know that

we will be recommending that the records not be destroyed. We'll include some recommendations for dealing with the records. If you find that the situation has changed since the photos were taken, let me know. I hope to get it approved quickly and I'll keep you posted. Let me know if you have any questions or want to discuss this further while we wait for the approval of the letter. Thanks,

On Fri, Mar 20, 2020 at 2:13 PM Ellis, John <Ellis.john@epa.gov> wrote:

Hi Anne, I was checking to see whether you got my message yesterday?

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Ellis, John
Sent: Thursday, March 19, 2020 3:50 PM
To: 'Anne Mason' <marianne.mason@nara.gov>
Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>;

Jack Kabrel <jack.kabrel@nara.gov>; Johnston, Robert <Johnston.Robert@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>
Subject: RE: Request for Emergency Destruction of Records

Hello Anne,

EPA's responses to NARA's questions are in red below. Given the current condition of the records staff are not allowed in the area to take more recent photographs.

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.

The photos taken by FMSD are attached. The records were located in a secure conference room being prepped to send to NARA when they got damaged.

2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.

The boxes were severely damaged by the water. Due to miscommunications between facilities staff and the program office, no action was taken for several weeks and the boxes became consumed with visible mold and a strong odor. If action had been taken within the first few days of the flood, it is likely some of the documents were salvageable; however, given the time the boxes remained wet, the papers became fully saturated with water and are now consumed with mold and a strong odor.

3. You stated that some of the information contained in the damaged records may be duplicated on other media?

We are not sure exactly what may be duplicated. Much of the non-paper media was removed from the 18 boxes prior to the leak and was not damaged. Based on the descriptions on the labels the non-paper media contains photographs and recordings of public hearings on the proposed rule, exhibits submitted by the public and questions and answers (Q&As). Given the condition of the paper records, we are unable to review them to verify duplicated information.

How much of the information could be reconstructed from other sources? Beyond what is on the non-paper media. We don't believe much of the record can be reconstructed.

Is there info that is not captured elsewhere and is only contained in the damaged paper documents? Yes, there is information that was only contained in the damaged paper documents and not captured elsewhere.

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI? No CUI was included in the records. PII may have been included. Some documents in the boxes included correspondence from members of the public. The documents contained names, street, cities and counties of residence. Full names, email addresses and home addresses may have been included.

Please let me know if you have further questions or would like me to arrange a visit for you to see the records in the next couple of days.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>

Sent: Thursday, March 19, 2020 6:53 AM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>

Subject: Re: Request for Emergency Destruction of Records

Hello Mr. Ellis,

I know these are chaotic times, but do you have an idea when you will be able to provide additional information? It is difficult for NARA to make a decision when we don't have the info we need. Thanks,

On Tue, Mar 10, 2020 at 11:08 AM Anne Mason <marianne.mason@nara.gov> wrote:

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.
3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

NARA will be coordinating our response with our Preservation Programs staff and possibly a couple of other NARA units as well. We may want to call you for follow up and to see if you have questions about the process. Let us know if you think a conference call would be helpful for you and we'll set up a WebEx session. Since I'm based in College Park, Maryland, it would also be possible for me to come to EPA for a meeting or to assess the records.

Meanwhile, if anything has changed since your initial letter to NARA please let us know so that we may update our case file information. Also, please do not hesitate to contact us with any questions.

Thanks in advance for this information.

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

----- Forwarded message -----

From: Laurence Brewer <laurence.brewer@nara.gov>

Date: Wed, Mar 4, 2020 at 5:05 PM

Subject: Fwd: Request for Emergency Destruction of Records

To: Cote, Darin <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Kabrel, Jack <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

A new FRED case from EPA.

----- Forwarded message -----

From: Ellis, John <Ellis.john@epa.gov>

Date: Wed, Mar 4, 2020 at 3:22 PM

Subject: Request for Emergency Destruction of Records

To: Laurence Brewer <laurence.brewer@nara.gov>

Hello Laurence,

Attached is a letter requesting Emergency Destruction of Records that are a menace to the health and safety of EPA personnel.

I look forward to your response.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

--

Laurence Brewer, CRM

Chief Records Officer for the U.S. Government

National Archives and Records Administration

Laurence.Brewer@nara.gov

Office: (301) 837-1539

Cell: (301) 974-4582

Blog: [Records Express](#)

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Tue, Aug 4, 2020 at 1:02 PM

To: Lisa Haralampus <lisa.haralampus@nara.gov>

Cc: Darin Cote <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Allison Olson <allison.olson@nara.gov>, "Kabrel, Jack" <jack.kabrel@nara.gov>

Thanks, Lisa!

I wasn't sure if this was still a FRED project since they're not following through with emergency destruction for these 18 boxes. Be good for me/RX to have some advice on procedures when a request is declined but the agency still wants NARA advice about levels of treatment which might include digitization more and more often.

Khesha clarified the advice she wanted on the vendor quotes, so I decided to provide questions for them to ask to clarify. Not as pointed as I would provide/work with the NARA BPA CO to follow up. But hopefully make the operation go smoothly.

(b) (5)

Pamela
Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: (b) (6)
www.archives.gov

On Tue, Aug 4, 2020 at 1:43 PM Lisa Haralampus <lisa.haralampus@nara.gov> wrote:

Hi Pamela,

I saw your emails and I'm forwarding to the entire FRED team (Darin and Jack) so they have awareness and can help with any action you need from AC. I think Anne Mason may be on leave.

- Lisa

----- Forwarded message -----

From: **Pamela Najar-Simpson** <pamela.najar-simpson@nara.gov>

Date: Tue, Aug 4, 2020 at 8:33 AM

Subject: Re: FW: Request for Emergency Destruction of Records

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, Olson, Allison <allison.olson@nara.gov>

Thanks for the clarification---the mandatory COR courses have me wary about contracting!

Two questions:

1. Did you send photos when you asked for quotes? Both vendors are assuming 'level one' cleaning which is what I would guess, but sometimes they may find things are worse once they get into the boxes.

2. After so many months the records should be dry. Do you know if they are? If you think so, you might ask about the need for vacuum-freeze drying and freezer storage, but I'll provide comments on both quotes below. Please note---these are questions not

BMSCat

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location?

It sounds like USPS/FedEx is planned for the return at least, but the same quote for both to and from the treatment facility.

2. There's a quote for a BMS packout, but based on the transport plans then do they expect you to arrange shipping? Unsure of the logistics.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer. Gamma irradiation will also do this (see #4). But ask about the context.

4. They propose using a 'microban' sanitizing treatment which as far as I am aware is an anti-fungal spray solution we don't recommend using on records. Our preferred treatment is gamma irradiation. I should also note that 'sanitizing' before cleaning would also make active mold go dormant like vacuum drying or freezing. Cleaning as well as sanitizing is recommended since the dormant mold 'debris' is a potential allergen, and mold spores are extremely resistant to any treatment that won't also cause immediate harm to paper.

This is the section in our BPA PWS about the subject. FYI

5.12 Task 12 – Disinfestation, Sanitization and Decontamination of Records

5.12.1 The Contractor will provide an outline of proposed treatment for insect infestation, mold and/or other biological or contaminant residues that are potentially harmful to records or the users of records.

5.12.2 The COR must pre-approve procedures: which may include freezing, anoxia, and irradiation. Treatment may be in combination with rehousing and surface cleaning procedures in sections 5.10 and 5.11.

5.12.3 The COR will normally only authorize the minimum effective gamma radiation dose for sterilization of 4.5 kilograys (kGy). Exposure levels of 10 kilograys (1 megarad) or higher are considered too high for paper-based records, accelerating paper aging processes by 50-100%.

5.12.4 Records that have received sanitizing or irradiation treatments must be appropriately labelled so they can be monitored and/or identified in the future.

Polygon

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location? The shipping charges sound like they plan to transport the records themselves, and I know they have at least 2 facilities within 2-3 hours of DC.

2. No quote for a pack-out, so they may assume you'll have the records ready to be moved, or with such a small amount see securing the boxes and getting them to the truck as part of the shipping charges. They have quoted for a Document Restoration Specialist, so this may be someone who will handle that as well overseeing Level 1 cleaning. Better to ask for details.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer and I see there's a charge for a month of freezer storage.

But as with BMSCat, irradiation will also stop active mold growth for more effective cleaning and is advised. Again, ask about the content.

4. Ask for the gamma irradiation requirements in 15.12.3 and 15.12.4 above to be in the contract for documentation.

Hope this helps. Let me know if you need any clarification (or the vendors do).

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: (b) (6)
www.archives.gov

On Mon, Aug 3, 2020 at 5:40 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Thanks for your response. I am attaching the quotes again. I have never been through the recovery process. I was hoping that you could review the estimates and let me know if the contractors are missing any steps that they should include? I know that you can't specifically recommend one contractor over the other, but if the lower estimate doesn't include a needed step, I won't know.

I will work with my Records Management contact on the transfer procedures.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Monday, August 3, 2020 2:07 PM
To: Reed, Khesha <Reed.Khesha@epa.gov>; Marianne Mason <marianne.mason@nara.gov>
Cc: Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Hi Khesha,

Good to hear you've got to Stage 2!

In the chaos of my email I seem to be missing the quotes attachment to the July 9 email

But NARA Records Management guidance is needed to respond to your questions:

1. Do the quotes seem appropriate? (b) (5)

2. (b) (5)

Apologies I missed responding to the July 9 email. (b) (5)

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Mon, Aug 3, 2020 at 10:01 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Our building will be entering Phase 2 for reopening this week. I'd like to get our records boxes picked up ASAP. Did you have a chance to review the estimates that I forwarded? I would appreciate your feedback.

Thanks,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

202-407-0507

From: Reed, Khesha

Sent: Thursday, July 9, 2020 4:08 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Subject: RE: FW: Request for Emergency Destruction of Records

Pamela,

Thanks for your assistance. I was finally able to work out a plan for our damaged records. I decided to go with Option 1 below. I received estimates from two companies (attached). I am waiting for a third estimate. Do these quotes seem appropriate?

When our building reaches Phase 2 of the reopening strategy, we can have contractors come in to pick up the boxes. Our facilities staff will oversee the loading. We have a box level inventory. Can the boxes be transferred directly to NARA after the recovery?

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Sent: Thursday, April 2, 2020 12:56 PM

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>; Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>

Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Thanks for the chance to clarify the scope of your project over the phone.

Project: 18 cubic feet of paper records in water-damaged boxes with what appears to be minor mold damage on some files.

General advice on contracting for records recovery services and references below can be found on the NARA website <https://www.archives.gov/preservation/records-emergency/contracting>

OPTION 1: Full records recovery using vendor services

I've provided vendor task/treatment recommendations based on the sample PWS on the NARA website, with ballpark cost estimates where possible. These are based on costs of similar projects with vendors under NARA Blanket Purchase Agreements, but should only provide guidelines. Vendors NARA has used with BPA contracts include Belfor, BMSCat, and Polygon but these are not the only competent service providers available. In this case since the records are dry/stable you have time to get multiple quotes without danger of further damage from delayed treatment, particularly if you are able to use Option 2.

1. Secure damaged boxes, and transport to/from vendor treatment facility (see Task 3 in the sample PWS on the NARA website): Cost subject to current business conditions, distance for transport, whether your agency uses all the records protection precautions NARA requires such as dedicated loads, and whether the vendor carries out the packing procedures describe below. Freezer/air-conditioned transport is not required.

* Agency staff must supervise loading. Produce a box-level inventory for tracking. Provide a version with box label/identification for the transport bill of lading with a copy sent to the vendor.

* Ensure all boxes are intact/can protect the records in transit, and close flaps. Tape shut if possible.

* Replace any boxes that are torn, or unable to be closed before transport.

* Confirm the inventory with the vendor and check on return.

2. Inspection, and remediation(cleaning) as required (see Task 11 in the sample PWS on the NARA website). The cost will be based on the level of cleaning that is required. These estimates are based on NARA BPA rates,

* Level 1 cleaning- \$45 cubic foot (per standard records box). From the photos it appears that this is the appropriate level, but during inspection the vendor may find some files that need Level 2 cleaning.

* Level 2 cleaning- \$95 cubic foot (per standard records box).

3. Reboxing of inspected and cleaned records (see Task 2 in the sample PWS on the NARA website). Labor costs for reboxing/labelling are usually included in inspection/cleaning, but clarify when the quote is provided..

* **All boxes** should be replaced as the old one may be contaminated.

* Ask for old box labels to be cut off and tucked into the box, and provide the vendor with instructions on how to label the new boxes.

* Vendor-supplied boxes average \$5-\$6.00 each, and usually the commercial records storage design with a separate lid. You may wish to provide standard records cartons when the vendor picks up the records to save this extra expense and possible need to rebox later.

Note: Vendors typically add overhead costs for project management, technical documentation etc.

OPTION 2: Combination of EPA and vendor services.

Interim rehousing and temporary storage by EPA, deferring remediation/cleaning until a later date (steps 2 and 3 above). The reboxed records will need to be stored in an air-conditioned space where the relative humidity stays below 60%.

.1. The primary health hazard with light mold **on records** is when it is disturbed and gets airborne and can be inhaled. A secondary health risk is getting mold particulates on hands, clothing and work areas where it could be disturbed/inhaled, transferred to other areas or

even ingested. **This advice does not apply in the case of heavy, actively growing mold affecting large quantities of records and records boxes; or when mold has affected the surrounding space---walls, floor coverings etc.**

2. PPE requirements and safe procedures for carrying out the packing steps listed in item 1 above include:

- * Use disposable gloves, lab coat/apron/sleeve covering to protect clothing. These are the hygiene precautions commonly used when carrying out any type of heavy cleaning. A dust mask is optional, but not necessary if correct precautions are taken. OSHA requirements are that staff using any respirator-type mask such as a 2-strap N95 must have been fit-tested.
- * Use sealable large rubbish bags to safely dispose of old boxes and used PPE.
- * All records boxes should be replaced.
- * Set up a work space to provide dirty, intermediate and clean spaces. It's more efficient to have a team of at least two people. One at the dirty end, one at the clean end.
- * Anyone working directly with the records in the dirty space needs to wear PPE, keep their face at least arms-length from the records (even if wearing a mask), and avoid disturbing the stack of files when moving them as little as possible.
- * Set up a records inventory ahead of time if possible.
- * **In the dirty space:** move the records to a new box in the intermediate space, cut the label off the old box if necessary and put it in the intermediate space, dispose of the old box in a rubbish bag.
- * **In the clean space:** close box flaps and tape shut (keeping face an arms-length from the records), transfer records label information to the new box, add a clear warning:-Mold Damaged, update the inventory list..
- * Clean the dirty work area and dispose of all refuse at the end of the work session.
- * Wash hands, and change clothing as needed at the end of the work session.

Good luck with the project, and please contact me if you have any other questions or need clarification.

Regards,
Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Thu, Apr 2, 2020 at 9:09 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Sure. I am available now until 10AM or from 2:30 – 3:30PM today.

Let me know what time works best for you.

Khesha

202-407-0507

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Sent: Thursday, April 2, 2020 9:06 AM

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>

Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Would it be possible to have a telephone conversation so I can get a bit more background to be able to provide targeted information and advice? I'll reference any relevant information from our telephone conversation in my written response, but talking will be a more efficient way to get the options clear in my mind to help with the services you need, timeline/priorities, and cost comparisons with past NARA projects of similar scope.

I'm teleworking as is most of NARA, and free so far until 3:30pm today. I'm on leave tomorrow (Friday 3 April), but available 9:00am-3:00pm Monday and Tuesday.

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Wed, Apr 1, 2020 at 4:53 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Per Anne Mason, I am reaching out to your for assistance with the recovery of records. We had 18 boxes of papers (see attached pictures taken last week). I am not sure about the current condition of the records. My management would like a rough estimate on how much the recovery will cost before deciding how to proceed. Based on your experience, about how much would it cost to rehouse and rebox? And separately, about how much to dry if necessary? I am looking for a very rough, order of magnitude estimate. I will get detailed estimates from a contractor, if I am directed to proceed.

I appreciate any advice and information you can provide.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Division

Office of Science and Technology, Office of Water

202-566-0594

From: Anne Mason <marianne.mason@nara.gov>

Sent: Friday, March 20, 2020 3:24 PM

To: Ellis, John <Ellis.john@epa.gov>

Cc: Johnston, Robert <Johnston.Robert@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>

Subject: Re: Request for Emergency Destruction of Records

Our Preservation division has some info about contracting services and vendors on their website. It includes a list of contractors and some work statements that you can use. While NARA can't recommend any particular vendor, I've successfully worked with BMS Cat and Belfor in past projects that are similar to this.

<https://www.archives.gov/preservation/records-emergency/contracting>

One of our conservators has been included in the discussions about this and can assist. Pamela Najar-Simpson at 301-837-0938, (b) (6) or via email at pamela.najar-simpson@nara.gov

She suggested, speaking from her experience, that you may want to initially contract for rehousing and reboxing and only deal with drying the records if they are indeed still wet when they get to the vendor's facility. If you write drying the records into the contract from the beginning, it may unnecessarily increase your costs.

On Fri, Mar 20, 2020 at 2:57 PM Ellis, John <Ellis.john@epa.gov> wrote:

Hi Anne,

Do you have any immediate recommendations of a company that's equipped to come and move the records in their current condition. They will likely need to be repacked, as the current boxes are full of mold and falling apart. We need to get them out of the GSA space.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>

Sent: Friday, March 20, 2020 2:45 PM

To: Ellis, John <Ellis.john@epa.gov>

Subject: Re: Request for Emergency Destruction of Records

Yes, I did. Thanks for the information and pictures. It was very helpful.

I met this afternoon with the emergency destruction team and we'll be drafting a letter that we'll send up the chain for approval. It won't be finalized until it's approved, but I did want to let you know that

we will be recommending that the records not be destroyed. We'll include some recommendations for dealing with the records. If you find that the situation has changed since the photos were taken, let me know. I hope to get it approved quickly and I'll keep you posted. Let me know if you have any questions or want to discuss this further while we wait for the approval of the letter. Thanks,

On Fri, Mar 20, 2020 at 2:13 PM Ellis, John <Ellis.john@epa.gov> wrote:

Hi Anne, I was checking to see whether you got my message yesterday?

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Ellis, John

Sent: Thursday, March 19, 2020 3:50 PM

To: 'Anne Mason' <marianne.mason@nara.gov>

Cc: Pamela Najjar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>; Johnston, Robert <Johnston.Robert@epa.gov>; Reed, Khesha <Reed.Khesha@epa.gov>; Jefferson, Gayle <Jefferson.Gayle@epa.gov>

Subject: RE: Request for Emergency Destruction of Records

Hello Anne,

EPA's responses to NARA's questions are in red below. Given the current condition of the records staff are not allowed in the area to take more recent photographs.

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.

The photos taken by FMSD are attached. The records were located in a secure conference room being prepped to send to NARA when they got damaged.

2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.

The boxes were severely damaged by the water. Due to miscommunications between facilities staff and the program office, no action was taken for several weeks and the boxes became consumed with visible mold and a strong odor. If action had been taken within the first few days of the flood, it is likely some of the documents were salvageable; however, given the time the boxes remained wet, the papers became fully saturated with water and are now consumed with mold and a strong odor.

3. You stated that some of the information contained in the damaged records may be duplicated on other media?

We are not sure exactly what may be duplicated. Much of the non-paper media was removed from the 18 boxes prior to the leak and was not damaged. Based on the descriptions on the labels the non-paper media contains photographs and recordings of public hearings on the proposed rule, exhibits submitted by the public and questions and answers (Q&As). Given the condition of the paper records, we are unable to review them to verify duplicated information.

How much of the information could be reconstructed from other sources? Beyond what is on the non-paper media. We don't believe much of the record can be reconstructed.

Is there info that is not captured elsewhere and is only contained in the damaged paper documents? Yes, there is information that was only contained in the damaged paper documents and not captured elsewhere.

4. Is there any sensitive information on any of the records like PII of commenters? Any CUI? No CUI was included in the records. PII may have been included. Some documents in the boxes included correspondence from members of the public. The documents contained names, street, cities and counties of residence. Full names, email addresses and home addresses may have been included.

Please let me know if you have further questions or would like me to arrange a visit for you to see the records in the next couple of days.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

From: Anne Mason <marianne.mason@nara.gov>
Sent: Thursday, March 19, 2020 6:53 AM
To: Ellis, John <Ellis.john@epa.gov>
Cc: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>; Darin Cote <darin.cote@nara.gov>; Jack Kabrel <jack.kabrel@nara.gov>
Subject: Re: Request for Emergency Destruction of Records

Hello Mr. Ellis,

I know these are chaotic times, but do you have an idea when you will be able to provide additional information? It is difficult for NARA to make a decision when we don't have the info we need. Thanks,

On Tue, Mar 10, 2020 at 11:08 AM Anne Mason <marianne.mason@nara.gov> wrote:

Hello Mr. Ellis,

I have been assigned to coordinate the NARA response to your request to destroy water-damaged records. Our team (copied on this message) has reviewed your letter and we have some additional questions. I hope that you can provide this additional information to assist us in our review of this situation so we can promptly complete our recommendations to NARA management.

Please provide:

1. Can you obtain digital photos of the damaged records and boxes? Additionally, photos of the building - records filing areas, etc. are helpful as well. These will become part of our case file for this destruction request.
2. Can you provide more information regarding the menace? Is there visible mold? The photos requested above should help in that. The presence of water alone on analog records can generally be treated (air dried or vacuum freeze dried if the latter service is available). However, the presence of "menaces" on the records complicate any recovery.
3. You stated that some of the information contained in the damaged records may be duplicated on other media? Could you provide more info? How much of the information could be reconstructed from other sources? Is there info that is not captured elsewhere and is only contained in the damaged paper documents?
4. Is there any sensitive information on any of the records like PII of commenters? Any CUI?

NARA will be coordinating our response with our Preservation Programs staff and possibly a couple of other NARA units as well. We may want to call you for follow up and to see if you have questions about the process. Let us know if you think a conference call would be helpful for you and we'll set up a WebEx session. Since I'm based in College Park, Maryland, it would also be possible for me to come to EPA for a meeting or to assess the records.

Meanwhile, if anything has changed since your initial letter to NARA please let us know so that we may update our case file information. Also, please do not hesitate to contact us with any questions.

Thanks in advance for this information.

--

Anne Mason, CA

Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.gov

----- Forwarded message -----

From: Laurence Brewer <laurence.brewer@nara.gov>

Date: Wed, Mar 4, 2020 at 5:05 PM

Subject: Fwd: Request for Emergency Destruction of Records

To: Cote, Darin <darin.cote@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Kabrel, Jack <jack.kabrel@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>

A new FRED case from EPA.

----- Forwarded message -----

From: Ellis, John <Ellis.john@epa.gov>

Date: Wed, Mar 4, 2020 at 3:22 PM

Subject: Request for Emergency Destruction of Records

To: Laurence Brewer <laurence.brewer@nara.gov>

Hello Laurence,

Attached is a letter requesting Emergency Destruction of Records that are a menace to the health and safety of EPA personnel.

I look forward to your response.

John B. Ellis, CRM - Agency Records Officer

Office of Mission Support (OMS) | Enterprise Records Management Division (ERMD)

1301 Constitution Ave., NW, Washington, DC 20460 | WJCW | Mail Code 2821T

Phone: 202-566-1643, Mobile: 202-657-3091

.....

Records or Federal Records - defined in 44 U.S.C. 3301, includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.

--

Laurence Brewer, CRM
Chief Records Officer for the U.S. Government

National Archives and Records Administration
Laurence.Brewer@nara.gov
Office: (301) 837-1539

Cell: (b) (6)

Blog: [Records Express](#)

--

Anne Mason, CA
Office of the Chief Records Officer, Operations Research and Support Team
Archives Specialist
301-837-3502
marianne.mason@nara.gov

--

Anne Mason, CA
Office of the Chief Records Officer, Operations Research and Support Team
Archives Specialist
301-837-3502
marianne.mason@nara.gov

--

Anne Mason, CA
Office of the Chief Records Officer, Operations Research and Support Team

Archives Specialist

301-837-3502

marianne.mason@nara.govDarin Cote <darin.cote@nara.gov>

Fri, Aug 7, 2020 at 7:58 AM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>Cc: Lisa Haralampus <lisa.haralampus@nara.gov>, Marianne Mason <marianne.mason@nara.gov>, Allison Olson <allison.olson@nara.gov>, "Kabrel, Jack" <jack.kabrel@nara.gov>

Hi Pamela,

I agree with you on all of your responses. I'd only add a link to the FRC webpage, which provides more specific guidance for records transfer during the pandemic. That url is provided below.

<https://www.archives.gov/frc>

Best,

Darin Cote

Electronic Records Policy Analyst

Policy and Program Support Team (ACPP)

Office of the Chief Records Officer for the U.S. Government

National Archives and Records Administration

w 817.551.2003 c (b) (6)

On Tue, Aug 4, 2020 at 1:03 PM Pamela Najar-Simpson <pamela.najar-simpson@nara.gov> wrote:

Thanks, Lisa!

I wasn't sure if this was still a FRED project since they're not following through with emergency destruction for these 18 boxes. Be good for me/RX to have some advice on procedures when a request is declined but the agency still wants NARA advice about levels of treatment which might include digitization more and more often.

Khesha clarified the advice she wanted on the vendor quotes, so I decided to provide questions for them to ask to clarify. Not as pointed as I would provide/work with the NARA BPA CO to follow up. But hopefully make the operation go smoothly.

(b) (5)

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Tue, Aug 4, 2020 at 1:43 PM Lisa Haralampus <lisa.haralampus@nara.gov> wrote:

Hi Pamela,

I saw your emails and I'm forwarding to the entire FRED team (Darin and Jack) so they have awareness and can help with any action you need from AC. I think Anne Mason may be on leave.

- Lisa

----- Forwarded message -----

From: **Pamela Najar-Simpson** <pamela.najar-simpson@nara.gov>

Date: Tue, Aug 4, 2020 at 8:33 AM

Subject: Re: FW: Request for Emergency Destruction of Records

To: Reed, Khesha <Reed.Khesha@epa.gov>

Cc: Marianne Mason <marianne.mason@nara.gov>, Lisa Haralampus <lisa.haralampus@nara.gov>, Olson, Allison <allison.olson@nara.gov>

Thanks for the clarification---the mandatory COR courses have me wary about contracting!

Two questions:

1. Did you send photos when you asked for quotes? Both vendors are assuming 'level one' cleaning which is what I would guess, but sometimes they may find things are worse once they get into the boxes.

2. After so many months the records should be dry. Do you know if they are? If you think so, you might ask about the need for vacuum-freeze drying and freezer storage, but I'll provide comments on both quotes below. Please note---these are questions not

BMSCat

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location?

It sounds like USPS/FedEx is planned for the return at least, but the same quote for both to and from the treatment facility.

2. There's a quote for a BMS packout, but based on the transport plans then do they expect you to arrange shipping? Unsure of the logistics.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer. Gamma irradiation will also do this (see #4). But ask about the context.

4. They propose using a 'microban' sanitizing treatment which as far as I am aware is an anti-fungal spray solution we don't recommend using on records. Our preferred treatment is gamma irradiation. I should also note that 'sanitizing' before cleaning would also make active mold go dormant like vacuum drying or freezing. Cleaning as well as sanitizing is recommended since the dormant mold 'debris' is a potential allergen, and mold spores are extremely resistant to any treatment that won't also cause immediate harm to paper.

This is the section in our BPA PWS about the subject. FYI

5.12 Task 12 – Disinfestation, Sanitization and Decontamination of Records

5.12.1 The Contractor will provide an outline of proposed treatment for insect infestation, mold and/or other biological or contaminant residues that are potentially harmful to records or the users of records.

5.12.2 The COR must pre-approve procedures: which may include freezing, anoxia, and irradiation. Treatment may be in combination with rehousing and surface cleaning procedures in sections 5.10 and 5.11.

5.12.3 The COR will normally only authorize the minimum effective gamma radiation dose for sterilization of 4.5 kilograys (kGy). Exposure levels of 10 kilograys (1 megarad) or higher are considered too high for paper-based records, accelerating paper aging processes by 50-100%.

5.12.4 Records that have received sanitizing or irradiation treatments must be appropriately labelled so they can be monitored and/or identified in the future.

Polygon

The overall quote is in the ballpark I would expect.

1. Where will the treatment work be carried out and how will the records be transported to the location? The shipping charges sound like they plan to transport the records themselves, and I know they have at least 2 facilities within 2-3 hours of DC.

2. No quote for a pack-out, so they may assume you'll have the records ready to be moved, or with such a small amount see securing the boxes and getting them to the truck as part of the shipping charges. They have quoted for a Document Restoration Specialist, so this may be someone who will handle that as well overseeing Level 1 cleaning. Better to ask for details.

3. Assuming the records are dry, then the only reason to carry out vacuum-freeze drying would be to make any active mold go dormant so it's easier to clean the records. This could be done with just a short time in the chamber, or even in a freezer and I see there's a charge for a month of freezer storage.

But as with BMSCat, irradiation will also stop active mold growth for more effective cleaning and is advised. Again, ask about the conte.t

4. Ask for the gamma irradiation requirements in 15.12.3 and 15.12.4 above to be in the contract for documentation.

Hope this helps. Let me know if you need any clarification (or the vendors do).

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: (b) (6)
www.archives.gov

On Mon, Aug 3, 2020 at 5:40 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Thanks for your response. I am attaching the quotes again. I have never been through the recovery process. I was hoping that you could review the estimates and let me know if the contractors are missing any steps that they should include? I know that you can't specifically recommend one contractor over the other, but if the lower estimate doesn't include a needed step, I won't know.

I will work with my Records Management contact on the transfer procedures.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Monday, August 3, 2020 2:07 PM
To: Reed, Khesha <Reed.Khesha@epa.gov>; Marianne Mason <marianne.mason@nara.gov>
Cc: Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Hi Khesha,

Good to hear you've got to Stage 2!

In the chaos of my email I seem to be missing the quotes attachment to the July 9 email

But NARA Records Management guidance is needed to respond to your questions:

1. Do the quotes seem appropriate? (b) (5)

2. (b) (5)

Apologies I missed responding to the July 9 email. (b) (5)

Regards,

Pamela

Pamela Najar-Simpson

National Preservation Program Officer

National Archives & Records Administration

8601 Adelphi Road, Room 3400

College Park MD 20740

tel: 301-837-0938 Cell: (b) (6)

www.archives.gov

On Mon, Aug 3, 2020 at 10:01 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Our building will be entering Phase 2 for reopening this week. I'd like to get our records boxes picked up ASAP. Did you have a chance to review the estimates that I forwarded? I would appreciate your feedback.

Thanks,

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

202-407-0507

From: Reed, Khesha

Sent: Thursday, July 9, 2020 4:08 PM

To: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>

Subject: RE: FW: Request for Emergency Destruction of Records

Pamela,

Thanks for your assistance. I was finally able to work out a plan for our damaged records. I decided to go with Option 1 below. I received estimates from two companies (attached). I am waiting for a third estimate. Do these quotes seem appropriate?

When our building reaches Phase 2 of the reopening strategy, we can have contractors come in to pick up the boxes. Our facilities staff will oversee the loading. We have a box level inventory. Can the boxes be transferred directly to NARA after the recovery?

Khesha Reed

Deputy Director

Standards and Health Protection Division

Office of Science and Technology, Office of Water

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Thursday, April 2, 2020 12:56 PM
To: Reed, Khesha <Reed.Khesha@epa.gov>
Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>; Lisa Haralampus <lisa.haralampus@nara.gov>; Olson, Allison <allison.olson@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Thanks for the chance to clarify the scope of your project over the phone.

Project: 18 cubic feet of paper records in water-damaged boxes with what appears to be minor mold damage on some files.

General advice on contracting for records recovery services and references below can be found on the NARA website <https://www.archives.gov/preservation/records-emergency/contracting>

OPTION 1: Full records recovery using vendor services

I've provided vendor task/treatment recommendations based on the sample PWS on the NARA website, with ballpark cost estimates where possible. These are based on costs of similar projects with vendors

under NARA Blanket Purchase Agreements, but should only provide guidelines. Vendors NARA has used with BPA contracts include Belfor, BMSCat, and Polygon but these are not the only competent service providers available. In this case since the records are dry/stable you have time to get multiple quotes without danger of further damage from delayed treatment, particularly if you are able to use Option 2.

1. Secure damaged boxes, and transport to/from vendor treatment facility (see Task 3 in the sample PWS on the NARA website): Cost subject to current business conditions, distance for transport, whether your agency uses all the records protection precautions NARA requires such as dedicated loads, and whether the vendor carries out the packing procedures describe below. Freezer/air-conditioned transport is not required.

- * Agency staff must supervise loading. Produce a box-level inventory for tracking. Provide a version with box label/identification for the transport bill of lading with a copy sent to the vendor.

- * Ensure all boxes are intact/can protect the records in transit, and close flaps. Tape shut if possible.

- * Replace any boxes that are torn, or unable to be closed before transport.

- * Confirm the inventory with the vendor and check on return.

2. Inspection, and remediation(cleaning) as required (see Task 11 in the sample PWS on the NARA website). The cost will be based on the level of cleaning that is required. These estimates are based on NARA BPA rates,

- * Level 1 cleaning- \$45 cubic foot (per standard records box). From the photos it appears that this is the appropriate level, but during inspection the vendor may find some files that need Level 2 cleaning.

- * Level 2 cleaning- \$95 cubic foot (per standard records box).

3. Reboxing of inspected and cleaned records (see Task 2 in the sample PWS on the NARA website). Labor costs for reboxing/labelling are usually included in inspection/cleaning, but clarify when the quote is provided..

- * **All boxes** should be replaced as the old one may be contaminated.

- * Ask for old box labels to be cut off and tucked into the box, and provide the vendor with instructions on how to label the new boxes.

- * Vendor-supplied boxes average \$5-\$6.00 each, and usually the commercial records storage design with a separate lid. You may wish to provide standard records cartons when the vendor picks up the records to save this extra expense and possible need to rebox later.

Note: Vendors typically add overhead costs for project management, technical documentation etc.

OPTION 2: Combination of EPA and vendor services.

Interim rehousing and temporary storage by EPA, deferring remediation/cleaning until a later date (steps 2 and 3 above). The reboxed records will need to be stored in an air-conditioned space where the relative humidity stays below 60%.

.1. The primary health hazard with light mold **on records** is when it is disturbed and gets airborne and can be inhaled. A secondary health risk is getting mold particulates on hands, clothing and work areas where it could be disturbed/inhaled, transferred to other areas or even ingested. **This advice does not apply in the case of heavy, actively growing mold affecting large quantities of records and records boxes; or when mold has affected the surrounding space---walls, floor coverings etc.**

2. PPE requirements and safe procedures for carrying out the packing steps listed in item 1 above include:

- * Use disposable gloves, lab coat/apron/sleeve covering to protect clothing. These are the hygiene precautions commonly used when carrying out any type of heavy cleaning. A dust mask is optional, but not necessary if correct precautions are taken. OSHA requirements are that staff using any respirator-type mask such as a 2-strap N95 must have been fit-tested.
- * Use sealable large rubbish bags to safely dispose of old boxes and used PPE.
- * All records boxes should be replaced.
- * Set up a work space to provide dirty, intermediate and clean spaces. It's more efficient to have a team of at least two people. One at the dirty end, one at the clean end.
- * Anyone working directly with the records in the dirty space needs to wear PPE, keep their face at least arms-length from the records (even if wearing a mask), and avoid disturbing the stack of files when moving them as little as possible.
- * Set up a records inventory ahead of time if possible.
- * **In the dirty space:** move the records to a new box in the intermediate space, cut the label off the old box if necessary and put it in the intermediate space, dispose of the old box in a rubbish bag.
- * **In the clean space:** close box flaps and tape shut (keeping face an arms-length from the records), transfer records label information to the new box, add a clear warning:-Mold Damaged, update the inventory list..
- * Clean the dirty work area and dispose of all refuse at the end of the work session.
- * Wash hands, and change clothing as needed at the end of the work session.

Good luck with the project, and please contact me if you have any other questions or need clarification.

Regards,
Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: (b) (6)
www.archives.gov

On Thu, Apr 2, 2020 at 9:09 AM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Sure. I am available now until 10AM or from 2:30 – 3:30PM today.

Let me know what time works best for you.

Khesha

202-407-0507

From: Pamela Najar-Simpson <pamela.najar-simpson@nara.gov>
Sent: Thursday, April 2, 2020 9:06 AM
To: Reed, Khesha <Reed.Khesha@epa.gov>
Cc: Ellis, John <Ellis.john@epa.gov>; Marianne Mason <marianne.mason@nara.gov>
Subject: Re: FW: Request for Emergency Destruction of Records

Khesha,

Would it be possible to have a telephone conversation so I can get a bit more background to be able to provide targeted information and advice? I'll reference any relevant information from our telephone conversation in my written response, but talking will be a more efficient way to get the options clear in my mind to help with the services you need, timeline/priorities, and cost comparisons with past NARA projects of similar scope.

I'm teleworking as is most of NARA, and free so far until 3:30pm today. I'm on leave tomorrow (Friday 3 April), but available 9:00am-3:00pm Monday and Tuesday.

Regards,

Pamela

Pamela Najar-Simpson
National Preservation Program Officer
National Archives & Records Administration
8601 Adelphi Road, Room 3400
College Park MD 20740
tel: 301-837-0938 Cell: (b) (6)
www.archives.gov

On Wed, Apr 1, 2020 at 4:53 PM Reed, Khesha <Reed.Khesha@epa.gov> wrote:

Pamela,

Per Anne Mason, I am reaching out to you for assistance with the recovery of records. We had 18 boxes of papers (see attached pictures taken last week). I am not sure about the current condition of the records. My management would like a rough estimate on how much the recovery will cost before deciding how to proceed. Based on your experience, about how much would it cost to rehouse and rebox? And separately, about how much to dry if necessary? I am looking for a very rough, order of magnitude estimate. I will get detailed estimates from a contractor, if I am directed to proceed.

I appreciate any advice and information you can provide.

Thank you,

Khesha Reed

Deputy Director

Standards and Health Division

Office of Science and Technology, Office of Water

202-566-0594