

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

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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



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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

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--

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](#)

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

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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

Darin Cote <darin.cote@nara.gov>
To: Laurence Brewer <laurence.brewer@nara.gov>

Fri, Aug 7, 2020 at 1:30 PM

Laurence,

Here's the email string from Pamela (through Lisa) that I received this week.

Let me know if you need anything else.

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)



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

From: **Lisa Haralampus** <lisa.haralampus@nara.gov>
Date: Tue, Aug 4, 2020 at 12:43 PM
Subject: New EPA Emergency Destruction of Records??
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 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) [Redacted]

2. (b) (5) [Redacted]

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 Najjar-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, 301-974-4592 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



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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 FMSSD 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



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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



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--

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](#)

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

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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

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>

Thanks Darin!

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 Fri, Aug 7, 2020 at 8:58 AM Darin Cote <darin.cote@nara.gov> wrote:

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.

I skirted around the 'Can the records be transferred to NARA directly after recovery?' since depending on which FRC they'd be going to and where the treatment facility is it might save time and expense. But that needs agreement of the FRC, taking responsibility, etc. And cost savings would be better if the treatment facility is in the same region as the FRC.

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 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 Najjar-Simpson** <pamela.najjar-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: 301-974-4592
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) [Redacted]

2. (b) (5) [Redacted]

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

(b) (5)

Regards,

Pamela

Pamela Najjar-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)

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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 Najjar-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 Najjar-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 Najjar-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

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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

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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)

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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.

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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

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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](#)

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Anne Mason, CA

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

Archives Specialist

301-837-3502

marianne.mason@nara.gov

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