

# National Archives and Records Administration

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**NARA 1310**  
September 6, 2000

**SUBJECT:** Review of Agency Records Storage Facilities

**TO:** Office Heads, Staff Directors, ISOO, NHPRC, OIG  
NAS, NWM, NWML, NR field units

**Purpose of this transmittal memo.** This transmits a new policy directive establishing the internal NARA procedures for ensuring the compliance of Federal agency records storage facilities with NARA regulations in 36 CFR part 1228, subpart K.

JOHN W. CARLIN  
Archivist of the United States

Attachment

# National Archives and Records Administration

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**SUBJECT:** Review of Agency Records Storage Facilities

## **1310.1 What is the purpose of this directive?**

This directive establishes internal NARA procedures for ensuring the compliance of Federal agency records storage facilities with NARA regulations in 36 CFR part 1228, subpart K.

## **1310.2 What is the authority for this directive?**

a. NARA is authorized to:

(1) Establish, maintain, and operate records centers for Federal agencies under 44 U.S.C. 2907;

(2) Approve agency records centers under 44 U.S.C. 3103; and

(3) Promulgate standards, procedures, and guidelines to Federal agencies with respect to the storage of their records in commercial records storage facilities (see 44 U.S.C. 2104(a), 2904 and 3102).

b. NARA regulations in 36 CFR part 1228, subpart K, specify the facility standards and approval processes that apply to all records storage facilities Federal agencies use to store, service, and dispose of their records.

## **1310.3 Definitions.**

As used in this directive:

- a. ***Agency records center*** means a records center not operated by NARA that is
- established and operated by a Federal agency for its own records and/or the records of other Federal agencies, or
  - Federally owned and contractor-operated.

b. ***Commercial records storage facility*** means a private sector commercial facility that offers records storage, retrieval, and disposition services.

c. ***Existing facility*** means a records storage facility used to store records on January 2, 2000, and that has stored records continuously since that date.

d. ***NARA records center*** means a records center operated by NARA, including the Washington National Records Center and the National Personnel Records Center.

e. ***New facility*** means a records storage facility established or converted for use as a records center or commercial records storage facility on or after January 3, 2000.

f. **Records storage facility** means a NARA records center, an agency records center, or a commercial records storage facility.

g. **Subpart K** means 36 CFR part 1228, subpart K, including any appendixes to the subpart.

#### **1310 .4 Responsibilities**

a. The Space and Security Management Division (NAS) is responsible for:

- (1) Facility inspections and documentation reviews for records storage facilities;
- (2) Approval or denial of waivers of NARA facility standards and alternative fire detection and suppression systems, consulting with appropriate industry standards body or other qualified expert(s) as needed to determine the adequacy of proposed alternatives to published NARA standards;
- (3) Maintaining the central registry of records storage facilities used to store Federal records;
- (4) Approving agency plans to bring noncompliant agency records centers into compliance;
- (5) Confirming that an agency has removed its records from a noncompliant records storage facility within the time limits specified in 36 CFR 1222.50(c)(3); and
- (6) Notifying an agency when NARA learns that the agency is using a records storage facility without obtaining NARA approval (see par. 1310.12).

b. The Life Cycle Management Division (NWML) is responsible for notifying NAS:

- (1) When an agency submits a records schedule for unscheduled records that will be stored in an agency records center or commercial records storage facility;
- (2) If it learns that an agency is storing records in a facility not listed as approved on the NAS central registry of records storage facilities; and
- (3) If it observes obvious noncompliances with subpart K in a records storage facility when staff visit the facility to review records as part of processing a records disposition request or while conducting an agency evaluation or technical assistance project.

c. The Modern Records Programs (NWM) is responsible for reviewing agency documentation for permanent records stored in off-site facilities compiled in accordance with 36 CFR 1228.154(c) and providing copies to other Office of Records Services – Washington, DC (NW) and Office of Regional Records Services (NR) units with an interest in the information.

d. The regional records management program in the Office of Regional Records Services (NR) is responsible for notifying NAS:

(1) If it learns that a regional office of an agency is storing records in a facility not listed as approved on the NAS central registry of records storage facilities; and

(2) If it observes obvious noncompliances with subpart K in a records storage facility when staff visit the facility to review records as part of processing a records disposition request or while conducting an agency evaluation or technical assistance project.

e. The Records Center Program Manager (NR) is responsible for notifying:

(1) NAS and NWML (and the regional records management program for actions involving a regional office) whenever an agency announces its intention to withdraw its holdings from a NARA records center or no longer regularly transfers additional records to a NARA records center; and

(2) NAS if it learns that an agency is storing records in a facility not listed as approved on the NAS central registry of records storage facilities.

**1310.5 What is the central registry of records storage facilities and how is it updated?**

The files described in pars. 1310.5a through 1310.5e comprise the central registry of records storage facilities reviewed by NAS. NAS modifies the registry as facilities are approved or disapproved. NAS provides a current report of approved records storage facilities (see par. 1310.5a) to NWML and NR each quarter, and notifies those offices of updates to the database whenever additional facilities are approved or removed from the approved facility database. NAS also updates the web listing of approved records storage facilities (see par. 1310.5b) within 5 workdays of approving a facility or removing a facility from the approved list.

a. NAS maintains a database and generates a quarterly report that includes the following elements for each approved records storage facility:

(1) Name and address of the facility;

(2) Date approved by NAS, if a NARA records center or agency records center, or date NAS completed its review of an agency's certification of compliance for a commercial facility;

(3) Agency(ies) that have obtained NARA approval (agency records center) or submitted certifications of compliance (commercial storage facility) for this facility and the name and address of the agency contact (NAS does not maintain this information on agencies that use a NARA records center);

(4) Waivers granted, if any; and

(5) Compliance requirements that will take effect October 1, 2009, that the

facility does not currently meet, if any.

b. NAS maintains a web page on the Records Management home page of the NARA public web site that includes the following elements for each approved records storage facility:

(1) Name and address of the facility, and

(2) Date approved by NAS, if a NARA records center or agency records center, or date NAS completed its review of an agency's certification of compliance for a commercial facility.

c. NAS maintains a case file for each approved records storage facility that contains:

(1) The agency request for approval and any documentation submitted with that request;

(2) A copy of the completed NAS checklist (see Appendix A);

(3) The official file copy of any correspondence relating to review of a waiver or alternative fire detection and suppression system; and

(4) The official file copy of NAS's approval letter to the agency.

d. NAS maintains an electronic list of records storage facilities for which NARA approval has been withdrawn or that did not receive NARA approval because of documented noncompliance with a facility requirement in 36 CFR part 1228, subpart K. This information is not maintained as part of the database or web page listing described in subpars. a and b. NAS maintains the supporting documentation for each disapproved facility in a separate case file.

e. NAS maintains a file on each fire detection and suppression system that NAS has certified as compliant with 36 CFR 1228.230(s). The file contains either

- the report of the results of independent live fire testing, or
- the report of the results of computer modeling and certification required by 36 CFR 1228.242(a)(3).

### **1310.6 What types of facility reviews does NAS perform?**

NAS performs the following types of records storage facility reviews:

a. Reviews of subpart K compliance – NAS reviews documentation and/or inspects records storage facilities to assess their compliance with the requirements in 36 CFR 1228.228 through 1228.234. Paragraph 1310.8 specifies how NAS conducts the review for agency and NARA records centers. Paragraph 1310.10 specifies how NAS conducts this review for commercial storage facilities.

b. Reviews of waiver requests – NAS reviews documentation submitted with requests for waivers from specific requirements in subpart K to determine whether to approve an exception to a standard in subpart K for:

(1) Systems, methods, or devices that are demonstrated to have equivalent or superior quality, strength, fire resistance, effectiveness, durability, and safety to those prescribed by this subpart (“equivalent or superior alternative”);

(2) Existing agency records centers that met the previous NARA standards in effect on January 2, 2000, but that do not meet a new standard required to be in place on January 3, 2000;

(3) The application of roof requirements in 36 CFR 1228.228 and 1228.230 to underground storage facilities; or

(4) Conflicts between NARA standards and either local/regional building codes or mandatory 30 CFR chapter I life-safety/ventilation requirements for underground storage facilities.

c. Reviews of plans to bring noncompliant agency records centers into compliance -- Under 36 CFR 1228.240(c)(2) and (d), NAS reviews plans submitted by agencies to bring unapproved existing agency records centers into compliance with current subpart K requirements.

### **1310.7 What are the time limits for NAS action?**

a. For reviews of subpart K compliance and reviews of plans to bring noncompliant agency records centers into compliance, NAS must respond to the agency with an approval or disapproval within 45 calendar days after receiving the request. This time limit may be extended if:

(1) Complete supporting documentation is not provided with the request (the 45-day time limit starts when the complete documentation is received);

(2) NAS must consult an industry standards body or qualified expert to determine whether the supporting documentation demonstrates compliance with 36 CFR 1228.230(s) (the time limit is extended to 75 days);

(3) NAS is not able to schedule an inspection of the facility within the first 30 days (NAS must complete the review within 15 days after the inspection is held); or

(4) The agency is also requesting a waiver from a subpart K requirement (see par. 1310.7b for the number of days that are added to the 45-day time limit).

b. For reviews of waiver requests, NAS must respond to the agency within the following time limits:

Type of waiver request	Time limits (calendar days)
Equivalent or superior alternative to NARA requirement	30 days (Initial notification if NARA must consult an industry standards body or qualified expert.) 60 days (Final determination if consultation is needed.)
Existing approved agency records center does not meet new standard	30 days (NAS may grant a short-term temporary waiver of up to 180 days if the agency's plan must be revised before NARA approval.)
Roof requirements for underground storage facilities	10 days (unless the agency has also requested another waiver)
Code conflicts	30 days

### 1310.8 How does NAS inspect NARA records centers and agency records centers for compliance with subpart K?

a. NAS will complete a baseline inspection of all existing NARA records center facilities by September 30, 2000. The baseline inspection will be an onsite inspection by an NAS inspection team including a professional engineer contractor, using the facility checklist.

b. NAS conducts an initial inspection of existing agency records centers as follows. An inspection team from NAS (General Engineer and another member of NAS with experience in fire safety) or a professional engineering firm on contract to NAS physically inspects the facility using the facility checklist in Appendix A. The facility director or designated representative signs the facility checklist and may provide a statement of disagreement or clarifications to the checklist findings. The inspection team or contractor informally discusses its findings with the agency before the end of the inspection visit. The completed checklist and any supplementary notes on corrective action that must be taken to bring the facility into compliance with subpart K serve as the inspection report. The Director, NAS reviews the inspection report and determines whether to approve the facility or to require corrective action before granting approval. NAS may issue a conditional approval that allows use of the facility while corrective actions are being made if there is no immediate danger to the records to be stored in the facility.

c. NAS reviews the 100% construction drawings and specifications and proposed shelving plan for new NARA records centers and agency records centers. If this review confirms design compliance, NAS grants conditional approval. NAS inspects new NARA records centers upon completion of construction or renovation. Upon completion of construction of an agency records center, the agency must either submit an Architect and Engineer (A&E) certification that the facility was in fact constructed in accordance with the approved design documents or request a NAS inspection. If the review of the A&E certifications demonstrates full compliance, NAS issues final approval. If the agency prefers an onsite inspection, the inspection must be in accordance with subpar. b.

d. NAS conducts a full onsite physical inspection of each approved agency records

center and NARA records center every 10 years or within 6 months after NAS is notified that a material change in the center has occurred. For approved facilities that must be modified to comply with roof, piping, or environmental control requirements that become effective October 1, 2009, NAS conducts an onsite physical inspection of the facility no later than March 31, 2010, to verify that the facility is in compliance with those phased-in requirements.

### **1310.9 What documentation is required to assure compliance of commercial facilities with subpart K?**

The agency must submit:

a. A copy of the contract incorporating (in mandatory terms) subpart K or a certification of compliance signed by the agency records officer. The GSA multiple award schedule for records centers (MAS) contract currently does not meet this requirement.

b. A description of the fire suppression system. If the facility is not listed as approved in the NAS central registry of records storage facilities, NAS also requires one of the following forms of documentation:

(1) Appendix B systems: The agency must submit a statement signed by a responsible official (i.e., Records Officer or agency Safety Officer) that the system complies fully with a system described in Appendix B of 36 CFR 1228, subpart K. NAS inspects the system during the first three years after NARA approval.

(2) Tested systems: The agency must submit a report from the testing lab, which may be accompanied by an additional report from a Fire Protection Engineer (FPE). NAS reviews the report(s). If the test clearly shows less than 300 cubic feet of records destroyed, NAS approves the system. If the report does not clearly distinguish between "involved" and "destroyed," NAS may seek additional clarification. If tests show clear failure, NAS does not approve the facility.

(3) Modeling/certification by FPE: The agency submits a full report of modeling, FPE's report, and certification. NAS verifies the FPE's status by means of a computer check of the FPE's registration. NAS reviews the modeling for completeness, compliance with ANSI standards, etc. NAS consults with the FPE that conducted the modeling if there are any questions about the certification. If NAS still has questions, NAS consults with the appropriate industry standards body or other qualified expert before approving or disapproving the system.

(4) Copy of previously approved system: The agency submits a certification from a responsible agency official (agency Records Officer or Safety Officer) that the system is an exact copy of a previously approved system.

c. A description of the security system.

d. A description of the shelving arrangement (height, whether pallets are used, etc.).

e. A description of the environmental controls and the type(s) of records to be stored.



For new facilities, this information must be provided for all records. For existing facilities, until October 1, 2009, the agency must provide the information only if nontextual permanent records will be stored in the facility. After September 30, 2009, agencies must provide the information for all facilities and records.

**1310.10 How does NAS review agency documentation for commercial records storage facilities?**

NAS registers the request on the date received in NAS. Within 15 calendar days, NAS reviews the name and address of the facility against the NAS central registry of records storage facilities for approved and noncompliant facilities, and verifies that the documentation contains the information specified in par. 1310.9.

a. If the facility is on the approved list, NAS notifies the agency in writing that the facility is compliant. If the facility appears on the list of noncompliant facilities, NAS notifies the agency that we have previously found the facility to be noncompliant in specific areas. NAS asks the agency to confirm in writing to NAS within 30 days that nonconformances have been corrected. NAS sends the notification within 2 workdays after the review is complete.

b. If the facility is not on either list, NAS reviews the documentation submitted with the request to ensure that the documentation specifies compliance with subpart K. Par. 1310.9 specifies the content of the required documentation. NAS also reviews any other readily available information about the facility (e.g., whether it is an underground facility). NAS completes its review and notifies the agency in writing within 45 calendar days of the approval of the facility or of the areas in which the facility appears to be not in compliance with subpart K. If the documentation is incomplete (e.g., there is no description of the fire suppression system, security system, or shelving arrangement), NAS asks the agency to correct the deficiencies so that NARA can complete its review.

**1310.11 How does NAS process requests for waivers made under 36 CFR 1228.236?**

a. Code conflicts.

(1) Agency documentation must contain:

(a) A concise explanation of the conflict;

(b) Citation to the code in conflict (if not available from normal sources or on the Internet, NARA may request a copy of the code document); and

(c) Either a demonstration that the code in conflict is more stringent or a demonstration that the conflicting code is mandatory and cannot be reconciled with the NARA requirement (e.g., letter from the authority having jurisdiction [building inspector, fire marshal, etc.]).

(2) NAS review:

(a) If the claim is that the conflicting code is mandatory, NAS reviews to ensure that the documentation is complete and supports the claim. If the documentation is incomplete, NAS sends a letter to the agency within 5 workdays requesting the missing information. If NAS has questions about the claim, NAS reviews the code in conflict and may consult with a professional engineer licensed in that State for review of the provisions, especially with regard to lack of flexibility in the local code.

(b) If the claim is that the conflicting code is more stringent, NAS reviews the claim in accordance with par. 1310.11b(2).

b. Equal or superior protection.

(1) Agency documentation must contain:

(a) A concise explanation of the alternative, including why the requester feels the alternative provides equal or superior protection; and

(b) Supporting documentation in one of the following forms:

- A testing report,
- A Fire Protection Engineer's report, or
- The agency Safety Officer's written determination.

(2) NAS reviews the testing results or other documentation for compliance with ANSI or other appropriate standards. If the documentation is incomplete, NAS sends a letter to the agency within 5 workdays requesting the missing information. If NAS has questions about the claim, NAS requests outside expert review.

c. Grandfather claims.

(1) Agency documentation must contain:

(a) Concise statement of how the facility met the previous requirements, but does not meet the new regulations (most likely to involve environmental controls or pest management), and

(b) Action plan with milestones, funding requirements, and a description of how the corrections will be funded. (The action plan must provide for correction to be completed within three years.)

(2) NAS reviews the documentation. If all required elements are present and the action plan appears feasible, NAS approves the waiver. If the documentation is incomplete or the description of the corrective action is not sufficiently detailed, NAS sends a letter to the agency within 5 workdays requesting the missing information. If the corrective action is not scheduled for completion within three years, NAS denies the waiver request.

d. Waivers of roof-related requirements for underground facilities.

(1) The agency documentation must include a description of the facility (drift or shaft) and its location.

(2) NAS reviews the documentation. If complete, NAS approves the waiver. If the documentation is incomplete, NAS sends a letter to the agency within 5 workdays requesting the missing information.

**1310.12 How does NAS handle notifications that an agency is storing records in an unapproved facility?**

a. When NWML or NR notify NAS that an agency intends to store, or is storing, records in a facility that is not on the list of approved records storage facilities, NAS sends a letter to the agency records officer reminding the agency of the approval requirements in 36 CFR 1228.240. The letter asks the records officer to submit the approval request within 45 calendar days or to contact NAS before that date to establish a later submission date.

b. If the agency records officer does not respond to the NAS letter within 55 calendar days, NAS prepares a letter to the head of the agency for the Archivist's signature. The letter informs the agency head that the agency has not complied with 36 CFR 1228.240 and that the agency must either take steps immediately to remove its records from the facility or submit the approval request.

c. NAS copies NWML and NR on all correspondence.

**1310.13 How does NAS monitor agency removal of records from noncompliant facilities?**

a. Under 36 CFR 1222.50(c)(3), agencies are responsible for initiating action to remove records from space that does not meet the standards if deficiencies are not corrected within 6 months after initial discovery of the deficiencies by NARA or the agency. Agencies must complete removal of the records within 18 months after initial discovery of the deficiencies.

b. If NAS discovers, on its own or through notification by an agency, deficiencies that render a records storage facility noncompliant, NAS promptly notifies the records officer in each agency that stores records in that facility, copying NWML and NR on the letter. The NAS notification letter informs the agency(ies) that the agency must provide, within 6 months of the date of the letter, either documentation to NAS that the deficiency has been corrected or the agency's plan to remove the records from the facility. A plan to remove the records must be started no later than 6 months of the date of the letter and scheduled for completion within 18 months of the date of the NAS letter. The agency may send the removal plan, initial removal notification, and notification that all records have been removed via letter or email to NAS.

c. NAS establishes a tickler file for each noncompliant facility. NAS reminds the agency records officer(s) one month in advance of the due dates to provide documentation, a removal plan, or removal notifications. If NAS does not receive the required material within 10

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workdays after the due date, NAS follows up with the records officer by telephone or email. If NAS still does not receive the required material or a request for a reasonable extension within 20 workdays of the original due date, NAS prepares a letter to the agency head for the Archivist's signature. The letter informs the agency head that the agency's records are stored in a noncompliant facility and what steps the agency must complete.

d. NAS copies NWML and NR on all correspondence. NAS informs NWML and NR of actions taken.

**Appendix A**

Facility Standards for Records Storage Facilities Inspection Checklist	
Agency:	
Facility:	Common Name: _____
	Street Address _____
	City, State & Zip _____
Facility Director or Representative:	I participated in the inspection and provided truthful information. _____ <<Typed name>> _____ Date <<Typed Title>> <input type="checkbox"/> Comments explaining or disagreeing with inspection findings are attached.
Inspector:	_____ <<Typed name>> _____ Date <<Typed Title>>
Facility Description:	

Compliance with 36 CFR 1228.228 Facility Requirements				
§1228.228 paragraph:	Requirement	OK	No	Other
(a)	The facility must be constructed with non-combustible materials and building elements, including walls, columns, and floors. (Waiver available)			
(b)	A facility with two or more stories must be designed or certified by a licensed fire protection engineer and civil/structural engineer to avoid catastrophic failure of the structure due to an uncontrolled fire on one of the intermediate levels.			
(c)	The building must be sited a minimum of five feet above and 100 feet from any 100 year flood plain areas, or be protected by an appropriate flood wall (see FEMA flood maps)			

<b>Compliance with 36 CFR 1228.228 Facility Requirements</b>				
<b>§1228.228 paragraph:</b>	<b>Requirement</b>	<b>OK</b>	<b>No</b>	<b>Other</b>
(d)	The facility must be designed in accordance with regional building codes to provide protection from building collapse or failure of essential equipment from earthquake hazards, tornadoes, hurricanes, and other natural disasters.			
(e)	Roads, fire lanes, and parking areas must permit unrestricted access for emergency vehicles.			
(f)	A floor load limit must be established for the records storage area by a licensed structural engineer. ... The allowable load limit must be posted in a conspicuous place and must not be exceeded.			
(g)	The facility must ensure that the roof membrane does not permit water to penetrate the roof. (New buildings: effective 1/3/2000; existing buildings: effective 10/1/2009)			
(h)	Piping (with the exception of sprinkler piping and storm water roof drainage piping) must not be run through the records storage area unless supplemental measures ... are used to prevent water leaks ... . (New buildings: effective 1/3/2000; existing buildings: effective 10/1/2009)			
(i)(1)	All storage shelving must be designed and installed to provide seismic bracing that meets the requirements of applicable regional building code.			
(i)(2)	Open-shelf records storage equipment must be braced to prevent collapse under full load. Each shelving unit must be industrial style shelving rated at least 50 lbs per cubic foot supported by the shelf.			
(i)(3)	Compact shelving, if used, must be designed to permit proper air circulation and fire protection ...			
(j)	The records storage area must be equipped with an anti-intrusion alarm system ... meeting the requirements of UL 1076, Proprietary Burglar Alarm Units and Systems (level AA) .... The alarm system must be monitored in accordance with UL 611, Central Station Burglar Alarm Systems.			
(k)	The facility must comply with the requirements for a Level III facility. (Appendix A -- see separate checklist)			
(l)	Records contaminated by hazardous materials ... must be stored in separate areas having separate air handling systems from other records.			
(m)	The facility must have an Integrated Pest Management program.			

<b>Compliance with 36 CFR 1228.228 Facility Requirements</b>				
<b>§1228.228 paragraph:</b>	<b>Requirement</b>	<b>OK</b>	<b>No</b>	<b>Other</b>
(n)	The following additional requirements apply only to new facilities: (1) No mechanical equipment containing motors in excess of 1 HP within records storage areas. (2) No high-voltage electrical distribution equipment (i.e., 13.2kva or higher) in records storage areas. (3) A redundant source of primary electrical service ... should be provided ... . Manual switching between sources of service is acceptable. (See text in rule; applies to HVAC, fire and security alarms.) (4) [HVAC system must reduce exterior air contamination entering the stacks] (see text in rule).			

<b>Compliance with 36 CFR 1228.230 Fire Safety Requirements</b>				
<b>§1228.230 paragraph:</b>	<b>Requirement</b>	<b>OK</b>	<b>No</b>	<b>Other</b>
(a)	The fire detection and protection system must be designed or certified by a licensed fire protection engineer.			
(b)(1)	All walls separating records storage areas from each other and from storage areas within the building must be 4-hour fire resistant.			
(b)(2)	The quantity of Federal records stored in a single fire compartment shall not exceed 250,000 cubic feet.			
(c)(1)	For existing records storage facilities, at least 1-hour rated fire barrier walls must be provided between the records storage area(s) and other auxiliary spaces.			
(c)(2)(a)	For new records storage facility, 2-hour-rated fire barrier walls must be provided between the records storage area(s) and other auxiliary spaces.			
(c)(2)(b)	For new facilities, at least one exterior wall of each stack area must be designed with a maximum fire resistive rating of one-hour, or, if rated more than one-hour, there must be at least one knock-out panel in one exterior wall of each stack.			
(d)	Penetrations in the walls must not reduce the specified fire resistance ratings.			
(e)(1)	The fire resistive rating of the roof must be a minimum of ½ hour.			
(e)(2)	For new records storage facilities, the fire resistive rating of the roof must also be a maximum of one hour.			

<b>Compliance with 36 CFR 1228.230 Fire Safety Requirements</b>				
<b>§1228.230 paragraph:</b>	<b>Requirement</b>	<b>OK</b>	<b>No</b>	<b>Other</b>
(f)	Openings in fire barrier walls must be protected by self-closing or automatic Class A fire doors, or equivalent doors that maintain the same rating as the wall.			
(g)	Roof support structures that cross or penetrate fire barrier walls must be cut and independently supported on each side of the fire barrier wall.			
(h)	If fire barrier walls are erected with expansion joints, the joints must be protected to their full height.			
(i)(1)	For new records storage facilities, building columns in records storage areas must be 4-hour resistant from the floor to slab above or to the location where they connect to the roof framing system.			
(i)(2)	For existing records storage facilities, the building columns must be at least 2-hour resistant.			
(j)(1)	Automatic roof vents for routine ventilation purposes must not be designed into new records storage facilities.			
(j)(2)	Automatic roof vents, designed solely to vent in the case of a fire, with a temperature rating of at least twice that of the sprinkler heads are acceptable.			
(k)	Where lightweight steel roof or floor supporting members are present, they must be protected either by applying a 10-minute fire resistive coating to the top chords of the joists, or by retrofitting the sprinkler system with large drop sprinkler heads. (see rule text)			
(l)	No open flame (oil or gas) unit heaters or equipment may be installed or used in any records storage area.			
(m)	For existing records storage facilities, boiler rooms or rooms containing equipment operating with a fuel supply ... must be separated from records storage areas by a 2-hour rated fire barrier wall with no openings directly from those rooms to the records storage area(s). Such areas must be vented directly outside to a location where fumes will not be drawn back into the facility.			
(n)	For new records storage facilities, boiler rooms or rooms containing equipment operating with a fuel supply ... must be separated from records storage areas by a 4-hour rated fire barrier wall with no openings directly from those rooms to the records storage area(s). Such areas must be vented directly outside to a location where fumes will not be drawn back into the facility.			
(o)	For new records storage facilities, fuel supply lines must not be installed in areas containing records, and must be separated from such areas with 4-hour-rated construction.			



Compliance with 36 CFR 1228.230 Fire Safety Requirements				
§1228.230 paragraph:	Requirement	OK	No	Other
(p)	Equipment rows running perpendicular to the wall must comply with NFPA 101 Life Safety Code, with respect to egress requirements.			
(q)(1)	No oil-type transformers, except thermally protected devices included in light ballasts, may be installed in records storage areas.			
(q)(2)	All electrical wiring must be in metal conduit, except that armored cable may be used where flexible wiring connections to light fixtures are required			
(q)(3)	Battery charging areas for electric forklifts must be separated from records storage areas with at least a 2-hour rated fire barrier wall.			
(r)	Hazardous materials ... must not be stored in records storage areas.			
(s)	All records storage and adjoining areas must be protected by a professionally designed fire-safety detection and suppression system that is designed to limit the maximum anticipated loss from any single fire event to a maximum of 300 cubic feet of records destroyed.  For systems in accordance with App. B, attach check-list. For other designs, see § 1228.242 for documentation requirements.			

Compliance with 36 CFR 1228.232, Environmental Control Requirements				
§1228.232 Paragraph:	Requirement	OK	No	Other
(a)	Paper-based temporary records must be stored under environmental conditions that prevent the active growth of mold. (See rule text)			
(b)	Nontextual temporary records, including microforms and audiovisual and electronic records, must be stored in records storage space that will ensure their preservation for their full retention period. (See rule text)			
(c)	Paper-based permanent, unscheduled, and sample/select records must be stored in records storage space that provides 24 hour/365 days per year air conditioning equivalent to that required for office space. (See rule text) Effective date: New facilities, 1/3/2000; existing facilities 10/1/2009			
(d)	Nontextual permanent, unscheduled and/or sample/select records: see parts 1230, 1232, and/or 1234 of 36 CFR Chapter XII.			





Compliance with 36 CFR Part 1228 Appendix B (Complete this section ONLY if the facility claims to be using the system described in Appendix B)				
Paragraph	Requirement	OK	No	Part
2a.	The records storage height must not exceed the nominal 15 feet (+/-3 inches) records storage height.			
2b.	All records storage and adjoining areas must be protected by automatic wet pipe sprinklers.			
2c.	1. The sprinkler system must be rated at no higher than 285 degrees Fahrenheit utilizing quick response (QR) fire sprinkler heads.			
	2. The sprinkler system must be designed by a licensed fire protection engineer to provide the specified density for the most remote 1,500 square feet of floor area at the most remote sprinkler head in accordance with NFPA 13 (1996), Standard for the Installation of Sprinkler Systems.			
	3. Installation of the sprinkler system must be in accordance with NFPA 13 (1996), Standard for the Installation of Sprinkler Systems.			
	4. Contractor's Material and Test Certificates per NFPA 13 chapter 8.			
	5. Hydraulic Calculations.			
2d.	1. Maximum spacing of the sprinkler heads must be on a 10-foot grid.			
	2. The positioning of the heads must provide complete, unobstructed coverage, with a clearance of not less than 18 inches, but not more than 60 inches, from the top of the highest stored materials.			
2e.	The sprinkler system must be equipped with a water-flow alarm connected to a continuously staffed fire department or central station, with responsibility for immediate response.			
2f.	1. A manual fire alarm system must be provided with central station services or other automatic means of notifying the municipal fire department.			

Compliance with 36 CFR Part 1228 Appendix B (Complete this section ONLY if the facility claims to be using the system described in Appendix B)				
Paragraph	Requirement	OK	No	Part
	2. A manual alarm pull station must be located adjacent to each exit.			
2g.	All water cutoff valves in the sprinkler system must be equipped with automatic closure alarm connected to a continuously staffed station, with responsibility for immediate response.			
2h.	A dependable water supply free of interruption must be provided. This normally requires a backup supply system having sufficient pressure and capacity to meet both fire hose and sprinkler requirements for 2 hours.			
2i.	Interior stand-pipe stations equipped with 1 ½ inch diameter hose may be provided in the records storage areas if required by the local fire department, enabling any point in the records storage area to be reached by a 50-foot hose stream from a 100-foot hose lay. If hose is provided, the cabinets must be marked "For Fire Department Use Only."			
2j.	Where fire hose cabinets are not required, stand-pipes must be provided at each floor landing in the building core or stair shaft. Hose outlets must have easily removable adapter and cap. Threads and valves must be compatible with the local fire department's equipment. Spacing must be so that any point in the records storage area can be reached with a 50-foot hose stream from a 100-foot hose lay.			
2k.	In addition to the designated sprinkler flow demand, 500 gpm must be provided for hose stream demand. The hose stream demand must be calculated into the system at the base of the main sprinkler riser.			
	1. Fire hydrants must be located within 250 feet of each exterior entrance or other access to the records center that could be used by fire-fighters.			

Compliance with 36 CFR Part 1228 Appendix B (Complete this section ONLY if the facility claims to be using the system described in Appendix B)				
Paragraph	Requirement	OK	No	Part
2l.	2. All hydrants must be at least 50 feet away from the building walls and adjacent to a roadway usable by fire apparatus. Fire hydrants must have at least two 2-½ inch hose outlets and a pumper connection. All threads must be compatible with local standards.			
2m.	Portable water-type fire extinguishers (2½ gallon stored-pressure type) must be provided at each fire alarm striking station (see also NFPA 10).			
2n.	1. Where provided, the walking surface of the catwalks must be of expanded metal at least 0.09-inch thickness with a 2-inch mesh length. The surface opening ratio must be equal or greater than 0.75.			
	2. The sprinkler water demand for protection over bays with catwalks where records are not oriented perpendicular to the aisles must be calculated to give 0.3 gpm per square foot for the most remote 2,000 square feet.			

