National Archives and Records Administration

Transmittal Memo

DATE: August 2, 2011

TO: Executives, Staff Directors, NHPRC, and OIG

SUBJECT: NARA 1562, Integrated Pest Management (IPM) Requirements for NARA Holdings

Purpose: This directive and its supplement establish requirements for a written Integrated Pest Management (IPM) Plan to discourage pest infestations in holding areas at all NARA facilities. The IPM Plan also guides response to pest infestations in any area where holdings are present or to the actual infestation of holdings.

Background/significant changes: IPM Plans for NARA Holdings work with the Integrated Pest Management Program required for federal buildings. The IPM Plan focuses on protecting holdings; in order to achieve this, the building needs a successful IPM program.

Available forms:

- NA 6064, IPM After-Action Report: Pest Infestation in a Holdings Area
- NA 6065, IPM After-Action Report: Pest Infestation of Holdings
- NA 6066, Integrated Pest Management Trap Inspection

Canceled policy: None.

Canceled forms: None.

Effective date: This directive is effective date of signature. The requirements in this directive must be addressed when a facility contract is negotiated or re-negotiated, but no later than 2016.

National Archives and Records Administration

Contact information: For questions on this directive, please contact Doris Hamburg, Preservation Programs, at (301) 837-1785 or <u>by email</u>.

DAVID S. FERRIERO Archivist of the United States

Attachments

SUBJECT: Integrated Pest Management (IPM) Requirements for NARA Holdings

1562.1 What is the purpose of this directive?

This directive establishes requirements for a written Integrated Pest Management (IPM) Plan to discourage pest infestations in holding areas at all NARA facilities. The IPM Plan also guides response to pest infestations in any area where holdings are present or to the actual infestation of holdings. Integrated Pest Management Plans for NARA Holdings work with the Integrated Pest Management Program required for federal buildings. The IPM Plan focuses on protecting holdings; in order to achieve this, the building needs a successful IPM program.

1562.2 What is the authority for this directive?

- a. 44 U.S.C. 2109, which makes the Archivist of the United States responsible for the preservation of records or other documentary material transferred to the Archivist's legal custody.
- b. 36 CFR 1232.12 indicates what records can be stored in a records storage facility and the conditions that apply.
- c. 36 CFR 1234.10(m) requires federal record storage facilities to have Integrated Pest Management Programs.
- d. General Services Administration's Federal Management Regulation (41 CFR 102-74.35) requires Executive Agencies to implement an IPM program.

1562.3 What is the effective date of this directive?

This directive is effective date of signature. The requirements in this directive must be addressed when the facility contract is negotiated or re-negotiated, but no later than 2016.

1562.4 Related Directives

- a. NARA 260, Food and Drink Near Archival and Records Center Holdings
- b. NARA 1571, Archival Storage Standards
- c. Supplement to NARA 1571

1562.5 What holdings are covered by this directive?

- a. Federal records and donated historical materials transferred to NARA's legal or physical custody, including records of other agencies that are stored in NARA record centers;
- b. Presidential records and artifacts in NARA's legal or physical custody; and
- c. Supreme Court records, records of Congress, and records of the Architect of the Capitol that have been deposited in NARA's physical custody.

1562.6 To which facilities does this directive apply?

This directive applies to all facilities that NARA occupies including;

- a. NARA-owned or leased facilities;
- b. GSA-owned or leased facilities used by NARA;
- c. Presidential libraries acquired by agreement in accordance with 44 U.S.C. 2112(a)(1)(B)(i); and
- d. Affiliated Archives. Appropriate NARA units ensure that IPM programs at affiliated archives are regularly evaluated for risk to NARA holdings as part of other program evaluations, and that each affiliated archives is made aware when IPM programs do not meet requirements for records protection.

1562.7 Definitions

- a. **Facility manager or NARA facilities management** The program official who is responsible for facility management activities within that building.
- b. **Holdings** Records as defined in 44 U.S.C. 3301 ("books, papers, maps, photographs, machine readable materials, or other documentary materials, regardless of physical form or characteristics"), historical materials as defined in 44 U.S.C. 2101(2), including artifacts, artwork, and other museum holdings, assassination records as defined in 44 U.S.C. 2107 note sec. 3(2), and Presidential records as defined in 44 U.S.C. 2201(2) that are in the physical and/or legal custody of NARA.
- c. **Holdings area** Any area where holdings are housed or accessed including a storage room or area including a loading dock, a temporary sorting or staging space, a designated processing area, research rooms, an exhibit area, or a preservation (conservation, duplication, microfilm, digital imaging) laboratory.
- d. **Holdings storage room** An area containing records that is enclosed by four firewalls, the floor, and the ceiling. Generally a storage area houses records for an extended period of time. The term includes stacks, vaults, Sensitive Compartmented Information Facilities (SCIFs), and artifact storage rooms.

- e. **Infestation** Presence of a target pest or evidence of an increasing number of any pests.
- f. **Integrated Pest Management (IPM)** As defined in 36 CFR 1234 is a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks. The IPM program emphasizes three fundamental elements:
 - (1) Prevention. IPM is a preventive maintenance process that seeks to identify and eliminate potential pest access, shelter, and nourishment. It also continually monitors for pests themselves, so that small infestations do not become large ones;
 - (2) Least-toxic methods. IPM aims to minimize both pesticide use and risk through alternate control techniques and by favoring compounds, formulations, and application methods that present the lowest potential hazard to humans and the environment; and
 - (3) Systems approach. The IPM pest control contract must be effectively coordinated with all other relevant programs that operate in and around a building, including plans and procedures involving design and construction, repairs and alterations, cleaning, waste management, food service, and other activities.
- g. **Pest** Any unwanted and destructive insect, rodent, bird or animal. It excludes mold and fungi.
- h. **Pest trap or trap** A monitoring device that assists with early detection of a wide variety of pests species. Usually constructed of cardboard and coated on the interior with a non-toxic, non-drying sticky substance, but may also use visual lures or chemical attractants called pheromones as bait.
- i. **Target pest** A group of pests that are of particular concern for holdings preservation because they either feed on protein and cellulose materials such as paper, leather, wood, textiles, fur, feathers, horn, or they that use these materials as nesting sites.

1562.8 Responsibilities

- a. **All individuals** are responsible for following procedures outlined in the facility IPM Plan that reduces the possibility of an infestation and for reporting evidence of infestation as established in the facility IPM Plan.
- b. Executives of Agency Services, Research Services and Legislative Archives, Presidential Libraries and Museum Services (or their equivalent) implement policy, procedures and management controls as required by this directive and related directives,

developing specific guidance as needed to address internal operating procedures within the Office programs.

c. Facility manager or NARA facilities management --

- (1) Administers the day-to-day facility management programs;
- (2) Oversees development and implementation of the IPM Plan at their facilities; and
- (3) Ensures that the NARA Safety and Occupational Health Program Manager reviews pesticide use for health and safety issues, and that Preservation Programs reviews use of pesticides in holdings areas for their potential effect on holdings. Custodial units must be informed prior to use of a pesticide in holdings areas.

ci. Custodial units --

- (1) Inspect all materials including holdings and pallets brought into a holdings area; and
- (2) Work with Preservation Programs to develop and implement a treatment plan if holdings are infested.
- cii. **Affiliated Archives Program Liaison** ensures that IPM programs at affiliated archives are regularly evaluated for risk to NARA holdings as part of other program evaluations, and that each affiliated archives is made aware when IPM programs do not meet requirements for records protection.

ciii. Facility and Property Management Division --

- (1) Conducts periodic building condition surveys as outlined in NARA 1571, par. 1571.23, including facility issues involved in implementing the facility IPM program and assists the program offices in establishing and maintaining a system-wide facility improvement and renovation program;
- (2) In coordination with other NARA offices, establishes architectural and design standards for all leased and NARA-owned facilities;
- (3) Furnishes professional and technical advice on the design and construction of archival storage facilities;
- (4) Acts as project manager for archival facility design and construction projects; and

- (5) Assists program offices in including IPM in consolidated facility maintenance contracts.
- g. **NARA Safety and Occupational Health Program Manager** reviews pesticide use for health and safety issues.
- h. **Preservation Programs** conducts an integrated, scientific preservation program including:
 - (1) Develops and recommends long-range preservation plans and policy including IPM Plans for NARA holdings, coordinating with Agency Services, Research Services, and Legislative Archives, Presidential Libraries and Museum Services;
 - (2) Provides technical support and advice for the development, review and implementation of IPM Plans for archival, permanent and temporary holdings in NARA's physical and/ or legal custody;
 - (3) Reviews the application of any pesticide in a holdings area, and approves any treatment of holdings for infestation;
 - (4) Carries out periodic reviews of preservation programs and holdings care at NARA facilities, including implementation of the IPM Plans for holdings;
 - (5) In coordination with other NARA offices, establishes architectural and design standards that require building-wide IPM best practices in all leased and NARA-owned facilities;
 - (6) Reviews the design, construction and renovation of holdings storage facilities for inclusion of IPM best practices to prevent pest infestation in holdings areas; and
 - (7) Monitors environmental conditions of archival facilities and works with facility staff to ensure that maintained environmental conditions discourage pest infestation.

How does NARA's IPM Program control the use of pesticides near or on holdings?

a. The likelihood of an infestation is reduced by blocking the entry of pests with exclusion and inspection techniques and by avoiding the conditions that encourage and support pests through sanitation and cleaning procedures and procedural operational safeguards such as inspection of all materials entering a facility. An active monitoring program allows early detection of a problem before it becomes large-scale.

- b. Use of pesticides around or in a NARA facility is based on need, not a routine schedule.
- c. Application of pesticides is in accordance with all Federal, State and local laws and regulations.
- d. When pesticides are necessary the least toxic formulation is used. Bait formulations and applications of pesticides and rodent control in non-liquid form are preferred.
- e. A Safety and Occupational Health Program Manager reviews the health and safety implications of the use of any pesticide and approves its use prior to application.
- f. Preservation Programs reviews the proposed use of any pesticides in holdings areas or when holdings are present for any adverse effect on the holding and for effectiveness against the targeted pest. Preservation Programs must approve the use of a pesticide in holdings areas or when holdings are present.
- g. Pesticides may never be applied directly to holdings, temporary records, or the boxes or containers that house them. Preservation Programs must be consulted for treatment options such as freeze-thaw cycles or exposure to an anoxic environment and must approve the course of treatment.

1562.10 What are the IPM Program Plan requirements for facility areas that house NARA holdings?

Any facility housing NARA holdings or records in NARA's physical custody must be covered by a written IPM Plan that manages risks to the holdings. The IPM Plan must address holding areas specifically and must be updated annually or after building renovations, changes in responsible staff, or alterations in operational procedures. The IPM Plan must be reviewed by Preservation Programs. The Plan must include the following:

- a. Blocking points of entry for pests by periodic inspection of the facility followed by remediation to seal the building envelop;
- b. Avoidance of infestation by controlling sources of potential nourishment such as water, food, or plants, and implementing operational procedures to discourage infestation;
- c. Inspection of holding shipments, pallets, crates, and storage supplies, coming into the facility, especially those entering holding areas. Inspection of food stocks, office supplies, exhibition production materials and props, and similar non-holdings materials entering the building;
- d. Procedures for maintaining clean and organized holding storage areas and processing rooms and other areas where holdings are present;

- e. Active monitoring for the presence of pests using insect and rodent traps;
- f. Documentation of the monitoring program including what type of traps are used, where traps are located, how often traps are inspected, and the date of inspections with a record of type and number of pests trapped and who inspected the traps. Use NA 6066, *Integrated Pest Management Trap Inspection*, or its equivalent;
- g. Notification procedures in the event of an infestation. Use NA 6065, *IPM After- Action Report: Pest Infestation of Holdings*, or its equivalent;
- h. Procedures for responding to an infestation and for the recovery and treatment of infested holdings and/or pest damage to holdings;
- i. Documentation of the response including the location of any area(s) of chemical application, and the chemical and brand name of the products used. Use NA 6064, *IPM After-Action Report: Pest Infestation in a Holdings Area*, or its equivalent;
- j. Clearly assigned and identified responsibility for all elements of the IPM program; and
- k. Mechanism for staff awareness and training on IPM practices.

1562.11 How are records created by this directive maintained under the NARA records schedule?

The IPM program records created and/or maintained by the functions and activities described in this Directive are currently unscheduled. They may not be destroyed until appropriate disposition instructions have been approved by the Archivist of the United States.