

Facility Standards for Federal Records Storage Facilities

A quick overview of what Federal Records Officers need to know about:

- What the Records Storage Facility Standards cover
- What agencies must do to meet the standards
- How to find NARA guidance on the standards

This overview should be used in conjunction with the Records Storage Facility Standards Toolkit which is available at www.archives.gov/records-mgmt/storage-standards-toolkit or in hard copy by request to scott.birckhead@nara.gov

Version 2.0 August 25, 2008

NARA's Authority under 44 U.S.C.

- **36 CFR §1228 subpart K** applies to all records storage facilities (whether Government owned, leased or contractor operated) that Federal agencies use to store, service, and dispose of their records. It specifies the minimum structural, environmental, property, and life-safety standards that a records storage facility must meet to store Federal records.
- **NARA Facilities**
NARA is authorized under 44 U.S.C. 2907 to establish, maintain, and operate records centers for Federal agencies.
- **Agency Facilities**
NARA authorized under 44 U.S.C. 3103 to approve a records center that is maintained and operated by an agency.
- **Commercial Facilities**
NARA is also authorized to promulgate standards, procedures, and guidelines to Federal agencies with respect to the storage of their records in commercial records storage facilities. (44 U.S.C. 2104a, 2904 and 3102).

What do the Subpart K standards mean to you? (1/2)

- Agencies are responsible for ensuring that records in their legal custody are stored in appropriate space as outlined in 36 CFR 1228 Subpart K
- If the current storage conditions are not in compliance, then the agency is responsible for initiating action to remove records from space that does not meet the Subpart K standards.

What do the Subpart K standards mean to you? (2/2)

- **If your agency stores records in a NARA facility**
 - It is NARA's responsibility to make sure the NARA Records Center facility meets the Subpart K standards (see File 1 of the Toolkit).
- **If your agency stores records in an agency records center or a commercial records storage facility**
 - The agency records officer is responsible for making sure the facility meets the Subpart K standards.
 - The records officer must also submit documentation to NARA (see §1228.240 or Files 2 and 3 of the Toolkit)

§1228.228 Facility Standards

(1/3)

- (a) Must be constructed with non-combustible materials (walls, columns and floors).**
- (b) Multi-story facilities must be designed or reviewed by both a licensed fire protection engineer and a civil/structural engineer.**
- (c) Must be outside of any 100 year flood plain areas.**
- (d) The facility must be designed in accordance with all applicable codes.**
- (e) There must be unrestricted emergency vehicle access provided to the facility.**
- (f) The floor load limit must be established by a structural engineer & posted in facility.**
- (g) The roof system must prevent water from entering the facility. We recommend there not be any roof mounted equipment above records storage areas.**

§1228.228 Facility Standards

(2/3)

- (h) No piping (with the exception of fire protection system piping) through records storage areas.**

- (i) Records Storage and Racking Systems must:**
 - **Provide seismic bracing to meet applicable codes.**
 - **Be designed to prevent collapse under full load.**
 - **If compact mobile shelving is used, there are specific requirements related to air circulation & fire-protection.**

- (j) The records storage area must be equipped with an anti-intrusion alarm system.**

- (k) The design of the facility must meet the requirements of a Level III facility as defined by the U.S. Marshals Service.**

§1228.228 Facility Standards

(3/3)

- (l) Contaminated records must be stored in a separate storage area on a separate HVAC system.**
- (m) The facility must have an integrated pest management program.**
- (n) For new records storage facilities (facilities established or converted after September 28, 2005):**
 - No motors over 1 HP in records storage areas.**
 - No high voltage equipment in records storage areas.**
 - Redundant source of primary power should be provided to insure continuous power.**
 - Positive air pressure for permanent records storage areas.**

§1228.230 Fire Safety Requirements

(1/3)

- (a) Fire detection & suppression designed or reviewed by a licensed fire protection engineer.**
- (b) Three-hour fire barrier walls must be provided between storage areas. No more than 250,000 cubic feet of Federal records per storage area.**
- (c) Two-hour rated fire barrier walls must be provided between records storage areas and auxiliary spaces,**
- (d) All penetrations through fire walls must be sealed with fire stopping material.**
- (e) The roof fire rating must be a minimum ½ hour or protected by fire sprinklers.**
- (f) Doors between records storage areas must be self-closing and have a Class A rating.**

§1228.230 Fire Safety Requirements

(2/3)

- (g) Roof supporting members that cross fire walls must be cut and supported independently on each side of fire barrier.**
- (h) Expansion joints in fire barrier walls must be properly protected.**
- (i) Building columns in records storage areas must be 1 hour fire resistive or protected in accordance with NFPA 13.**
- (j) No automatic roof vents for routine ventilation are allowed in records storage areas. Properly designed roof vents for fire venting are acceptable.**
- (k) Light-weight steel must be protected with 10 minute fire resistant coating or large drop sprinkler heads.**
- (l) Open flame unit heaters or equipment must be installed in accordance with NFPA 54 and the Uniform Mechanical Code.**
- (m) Existing facilities – two-hour fire barrier wall separation with no openings between records storage areas and boiler rooms or rooms with fuel supplies (generator rooms).**

§1228.230 Fire Safety Requirements

(3/3)

- (n) New facilities – four- hour fire barrier wall separation with no openings between records storage areas and boiler rooms or rooms with fuel supplies (generator rooms).**
- (o) New facilities - fuel supply lines must not be installed in records storage areas . Fuel lines must be separated from records storage areas by four-hour rated construction assemblies.**
- (p) Equipment rows running perpendicular to walls must be NFPA 101 compliant.**
- (q) No oil-based transformers are permitted in records storage areas – light ballast OK. Electrical wiring must be in metal conduit. Battery charging areas for electric forklifts require at least two-hour fire barrier separation from records storage.**
- (r) No hazardous materials are permitted to be stored in records storage areas – including nitrate film.**
- (s) All records storage areas must have a professionally designed fire detection and suppression system designed to limit loss to a maximum of 300 cubic feet in case of a fire.**

§1228.232 Environmental Controls Requirements

(1/1)

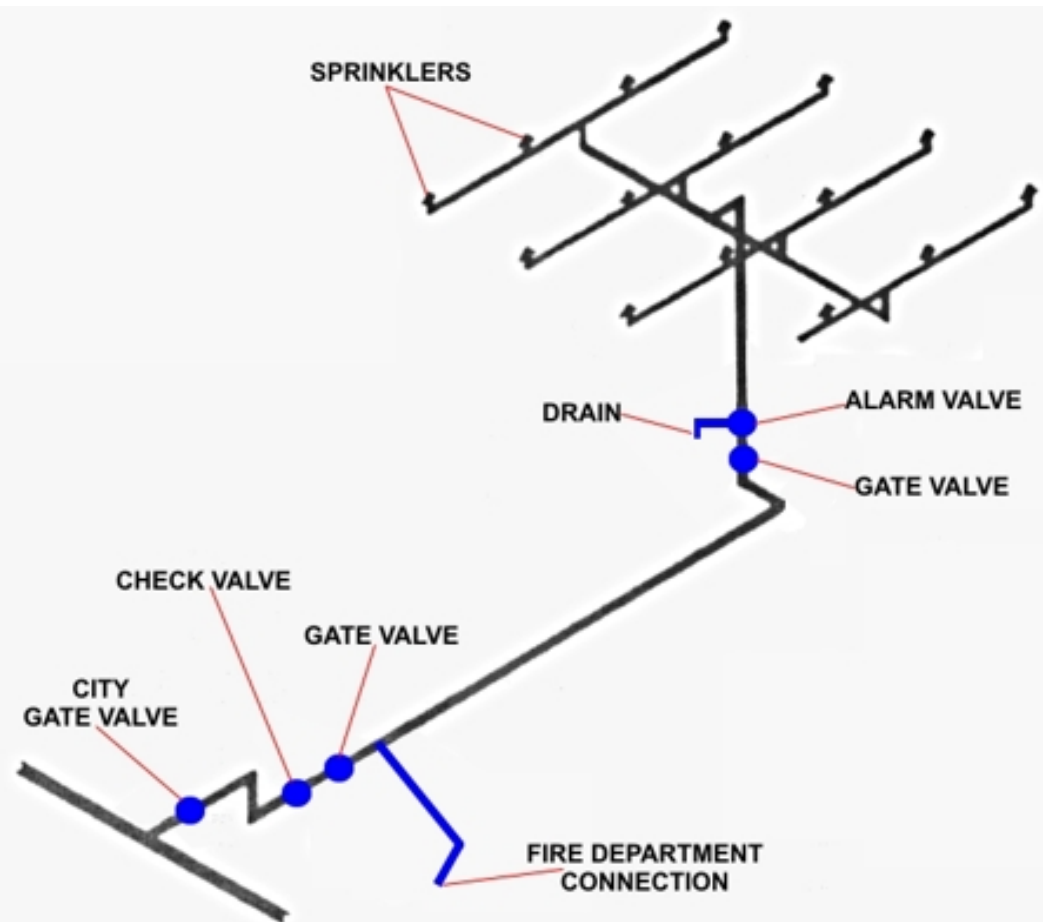
- (a) Paper-based temporary records must be stored in a manner to prevent mold growth:**
 - **No leaks or moisture problems**
 - **Avoid high relative humidity (RH)**
 - **No greater than 70% RH with any temperature**
 - **No greater than 55% RH if high temperatures**
- (b) Non-textual temporary records must be stored in conditions that preserve them based on their full retention period.**
- (c) Paper-based permanent records must be stored in areas with 24 hour / 365 days per year air conditioning equivalent to office space with appropriate temperature, humidity and air-exchanges.**
- (d) Non-textual permanent records, unscheduled records and sample/select records must comply with the standards for permanent records.**

Fire Suppression Performance

The fire detection and suppression system must be designed and installed to limit the maximum anticipated loss in any single fire event to a maximum of **300 cubic feet** of records. §1228.230(s)



Fire Suppression System



1. Must be designed or reviewed by a licensed fire-protection engineer (LFPE) - §1228.230
2. Must be documented by one of the following:
 - NARA Appendix B
 - Live Fire Test
 - LFPE Report & Seal - §1228.242

Part 1228 Appendix B (NARA-certified fire safety systems)

- Contains prescriptive requirements based on live fire testing that have been certified by NARA to meet the fire suppression performance in §1228.230(s)

Certifications that form part of the documentation to send to NARA in support of a request for approval of an agency records center or a certification statement by a Federal Records Officer that a commercial records storage facility complies with the 36 CFR 1228, subpart K standards.

- Fire Detection System
- Fire Suppression System
- Floor Load Capacity
- Flood Plain Certification
- Integrated Pest Management
- Intrusion Alarm Certification (UL1076)
- Shelving Design & Installation for Seismic Requirements
- Temporary or Permanent? ASHRAE Standard 55 & ASHRAE Standard 62 may be required.
- Certificate of Occupancy



Agency Records Centers

- An agency must obtain NARA approval to establish or to relocate an agency records center (or prior to using an agency records center operated by another agency).
- NARA will review documentation submitted by the agency to verify the facility meets the requirements of subpart K.

See Toolkit File 2

Agency Record Center: Exclusion

- §1228.240(b) *Exclusions*

... excludes agency records staging and/or holding areas with a capacity for containing less than 25,000 cubic feet of records ...

- The facility standards still apply.

Commercial Records Centers (1/2)

- Before storing agency records in a commercial records storage facility, the agency must
 - ensure that the facility meets the subpart K standards.
 - submit documentation to NARA that shows that the facility meets the standards.
 - ensure that NARA has the right to inspect the facility.

Commercial Records Centers (2/2)

- Acceptable documentation required to show compliance with the standards:
 - A copy of the agency's contract with the commercial records storage facility incorporating the Subpart K standards.
 - A statement from the agency's records officer certifying that the facility meets the requirements of Subpart K

See Toolkit File 3

What if the facility does not meet all of the Subpart K requirements?

- Agency can request a waiver from a subpart K requirement.
 - the request for a waiver needs to be accompanied by information explaining how the alternative is equivalent or superior to the standard requirement.
- NARA reviews supporting documentation before approving or denying waiver requests.

Where do I send documentation for agency records centers, commercial facilities and waiver requests?

Send to:

- Director, Space & Security Management Division (NAS)
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740-6001

OR

- frank.quigley@nara.gov



NARA Web Resources

- <http://www.archives.gov>
- Click on: Records Managers
- Contains information on NARA guidance and regulations



The NARA Public Website is www.archives.gov

NARA - U.S. National Archives and Records Administration - Archives.gov Home - Microsoft Internet Explorer

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NARA "Records Managers" Page

The screenshot shows a Microsoft Internet Explorer browser window displaying the NARA Records Management Information Page. The address bar shows <http://www.archives.gov/records-mgmt/>. The page header includes navigation links: Archives.gov Home, Subject Index, Contact Us, FAQs, and Español. The main content area features a banner for "Records Managers" with the text: "If you are a Federal Government employee, you can find information on Federal records management requirements on this site to learn more!". Below the banner is a "Records Management Frequently Asked Questions" section with a grid of links: News and Events, What's New!, Guidance and Regulations, Frequently Asked Questions, Related Links, Federal Records Officers, Training, General Records Schedule, RM Certification, Targeted Assistance, and Records Storage Standards Toolkit, List of NARA Contacts for Your Agency. A yellow callout bubble with the text "Guidance and Regulations" points to the corresponding link. The left sidebar lists "RECORDS MANAGEMENT RESOURCES" including: Records Management FAQs, Records Scheduling & Disposition FAQs, Federal Records Centers Services, Electronic Records Management (ERM), Toolkit for Managing Electronic Records, Records Management Handbook (highlighted with a yellow star), Records Management Initiatives (RMI), Records Management Training, Electronic Records Archives Program (ERA), Electronic Records Guidance, Federal Records Centers (FRC), and Basic Laws & Regulations. The bottom of the browser shows the Windows taskbar with the start button, several open applications (Novell Groupware, FY08 Mgmt, Microsoft PowerPoint, The National...), and the system clock showing 10:32 AM on 11/2/08.

NARA Records Management Guidance and Regulations

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Address <http://www.archives.gov/records-mgmt/policy/guidance-regulations.html>

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Records Managers

Records Management Policy NARA Records Management Guidance and Regulations

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NARA Records Management Guidance and Regulations

- NARA regulations affecting Federal agencies and their records management programs are found in Subchapter B of 36 Code of Federal Regulations
 - [NARA Regulations](#) ★
- NARA also issues NARA Bulletins to Federal agencies providing assistance on the management and disposition of records. Each bulletin issued each fiscal year contains a list of records management bulletins still in effect.
 - [NARA Bulletins](#) ★
- NARA issues other records management guidance to agencies including:
 - [NARA ERM Guidance on the Web](#)
 - [Fast Track Guidance Development Project](#)
 - [Records Management Publications](#)

“NARA Regulations”
Or ...
“NARA Bulletins”

Records Management Resources

- Records Management FAQ's
- Records Scheduling & Disposition FAQ's
- Federal Records Centers Services
- Approved Federal Records Storage Facilities
- Electronic Records Management (ERM)
- Records Management Initiatives (RMI)
- Records Management Training
- Electronic Records Archives Program (ERA)
- Electronic Records Guidance
- Federal Records Centers (FRC)
- Basic Laws & Authorities
- Meetings & Activities
- More Resources

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NARA Regulations

The screenshot shows a Microsoft Internet Explorer browser window with the address bar displaying <http://www.archives.gov/about/regulations/subchapter/b.html>. The page content includes a navigation menu on the left with categories like 'ABOUT US', 'OUR SERVICES', and 'RESOURCES'. The main content area is titled 'Subchapter B - Records Management' and contains a list of regulations. A yellow star is placed next to the 'Regulations' link in the left sidebar. A yellow callout box on the right side of the page contains the text 'Part 1228', which is also highlighted in the list of regulations.

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Subchapter B - Records Management

This subchapter contains regulations affecting Federal agencies and their records management programs.

- [Part 1220](#) - Federal Records; General
- [Part 1222](#) - Creation and Maintenance of Records; Adequate and Proper Documentation
- [Part 1228](#) - Disposition of Federal Records
- [Part 1230](#) - Micrographics
- [Part 1232](#) - Audiovisual Records Management
- [Part 1234](#) - Electronic Records Management
- [Part 1236](#) - Management of Vital Records
- [Part 1238](#) - Program Assistance

“Part 1228”

NARA Regulations, 1228

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Subpart J -- Transfer, Use, and Disposition of Records in a NARA Records Center

1228.160	How does an agency transfer records to a NARA records center?
1228.162	How does an agency transfer vital records to a NARA records center?
1228.164	What records must be transferred to the National Personnel Records Center (NPRC)?
1228.166	How does an agency transfer records to the National Personnel Records Center (NPRC)?
1228.168	How can records be used in NARA records centers?
1228.170	How are disposal clearances managed for records in NARA records centers?

Subpart K -- Facility Standards for Records Storage Facilities

General

1228.220	What authority applies to this subpart?
1228.222	What does this subpart cover?
1228.224	Publications incorporated by reference.
1228.226	Definitions.

Facility Standards

1228.228	What are the facility requirements for all records storage facilities?
1228.230	What are the fire safety requirements that apply to records storage facilities?
1228.232	What are the requirements for environmental controls for records storage facilities?

Handling Deviations From NARA's Facility Standards

1228.234	What rules apply if there is a conflict between NARA standards and other regulatory standards that a facility must follow?
1228.236	How does an agency request a waiver from a requirement in this subpart?

“Subpart K”

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Facility Standards

The screenshot shows a Microsoft Internet Explorer browser window with the address bar displaying <http://www.archives.gov/about/regulations/part-1228/k.html>. The page content is as follows:

[Subchapter B -- Records Management]
PART 1228 -- Disposition of Federal Records
Subpart K -- Facility Standards for Records Storage Facilities

Part 1228 was last amended on 9/28/05.

General

- 1228.220 What authority applies to this subpart?
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Handling Deviations From NARA's Facility Standards

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- 1228.236 How does an agency request a waiver from a requirement in this subpart?
- 1228.238 How does NARA process a waiver request?

Facility Approval and Inspection Requirements

- 1228.240 How does an agency request authority to establish or relocate records storage facilities?
- 1228.242 What does an agency have to do to certify a fire-safety detection and suppression system?
- 1228.244 When may NARA conduct an inspection of a records storage facility?

The left sidebar of the browser window contains a navigation menu with the following items:

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