

Facility Standards for Records Storage Facilities Inspection Checklist

Complete all sections of this checklist for the commercial records storage facility. Also complete either the included Supplemental Checklist for Appendix B Fire-Safety Systems or provide the information required by 36 CFR 1234.3. This checklist was updated in October 2012 to show the current citations to 36 CFR 1234. The earlier used citations to 36 CFR 1228 subpart K were changed to 36 CFR 1234 but the regulation content remains the same.

Facility Standards for Records Storage Facilities Inspection Checklist (Effective date of checklist September 2005)			
Federal Agency:			
Facility:	Common Name:		
	Street Address		
	City, State & Zip		
	Facility description (size and capacity):		
Facility Director or Representative:	... Comments explaining or disagreeing with inspection findings are attached.		
Inspector or Reviewer:	<div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="text-align: right;">Date</div>		
	<div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="text-align: right;">Date</div>		
	INSPECTION/REVIEW DATE:		
List of Attachments			
Description	Yes	N/A	
Supplemental Checklist for Appendix B Fire-Safety Systems			
Certification of fire-safety detection and suppression system (36 CFR 1234.32)			
Exceptions caused by Code Conflicts (36 CFR 1234.20)			
Waiver request(s) (36 CFR 1234.22)			
Other: (Describe)			

Section 1 - Compliance with 36 CFR 1234.10 Facility Requirements				
§1234.10 paragraph:	Requirement	OK	No	Other
(a)	The facility must be constructed with non-combustible materials and building elements, including walls, columns, and floors.			
(a) exception 1	If the roof is constructed of combustible material it is protected by a properly installed and maintained wet-pipe automatic sprinkler system.			
(a) exception 2	Existing records storage facility with combustible building elements has an approved waiver from NAS that allows continued use until October 1, 2009 provided documentation has been submitted that indicates a fire-suppression system designed to mitigate the risk is present.			
(b)	A facility with two or more stories must be designed or reviewed 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)			
(d)	The facility must be designed in accordance with national, regional, state or local building codes (whichever is most stringent) 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 9/28/2005; existing buildings: effective 10/1/2009)			
(h)	Piping (with the exception of sprinkler piping and limited storm water roof drainage piping – see 36 CFR 1228.228(h) of the rule for further information) must not be run through the records storage area unless supplemental measures ... are used to prevent water leaks ... (New buildings: effective 9/28/2005; existing buildings: effective 10/1/2009)			
(i)(1)	All racking systems, steel shelving, or other open-shelf records storage equipment must be designed and installed to provide seismic bracing that meets the requirements of the applicable state, regional, and local building code (whichever is most stringent).			
(i)(2)	Racking systems, steel shelving, or other open-shelf records storage equipment must be braced to prevent collapse under full load. Each racking system or 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. (36 CFR 1234 Appendix A -- see Section 4 of this Checklist)			

Section 1 - Compliance with 36 CFR 1234.10 Facility Requirements				
§1234.10 paragraph:	Requirement	OK	No	Other
(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.			
(n)	The following additional requirements apply only to new facilities:			
(n.1)	(1) No mechanical equipment containing motors in excess of 1 HP within records storage areas (excluding material handling and conveyance equipment that have operating thermal breakers on the motor).			
(n.2)	(2) No high-voltage electrical distribution equipment (i.e., 13.2kv or higher) in records storage areas.			
(n.3)	(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.)			
(n.4)	(4) For new facilities that store permanent records:			
requirement a.	a. A facility storing permanent records must be kept under positive pressure.			
requirement b.	b. No intake louvers in loading dock areas, parking or other areas subject to vehicle traffic.			
requirement c.	c. Separate air supply and exhaust system for loading docks.			

Section 2 - Compliance with 36 CFR 1234.12 Fire Safety Requirements				
§1234.12 paragraph:	Requirement	OK	No	Other
(a)	The fire detection and protection system must be designed or reviewed by a licensed fire protection engineer. Review requires submission of a report under the seal of a licensed fire protection engineer; see rule text for minimum requirements.			
(b)(1)	All walls separating records storage areas from each other and from storage areas within the building must be at least 3-hour fire barrier walls.			
(b)(2)	The quantity of Federal records stored in a single records storage area must 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.			

Section 2 - Compliance with 36 CFR 1234.12 Fire Safety Requirements				
§1234.12 paragraph:	Requirement	OK	No	Other
(e)	The fire resistive rating of the roof must be a minimum of ½ hour.			
(e) alternate	Unrated roof is protected with an automatic sprinkler system in accordance with NFPA 13.			
(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)	Building columns in records storage areas must be 1-hour fire resistant.			
(i) alternate	Unrated columns are protected in accordance with NFPA 13.			
(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)	Open flame (oil or gas) unit heaters or equipment, if used, must be installed or used in any records storage area in accordance with NFPA 54 and the Uniform Mechanical Code.			
(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.			
(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.			

Section 2 - Compliance with 36 CFR 1234.12 Fire Safety Requirements				
§1234.12 paragraph:	Requirement	OK	No	Other
(s)	<p>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.</p> <ul style="list-style-type: none"> For systems in accordance with 36 CFR 1234 Appendix B, attach Supplemental Checklist for Appendix B Fire-Safety Systems. For other designs, see § 1234.32 for documentation requirements. 			

Section 3 - Compliance with 36 CFR 1234.14 Environmental Control Requirements				
§1234.14 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. Effective 09/28/2005 for new records storage facility and 10/1/2009 for existing facilities. (See rule text)			
(c)	<p>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)</p> <p>Effective date: New facilities 09/28/2005; existing facilities 10/1/2009</p>			
(d)	Nontextual permanent, unscheduled and/or sample/select records: see parts 1238, 1237, and/or 1236 of 36 CFR subchapter B.			

Section 4 - Minimum Security Requirements (Appendix A)				
Compliance with Federal Facility Security Standards, Level III				
For explanation of requirements, see File 6 of this Toolkit or http://www.archives.gov/about/regulations/appendix-a.html				
Citation	Requirement	OK	No	Partial
S1	Control of facility parking			
S2	Receiving/shipping procedures			
S3	Intrusion detection system with central monitoring			
S4	Meets <i>Life Safety Standards</i>			
S5	Adequate exits from records storage areas			
S6	High security locks on entrances/exits			
S7	Visitor control/screening system			
S8	Prevent unauthorized access to utility areas			
S9	Provide emergency power to critical systems			
S10	Conduct background security checks and/or establish security control procedures for service contract personnel			

Notes – use this space to add information about “Other” and “Partial” answers in Sections 1 through 4 of the Checklist

Supplemental Checklist for Appendix B Fire-Safety Systems Compliance with 36 CFR Part 1234 Appendix B (Complete this checklist ONLY if the facility claims to be using the system described in Appendix B)				
Paragraph	Requirement	OK	No	Partial
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.			
	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			

Supplemental Checklist for Appendix B Fire-Safety Systems Compliance with 36 CFR Part 1234 Appendix B (Complete this checklist ONLY if the facility claims to be using the system described in Appendix B)				
Paragraph	Requirement	OK	No	Partial
	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.			
2l.	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.			
	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.			
Notes for Supplemental Checklist				
Reference	Comments			