Appendix L Managing Special Documents

Some documents have special requirements or there is a need to consult an environmental attorney about the document's status.

ATSDR Health Surveys

The Agency for Toxic Substances and Disease Registry (ATSDR) is invited to do a Public Health Assessment (PHA) for installations.

The assessment usually involves researching drinking water, wastewater, vapor intrusion, leaking tanks, housing, asbestos, radon, other hazardous waste, and anything else hazardous to the humans who live (or lived) on or near an installation.

Occasionally, ATSDR focuses on a single area or a few areas of environmental concern on an installation. In addition to exhaustive research, they send out hundreds of thousands of questionnaires to former base residents, current residents, and those who live or used to live near an installation. ATSDR activities are dependent on the program or programs the ATSDR is researching.

ATSDR issues the draft version of the PHA for public comments, addresses the comments, and then issues a final version of the document. The review process takes a year or more.

In a departure from the recommended management of draft documents, place both the draft and final versions of PHA documents in the Administrative Record File as OSWER 9833.3A-1 directs.

Audio and Visual Files in Documents

Some documents have audio or visual files. NIRIS cannot accommodate any of these types of files.

Use a slipsheet in the location where the audio or visual files is located within the document. See Appendix X for the approved slipsheet format

Calibration Data

Calibration data must be retained. If the information is not included in a document appendix, it must be inventoried and added as a Site File record. Calibration data must be associated with the site on which the equipment was used. Association should be made using site, SWMU, AOC, UST, Area, etc. designations as well as by contract and delivery order number.

Calibration Data is not normally scanned.

The paper version is sent to the Federal Records Center.

Chain of Custody Forms and Reports

If Chain of Custody forms and reports are separate from the validation reports or not included in a document appendix, metadata about them must be added to the Site File. See 40 C.F.R. Section 300.805(a)(1).

Chain of Custody Forms and Reports are scanned.

Contract Documents

Contract and associated documents and progress reports are **NOT** part of the Administrative Record File, Post Decision File, or Site File. Environmental personnel may be provided with copies of contract documents; however, these documents are Acquisitions records rather than Environmental records. Consult the Navy Records Management Manual, SECNAV M-5210.1, for further information.

"Courtesy Copies" Cleanup Documents

When the Navy, for one reason or another, is no longer responsible for cleaning up a property, the Navy still has an interest in obtaining and maintaining copies of the documents (courtesy copies) from the "new" owner which 'document' the cleanup work being done

The Navy's recordkeeping obligations are normally based on the agreement(s) between the new owner and the Navy when the property is transferred or sold by the Navy or USMC.

Usually, transfer or sale agreements state that the Navy will provide copies of their cleanup documents to the new owner up to the sale or transfer date and/or the new owner will provide the Navy 'courtesy' copies of documents of the cleanup work done by them after the transfer or sale date.

Once a property is sold or transferred, the Navy is normally no longer involved with the cleanup. However, unexpected discoveries by the new owners or transfer or sale agreements can be the basis for the Navy again becoming part of the cleanup. If the Navy must readdress some aspect of the cleanup, the courtesy copies of documents, provided by the new owner, can be very helpful.

Courtesy copies of cleanup documents provided by the new owner should be added to the Site File

Draft and Draft Final Versions of Documents

Do not add draft or draft final versions of documents to the Administrative Record File, Site File, or Post Decision File unless they meet specific criteria found in the U S EPA OSWER DIRECTIVE 9833.3A-1, ***Final Guidance on Administrative Records for Selecting CERCLA Response Actions***, 3 December 1990, Part III G, Draft Documents and Internal Memoranda and the U S EPA Memorandum, ***Revised Guidance on Compiling Administrative Records for CERCLA Response Actions,*** 20 September 2010, Part II C, Contents of the Administrative Record.

Draft and draft final versions of documents are generally not included in the AR File. See 40 C.F.R. § 300.810(b). To quote the Guidance:

"…Documents Generally Not Included in the Administrative Record include:

- Documents which neither form the basis for the selection of a response action or demonstrate public participation

- Deliberative materials (including draft documents and internal memoranda) Under EPA's regulations, in general, only non-deliberative documents should be included in the Administrative Record…"

Drafts are often revised or superseded by subsequent drafts and final documents prior to the selection of a response action and may reflect the internal, pre-decisional deliberations within the Command so drafts are typically not included in the AR File.

Please note that internal memoranda, staff notes and communications are also typically not part of the AR File. See 40 C.F.R. § 300.810(b).

Reasons to Accept Draft and Draft Final Versions

Accept draft or draft final versions of documents for which no final version was or will be published. Include documentation such as correspondence or memorandum in the AR or PF, as appropriate, stating the why the draft or draft final is accepted as the final version.

Accept draft or draft final versions of documents if it is the last or only version to be issued under an expiring contract or task order and no later version has or will be issued. Add the document to the SF until a final version is published. When a final version is published, update the record metadata to reflect the final document title, date and File Type. Delete the draft or draft final version from NIRIS.

Accept draft or draft final versions of document identified by Project Managers, counsel, or others, documenting unusual issues or circumstances. Include these documents in the SF unless there is a compelling reason to include in the AR or PF.

When a draft contains unique factual information that is considered or relied upon in a response action decision, it is acceptable to extract the information and place it into a non-deliberative document and add it to the Files. Consult an Environmental attorney prior to adding this type of document to assess whether it should be placed in the SF or AR.

Accept draft or draft final versions of documents which require public review and comments. Include the draft or draft final version of the document in the AR. Including it demonstrates the public's opportunity to participate in and comment on the selection of the remedial or removal action.

If a draft or draft final version of a document is accepted for inclusion in NIRIS, it must have a Distribution Statement

See OSWER DIRECTIVE 9833.3A-1, ***Final Guidance on Administrative Records for Selecting CERCLA Response Actions***, Section III, Contents of the Administrative Record, Parts A and B, Remedial Actions and Removal Actions.

See also the **Recordkeeping Manual**, Appendix E, Community Relations, for a list of typical documents and additional information.

Environmental Baseline Surveys (EBS) / Environmental Condition of Property (ECP)

The Environmental Baseline Survey is a later version of an older document called ‘Engineering Survey’ which precedes Preliminary Assessments. The Engineering Survey was done to determine where potential installation restoration sites might be located. The Survey also covered compliance issues.

Environmental Baseline Surveys were done before an installation property was turned over or sold so that a snapshot of the environmental conditions including compliance related issues was documented.

The Environmental Baseline Survey was renamed Environmental Condition of Property.

An ECP has different purposes depending on whether it is done for an ER,N installation or whether it is done for a BRAC installation.

When an ECP is done for ER,N property, add it to the Site File since the survey generally covers the environmental conditions of property of a small (usually) defined area on an installation.

For example, if there was a need to construct an ATM, an ECP would be done for the ATM site and a small defined area around the site. This type of document will normally not generate regulator comments. Include this type of ECP in the Site File since it does not forward the installation restoration work.

When an ECP is done for a BRAC installation, it covers the entire installation, fence to fence. Add the document, regulator comments, and DON responses to the Administrative Record File. Enter related comments and correspondence as separate records in the same file.

BRAC requires the creation of ECPs for BRAC installations, and distribution of the documents to the public.

Form 1s

Form 1s (the common name), the data and laboratory results cover page, displays the sample results for an individual data summary, data report, or data validation report package. Form 1s' can also be found in data validation narratives marked up with a data validator's changes.

Add Form 1s' in NIRIS EDMS as a part of the data package for which they were created; do not add them as a single/standalone document as their content could be very easily misconstrued because they are out of context without the accompanying data package. Do not add single/standalone Form 1s' to NIRIS EDMS unless directed to do so, in writing, by a DON Project Manager.

On rare occasions, Form 1s' are submitted to chemists and Project Managers as single/standalone documents to expedite the decision making process while awaiting the complete package's arrival.

They are never used as a stand-in for a complete data package.

The Form 1s is included in a complete data or laboratory package when it is submitted to chemists and Project Managers.

Guidance and Policy Documents

Do not include general guidance documents which are readily available

Add guidance documents or portions of guidance documents which are considered or relied on in selecting a response action in the ARF

Guidance documents generated to address issues that specifically arise at a site must be included in the ARF

Guidance documents which were reviewed but not relied on may be included in the ARF.

<u>Interviews</u>

Private citizen names are normally considered sensitive information. The Department of Justice has articulated that private citizen names in government records are normally protected, this is reflected in their FOIA guide and is supported by copious case law.

When determining release of names, Office of Counsel considers whether there is an overarching need to release private citizen names if they do not add to public discourse regarding an historic event

Government employee names reflected in government documents in their official capacity are normally not considered sensitive absent some sensitive or statutory reason to do so.

If an interview, including PFAS Preliminary Assessment Report interview(s), contain no off-base release information and all the interviewees are acting in their current official capacity

- Interviewee names can be mentioned in the report
- Create a specific appendix for Interviewee Questions
- Do not flag the Questionnaire Appendix "sensitive"
- Release the draft version of the report (with the Questionnaire Appendix included) for regulator review and comment
- **When Finalized**
  - Add the report, including the Questionnaire Appendix, to the Administrative Record File
  - Use Distribution Statement A (unlimited distribution)

Note: Recommend that interviewee names be kept out of the report and only the title/job positon be included because interviewee names add no real value

If an interview, including Preliminary Assessment Report interview(s), contain off-base release information, and all the interviewees are acting in their current official capacity

- Interviewee names can be mentioned in the report
- Remove the Questionnaire Appendix from the report before distributing it to federal and state agencies for review
- Label the Questionnaire Appendix “sensitive”
- Use Distribution Statement D (Department of Defense and U.S. DoD contractors only)
- Add the Questionnaire Appendix to the Site File
- Create a title which will link the Appendix to the report when an ER Search is done
- **When Finalized**
  - Ensure that the Questionnaire Appendix has been removed from the Report
  - Add the Questionnaire Appendix as a separate document to the Site File
  - Use Distribution Statement D (Department of Defense and U.S. DoD contractors only)
  - Create a title which will link the Appendix to the report when an ER Search is done
  - Add the Report**, without** the Questionnaire Appendix, to the ARF
  - Use Distribution Statement A
  - Create and add an appropriate slip sheet from examples in the Recordkeeping Manual, Appendix X

If all the interviewees, including the Preliminary Assessment Report interviewees, are acting in their current official capacity and the off-base release information is recorded separately from the on-base information

- **On-base Preliminary Assessment Report**

- Interviewee names can be mentioned in the report
- Do not flag the Questionnaire Appendix “sensitive”
- Release the draft version of the report (with the Questionnaire Appendix included) for federal and/or state agency review
- **When Finalized**
    - add to the Administrative Record File
    - use Distribution Statement A (unlimited distribution)

- **Off-base "Preliminary Assessment" Report includes the appropriate interview information and references and NOT submitted for review outside the Navy**
    - Flag the report “sensitive”
    - Add to the Site File
    - Use Distribution Statement D (Department of Defense and U.S. DoD contractors only)

If an interviewee, including Preliminary Assessment Report interviewees, is a private citizen and not acting in a current official capacity

- Do not use interviewee names in the Report because the interviewee is being interviewed as a private citizen (e.g. retired Fire Chief or community member)
- Label the Questionnaire Appendix “sensitive”
- Use Distribution Statement D (Department of Defense and U.S. DoD contractors only)
- Remove the Questionnaire Appendix from the Report before Distributing it to federal and state agencies for review
- Ensure that the report distribution cover letter clearly states that the Questionnaire Appendix was removed from the report because it contains

sensitive information

- Only DOD personnel are authorized to review the appendix

- State that the appendix has Distribution Statement D

- **When Finalized**

  - Ensure that the Questionnaire Appendix was removed from the Report

  - Add the Questionnaire Appendix to the Site File

  - Use Distribution Statement D

  - Create a title which will link the Appendix to the report when an ER Search is done
  - Add the Report without the Questionnaire Appendix to the ARF

  - Use Distribution Statement A

  - Create and add an appropriate slip sheet from examples in the Recordkeeping Manual, Appendix X

<u>National Environmental Policy Act (NEPA) Documents</u>

NEPA documents are not included in the Files. NEPA is a separate program which creates an Administrative Record for the proposed federal undertaking. They constitute a body of records which document a different environmental process.

Legal Authority

The National Environmental Policy Act of 1969, as amended (Pub. L. 91-190, 42 U.S.C. 4321-4347, January 1, 1970, as amended by Pub. L. 94-52, July 3, 1975, Pub. L. 94-83, August 9, 1975, and Pub. L. 97-258, § 4(b), Sept. 13, 1982)

CFR Title 40 Protection of Environment, Chapter V-Council on Environmental Quality

CFR Title 32 National Defense, Chapter VI Department of the Navy, Part 775 Procedures for Implementing the National Environmental Policy Act

Base Realignment and Closure (BRAC) real estate and environmental project managers create, in connection with Environmental Impact Statements (EIS), the following types of documents, Finding of Suitability to Transfer (FOST), Finding of Suitability to Lease (FOSL), and Finding of Suitability for Early Transfer (FOSET).

Most large installation closures and realignments require EISs and RODs while the smaller closures and realignments require Environmental Assessments (EA) and Finding of No Significant Impact (FONSI).

The NEPA process consists of an evaluation of the environmental effects of a federal undertaking including its alternatives. There are three levels of analysis depending on whether or not an undertaking could significantly affect the environment. These three levels include:

- **Categorical Exclusion**: At the first level, an undertaking may be categorically excluded from a detailed environmental analysis if it meets certain criteria which a federal agency has previously determined as having no significant environmental impact. A number of agencies have developed lists of actions which are normally categorically excluded from environmental evaluation under their NEPA regulations.

- **Environmental Assessment/Finding of No Significant Impact (EA/FONSI):** At the second level of analysis, a federal agency prepares a written environmental assessment (EA) to determine whether or not a federal undertaking would significantly affect the environment. If the answer is no, the agency issues a FONSI. The FONSI may address measures which an agency will take to mitigate potentially significant impacts.

- **Environmental Impact Statement (EIS)**: If the EA determines that the environmental consequences of a proposed federal undertaking may be significant, an EIS is prepared. An EIS is a more detailed evaluation of the proposed action and alternatives. The public, other federal agencies, and outside parties may provide input into the preparation of an EIS and then comment on the draft EIS when it is completed.

The Chief of Naval Operations (CNO) has a contractor-maintained database library of FONSIs and RODs for DON actions such as construction projects or at-sea training.

in SECNAV Manual M-5210.1, *Department of the Navy Records Management Manual,* January 2012. The Disposition Manual should be regularly consulted for changes and updates.

Native File Formats

A **native file format** refers to the software application used to create a file.

Do not submit document native files for inclusion in NIRIS. Native Files are not part of official records and NIRIS cannot upload, maintain and store native files. Additionally, Records Management will not maintain and store native files.

In litigation, when opposing parties cannot agree on a form of production, Rule 34(b)(ii) comes into play. Rule 34(b)(ii) states that “if a request does not specify the form or forms for producing electronically stored information, a responding party must produce the information in a form or forms in which it is ordinarily maintained or in a form or forms that are reasonably usable.”

Reviewing and producing native file formats is challenging; native files cannot be redacted, no search across native files can be done, Bates numbers cannot be used and there is little to no control over their alteration.

PFAS Special Area Technical Memorandums, PFAS Preliminary Assessments, PFAS Site Investigations

Add technical memorandums or reports which cover off-base and/or on-base sampling to the Administrative Record File

Flag documents with sensitive information (like a map) in EDMS and cite the appropriate FOIA and page numbers

For documents which have interviews, communication records or site visit information, see the PFAS Interview section of this Appendix.

Raw Analytical Data Packages and Unverified Laboratory Data Packages

New Raw Analytical Data Packages and Unverified Laboratory Data Packages

The paper and PDF version of raw analytical data packages and unverified laboratory data must be submitted together using the Document Data Sheet Form. The data will not be added until both versions are submitted to NIRIS. **See Appendix O**, the SOP to Submit Documents

If known, add the name of the report(s) supported by the raw analytical data packages and unverified laboratory data in the Document Data Sheet Form NOTES field. The transmittal letter may have this information

Request that the contractor, if possible, submit the data with the final version of the report it supports

Because they are usually very large files, raw analytical data packages and unverified laboratory data packages are added to NIRIS as separate documents, assigned a NIRIS computer generated record number and transferred to the FRC as a Restoration document.

- Create metadata in EDMS for each raw analytical data package

- Select Analytical Data as the Document Type
    - Select Site File as the File type
    - Add the contract number and contract task order (CTO) number to the appropriate fields
    - Identify the laboratory or company which produced the data
    - Add the name(s) of reports the data supports in the Keywords field

- Compress and upload the PDF. **See Appendix** K, NIRIS EDMS Ready .PDFs for directions for compressing large files into acceptable size for NIRIS

- Process, pack and ship the paper and PDF version to the appropriate FRC for storage

Old/Historic Raw Analytical Data Packages and Unverified Laboratory Data Packages

P**aper versions of historic** raw analytical data packages and unverified laboratory data packages for which there is no electronic version

- Create metadata in EDMS for every analytical data package
    - Select Analytical Data as the Document Type
    - Select Site File as the File Type
    - Add the contract number and contract task order (CTO) number to the appropriate fields
    - Identify the laboratory or company which produced the data
    - Add the name(s) of reports the data supports in the Keywords field
    - Note in the Comments field that the paper has not been scanned and there is no PDF version

- Do not scan **historic paper versions** of raw analytical data packages and unverified laboratory data packages to create an electronic version

- Process, pack and ship the paper version to the appropriate FRC for storage

.PDF versions of historic raw analytical data packages and unverified laboratory data packages for which there is no paper version. See 40 C.F.R. Section 300.805(a)(1).

- Create metadata in EDMS for every analytical data package
    - Select Analytical Data as the Document Type
    - Add the contract number and contract task order (CTO) number to the appropriate fields
    - Identify the laboratory or company which produced the data
    - Add the name(s) of reports the data supports in the Keywords field
- Compress and upload the PDF. **See Appendix** K, NIRIS EDMS Ready .PDFs for directions for compressing large files into acceptable size for NIRIS
- Do not print historic electronic versions of raw analytical data packages and unverified laboratory data packages to create a paper version because it generates an extremely high volume of paper
- Process, pack and ship the PDF version to the appropriate FRC for storage

Information about Raw Analytical Data Packages and Unverified Laboratory Data Packages

If the raw analytical data packages and unverified laboratory data packages supports multiple reports, create a single metadata entry in EDMS and reference all of the reports the data supports.

Raw analytical data packages and unverified laboratory data packages are assigned the same SSIC code as the report it supports.

Because of the size of raw analytical data packages and unverified laboratory data packages, submit them separately from the report(s) it supports.

Raw analytical data packages and unverified laboratory data packages are not required to be physically located with the document(s) it supports, either at an Information Repository, in NIRIS, or at FRCs because their submittal dates usually differ from the report submittal date.

Should a report contain raw analytical data or unverified laboratory data, request that the Project Manager or contractor remove it and submit the package(s) separately. If it is not possible to separate the data, remove the appendix or section which has the data and add it as a separate document to NIRIS.

If possible, send the paper or PDF version of the raw analytical data packages and unverified laboratory data packages to FRCs with the report it supports.

Remedial Alternative Analysis (RAA)

A draft Feasibility Study with a summary of all Remedial Alternative Analysis (RAAs) is sent to a third party to review to ensure that all alternatives have been vetted and the best options selected for final review.

The RAA process is meant to be a form of **working papers** which encourage discussion(s) between technical support personnel and Remedial Project Managers, not as a decision step or part of the formal decision-making process

Remedial Alternative Analysis is not required law or statute and does not play a part in the formal cleanup decision-making process (with a possible exception*); they are considered working papers. Their purpose is to ensure that the Project Manager has considered all the alternatives and options before the selected cleanup options are shared with regulators (who comment) via the Feasibility Study.

*The possible exception to the rule of NOT including them in the Files would be a scenario in which the Project Manager presented the RAA alternatives and options to the regulators and advised that a new cleanup strategy should be considered. In this case, the RAAs would play a part in the cleanup decision-making process because the regulators are involved.

If there is a FOIA request for an RAA, the Remedial Project Manager would be responsible for producing the document. RAA are housed in NIRIS in the Document Review Tool and are held indefinitely because, as working papers, they have no disposition schedule. Office of Counsel would be responsible for applying appropriate exemptions from release under FOIA or discovery

"…The Feasibility Study process where remedial alternatives have been identified and screened but prior to detailed evaluation is the appropriate time to conduct a third party Remedial Alternative Analysis (RAA) review.

The RAA review is a fast-tracked optimization review of the remedial alternatives that will ultimately be evaluated in the Feasibility Study. It provides an opportunity to optimize the remedial alternative evaluation process, looking at the alternatives selected for further review and potentially considering additional alternatives not selected. Optimization review at this stage can save time and cost by avoiding the need to back up and re-consider alternatives after the full draft Feasibility Study has been submitted for review…"*

***Citation:* FINAL USER'S GUIDE, UG-2087-ENV, GUIDANCE FOR OPTIMIZING REMEDY EVALUATION, SELECTION AND DESIGN**

Site Management Plans

Site Management Plans are added to the Administrative Record File.

Site Management Plans are usually required when there is a Federal Facility Agreement (FFA) under CERCLA Section 120.

The Site Management Plan provides a summary of CERCLA response actions to be undertaken at an installation during a specific timeframe.

The Site Management Plan provides milestones which reflect the schedule of completing CERCLA response actions that have been agreed to by DON and regulatory agencies in the FFA. Milestones are provided for both the Environmental Restoration Program and the Munitions Response Program, both of which are part of the Installation Restoration program.

Site Management Plans are maintained and updated on a yearly basis in the NIRIS.

Ensure that Records Management obtains a copy of the complete document after each yearly update.

Site Management Plans are house in the NIRIS Remedial Project Manager Tool.

Streamline Documents

Streamlined Records of Decision, Long Term Monitoring Reports and Five Year Reviews

Streamlining documents is a method to make a paper and .PDF version of a document smaller by linking to or referring to referenced documents rather than copying the referenced documents into the document

Streamlined documents have unique document publishing standards and techniques. Creators of these documents usually need to include portions or sections of older documents housed in NIRIS or cite a portion or section of an older document in NIRIS rather than include the entire document.

There are instances when documents may have a copy of an entire historic NIRIS document as an appendix. The recommendation is to use the NIRIS document number and table of contents in lieu of the entire document as an appendix. Using the document table of contents alleviates adding multiple copies of a document in the database.

Electronic Streamline Documents

Links between individual documents will not work in NIRIS. There are no plans to change this.

Electronic versions of streamlined documents usually include the relevant portions of other referenced NIRIS housed document(s) at the end of the document and create links within the document text. Links within a document WILL WORK when the document is added and uploaded to NIRIS.

Some Streamlined document creators choose not to put the relevant portions of older document(s) at the end of the electronic version. They cite specific sections of older documents and the NIRIS document/record number. When the document is added and uploaded to NIRIS, it is clear which older document(s) have been cited. All Administration Record File documents have a unique six digit number. If there is a need to view the document, it can be found using the unique NIRIS record number.

There are specific directions on how to put these types of documents together so that the links within the document "work". See **Appendix W**, Streamline Document Construction

Paper Streamlined Documents

Paper versions of streamlined documents usually include the relevant portions of other referenced NIRIS housed document(s) at the end of the document.

Some Streamlined document creators choose not to put the relevant portions of older document(s) at the end of the paper version. They cite specific sections of older documents and the NIRIS document/record number so they can be located in NIRIS

Document creators are asked to submit the relevant portions of the document, in a paper and NIRIS approved PDF format.

Superseded Pages within a Document

Request that the Project Manager, using a Document Data Sheet Form, submit a complete, updated document, with the superseded pages, to replace the complete document.

Do not accept replacement pages

Validated Laboratory Data Packages

The paper and PDF version of verified data must be submitted together using the Document Data Sheet Form. The data will not be added until both versions are submitted to NIRIS. **See Appendix O**, the SOP to Submit Documents

Validated laboratory data, associated with a report, and not part of a document index, is assigned the same SSIC code as the report it supports.

If known, add the name of the report(s) supported by the validated data in the Document Data Sheet Form NOTES field. The transmittal letter may have this information

Request that the contractor, if possible, submit the data with the final version of the report it supports

Validated data packages are added to NIRIS as separate documents, assigned a NIRIS computer generated record number and transferred to the FRC as a Restoration document

- Create metadata in EDMS for every verified data package

    - Select Analytical Data as the Document Type

    - Select Administrative Record as the File Type

    - Add the contract number and contract task order (CTO) number to the appropriate fields

    - Identify the laboratory or company which produced the data
    - Add the name(s) of reports the data supports in the Keywords field

- Compress and upload the PDF. **See Appendix** K, NIRIS EDMS Ready .PDFs for directions for compressing large files into acceptable size for NIRIS

- Send validated laboratory data paper and PDF versions to Federal Records Centers with the report it supports

- Process, pack and ship the paper and PDF version to the appropriate FRC for storage