

Lawrence Berkeley National Laboratory
Environment, Health and Safety Division
Environmental Services Group

**Environmental Restoration Program
Records Management Plan**

May 2007

Records Management Plan

REVIEW AND APPROVAL

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LIST OF ABBREVIATIONS

Ca-EPA	California Environmental Protection Agency
CAP	Corrective Action Process
CMS	Corrective Measures Study
DOE	U.S. Department of Energy
DTSC	Department of Toxic Substances Control Board
EH&S	Environment, Health and Safety Division
EM	Environmental Management
ERP	Environmental Restoration Program
LBNL	Lawrence Berkeley National Laboratory
LTS&M	Long-Term Surveillance and Maintenance
OS	Office of Science
RCRA	Resource Conservation and Recovery Act
UC	University of California

1 INTRODUCTION

The Ernest Orlando Lawrence Berkeley National Laboratory (LBNL) is a national research facility that is managed by the University of California, with primary funding and oversight provided by the United States Department of Energy (DOE). It is a multi-program laboratory with major research programs in physics, chemical sciences, geosciences, biosciences, advanced materials, life sciences, and energy efficiency.

As a result of past LBNL operations, hazardous materials such as solvents were released to soil and groundwater. LBNL now has improved operation control systems and practices to prevent spills and unwanted releases. In 1993, the California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control (DTSC) issued a Hazardous Waste Facility Permit to LBNL. As a condition of that permit, LBNL was required to investigate and address all historical releases of hazardous waste and substances that may have occurred at the site as part of the Resource Conservation and Recovery Act (RCRA) Corrective Action Process (CAP).

Environmental investigations are conducted at LBNL by the Environmental Restoration Program (ERP or Program). The ERP, which is under the Environmental Services Group of Berkeley Lab's Environment, Health and Safety (EH&S) Division, is part of a nationwide effort by the DOE to identify and clean up contaminated areas at its facilities. In parallel with the DTSC RCRA CAP, the DOE also required LBNL to investigate and address historical releases of radionuclides at LBNL.

LBNL completed the RCRA Corrective Measures Study (CMS) Report in 2005. The CMS Report provided recommendations for the specific corrective measures or remedial systems that are required to eliminate or reduce potential risks to human health from contaminants in the soil and groundwater at LBNL, and protect the potential beneficial uses of the groundwater. Construction of all the approved remediation systems has been completed, and the site has entered the Long-Term Surveillance and Maintenance (LTS&M) phase of the process.

On August 26, 2005, the Under Secretary for Energy, Science, and Environment approved the realignment of environmental management responsibilities for LBNL from the Office of Environmental Management (EM) to the Office of Science (SC) in fiscal year (FY) 2007. Subsequently, a Site Transition Plan for LBNL was approved by SC and EM in April 2006. On October 1, 2006 SC assumed functional responsibility for the LTS&M program from EM. Due to continuing resolution in FY07, budget responsibility will likely transfer to SC in FY 08.

2 PURPOSE AND SCOPE

The environmental investigations and cleanup activities performed by the LBNL ERP have resulted in the generation of vital records that document the basis for regulatory compliance decisions made by LBNL. This Records Management Plan (Plan) was prepared to formalize the requirements, responsibilities, and procedures for managing these records, and to specify the requirements for an Official Program File and File Management System.

The types of records managed under this Plan include:

- Technical reports and workplans
- Procedures
- Field documentation
- Laboratory analytical reports
- Permits
- Waste management records
- Administrative records (correspondence, meeting minutes, etc.)

3 REQUIREMENTS

DOE Order 243.1, Records Management Program, includes a *Contractor Requirements Document* that applies to "contractors that create, receive, use, maintain, disseminate, and/or dispose of DOE records in connection with the performance of DOE-funded tasks or activities."

The *LBNL Regulations and Procedures Manual*, states "all records generated by the Laboratory under terms of the DOE/LBNL Contract with DOE are considered institutional. As such, all Laboratory records are owned by the United States government, with the exception of the University's fiscal and administrative records." The requirements of the LBNL records management program are mandatory, and are consistent with all applicable laws and DOE requirements.

The documents listed below were reviewed and considered in the preparation of this Plan. Documents not specifically identified in the University of California (UC)/DOE Prime Contract (No. DE-AC02-05CH11231) were only used as guidance in the preparation of this Plan.

- UC/DOE Contract No. DE-AC02-05CH11231
- LBNL *Regulations and Procedures Manual*, Section 1.17, Archives and Records Management

Records Management Plan

- DOE Order 243.1 Records Management Program (February 2006)
- DOE *Records Schedule for Environmental Records* (August 2003)
- *Records Management Transition Plan for the Lawrence Berkeley National Laboratory*, March 2, 2006
- *Office Legacy Management, Information and Records Management Transition Guidance*, Final Draft, February 2004
- DOE Order 200.1 Information Management Systems (September 1996)
- DOE/EH-231-010/1191 The Administrative Record (updated January 2006)
- *DOE Records Management Handbook* (September 2006)

4 DEFINITIONS

Definitions included in the following sections are from 44 U.S.C. 3301, DOE O 243.1 and/or DOE/EH-231-010/1191. Not all types of records or materials described below are pertinent to LBNL's ERP. Definitions of other terms used in this Plan are provided in Attachment 1.

4.1 Records

Records include all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government.

Any document that contains information relevant to the decisions made by LBNL's ERP regarding environmental investigations or cleanup activities is subject to the requirements of this Plan. Technical databases are also included, and Email communications if they contain information that is both important for documenting ERP activities and is not covered by another record, such as a report, workplan, or letter. Documents not produced by the ERP, but which may be also considered records, include regulatory agency comments on ERP documents and other regulatory agency correspondence.

4.2 Resource Conservation and Recovery Act (RCRA) Administrative Record

The RCRA Administrative Record provides the documentation of the basis for the U.S. Environmental Protection Agency or the authorized state agency selecting a RCRA corrective action or approving a RCRA permit/permit modification or closure plan. For this Program, the RCRA Administrative Record is the documentation of the basis of DTSC's decision for approving LBNL's RCRA investigation and cleanup actions. Records related to radionuclide investigations are not included in this category because

radionuclides are not regulated under RCRA. Characterization and assessment of radionuclides at LBNL was conducted under the regulatory authority of the DOE.

The official RCRA Administrative Record for the CAP at LBNL is maintained by the DTSC at 700 Heinz Ave., Suite 200, Berkeley California 94710. Copies of most Administrative Record documents are also available in the Information Repositories at the LBNL Building 50 Library and for public review at the City of Berkeley Main Library, 2090 Kittredge St. Berkeley California 94704.

4.3 Non-Record Materials

Non-record materials are government-owned informational materials that are excluded from the legal definition of records or do not meet the requirements of that definition. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and or processed documents are classified as non-record materials.

In addition, draft documents that have been superseded are considered non-records and may be destroyed.

4.4 Active and Inactive Records

Active records are those necessary to conduct the current business of the ERP, and/or contain information that is reviewed or used as reference when creating new documents or for making decisions.

Inactive records are those no longer required to conduct ERP business, and are ready for archiving and storage.

5 RESPONSIBILITIES

5.1 ERP Leader

The ERP Leader is responsible for assuring that the requirements for ERP records set forth in this Plan are implemented. Responsibilities include:

- Distinguishing record from non-record materials
- Determining the records that are subject to the management procedures in this Plan
- Assuring records are made available to the Records Administrator

- Identifying inactive records for transfer to the LBNL Archives and Records Office
- Overseeing the annual records review

5.2 ERP Administrator

The ERP Administrator supports the ERP Leader and is responsible for the maintenance and disposition of the ERP records. Responsibilities include:

- Logging and assigning a file index identification code to records as they are generated or received
- Properly filing records
- Updating the ERP File Index as needed
- Maintaining a current Record Inventory List
- Assisting in the annual records review
- Coordinating with the LBNL Archives and Records Office for the transfer of inactive records for archiving and storage

6 PROCEDURES

6.1 Record Indexing

The Program File Index is provided as Attachment 2. New categories may be added, if required to provide a more comprehensive listing of the records. The ERP Administrator will assign an index ID to a record(s) based on its classification from the categories listed on the File Index (Attachment 2). For example, technical reports are assigned the index code of TP, followed by a sequential number starting at 1. In some cases, records may be compiled over a period of time (e.g. sampling records, meeting minutes, inspection forms) prior to submission to the ERP Administrator. These compiled records will be managed as a group that is assigned a single index code.

A draft report is assigned an index ID once it is submitted for external review. Each subsequent version would be assigned the same index ID and an alpha indicator starting with the letter "a." For example, a draft technical report may be assigned the index code, TP100; subsequent draft versions would be assigned TP100a, TP100b, etc.

6.2 Managing Electronic Documents

In general, the records management requirements will apply to electronic documents. The Electronic Records and Signatures in Commerce Act of June 2000 broadly authorizes the

retention of electronic documents in place of paper originals. This allows the paper documents to be destroyed provided the electronic document is retained by being backed up onto a compact disc. The disc must be assigned an index ID and logged into the Record Inventory List.

Records such as correspondence may be retained in hard copy enabling the deletion of the electronic copy.

6.3 Using and Returning Records

ERP records will be stored in locking file cabinets and locking bookshelves. Records can only be checked out for use inside the building. If a record must be used outside of the building, a copy will be made and given or sent to the requester. When a record is checked out, a check out card will be completed by the borrower and placed where the record was pulled. The check out card will contain the name and extension of the borrower, the title of the document, and the date checked out. The ERP Administrator will monitor the check out cards on a weekly basis.

6.4 Records Inventory and Annual Review

The ERP Administrator will prepare a Records Inventory List (Attachment 3) to help plan, control, organize, and otherwise manage the creation, maintenance, use, and disposition of ERP records. The inventory list will be maintained so that it can be used to identify, locate, and retrieve records.

Information entered on the Record Inventory List will include:

- Title of the document
- File index code
- Location or storage information
- Retention and disposition schedule
- Date range of the record, if appropriate
- Status (i.e., active or inactive)
- Medium (e.g., paper or electronic)

The Program files will be reviewed annually to ensure records are properly identified, all records are within the files or their location is known, and that the Records Inventory List is complete.

6.5 Official Program File Location and Storage

All active Program records will be maintained in a central location(s) in Building 85B. Some records may be temporarily stored at Building 14 prior to their submission to the ERP Administrator for indexing and filing.

7 RECORD ARCHIVING AND RETENTION

Records deemed to be inactive by the ERP Leader will be transferred for archiving at the LBNL Archive and Records Office. The records should be boxed and accompanied by a records inventory for each box. The inventory should list all records contained and the record retention schedule for each. When possible, records from the same category and same retention schedules will be boxed together. Specific instructions for the transfer of records for archiving can be found in the LBNL *Regulations and Procedures Manual*.

The following retention times follow the DOE Environmental Records Schedule (August 2003) approved by the National Archives and Records Administration for records retention. The primary categories applicable to the LBNL ERP are:

Document Type	Retention Time
Sampling	50 years
Modeling and Characterization	75 years
Waste Management	2 years to permanent
Remedial Actions	75 years

For a complete list of record schedules, refer to the disposition schedules posted on the DOE Chief Information Officer Records Management Web pages at <http://cio.energy.gov/records-management/disposition.htm>.

8 REFERENCES

Ernest O. Lawrence Berkeley National Laboratory, *Regulations and Procedures Manual*, Section 1.17, Archives and Records Management, August 2006

Records Management Transition Plan for the Lawrence Berkeley National Laboratory, March 2, 2006

University of California/Department of Energy Contract No. DE-AC02-05CH11231

U.S. Department of Energy Order 243.1, *Records Management Program*, February 3, 2006

U.S. Department of Energy, Office of Legacy Management, *Information and Records Management Transition Guidance*, Final Draft, February 2004

U.S. Department of Energy Order 200.1, *Information Management Program*, September 30, 1996

U.S. Department of Energy Guidance 1324.5B, *Records Management and Disposition*, July 19, 1996

U.S. Department of Energy, *Records Schedule for Environmental Records*, August 2003

U.S. Department of Energy Office of Environment, Safety and Health, DOE/EH-231-010/1191, *The Administrative Record*, updated January 2006

U.S. Department of Energy, *Records Management Handbook*, September 2006

9 ATTACHMENTS

1. Definitions
2. ERP Program File Index
3. Record Inventory List

Attachment 1

Definitions

Adequate and Proper Documentation. A record of the conduct of the U.S. Government business that is complete and accurate to the extent required to document the organization, functions, policies, decisions, procedures, and essential transactions of the agency and that is designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities.

Central Files. Files accumulated by several offices or organizational units and maintained and supervised in one location. Also called centralized files.

Contractor Records. Data produced and/or maintained by a contractor for a Federal agency and required to provide adequate and proper documentation of that agency's programs and manage them effectively.

Cut-Off Date. For individual reports, the cut-off date is the report date. For files or records in series or groups, e.g., field log books, the cutoff date is the most recent date of entry.

Disposition. A broad term which may refer to any of the following:

- Destroying records
- Transferring records to the LBNL Archive and Records Office for storage

Electronic Records. Records stored in a form that only a computer can process. Also called machine-readable records or ADP records.

Final Disposition. The end of the records life-cycle in which temporary records are disposed of and permanent records are transferred to Archives and Records.

Records Management. The planning, controlling, directing, organizing, training, promoting and other managerial activities related to the creation, maintenance and use, and disposition of records to achieve adequate and proper documentation of Federal policies and transactions and effective and economical management of agency operations.

Attachment 2

LBNL ERP Program File Index

Category	No.	Description
Index ID		
TP	1	Technical Reports: investigation, corrective measures, progress, assessments, determinations, proposals
PP	1	Plans and Procedures: investigation, monitoring, data validation, materials management, waste disposal, well construction, closure, corrective measure, treatment system operation, community relations, health and safety
FA	1	Field Records: note books, well construction, sample collection, inspection/measurement forms, schedules
LR	1	Analytical Lab records
RP	1	Permits: ground penetration, monitoring well installation, hazardous waste, air emission, wastewater discharge
WM	1	Waste Management: hazardous waste forms, landfill disposal forms, carbon regeneration certificates
BD	1	Baseline documents
AR	1	Administrative Records: letters, memorandum, e-mail (not otherwise covered), meeting minutes/handouts, fact sheets, training

