



# STATE OF CONNECTICUT

## CONNECTICUT STATE LIBRARY

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July 30, 2014

Edward G. McAnaney  
First Selectman  
Town of Suffield  
83 Mountain Road  
Suffield, CT 06078

Dear Mr. McAnaney:

This letter reports my findings and recommendations following my site visit to the Suffield Town Clerk's Office on June 4, 2014. This visit included inspection of the town clerk's vault and a meeting regarding the possible relocation of the town clerk's office and vault for an upcoming town hall renovation project.

### Vault Inspection

Pursuant to Connecticut General Statutes §7-27, municipal vaults must conform to the *Standard for Fire-Resistive Vaults and Safes, Connecticut Agencies Regulations §11-8-1 through §11-8-12*. Vaults must be maintained in compliance with these regulations and any modifications to vaults must be approved in advance by this office.

As you are aware, vaults are intended to provide the highest level of protection for a municipality's permanent and essential records. These records are critical in documenting the town's governance and history and the rights and privileges of its citizens. The impact of any loss or damage to these records would be significant.

A vault protects from exterior fires by providing a fully sealed and protected fire-rated enclosure; a level of insulation that prevents the interior temperature from rising above 350 degrees through a four-hour fire event; and sufficient structural integrity to resist high levels of impact, for example, from pressurized fire hoses and falling debris. In addition, restrictions on services within a vault reduce the risk of loss from interior fires. Most electrical services are prohibited and lighting must be installed using a two pole circuit ensuring that there is no live electricity within the vault when it is closed at night.

An on-site vault inspection is necessarily limited in scope, excluding the evaluation of design, construction and other elements not apparent on visual assessment. It is the responsibility of the town, however, to be cognizant of all vault regulation requirements and to ensure that the vault meets these requirements.

Based on visual inspection only, the Town of Suffield is cited for the following violation of *Connecticut Agencies Regulations §11-8-1 through §11-8-12*:

- Section 11-8-5 (c). Openings in walls. There are three windows with 1.5 hour rated fire doors.

Windows are prohibited in vaults and the fire doors do not compensate for the breach of the vault walls. The windows must be sealed in a manner that will bring the walls into compliance with the requirements concerning 4 hour fire rating, insulation and structural integrity; see in particular Section 11-8-5.

In addition, we have concerns regarding the space above the dropped ceiling, as discolored ceiling tiles indicate past water leaks. The town must examine the walls, roof and piping in this area and take any necessary remedial steps; see in particular Sections 11-8-5; 11-8-7, and 11-8-10. Also note that records should never be stored on top of shelving even under the best of conditions as shelving enclosures provide increased protection from both fire and water damage.

The town should also be aware that the vault is unusually small in size, measuring at about 330 square feet. It does not meet the recommended minimum size guidelines of 600 square feet for a town with a population size of 10,000 to 15,000. This should be kept in mind for the future should an expansion project or new construction become possible. For the present, it becomes that much more important to ensure there is appropriate storage space outside the vault for the town's other records, so that all town records can be stored under good conditions and without overcrowding the vault.

#### Records Storage Areas

There are significant concerns regarding the two rooms being used for records storage in the basement. Both areas have a strong musty smell, indicating risk of mold damage or water damage to the records. Records storage areas must be maintained at a stable temperature of 70 degrees or lower and 30% to 50% relative humidity. If there is no other location for records storage, the town should monitor the conditions by installing, for example, a min/max thermohygrometer in both locations, and should take steps to improve the conditions and to reduce the risks of both water and fire damage. Note also that records must be stored at an adequate distance from heating equipment.

In addition, the area referred to as a 'former vault' cannot be considered a true vault and no permanent records should be stored in that area. The space is quite disorganized and overcrowded and requires the town's attention. Non-records items should be relocated or disposed first. The town should then assign staff to sort through the records belonging to their departments and to request disposal authorization for records past their retention periods. Once this step is completed, it will be possible to evaluate the remaining records and take steps to store them properly. If the town cannot complete this project without assistance, a records management consultant can be hired to assist using targeted grant funds or local funds. Until this project is completed, the town risks losing permanent records or important historical records that may be located in that room. Grand lists, for example, are permanent records that require vault protection. In some cases, if a town cannot provide proper storage for its historical records, it may be possible to transfer them to the State Archives; contact the State Archivist for more information.

Both areas require better supervision; it is important to keep centralized records storage areas secure and to assign someone to hold the keys and provide oversight for the area. For example, the gatekeeper should ensure that all boxes are properly labeled before being transferred to the room, including the records series number and title, date range, and expected date of disposition, and that records are stored in an organized manner. Records shelving should be non-combustible (metal) and

the lowest shelves should be at least three inches from the floor to reduce the risk of water damage. Staff should be instructed not to leave boxes on the floor as it places the town's records at the highest risk of water damage and costly recovery services.

#### Town Hall Renovation Project -- Town Clerk's Office and Vault

This visit included a meeting with Town Clerk George Belter and Facilities Manager Julie Oakes to discuss a possible upcoming town hall renovation project as it relates to the town clerk's office and vault.

If this project moves forward and requires a temporary relocation of the town clerk's office and vault, the town will need to consider a number of factors to ensure the protection and accessibility of its records. These types of projects are evaluated on a case-by-case basis and require careful planning.

The clerk should begin by creating an inventory of all permanent and essential records, noting the records that are backed up with off-site microfilm security copies; the records that have been scanned and can be accessed electronically; the records that have duplicate copies maintained by another agency (for example, certain vital records maintained by the Department of Public Health); and the records for which there exists only the official hard copy maintained in the town clerk's vault.

The town should then confirm the location and quality of the microfilm and ensure that appropriate backup and other procedures are in place for all scanned records. For further information, refer to the microfilm and digital imaging policies set by the Public Records Administrator and available on the State Library's website. Note that we expect an updated version of the digital imaging policy to be posted shortly.

Where possible, in advance of the relocation project, the town should take steps to create security copies for records that have none. While microfilm and paper are the only media accepted for long-term backup of permanent records, digital images, if properly created and maintained, can be helpful for access and may provide shorter term backup security.

Finally, the town must take steps to ensure the best possible physical protection for its records in an alternate location. While it is helpful to consider the backup measures in place for the official record copies, it must be remembered that if these records are damaged or lost, the records recovery process can be very costly, time consuming and challenging; and in some cases it could be impossible to fully recover all records.

It may be possible to move some records to a commercial site that offers vault storage or to negotiate with another town to use some portion of available space, for example, in a secondary town vault. In some cases, it is workable to store records off-site in this way, provided that the town can retrieve them within a reasonable timeframe to provide access on request.

For records that need to remain immediately accessible and in close proximity to the Town Clerk's office, towns have in the past addressed this in a number of ways. Typically a town will construct or modify a room at the interim town hall location, taking steps to ensure the highest level of protection for the records that the town is able to provide. The same factors that are addressed in the vault regulations must be considered, including fire rating, insulation, structural integrity and electrical and

other services to the room. Fire-rated safes or cabinets can also be used on site but as these provide limited space, they may need to be reserved for only certain records.

While the room serving as a "temporary vault" must be planned carefully, the choice of the building that serves as the interim town hall will also impact the security of the records. A fire-resistive building with good fire detection and suppression systems (sprinklers) already in place is preferable to a less protected facility.

**Next Steps**

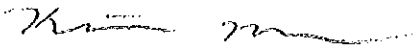
Regarding the town hall renovation project, the plans concerning the relocation of the vault records must be reviewed by our office in advance. We recommend contacting our office early in the planning stages to discuss the options that you are considering. Final plans must be submitted in writing for our review.

Regarding the town clerk's vault, we require your written reply within 60 days of the date of this letter concerning your corrective plan of action for the citations listed above.

In addition, note that the town must submit all vault work plans to this office in advance for approval, with letters of certification from the appropriate professional town staff or contractors that the plans meet the requirements of the regulations; detailed instructions regarding the approval process will be sent separately for your reference.

If you have additional questions, please contact our office.

Sincerely,



Kathy Makover  
Field Archivist

Reviewed by:



LeAnn R. Power, CRM  
Public Records Administrator

CC: George Beiter, Town Clerk  
Julie Oakes, Facilities Manager