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Subject: Re: Fw: framing the question of "how are we handling library materials that are not EPA documents?"

Could reports produced by EPA contractors and grantees be digitized and added to NEPIS but, to allay concerns about Agency responsibility, with a disclaimer? (Something along the line of "This report has been produced with funding by US EPA but has not undergone formal Agency review. Consequently, it may not represent the Agency's position.") In this way, the reports would be easily available and the Agency would not be held legally responsible for their contents. (Obviously, OGC would be needed in this.) Also, the NEPIS homepage could include language to the effect that some reports in the database contain a disclaimer but are included to further scientific inquiry.

The reports should be digitized because:

1. The information in these reports can be very valuable. Often, the only reason such reports, particularly contractor-produced reports, were not printed with EPA covers and report numbers is that the project officer and/or sponsoring EPA office did not know or did not bother to follow the standard printing and distribution procedures. This is a proverbial situation in which you can't "judge a book by its cover."
2. Regardless of their status, such reports have often been used in the regulatory process and may be needed to support future court cases.
3. Because these reports did not go through the standard distribution procedures, they are the very ones that are so difficult to find. Hardly a day goes by that an EPA library doesn't post a listserver message asking for help in tracking down these reports. The cost in EPA staff and library contractor time spent looking for these documents would be significantly reduced. NEPIS availability of these reports would probably reduce FOIAs as well.