

## **The three primary issues that OECA is concerned about are:**

- Issue 1: Information Access
- Issue 2: Timeliness of Services
- Issue 3: Costs and Funding

### **ISSUE 1: Information Access:**

#### ***Dispersal of Collections:***

The information, collections, and data housed in closing regional libraries are an important element of OECA's enforcement work. Of particular importance are industrial process documents, analytical methods, and background documents used to develop Agency guidance and rules. To avoid losing access to such essential documents, rigorous documentation and cataloging will be needed. OECA needs assurances that this type of information will be maintained within an Agency collection system and that these collections will remain cataloged, inventoried, and accessible. Dispersing the data and information outside of the Agency to other federal, state, and local libraries or universities would be of significant concern to OECA. Prior to a regional collection being dispersed, OECA would seek an opportunity to review and comment on the dispersal protocols so that our mission is given due consideration.

#### ***Accessibility of Digitized Information:***

Cataloging of the digitized image needs to be subject to rigorous review and QC to ensure that the image is cataloged and correctly referenced. The digitized system must mirror the hard copy system of cataloging so that the original hard copy is easily accessible. One small mistake could result in a valuable document being lost for all time. Also, based on recent testimony by James H. Billington, Librarian of Congress, before the House Appropriations Subcommittee on Legislative Branch, EPA will need to make sure that digitization is stable (he testified that analog materials are more stable...) and cannot be altered. This is a concern because the legal issue of "best evidence rule" must play an important role in how EPA's documents are handled.

### **ISSUE 2: TIMELINESS OF SERVICES**

Issues of timeliness for accessing information should be addressed and a plan developed for contingency measures to provide emergency access in time-sensitive, critical situations.

#### ***Litigation Response***

If OECA is involved in a civil or criminal litigation and the judge asks for documentation, we rely heavily upon the Agency library network to locate the information and have it produced to a court house in a timely manner. For example:

## **LIBRARY PLAN: OECA ISSUES/CONCERNS**

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*In June 2005, an NEIC chemist was testifying at a Detroit, Michigan, courthouse. He called the NEIC library staff from the courthouse around noon with a rush request for two scientific articles on isocyanate reactions. The NEIC library does not subscribe to the polymer science journals containing these articles. The inter-library loan librarian located a library that had these journals and arranged immediate delivery via fax. The articles were sent to the courthouse law library for delivery to the chemist. This was accomplished within four hours and was available for timely use in the courtroom.*

As library plans evolve, a strategy for uninterrupted timely response to OECA information needs will be essential to the success of our mission.

### **Interlibrary Loan (ILL) within Closed Libraries:**

Many times OECA employees are faced with tight deadlines. Absent a well-defined, efficient, cost-effective process to obtain the information they need to make their case within tight timeframes, the Agency may be faced with serious ramifications. An example of the use of the present system:

*An NEIC chemist was in the midst of testifying over a period of days when, on a Friday morning, five articles were brought up by the defense. The chemist came to the NEIC library with the request early that afternoon. The library technician immediately copied the two articles available in journals within the NEIC library. The NEIC library then located the other three articles through the on-line catalog and through the inter-library loan process arranged for them to be faxed to NEIC. All five articles were delivered the courthouse within three hours.*

### **ISSUE 3: COSTS AND FUNDING**

Many of the points put forth in the library plan have associated costs which merit further consideration, including:

- paying a vendor for a product or service,
- costs or increased use/demands on a library, resulting in increased labor costs, both contract and EPA employee hours,
- digitizing documents,
- Interlibrary Loan Services (ILL), and
- Desktop Subscription Funding Reduction and the Online Library System (OLS).