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F. PROCEDURES TO PREVENT HAZARDS

The waste management units addressed in this permit reapplication are designed and operated to minimize exposure of hazardous constituents to the general public, operating personnel, and the environment. This section describes the procedures and equipment/structures used at these units to help prevent, mitigate, or respond to environmental or human health hazards. Also described in this section are the inspection plans and schedules at these units to ensure proper maintenance and operation.

The waste management units addressed in this permit reapplication are calcined solids storage in tanks. These units are all located at the Idaho Nuclear Technology and Engineering Center (INTEC). Section D of this permit reapplication describes the operations of these units.

F-1. Security

F-1a. Security Procedures and Equipment [IDAPA 58.01.05.008 and 58.01.05.012; 40 CFR 264.14 and 270.14(b)(4)]

A security system, physical control procedures, and equipment control access to the INTEC. A security force under contract with the U.S. Department of Energy, Idaho Operations Office (DOE-ID), operates the security system. DOE-ID operates a personnel security clearance program to ensure that employees that are required to have a clearance to perform their duties are evaluated and cleared consistent with DOE-ID security policies.

Specific security measures taken for INTEC include fencing, warning signs, keycard access or personnel sign-in, and building locks.

Fencing, guarded gates and uniformed guards with communication devices are used at INTEC to provide facility security. There are communication devices in occupied buildings at the INTEC. The same communication devices may be used for communication outside the plant. The INTEC also has a plant-wide voice paging system that is used to announce critical information regarding security and safety.

F-1a(1) 24-Hour Surveillance System [IDAPA 58.01.05.008; 40 CFR 264.14(b)(1)]

Security at the INTEC is maintained by a staff of trained security guards, who monitor the entry and egress of people and material from the INTEC facility. The main INTEC guard gate at the west side of the INTEC is staffed with guards 24 hours a day, 7 days a week. There are other gates into the INTEC,
and they are either locked, staffed with guards, or keycard controlled. The guards perform other security
functions within the plant premises, including patrolling the perimeter fence and areas throughout the INTEC on a 24-hour basis.

**F-1a(2) Barrier and Means to Control Entry**

The treatment, storage, or disposal facilities at INTEC are enclosed with a fence. All gates into INTEC are either locked or manned with security guards.

**F-1a(2)(a) Barrier [IDAPA 58.01.05.008; 40 CFR 264.14(b)(2)(I)]**

The INTEC facility is located approximately 42 air miles west of the largest nearby population area, Idaho Falls, Idaho. There are gates in the perimeter fences but only three are guarded gates. These gates are identified with the Guard Post (building) where they are located. The other gates are locked but can be opened by patrols when requested.

**F-1a(2)(b) Means to Control Entry [IDAPA 58.01.05.008; 40 CFR 264.14(b)(2)(ii)]**

Employees, sub-contractors, or vendors who have completed required access training and have keycard access are not escorted in the general INTEC interior.

Individuals who have the required access training but do not have key card access sign an “Employee Log” and are allowed into INTEC without being escorted.

Individuals that do not have the required access training and do not have keycard access are escorted and sign a “Visitor Log” to gain access to INTEC. These entry procedures into the INTEC prevent access into Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA)-regulated units by the general public and visitors.

For accountability reasons, all persons entering the INTEC must either enter through the card reader turnstile as they enter, or sign the INTEC entrance log (“Visitor Log” or “Employee Log” as applicable). When personnel leave the INTEC, they exit through the card reader turnstiles or sign out at the guard gate.
F-1a(3) Warning Signs [IDAPA 58.01.05.008; 40 CFR 264.14(c)]

Warning signs that are visible and legible from at least 25 ft are posted at guard gates and on the fence around the INTEC. Entrances into RCRA-regulated storage or treatment areas will have, at a minimum, signs reading “DANGER--Unauthorized Personnel Keep Out.”