AMWTP HWMA/RCRA PERMIT

FOR THE

IDAHO NATIONAL LABORATORY

ATTACHMENT 3

Section F

Security

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TABLE OF CONTENTS

ATTACHMENT 3

PROCEDURES TO PREVENT HAZARDS (SECURITY)

F. PROCEDURES TO PREVENT HAZARDS ................................................................. 1

F-1 Security .............................................................................................................. 1

F-1a Security Procedures and Equipment ............................................................... 1

F-1a(1) Surveillance System .................................................................................... 1

F-1a(2) Barrier ......................................................................................................... 2

F-1a(3) Means to Control Entry ................................................................................ 2

F-1a(4) Warning Signs ............................................................................................. 2

LIST OF EXHIBITS

Exhibit F-1. Example INL Boundary No Grazing Sign ............................................. 3

Exhibit F-2. Example INL Boundary No Trespassing Sign ......................................... 4

Exhibit F-3. Example of Warning Sign ...................................................................... 5

Exhibit F-4. Example of Hazardous Waste Generator Improvements Rule (HWGIR)
Warning Labels/Signs at AMWTP facilities ............................................................ 6
F. PROCEDURES TO PREVENT HAZARDS

F-1 Security [IDAPA 58.01.05.008 and 58.01.05.012; 40 CFR 264.14, 270.14(b)(4)]

A three-level security system including INL property warning signs, access control for the INL, and security surveillance patrolling provides overall security at the INL, the RWMC, and the AMWTP.

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)]

The MWMUs are located within the TSA portion of the RWMC. To gain access to the RWMC and the AMWTP, authorized personnel or visitors must first gain access to the INL by the public highways, as described in Attachment 1. Once within the INL, traffic to the RWMC and the AMWTP enters the RWMC from Adams Boulevard via one of the designated AMWTP access gates. When authorized, traffic may enter the TSA directly through one of four gates in the southern part or one gate in the eastern part of the RWMC fence. Three of the south gates and the one RWMC gate are for AMWTP personnel, DOE, Government, and INL contractor-owned vehicle access, and the fourth south gate is a railroad entrance. The access points described above are identified on the RWMC/AMWTP Topographic Map, located in Appendix II. The RWMC and the AMWTP are provided with a surveillance system, a physical barrier, and the means to prevent entry of unauthorized persons to all MWMUs.

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

Access to the AMWTP is controlled by access control personnel who are based at or near the various entrances to the AMWTP and the TSA. These entrances serve as the main access control points for persons and vehicles entering or exiting the AMWTP area. Typically, AMWTP personnel and visitors enter the TSA through a dedicated gate either on the south or north end of the TSA. See the RWMC/AMWTP Topographic Map in Appendix II for further information. All personnel entering through the south gate must check in at the AMWTP access point to obtain access authorization. All personnel entering through the north gate must check in.
at the RWMC access point to obtain access authorization. Visitors to the AMWTP are escorted, as required.

Further security is provided by INL security personnel, who conduct roving patrols around the perimeter of the RWMC. If off-normal conditions are detected, the appropriate AMWTP, RWMC, and/or INL personnel are immediately notified. All gates, located on the outermost fence surrounding the RWMC leading into the AMWTP controlled areas, are locked when not manned or in use.

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

Physical security at the RWMC/AMWTP includes fencing of the entire area with locked or monitored gates. The perimeter fence and access gates are presented on the RWMC/AMWTP Topographic Map, located in Appendix II. The perimeter fence is designed as a deterrent to any unauthorized person attempting to enter or remove material from the RWMC and the AMWTP, and as a deterrent to livestock attempting to enter the RWMC and the AMWTP. The perimeter fence is constructed of either chain link or metal wire. Portions of the fence may be topped with barbed wire.

**F-1a(3) Means to Control Entry [IDAPA 58.01.05.008; 40 CFR 264.14(b)(2)(ii)]**

Means to control entry at the AMWTP are maintained by both administrative controls and physical measures. As discussed in Sections F-1a(1) and F-1a(2), the RWMC and the AMWTP are provided with a surveillance system and are surrounded by a perimeter fence and lockable gates. Access into the RWMC/AMWTP security area is controlled by locked or manned gates, card-readers, or access control personnel located at the various RWMC and AMWTP entrances.

**F-1a(4) Warning Signs [IDAPA 58.01.05.008; 40 CFR 264.14(c)]**

Warning signs are posted in the vicinity of each entrance to the MWMUs and in the vicinity of each TSA gate. These signs are written in English (the principal language in southeast Idaho), are legible from a distance of 25 ft, and are visible from most angles of approach. See Exhibits F-1, F-2, and F-3 for example warning signs used throughout the INL and the TSA.
Additionally, warning labels/signs indicating the hazards of the wastes being managed in each AMWTP permitted area will be posted at the entrances to those areas. These labels ensure personnel entering a permitted area are aware of the hazards associated with the waste in accordance with the Hazardous Waste Generator Improvements Rule (HWGIR) requirements. See Exhibit F-4 for an example of this warning label/sign.
The unauthorized entry upon any facility, installation, or real property subject to the jurisdiction, administration or in the custody of the United States Department of Energy, which has been designated as subject to the provisions contained in Part 860 of the Rules and Regulations of the United States Department of Energy (10 CFR Part 860), which rules were continued in effect by Section 705(a) of the Department of Energy Organization Act, is prohibited, and the unauthorized carrying, transporting, or otherwise introducing or causing to be introduced any dangerous weapon, explosive, or other dangerous instrument or material likely to produce substantial injury or damage to persons or property, into or upon such facility, installation, or real property is prohibited.

Whoever willfully violates the aforesaid regulation shall, upon conviction thereof, be punishable by a fine of not more than $1,000. Whoever willfully violates this regulation with respect to any facility, installation, or real property enclosed by a fence, wall, floor, roof, or other structural barrier, shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished by a fine of not to exceed $5,000 or imprisonment for not more than 1 year, or both.

By authority of Section 229 of the Atomic Energy Act of 1954, as amended, and Part 860 of the Rules and Regulations of the United States Department of Energy, this facility, installation, or real property has been designated as subject to these regulations by the United States Department of Energy.

Exhibit F-1. Example INL Boundary No Grazing Sign
The unauthorized entry upon any facility, installation, or real property subject to the jurisdiction, administration or in the custody of the United States Department of Energy, which has been designated as subject to the provisions contained in Title 10, Code of Federal Regulations, Part 860, is prohibited. The unauthorized carrying, transporting, or otherwise introducing or causing to be introduced, any dangerous weapon, explosive, or other dangerous instrument or material likely to produce substantial injury or damage to persons or property, into or upon such facility, installation, or real property is likewise prohibited.

Whoever willfully violates these regulations upon conviction, shall be punishable by a fine of not more than $5,000. Whoever willfully violates these regulations with respect to any facility, installation, or real property enclosed by a fence, wall, floor, roof, or other structural barrier, shall be guilty of a misdemeanor and, upon conviction, shall be punished by a fine not to exceed $100,000 or imprisonment for not more than 1 year, or both. (Title 42, United States Code, § 2278(a); Title 18, United States Code, § 3571.)

By authority of Section 229 of the Atomic Energy Act of 1954, as amended [(Title 42, United States Code, § 2278(a)], and Title 10, Code of Federal Regulations, Part 860 of the rules and regulations of the Department of Energy, this facility, installation, or real property has been designated as subject to these regulations by the United States Department of Energy. Trespassers may be subject to the provisions stated above.

Exhibit F-2. Example INL Boundary No Trespassing Sign
Exhibit F-3. Example of Warning Sign
Exhibit F-4. Example of Hazardous Waste Generator Improvements Rule (HWGIR) warning labels/signs at AMWTP facilities