

**HWMA/RCRA PART B PERMIT**  
**FOR THE**  
**IDAHO NATIONAL LABORATORY**

**BOOK 1 OF 1**

**PER-140 – MATERIALS AND FUELS COMPLEX**  
**SODIUM PROCESS FACILITY AND**  
**SECONDARY SODIUM SYSTEM**

**ATTACHMENT 3**

**SECTION F – PROCEDURES TO PREVENT HAZARDS**  
**AND**  
**SECTION F-1 – SECURITY**

**MODIFICATION DATE: December 5, 2012**

**CONTENTS**

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

    F-1 Security ..... 1

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

            F-1(a)(1) Twenty-Four Hour Surveillance System ..... 1

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

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

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

            F-1(a)(3) Warning Signs ..... 3

**ATTACHMENTS**

- F-1. Photograph of HWMA Unit Access Doors Warning Signs

1 **F. PROCEDURES TO PREVENT HAZARDS [Idaho Administrative**  
2 **Procedures Act (IDAPA) 58.01.05.008 and 012; 40 Code of Federal**  
3 **Regulations (CFR) 264.14. 15, 17, 32, 33, 35, 174 176, 177, 195, 198,**  
4 **602 and 270.14-16]**

5 In accordance with the requirements of Idaho Administrative Procedures  
6 Act (IDAPA) 58.01.05.008 and 012; 40 Code of Federal Regulations  
7 (CFR) 264.14, and 15, 17, 32, 33, 35, 174, 176, 177, 195, 198 and 602 and  
8 270.14–16, this section of the Hazardous Waste Management Act  
9 (HWMA)/Resource Conservation and Recovery Act (RCRA) Permit  
10 describes the procedures that will be taken to prevent hazards during  
11 hazardous waste (HW)/mixed waste (MW) storage, repackaging and/or  
12 treatment at the Materials and Fuels Complex (MFC) HWMA units. For  
13 reference, the locations of the MFCHWMA units discussed in this section  
14 are shown in the INL HWMA/RCRA Permit in Attachment 1, Facility  
15 Description, Section B, MFC Facility Description.

16 The information provided in this section is organized by subsection as  
17 follows:

- 18 • Subsection F-1, Security
- 19 • Subsection F-2, Inspections

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

22 **F-1(a) Security Procedures and Equipment [IDAPA 58.01.05.012 and**  
23 **58.01.05.008; 40 CFR 270.14(b)(4) and 264.14]**

24 MFC HWMA units are located within MFC property protection areas  
25 (PPAs), which are controlled access areas patrolled by INL security police  
26 officers (SPOs) and defined by security fences. Details of in-place security  
27 procedures and equipment are described in the following subsections.

28 **F-1(a)(1) Twenty-Four Hour Surveillance System [IDAPA 58.01.05.008; 40**  
29 **CFR 264.14(b)(1)]**

30 The MFC PPAs have a 24-hr surveillance system and key card entry  
31 system to control access into the MFC PPAs. Also, 24-hr surveillance of  
32 the area is provided by SPOs who patrol the area and monitor the

1 perimeter with surveillance cameras. An intrusion-detection system  
2 constantly monitors the entire MFC PPA perimeter.

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

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

5 The HWMA units are located within the MFC PPAs. The PPAs are  
6 defined by security fences, either a double or single, 8-ft tall, chain-link  
7 fence topped with razor wire that surrounds the MFC PPAs. A map  
8 showing the barrier fencing is provided in this Permit in Attachment 1,  
9 Facility Description, Section B, MFC Facility Description.

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

11 Access to the MFC PPAs is controlled by eight gates. The majority of  
12 personnel and vehicular traffic enter and exit the MFC PPAs through the  
13 main gate, which is staffed by MFC SPOs. A single controlled roadway  
14 access funnels personnel and vehicular traffic to the main gate. Other  
15 gates, used on an as-needed basis, are otherwise locked and monitored by  
16 24-hr surveillance.

17 The MFC Security Building (Bldg. 701), also known as the guardhouse, is  
18 located at the main gate and is the main ingress/egress point to MFC  
19 facilities. Only authorized personnel and escorted, authorized visitors,  
20 holding appropriate identification badges, are allowed entry. The  
21 guardhouse is staffed by INL SPOs, 24-hr a day, 7 days a week.

22 In addition, access to the HWMA units may be further controlled by a key  
23 card entry system, locked doors/gates and/or 24-hr surveillance system. A  
24 photograph of a HWMA unit access door with a warning sign is provided  
25 in Attachment 3, Security – Attachment F-1. Access to the HWMA units  
26 is restricted to personnel who are qualified in accordance with  
27 facility-specific training requirements and authorized by the HWMA unit  
28 management. The training records documenting completion of required  
29 HWMA facility-specific training are maintained in accordance with this  
30 Permit in Attachment 5, Section H, Personnel Training. Access by any  
31 other individuals (such as visitors or tour groups) may be granted provided  
32 they are continuously escorted by qualified personnel and authorized by  
33 the HWMA unit manager or designee.

1 **F-1(a)(3) Warning Signs [IDAPA 58.01.05.008; 40 CFR 264.14(c)]**

2 HWMA unit access doors/gates are posted with warning signs. Typically  
3 there are several messages depending on the HW/MW managed in the  
4 HWMA unit. At a minimum there will always be a posting with the  
5 message:

6 **DANGER UNAUTHORIZED PERSONNEL KEEP OUT.**

7 A photograph of this warning sign is provided in Attachment 3, Security –  
8 Attachment F-1

## Attachment F-1

### Photograph of Example of HWMA Unit Access Door Warning Sign

(Example of Danger Sign Only)

