

HWMA/RCRA STORAGE and TREATMENT PERMIT
for the
MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 3

Section F-1 – Security

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EFFECTIVE DATE: OCTOBER 1, 2015

REVISION DATE: OCTOBER 30, 2017

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F. PROCEDURES TO PREVENT HAZARDS (IDAPA 58.01.05.008 and 012; 40 CFR 264.14, 15, 17, 32, 33, 35, 174, 176, 177, 195, 198, 602, and 270.14-16)

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

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

- Subsection F-1, Security
- Subsection F-2, Inspections
- Subsection F-3, Prevention and Preparedness
- Subsection F-4, Preventive Procedures, Structures, and Equipment
- Subsection F-5, Ignitable, Reactive, and Incompatible Wastes.

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

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

MFC HWMA units [excluding the Radioactive Scrap and Waste Facility (RSWF), RSWF staging/storage area and North Fenced Area (NFA)] are located within MFC property protection areas (PPAs), which are controlled access areas patrolled by INL security police officers (SPOs) and defined by security fences. The RSWF, RSWF staging/storage area and NFA are controlled areas outside of a PPA, but are also patrolled by INL security and defined by security fences. Details of in-place security procedures and equipment are described in the following subsections.

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

The MFC PPAs have 24-hr surveillance systems and key card entry systems to control access. Also, 24-hr surveillance of the areas is provided by SPOs who patrol the areas and monitor the perimeters with surveillance cameras. An intrusion-detection system constantly monitors the entire main MFC PPA perimeter.

RSWF is illuminated by perimeter lighting with security patrols providing 24-hour coverage, and includes motion detectors and cameras that are monitored in the Central Alarm Station.

RSWF staging/storage area and NFA have SPO patrols providing 24-hour coverage.

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

The HWMA units, with the exception of RSWF, RSWF staging/storage area and NFA, are located within the MFC PPAs. The PPAs are defined and surrounded by security fences; either double or single, 8-ft tall, chain-link fences topped with razor wire. A map showing the barrier fencing is provided in Attachment 1, Facility Description, Section B, MFC Facility Description.

The RSWF is enclosed by a 7-ft high security fence and the RSWF staging/storage area and NFA are enclosed by a 9-ft high security fence. The INL SPOs are staffed 24 hours a day and seven days a week.

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

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

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

Access to the HWMA units may be further controlled by key card entry systems, locked doors/gates, and/or 24-hr surveillance systems. A photograph of a HWMA unit with access controls is provided in Attachment F-1. Access to the HWMA units is restricted to personnel who are qualified in accordance with facility-specific training requirements and authorized by the HWMA unit management. The training records documenting completion of required HWMA facility-specific training are maintained in accordance with Attachment 5, Section H, Personnel Training. Access by other individuals (such as visitors or tour groups) may be granted, provided they are continuously escorted by qualified personnel and authorized by the HWMA unit manager, or designee.

Access to RSWF is gained through the personnel trailer via its personnel gate or two chain link gates (locked) located at the southwest corner and the northeast center of the facility. The INL SPOs are staffed 24 hours a day and seven days a week.

Access to RSWF staging/storage area is through two locked gates, one off the main access road that allows vehicles to enter or exit from the southeast side of the road and one that allows vehicles to enter or exit onto the main access road from the northeast side.

Access to the NFA is through two locked gates off the main access road that allow vehicles to enter or exit from the southwest side.

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

HWMA unit access doors/gates are posted with warning signs into the active portions of the HWMUs, which include each entrance gate into RSWF, RSWF staging/storage area and NFA. There are typically several messages depending on the HW/MW managed in the HWMA unit. At a minimum, there will always be a posting with the message:

DANGER, UNAUTHORIZED PERSONNEL KEEP OUT.

A photograph of this warning sign is provided in Attachment F-2.

Attachment F-1

Photographs of MFC Security Barrier Fencing and Postings



NOTICE
THIS AREA IS MONITORED BY
PHYSICAL PROTECTION
SURVEILLANCE EQUIPMENT

No Trespassing
United States
Department of Energy



ATTENTION
BY ENTERING THIS AREA YOU CONSENT TO
THESE PROCEDURES:
ALL PERSONS, VEHICLES, AND ITEMS
ENTERING AND LEAVING THIS AREA
WILL BE SEARCHED.
PROHIBITED AND UNAUTHORIZED ARTICLES
FOUND MAY BE SEIZED

Searches on entry are to prevent the introduction of prohibited articles. Prohibited articles include firearms or other weapons, explosives, incendiary devices, or other items capable of causing personal injury or property damage; cameras, copying or reproducing devices; recording or transmitting devices; alcohol or illegal drugs; or other devices with similar purpose or effect.

Searches on exit are to prevent the unauthorized removal of special nuclear material, classified documents, or other government property.



#1

CAUTION
SPECIAL INSTRUCTIONS

CAUTION
CONTROLLED AREA

Attachment F-2

Photograph of HWMA Unit Access Door Warning Sign

(Danger Sign Only)



DANGER

**UNAUTHORIZED
PERSONNEL**

KEEP OUT