Attachment 3
Security Procedures
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F.0 Procedure to Prevent Hazards

The information provided in this Section is submitted in accordance with the requirements of IDAPA 58.01.05.012 [40 CFR 270.14] and applicable sections of IDAPA 58.01.05.008 [40 CFR 264.14, 264.15, 264.17, 264.174, 264.194, and 264.226].

The following subject areas will be addressed in this Section:

- General security provisions
- Inspection schedule
- Spill prevention and containment
- Prevention of accidental ignition or reaction of ignitable, reactive, or incompatible wastes, as they relate to hazard prevention

Facility security and safety related features, including security fencing and gates, are shown on Drawing Number PRMI-T10.

F.1 Security

In accordance with IDAPA 58.01.05.008 [40 CFR 264.14], USEI makes every effort to prevent the unknowing entry, and to minimize the possibility of unauthorized entry, into the active portions of the facility.

F.1.a Security Procedures and Equipment

The facility has procedures and equipment in place to minimize opportunities for unauthorized entry into the facility. Procedures, including routine safety and security inspections, and equipment consisting of gates and fences are discussed below.

F.1.a.(1) Surveillance System

The facility is completely surrounded by a fence that controls entry to the facility at all times. Therefore, twenty-four hour surveillance is not required.

F.1.a.(2) Barrier

A six (6) foot high chain-link fence completely surrounds the perimeter of the facility. Drawing # PRMI-T10 shows the location of the fencing and gates. This perimeter fence is topped with barbed wire to deter entry over the fence. The fence is monitored by regularly-scheduled inspections, to detect breaches that could allow unauthorized entry as described in paragraph F.2.a.(2).

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

The facility is equipped with several gates for ingress and egress purposes. During normal operating hours, only the main gate is used for personnel and vehicle access. The other gates are used for other personnel and vehicle access, as necessary. Normal operating hours are from 7:00 a.m. to 5:00 p.m., Monday through Friday, excluding holidays. However, it is not unusual to adjust operating hours depending on waste receipts and available daylight hours and operational requirements.

The main gate is kept in the closed position unless attended by personnel or when a vehicle is entering or exiting the gate. A guard house is located adjacent to the gate within the fenced perimeter. All vehicles
entering the facility through the main gate receive guidance and instruction from personnel at the gate and within the facility. Road signs are also present providing specific instructions to direct traffic to the appropriate facility locations as well as facility traffic regulations.

Alternately, USEI may elect to control gate access during normal working hours by use of a TV-monitored remote control system. An intercom system at the main gate would allow visitors to communicate with facility personnel or security personnel before being granted access to the facility. Through use of this intercom system, facility personnel may instruct visitors regarding where to proceed within the active portion of the facility.

The alternate vehicle access gates are locked except when facility operations require alternative vehicle access (e.g., hauling material from gravel source) or during emergency situations. When used for these occasional purposes, the gates are closed and locked when access through these gate(s) is no longer needed.

The personnel gates are kept locked except for emergency situations as described in the Contingency Plan or when the gate is under observation by personnel. When unlocked during an emergency situation, access through these gates is monitored by facility personnel until relocked.

Currently, USEI maintains 24-hour coverage at the guard shack, however, this level of coverage may be modified, as necessary. Per the requirements of IDAPA 58.01.05.008 [40 CFR 264.14], USEI is required to prevent the unknowing entry, and minimize the possibility of unauthorized entry onto the active portion of the facility. Since USEI maintains a locked facility with a six (6) foot fence, USEI will meet the requirements regardless of whether or not guards are on the facility 24-hours per day.

**F.1.a.(4) Warning Signs**

Pursuant to IDAPA 58.01.05.008 [40 CFR 264.14], signs stating “Danger — Unauthorized Personnel Keep Out” are posted at all fence gates at intervals of approximately every 300 feet of fence around the facility. These signs are visible from all approach angles, are at least 12 inches by 18 inches in dimension, and are legible from a distance of 25 feet.

**F.1.b Waiver**

USEI does not request a waiver of the security procedures and equipment requirements stated in IDAPA 58.01.05.008 [40 CFR Part 264.14(a)(1), (2)].
RCRA FEATURES:
1. OUTDOOR STABILIZATION FACILITY
2. VEHICLES WASH FACILITY
3. EVAPORATION POND LOADING / UNLOADING
4. RCRA STORAGE TANKS - LEACHATE
5. PROCESS PLANT PAD
6. INDOOR STABILIZATION FACILITY
7. EAST TRUCK UNLOADING APRONS 1, 2, & 3
8. WEST TRUCK UNLOADING APRONS 1 & 2
9. LEACHATE TREATMENT SYSTEM
10. RCRA STORAGE TANKS - LEACHATE
11. PROCESS PLANT PAD
12. INDOOR STABILIZATION FACILITY
13. EAST TRUCK UNLOADING APRONS 1, 2, & 3
14. WEST TRUCK UNLOADING APRONS 1 & 2
15. FUEL STORAGE TANKS / STATION
16. COMPRRESSED GAS STORAGE AREA
17. REAGENT STORAGE
18. SECURITY BLDG
19. PROPANE TANKS
20. SAFETY EQUIPMENT - CONTAINERS
21. PAD 4 OFFICE
22. PAD 7 OFFICE
23. PCB CONTAINMENT (INACTIVE)
24. HYDRANT (NON-POWERED)