

SECTION F-1
SECURITY PLAN

Revision 0
February 2021

SECTION F-1 – SECURITY PLAN

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SECTION F-1 – SECURITY PLAN

1.0 SECURITY

In accordance with 40 CFR 264.14, 270.14(b)(4), and OAC 252:205-3-2(f), the CPCC plant has developed a security plan in conjunction with the Systech facility that includes a 24-hour surveillance system and warning signs to control entry into the plant. CPCC personnel are on site 24 hours per day and use hand-held radios, portable telephones, and the plant's internal telephone system to provide an immediate means of communication if a breach of security occurs. Visitor access to the plant is controlled by requiring all visitors to register at the CPCC main office and to be escorted by a plant employee at all times. Systech personnel employed by the on-site Systech operation are not considered to be visitors. Certain vendors and contractors that are routinely onsite or onsite for extended periods of time may not be escorted provided they have had MSHA Part 46 training and CPCC site specific introductory safety training to familiarize them with the locations and hazards associated with the FQW to ensure they are not unduly exposed.

1.1 24-hour Surveillance System

A camera and monitor provide continuous surveillance on the FQW pumps. The surveillance system is monitored by the CPCC Control Room personnel 24-hours per day when the kiln is in operation. A Kiln Burner Operator is on duty at all times in the CPCC Control Room when the kiln is operating. The Kiln Burner Operator, along with the Shift Supervisor/Leadman, are responsible for ensuring that no unauthorized personnel are in the area. In the event that the control room is not manned (e.g., annual plant shutdowns for maintenance) the gates are locked to prevent unauthorized access to the operational areas. The active area of the CPCC kilns is relatively small, aiding in surveillance of the area.

1.2 Warning Signs

Signs bearing the legend "DANGER--UNAUTHORIZED PERSONNEL KEEP OUT" or similar language are posted at entrances to the CPCC plant and at access stairways to the kiln floor area. These signs are legible from a distance of at least 25 feet and are visible from all angles of approach to the kiln floors.

1.3 Fencing and Access Control

The CPCC plant is surrounded by a fence to prevent the unauthorized entry of personnel or livestock onto the active portion of the facility. The main gate is closed and provided with access control during overnights and weekends and all other gates are closed and locked during those times.

1.4 Waiver

The CPCC plant does not request a waiver from security requirements under 40 CFR 264.14(a).