

AZ HWMA PERMIT
EPA ID NO. AZD 980 814 479
UNIVERSAL PROPULSION COMPANY

PERMIT ATTACHMENT B
SECURITY PLAN
FINAL PERMIT REV 0

ATTACHMENT B

SECURITY PLAN

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SECURITY

B.1. SECURITY PROCEDURES AND EQUIPMENT

As required by R18-8-264.A (40 CFR §264.14), UPCO maintains property security through the use of fencing and gates as a means to control entry.

Except for the south-western corner of the property, the perimeter of the property is surrounded by Arizona State Land Department (ASLD) rangeland fencing. The rangeland fencing is approximately four feet in height and is constructed of four strands of barbed wire. The interior portion of the property that previously housed the facility operations is surrounded by a six foot high chain link security fence, with three strands of razor wire above the top of the security fence. The bottom of the fence exhibits no gaps sufficiently large to permit human entrance. This fence is referred to as the interior fence.

Gates are located along the southern portion of the interior fence at entrance points into what was previously the operating area. A gate is also located at the northeastern corner of the property. Additionally, gates have been placed in various locations along the rangeland fencing to allow access to the wells that were not within the original facility operational area. All of the gates are secured with padlocks that are accessible by both ASLD and UPCO.

The padlocks utilized by UPCO are manufactured by Best Access Systems, part number 41B772-L. The padlocks are machined from solid extruded brass with a chromium plating finish. They have a 3/8 inch diameter stainless steel shackle and a 7-pin core. A Best Access System padlock specification is included as Exhibit B-1.

On-site and off-site groundwater monitoring wells are protected from vandalism or damage by steel monuments set in concrete pads surrounding the top of each monitoring well casing. Within the monument, the top of each well casing includes a well seal that protects the well from entry by foreign objects or debris. Each monument is painted to blend in with the natural surroundings and has a steel cover which is also secured with a Best 41B772-L padlock. Specifications for the well monuments are found in Exhibit B-2.

B.2. 24 HOUR SURVEILLANCE SYSTEM

Since the facility is no longer active and UPCO maintains fencing consistent with R18-8-264.A (40 CFR §264.14(b)(ii)), the 24-hour surveillance system and contracted security are no longer maintained.

B.3. WARNING SIGNS

Although the facility is no longer active, UPCO will maintain warning signs in accordance with R18-8-264.A (40 CFR §264.14(c)). The signs state “Danger – Unauthorized Personnel Keep Out”, are mounted on each gate of the interior fence and upon the interior fence in a sufficient number so as to be seen from any approach. Signs must be legible from at least 25 feet away.

B.4 INSPECTIONS

The inspection checklist for the wells, fencing and gates is in Exhibit B-3. A map of the fenced areas/gates is provided in Permit Attachment A, Exhibit A-1.

- B.4.1 On-site and off-site wells are inspected not less than once per calendar quarter to ensure proper well condition;
- B.4.2 The interior fence is inspected once per calendar quarter to verify integrity of the fence, and presence and condition of signage; Permittee shall maintain the fence so as to minimize gaps below the fence to minimize the possibility of trespass.
- B.4.3 All gates are inspected once per calendar quarter to verify gate function and integrity, condition of locks, and the presence and condition of warning signs.

B.5 REPAIRS

Inspector shall note all deficiencies for wells, fencing, or gates on the checklist, and damages shall be photographed. Orders for repair shall be made within 24 hours of discovery. Repairs shall be completed within thirty days, unless an extension is granted by the Director. Dates of orders and dates of repair shall be noted on the checklist. Repaired items shall be photographed. Checklists, repair orders, and photograph prints shall be retained in the operating record for the facility (see Permit Condition I.G).

B.6 TRESSPASS

Inspector shall note any signs of trespass on the inspection checklist. Trespass incidents shall be reported to the Phoenix Police Department non-emergency contact (Permit Attachment C) within twenty-four hours of discovery.

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EXHIBIT B-1

MONITOR WELL LOCK SPECIFICATIONS

STANLEY
Security Solutions



3 SERIES

PADLOCKS



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GENERAL INFORMATION

The heart of every Best Access Systems padlock is a standard key removable core which is interchangeable throughout most of the entire line of BEST products. This standardization permits BEST locks of any type, size or style to be masterkeyed into one system which can expand to include future locking needs.

B SERIES SHACKLE CHART

Shackle Material	Brass			Stainless Steel			Hardened Steel		
Series	11B	21B	41B	11B	21B	41B	11B	21B	41B
Shackle Diameter	1/4"	5/16"	3/8"	1/4"	5/16"	3/8"	1/4"	5/16"	3/8"
ASTM Grade	x	x	x	3	4	3	4	4	4
Cut Resistance	x	x	x	3	4	5	6	6	6
Corrosion	x	x	x	6	6	6	6	6	6
Tensil	x	x	x	4	4	4	4	4	4
Shock	x	x	x	6	4	3	4	4	4

PATENTS

Products protected by one or more of the following patents:

3,603,123	4,075,878	3,882,699
3,850,014	3,652,114	3,728,879
3,605,458	4,244,093	4,386,510
4,424,693	4,444,034	4,655,063
D290,085	Other patents pending.	

PATENTED KEYING

BEST Peaks®— For advanced solutions in key control and security, BEST offers Peaks®, the most adaptable and cost effective patented keying system on the market. The patented mechanism ensures that cylinders and cores will only operate with the Peaks® keys, which are only available through authorized BEST distributors.

For BEST products, Peaks® offers the security and convenience of a patented solution for interchangeable core. Peaks® is also available to adapt to a wide variety of locks from other manufacturers. All cylinders can be keyed into the same system, providing you the ability to operate all the locks at your facility using a single key, regardless of the lock manufacturer.



Specifications

Case– Machined from solid extruded brass or aluminum.

Standard finish is 626 satin chromium plated.

Width– 1 $\frac{5}{8}$ "

Length– 2 $\frac{1}{16}$ "

Thickness– $\frac{25}{32}$ "

Shackle– The shackle locks at both heel and toe.

The length of shackle opening is measured from top of case to inside of shackle when padlock is locked.

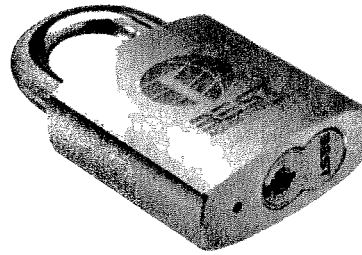
Material– Brass or stainless steel

Diameter– $\frac{1}{4}$ "

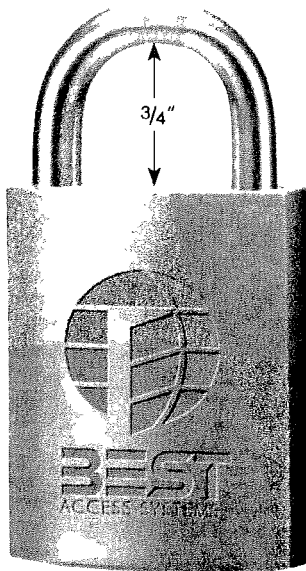
Width of opening– $\frac{7}{8}$ "

ASTM F883– Meets Grade 3 with stainless steel shackle.

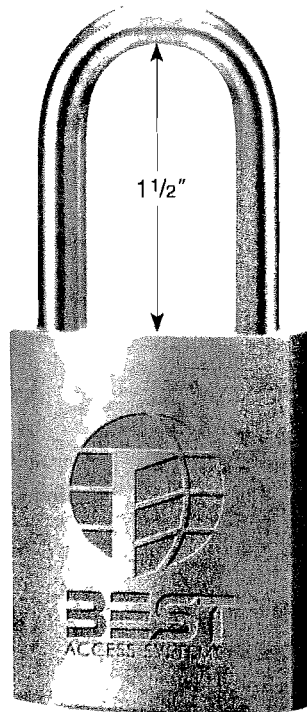
ASTM F883– Meets Grade 6 for option E. (Corrosion resistance).



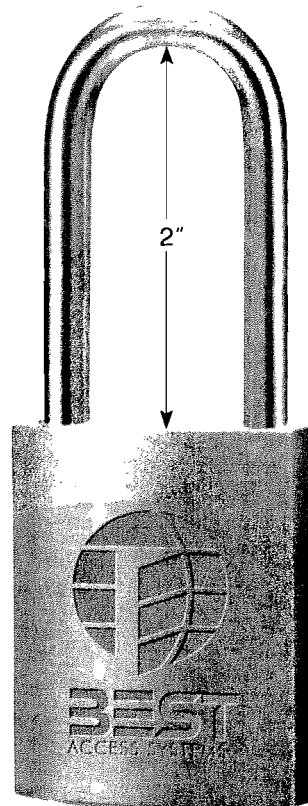
11B Padlock



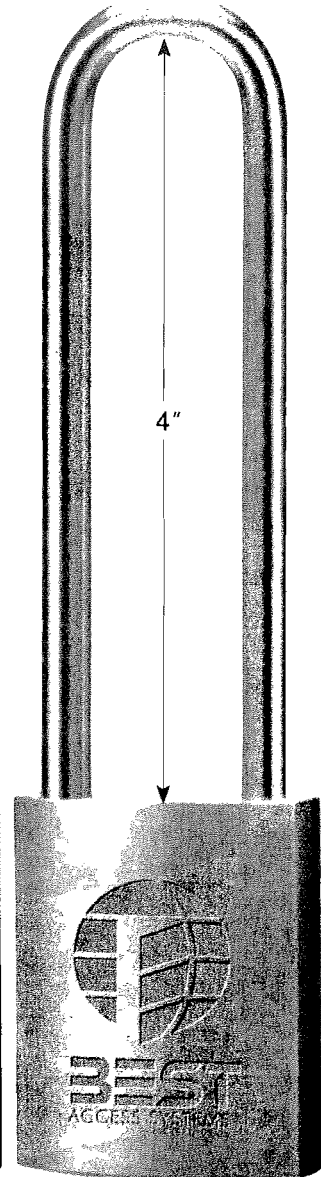
11B72 Actual Size



11B722 Actual Size



11B772 Actual Size



11B782 Actual Size

11B/12B – HOW TO ORDER

11B	7	2	T			
Shackle Diameter	Core Housing	Shackle Height	Function Code	Chain Option	Special	Options Stamp No.
11B– brass $\frac{1}{4}$ " diameter	7– 7 pin housing accepts all Best cores	Steel shackle	T–key retained L–non-key retained	M– case drilled for clevis only M1– bronze chain (11B only) M5– galvanize steel chain with gray polycoating (page 9)	Blank – Best logo PS1010 – safety first (11B only) (Specify padlock stamp number or describe stamp. (11B only) Price for special stamps available upon request. (page 9)	F3– frangible shackle (11B720 only) 606– satin brass (11B only) ZZ– double lockout (11B only) Red– anodized finish (12B only) Black– anodized finish (12B only) (pages 9-10)
12B– aluminum $\frac{1}{4}$ " dia.		Brass shackle				
		2 – $\frac{3}{4}$ " 22 – 1 $\frac{1}{2}$ " 72 – 2" 82 – 4"				
		0 – $\frac{3}{4}$ " 20 – 1 $\frac{1}{2}$ " 70 – 2" 80 – 4"				

21B/22B SERIES

Specifications

Case—Machined from solid extruded brass or aluminum.

Standard finish is 626 satin chromium plated.

Width— $1 \frac{25}{32}$ "

Length— $2 \frac{1}{16}$ "

Thickness— $\frac{13}{16}$ "

Shackle—The shackle locks at both heel and toe. The length of shackle opening is measured from top of case to inside of shackle when padlock is locked.

Material—Bronze or stainless steel

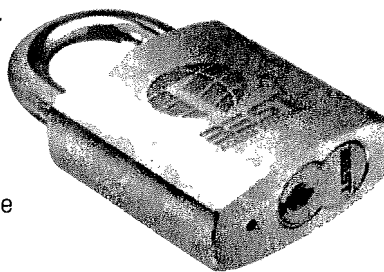
Diameter— $\frac{5}{16}$ "

Width of opening— $\frac{1}{8}$ "

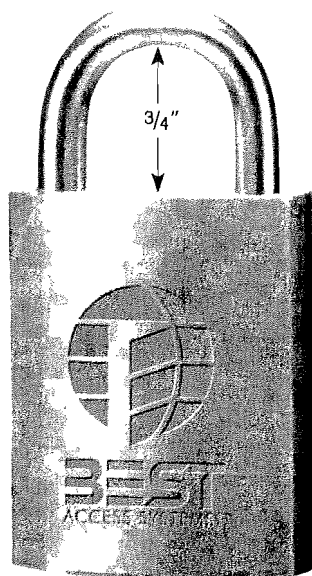
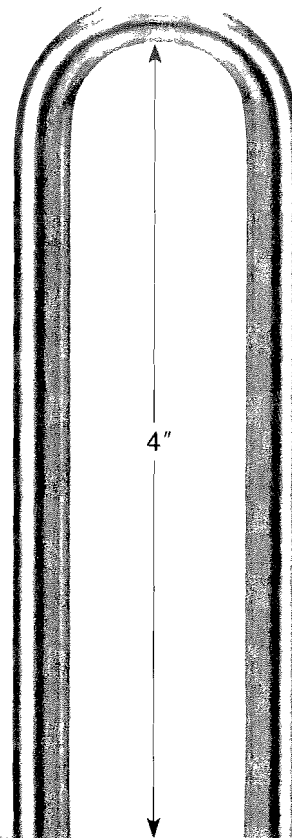
ASTM F883—Meets Grade 4 with stainless steel shackle.

ASTM F883—Meets Grade 6 for shackle cutting force with XSPL shackle option.

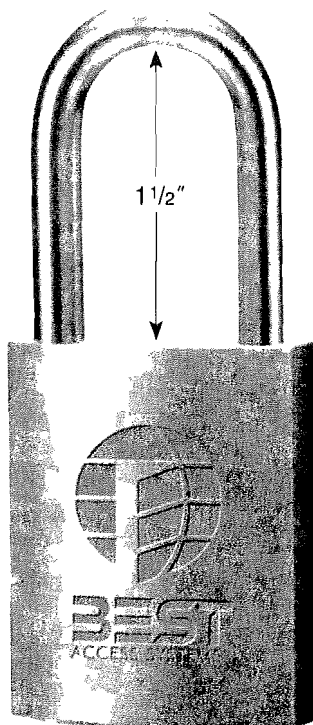
ASTM F883—Meets Grade 6 for option E. (Corrosion resistance).



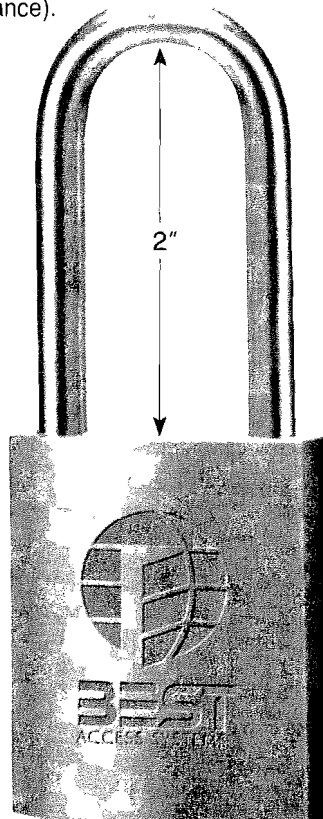
21B Padlock



21B72 Actual Size



21B722 Actual Size



21B772 Actual Size



21B782 Actual Size

21B/22B — HOW TO ORDER

21B Shackle Diameter	7 Core Housing	2 Shackle Code	T Function	Chain Option	Special Stamp No.	Options
21B— brass $\frac{5}{16}$ " dia. 22B— aluminum $\frac{5}{16}$ " dia.	7— 7 pin housing accepts all Best cores	Steel shackle 2— $\frac{3}{4}$ " 21— 1" w/shroud 22— $1 \frac{1}{2}$ " 72— 2" 82— 4" Brass shackle 0— $\frac{3}{4}$ " 20— $1 \frac{1}{2}$ " 70— 2" 80— 4"	T— key retained L— non-key retained	M— case drilled for clevis only M1—bronze chain (21B only) M5—galvanize steel chain with grey polycoating (page 9)	Blank—Best logo PS1010—safety first (21B only) (Specify padlock stamp number or describe stamp. (21B only) Price for special stamps on request.) (page 9)	606—satin brass (21B only) SH— shrouded with cut resistant shackle (21B only) WC— weather cover XSPL—cut resistant shackle Red— anodized finish (22B only) Black— anodized finish (22B only) (pages 9-10)

Specifications

Case—Machined from solid extruded brass or aluminum.

Standard finish is 626 satin chromium plated.

Width— $1 \frac{15}{16}$ "

Length— $2 \frac{1}{16}$ "

Thickness— $\frac{7}{8}$ "

Shackle—The shackle locks at both heel and toe.

The length of shackle opening is measured from top of case to inside of shackle when padlock is locked.

Material—Bronze or stainless steel

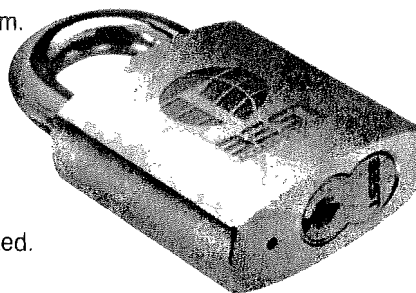
Diameter— $\frac{3}{8}$ "

Width of opening— $\frac{1}{8}$ "

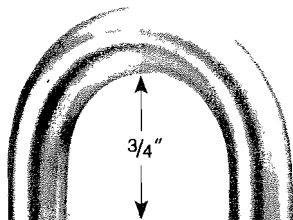
ASTM F883—Meets Grade 3 with stainless steel shackle, grade 4 with XSPL shackle.

ASTM F883—Meets Grade 6 for option E. (Corrosion resistance).

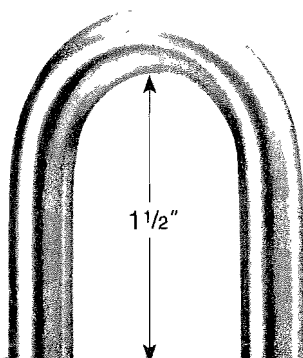
ASTM F883—Meets Grade 6 for shackle cutting force with XSPL shackle option



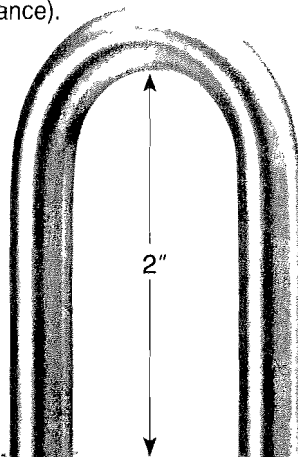
41B Padlock



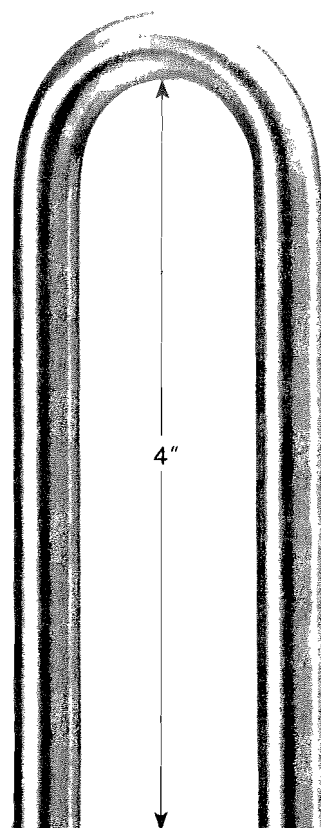
41B72 Actual Size



41B722 Actual Size



41B772 Actual Size



41B782 Actual Size

41B/42B — HOW TO ORDER

41B Shackle Diameter	7 Core Housing	2 Shackle Height	T Function	Chain Option	Special Stamp No.	Options
41B— brass $\frac{3}{8}$ " diameter 42B— aluminum $\frac{3}{8}$ " diameter	7— 7 pin housing all Best cores	Steel shackle 2 — $\frac{3}{4}$ " 22 — $1 \frac{1}{2}$ " 72 — 2" 82 — 4" Brass shackle 0 — $\frac{3}{4}$ " 20 — $1 \frac{1}{2}$ " 70 — 2" 80 — 4"	T— key retained L— non-key retained	M— case drilled for chain M1— bronze chain (41B only) M5— galvanize steel chain with gray polycoating (page 9)	Blank — Best logo (Specify padlock stamp number or describe stamp. (41B only.) Price for special stamps on request.) (page 9)	606— satin brass (41B only) S— car seal slot (41B only) WC— weather cover XSPL— cut resistant shackle Red— anodized finish (42B only) Black— anodized finish (42B only) (pages 9-10)

21BSH SHROUD OPTION



21B Padlock with Stainless Steel Shroud on hinge hasp (not supplied)



21B with Stainless Steel Shroud

Features & Benefits

- Cast stainless steel shroud with black powder-coated finish
- Through hardened shackle for cut resistance
- Utilized same internal components and body as standard 21B padlock
- Accepts all Best cores, with Standard, Premium, Peaks™ keying system
- Meets ASTM F883 Grade 4; meets Grade 6 for cut resistance
- Available in either key retained or non-key retained

21B SHROUD – HOW TO ORDER

21B	7	21	L			SH
Shackle Diameter	Core	Shackle Housing	Function Code	Chain Option	Special Stamp No.	Options
21B– 5/16" dia.	7– 7-pin housing accepts all BEST cores	21– 1" shackle opening	T– key retained L– non-key retained	N/A for shroud option	N/A for shroud option	SH– shroud with cut resistant shackle (21B only)

Specifications

Case— Machined from extruded brass. Standard finish 626 satin chromium plated.

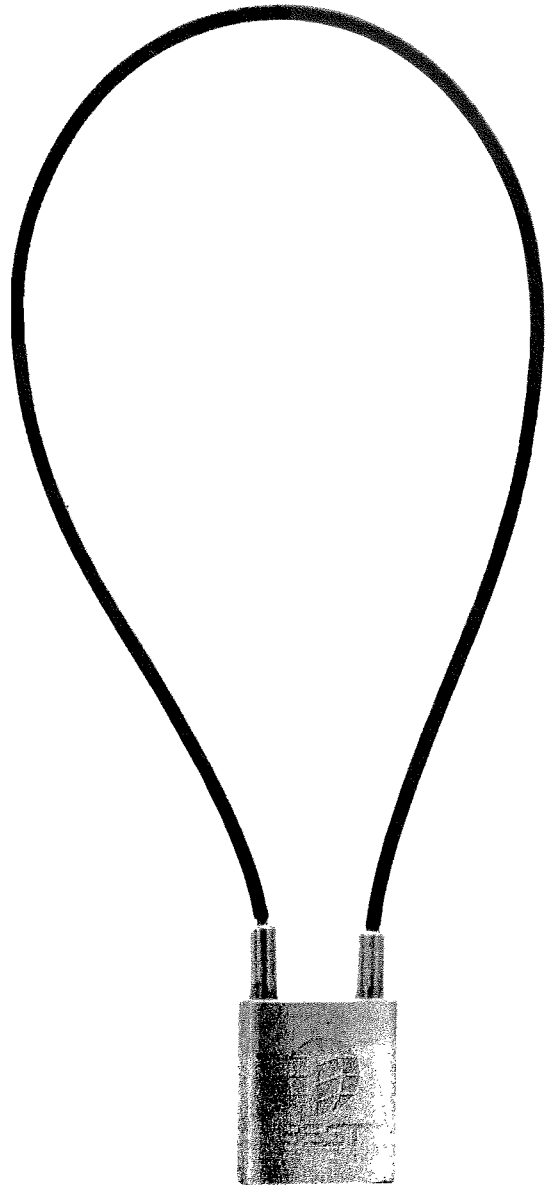
Width— 1 ²⁵/₃₂ "

Length— 2 ¹/₁₆ "

Thickness— ²⁷/₃₂ "

Shackle Cable: Diameter ¹/₈ " stainless steel. Length variable.
18" standard unless specified other length.

Cable jacket: A tough plastic coating protects vulnerable surfaces.
Measure cable length from top of case to top of case.



21JB7 - 18

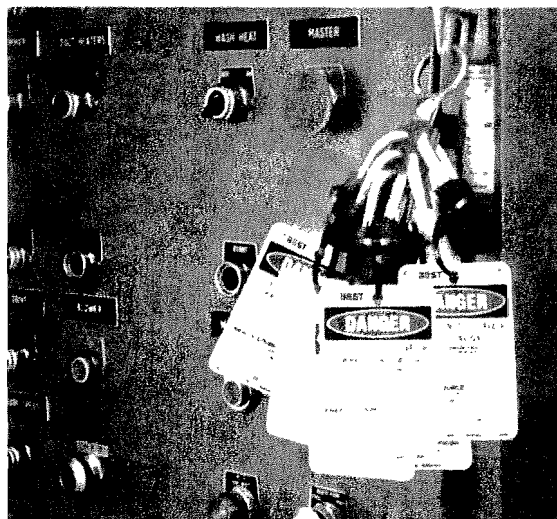
21JB — HOW TO ORDER

Series Housing	Core Length	Cable	Options
21JB— cable padlock	7— 7 pin housing accepts all Best cores	18— 18" 24— 24" 36— 36" 42— 42" 48— 48" 54— 54"	606— clear coated satin brass

LOCKOUT / TAGOUT

OSHA requires that a Lockout/Tagout system be placed upon energy control devices to ensure that machines and equipment are isolated from all energy sources before employees perform service or maintenance activities. This is particularly necessary where the unexpected energization, start-up, or release of stored energy could cause injury or equipment damage. Stanley Security Solutions' Lockout/Tagout system includes six durable PVC vinyl coated BEST padlocks with Lockout/Tagout devices (11B/12B, 21B/22B, 41B/42B).

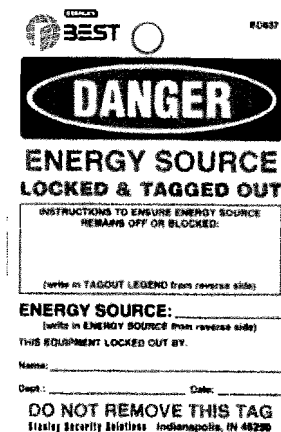
The OSHA vinyl coated padlocks will not chip or corrode. They also resist acids, oils or abrasions. Available is an OSHA accepted 6-padlock red polyresin coated aluminum lockout (BD655), and easy-to-read energy source identification tags. In addition to names of the workers, our tags can provide pertinent information, i.e. where the worker can be located. Details of OSHA Lockout/Tagout standard can be found in the code of Federal Regulations for labor at Title 29 part 1910.147, the control of hazardous energy Lockout/Tagout.



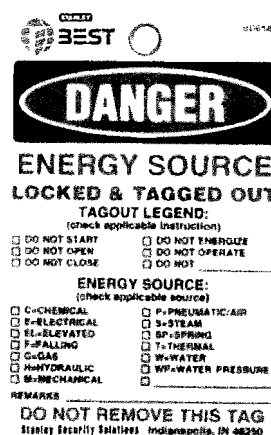
Lockout/Tagout Padlocks



**Lockouts
BD655**



**Front
Identification Tag
BD657 (includes one tie per tag)
Tagout Tag
BD658 (includes one tie per tag)**



**Back
Identification Tag**

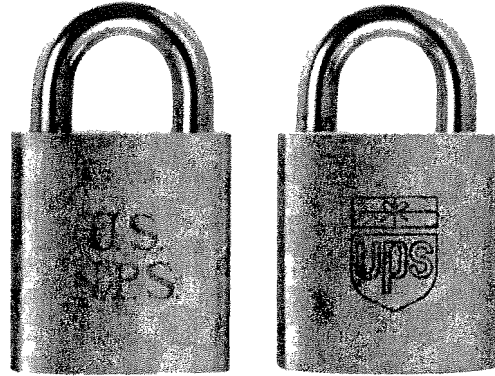
LOCKOUT/TAGOUT PADLOCKS – HOW TO ORDER

11B Padlock Series	7 Core Housing	2 Shackle Code	T Function Option	Chain	Special Stamp No.	O/ORA Options
11B/12B– 1/4" 21B/22B– 5/16" 41B/42B– 3/8"	7– 7 pin housing accepts all Best cores	For specific order procedures and complete specifications, see pages 3 through 7				Vinyl Cases O/RED– Red O/YEL– Yellow O/BLU– Blue O/BLA– Black O/ORA– Orange O/GRE– Green

ACCESSORIES AND OPTIONS

Special Stamped Padlocks

Upon special request, and at no charge other than the initial cost of the die, BEST padlocks may be die-stamped with the customer's identification as specified. If stamp has been previously ordered, specify stamp number. (Brass padlocks only.)

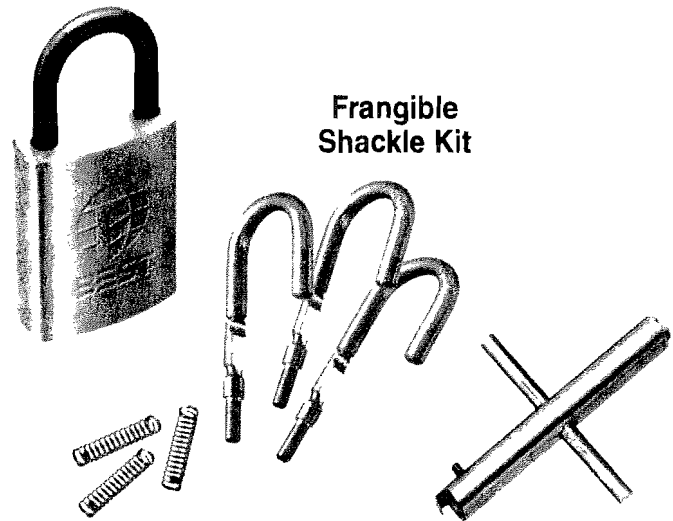


Samples of Padlock Stamping

F3-- Option Frangible Shackle

Available in 11B series only. The frangible shackle pad lock is designed for fire and safety equipment, cabinets, etc. where casual entry needs to be prevented. During emergency, the shackle may be snapped by a hard blow or strong, steady pressure permitting entry without use of a key. (Check lock regulations). A brass 1 1/2" - number 20 size shackle is made frangible through use of special break point. Broken shackles are easily replaced in the field and may be ordered separately. A complete frangible shackle kit (including three frangible shackles, three shackle springs and one padlock disassembly tool) may be ordered with each padlock order.

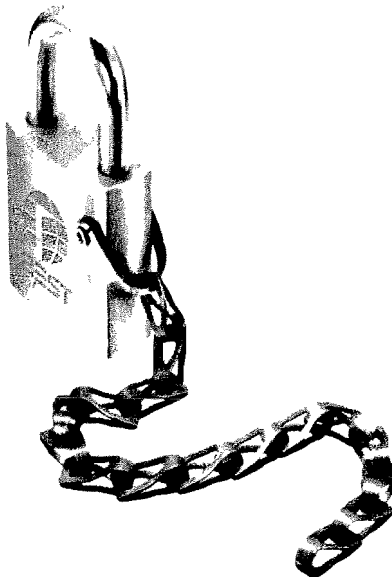
To order kit specify: 11BFK



Frangible
Shackle Kit

M-Option Chains

Chains may be supplied with padlock. When ordering clevis and chains, add M1 or M5 to padlock nomenclature. Standard chain length is 9", special length chains available upon request.



M1 - 9"
Bronze Chain

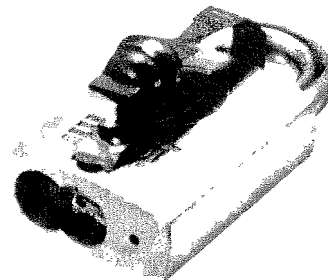


M5 - 9"
Galvanized Steel Chain with
Gray Plastic Polycoat Cover

ACCESSORIES AND OPTIONS

S- Option Car Seal Feature

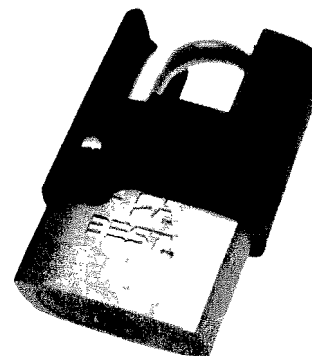
Available in all 41B padlocks. Case is slotted below the core to accommodate most popular car seal bands. When in place, car seal band insures tampered with. Seals are available direct from car seal manufacturers. A special long blade key is required for 7-pin systems. When ordering simply add "S" to the option column of the 41B nomenclature.



41B car seal feature

SH- Option Shrouded Padlock

Available in 21B padlocks. Cast stainless steel shroud with black powder-coated finish. Features hardened shackle for cut resistance. When ordering add "SH" to option column of the pad lock nomenclature.



21B shroud option

WC- Option Weather Covers

Available in 21B/22B and 41B/42B padlocks. The padlock weather covers are molded durable PVC that won't chip or corrode and resists acids, oils and abrasion. When ordering add "WC" to option column of the padlock nomenclature.



21B & 41B weather option

ZZ- Option Double Lockout/Safety First

Available in 11B only, the double lockout safety padlock provides additional safety for maintenance crews making repairs in widely separated areas. The shackles of 11B padlocks are passed through holes in the extended skirt at the base of this lock. As long as either 11B padlock remains in place, the lock-out safety padlock cannot be unlocked. Elliptical solid brass case is 1 1/2" wide and is stamped with words "Safety First" on one side. Holes at base of case will accommodate 11B shackles only. Minimum shackle opening should be 1 1/4". A long blade key is required for 7-pin systems. Dust cover cannot be used with double lockout.



11B double lockout option

PADLOCK REPAIR AND PARTS

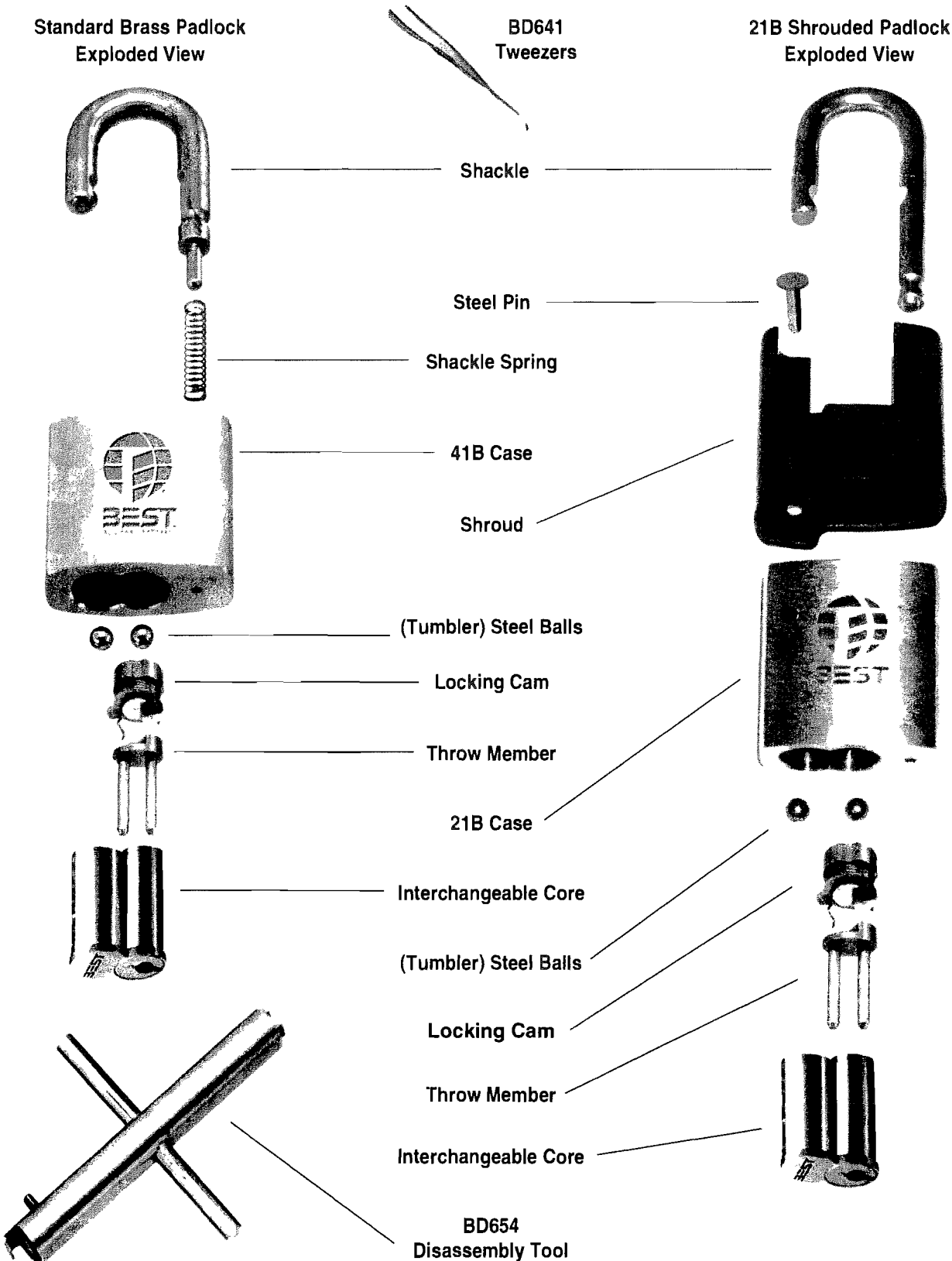
11B/12B – 21B/22B – 41B/42B Series

With the simplest of tools, proper replacement parts and minimal training, all BEST padlocks can be used for the duration of any installation. Listed below are the parts and tools required for the various series of padlocks. Contact your local Stanley Security Solutions office for special instruction and information about factory seminars for padlock repair. BEST padlocks can be repaired and worn parts replaced, virtually eliminating padlock replacement costs.

**Standard Brass Padlock
Exploded View**

**BD641
Tweezers**

**21B Shrouded Padlock
Exploded View**



For more information on Stanley Security Solutions' products, services, and office locations visit our web site at www.stanleysecuritysolutions.com

Product information contained in this catalog has been compiled and presented with as much care and completeness as is reasonably possible. Errors or mistakes may be present, and in many cases, reliance has been placed on information supplied by other manufacturers which may be in error or which may be subject to changes or modifications by the manufacturer without notice and without obligation. Therefore, no guarantee can be made or should be assumed or implied with regards to product information contained in this catalog.

STANLEY

Security Solutions

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10M 707

BAS028

AZ HWMA PERMIT
EPA ID NO. AZD 980 814 479
UNIVERSAL PROPULSION COMPANY

PERMIT ATTACHMENT B
SECURITY PLAN
FINAL PERMIT REV 0

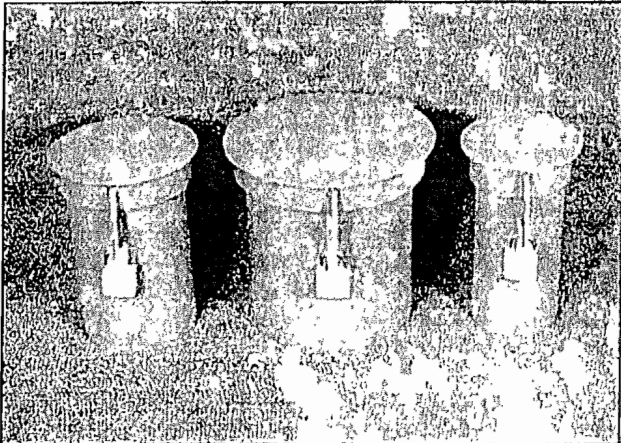
EXHIBIT B-2

MONITOR WELL MONUMENT SPECIFICATIONS

MORRIS

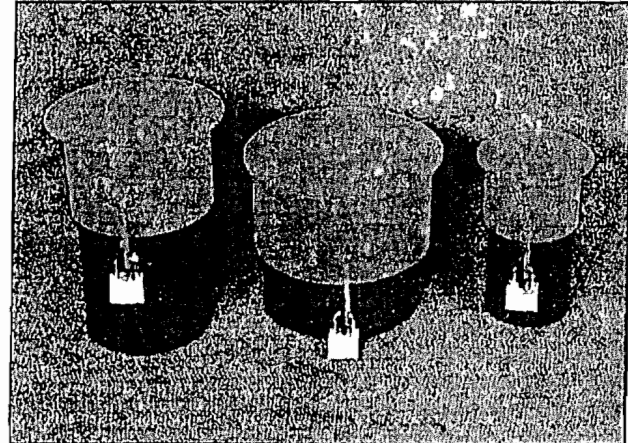
ABOVE GROUND

PROTECTIVE CASINGS

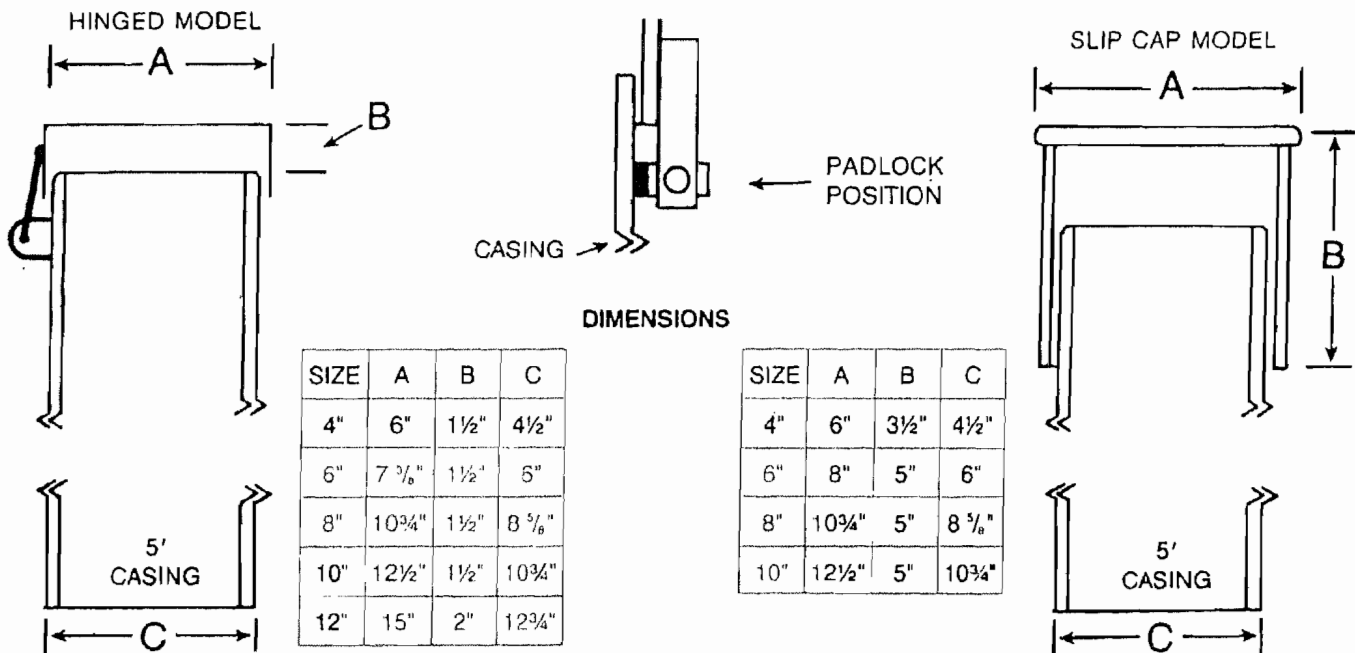


HINGED MODELS

- All Models Made From WELDED STEEL Construction
 - Tamper Proof
 - All 4", 6", 8" and 10" Models In Stock
 - Custom Sizes Available on Special Order



SLIP CAP MODELS



HINGED MODELS

ITEM #	DESCRIPTION	WEIGHT (LBS.)
300004201	4" MONITOR WELL HINGED LOCKING CAP WITH PROTECTIVE CASING	28
300006201	6" MONITOR WELL HINGED LOCKING CAP WITH PROTECTIVE CASING	37
300008201	8" MONITOR WELL HINGED LOCKING CAP WITH PROTECTIVE CASING	88
300010201	10" MONITOR WELL HINGED LOCKING CAP WITH PROTECTIVE CASING	110
300010201	12" MONITOR WELL HINGED LOCKING CAP WITH PROTECTIVE CASING	141

SLIP CAP MODELS

ITEM #	DESCRIPTION	WEIGHT (LBS.)
300004045	4" MONITOR WELL LOCKING CAP	5
300004046	4" MONITOR WELL LOCKING CAP WITH PROTECTIVE CASING	30
300006068	6" MONITOR WELL LOCKING CAP	7
300006069	6" MONITOR WELL LOCKING CAP WITH PROTECTIVE CASING	42
300008085	8" MONITOR WELL LOCKING CAP	23
300008086	8" MONITOR WELL LOCKING CAP WITH PROTECTIVE CASING	109
300008111	10" MONITOR WELL LOCKING CAP	32
300008112	10" MONITOR WELL LOCKING CAP WITH PROTECTIVE CASING	137

AZ HWMA PERMIT
EPA ID NO. AZD 980 814 479
UNIVERSAL PROPULSION COMPANY

PERMIT ATTACHMENT B
SECURITY PLAN
FINAL PERMIT REV 0

EXHIBIT B-3

MONITOR WELL AND FENCING INSPECTION LOG

MONITORING WELL & SECURITY FENCING INSPECTION LOG
UNIVERSAL PROPULSION COMPANY, INC. (UPCO)
(40 CFR 264.15)

Inspector Name (Print): _____

Date: _____

Inspector Signature: _____

Time: _____

Monitoring Well or Equipment Identification	In Operational Condition (Y/N)	Secured? (Y/N)	Comments
MW-1			
MW-2			
MW-3			
MW-4			
MW-5			
MW-6			
MW-7			
MW-8			
MW-9			
MW-10			
MW-11			
MW-12			
MW-13			
MW-14			
MW-15			
MW-16			
MW-17			
MW-18			
MW-19			
SVMW-1			
UPCO Interior Fence, Gates & Locks			
ASLD Exterior Fence, Gates & Locks			
Off-Site Wells' Fence, Gates & Locks			
ID	Corrective Action		Date Corrected

Corrective action is required for each "N" identified above.