

Section 2.19 Security Concerns

2.19.1 Port of Vancouver Security

The Facility is located at the Port and will be operated in accordance with the Port's security program. Access to the port's marine terminals is allowed primarily through the main security gate at the 26th Avenue overpass. The port's security plan and policies require that all people entering the port's terminal areas show photo identification and have a valid business purpose to be on the Facility. This is accomplished through the port's screening process, administered to anyone who enters the port's marine terminals. In addition, this area is secured with fencing, video camera monitors and 24/7 stationary and mobile patrols.

All personnel who perform work (including contractors and consultants) within the Port's maritime facility are required to have a Transportation Worker Identification Credential (TWIC) in order to perform their duties without an appropriate credential person to provide an escort. This program was established by Congress and is administered by the Transportation Security Agency and the USCG.

2.19.2 Construction Phase Security Plan

The Applicant and selected contractor(s) will develop a formal site security plan to safely secure the site during the construction phase. This plan will outline access procedures, roles and responsibilities and identify the methods of physically securing the site. Measures such as perimeter fencing, access gates, CCTV systems and security personnel may be employed. Area 400 will require that construction personnel comply with TWIC requirements. The plan will be developed in coordination with the Port security personnel.–

2.19.3 Operations Site Security Plan

An Operations Site Security plan will be completed pursuant to 33 CFR 105 and will be approved by the Port and USCG. Security measures anticipated at the site include fencing to prevent any public access to project facilities. The northern side of the WVFA rail loop facilities is fenced to prevent public access. Security gating will be provided at the rail loop access at the Gateway overpass. Security provisions for Area 400, Marine Vessel Loading, will be implemented as described in Section 2.19.4 below.

Parking for the Facility's operations and maintenance staff will be provided at the administration and support buildings. All other persons, such as vendor equipment personnel, maintenance contractors, material suppliers, and all others, will acquire permission for access from a designated site employee prior to entrance. Access to each project area will be granted on a project/job need basis by the Plant Manager.

2.19.4 Federal Requirements Applicable to Area 400 – Marine Vessel Loading

2.19.4.1 Overview

As a result of the Facility's capacity to transfer oil in bulk to a vessel that has a total capacity of all bulk products carried of 250 barrels or more, the Facility is regulated under the federal provisions of 33 CFR 154. In turn, the Maritime Transportation and Security Act of 2002 (MTSA), as implemented through 33 CFR 105, establishes federally mandated security requirements for facilities regulated under 33 CFR 154. The provisions of 33 CFR 105 will only

apply to the facilities located, and activities conducted, at Area 400 – Marine Vessel Loading. The primary provisions of 33 CFR 105 are summarized in Table 2.19-1 below.

Table 2.19-1. Summary of 33 CFR 105 Provisions

Subpart	Provisions
Subpart A – General	<ul style="list-style-type: none"> • Applicability, documentation and compliance dates • Compliance with the Maritime Security (MARSEC) directive⁽¹⁾
Subpart B – Facility Security Requirements	<ul style="list-style-type: none"> • Definition of a security organizational structure, including the appointment of a Facility Security Officer, preparation and conducting of a Facility Security Assessment (FSA) in accordance with Subpart C, and implementation of the Facility Security Plan (FSP), including related training, drill and record keeping activities. • Implementation of the TWIC program • Compliance with Maritime Security (MARSEC) level coordination and implementation at the port ⁽¹⁾
Subpart C – Facility Security Assessment (FSA)	<ul style="list-style-type: none"> • Requirements for conducting and documenting the FSA
Subpart D – Facility Security Plan (FSP)	<ul style="list-style-type: none"> • Format, Content and preparation of the FSP • Requirements for submittal of the FSP 60 days prior to the beginning of terminal operations • Amendment, annual auditing, and biannual USCG inspection processes

(1) MARSEC directives and levels are established by the USCG under 33 CFR 101, Maritime Security: General.

2.19.4.2 Facility Security Plan

The Applicant will conduct a FSA and develop a FSP in accordance with 33 CFR 105; the plan will be submitted to the USCG Captain of the Port (COPT) 60 days prior to beginning operations at Area 400. The plan is sensitive security information and will be protected in accordance with 49 CFR 1520. The contents of the plan will be developed based on the final design and operational parameters of the Facility, and are expected to include, but not be limited to, the implementation of the following security actions, subject to final determination by the USCG:

- All unloading, storage, internal pipe lines, and valves will be contained within the Facility’s restricted area that will be monitored by a dedicated security force at all times.
- Access to the restricted area will be secured and monitored.
- Site security lighting
- Monitored security video camera system
- All persons requiring unescorted access to the Facility, including employees and contractors, must possess Transportation Workers Identification Credential (TWIC).
- Conducting security exercises and drills
- Identification of coordination actions with local and state law enforcement agencies.
- Procedures for access during emergency events
- Appointing a Facility Security Office with responsibilities to maintain and implement the FSP.

In addition, the Port will support and supplement the Facility’s security efforts with controls to deter access, and fixed and mobile patrols and will coordinate with the Facility for an integrated security posture.