

MINIMUM SECURITY STANDARDS FOR HIGH-SECURITY WAREHOUSE AND HIGH SECURITY STORAGE ROOMS

Structural Standards

The minimum structural standards described below will be required for all future construction. Existing structures shall be brought into compliance before they are approved for storage of Title II weapons. A deficiency in a given element of the standards will not constitute grounds for disapproval if it is compensated by an appropriate countermeasure that assures the overall security of the facility.

A. High-Security Warehouse - High security warehouses shall have walls constructed of masonry (reinforced concrete blocks, brick) or rein-forced concrete with concrete floors. Roof structures and/or ceilings shall be of fire-resistant construction which will provide a degree of security equal to or greater than the approved protection of windows and doors. The number of doors and windows will be limited to those absolutely necessary.

1. Windows shall be protected with 9-gauge steel mesh with a 2-inch diamond grid secured to a steel frame securely attached to the building with the fastenings inaccessible from the building exterior. Expanded metal providing the same degree or security as 9-gauge steel mesh may be used in lieu of that mesh. Steel bars may be used to protect windows if vertical bars are not more than 4 inches apart with horizontal bars welded to the vertical bars so that the interstices do not exceed 32 square inches. The ends of the steel bars will be embedded securely in the structure of the building or welded to a steel frame fastened securely to the building, as mentioned above. Operators should establish procedures to assure that all windows are locked at the close of business each day.
2. Access doors shall be constructed of materials that will render forcible entry extremely difficult within five minutes, using tools that are readily obtainable from retail stores. All doors, except the main entrance, shall be secured on the inside by deadlocking bars or bolts. Deadlocking bars shall be shielded from defeat from the exterior and drilled and pinned to their holding brackets. Door frames shall be fastened to the building so that they cannot be separated from the casing. The main entrance to the warehouse shall be secured by a high-security padlock and hasp. Outswinging doors shall be mounted on fixed-pin security-type hinges, safety stud hinges, or the equivalent.

B. Buildings Which Contain a High-Security Storage Room - the circumstances surrounding the location of a high-security storage room within a specific building will vary from one facility to another. Customs shall encourage operators to establish procedures to reduce the opportunity for unobserved access to the high-security storage room within the building. Internal procedures shall include provisions to prevent loitering near the high-security storage room. Physical security measures for buildings in which a high-security storage room is located shall, at a minimum, comply with Customs Standards for Cargo Security (TD 72-56).

C. High-Security Storage Room

3. The roofs, walls, and flooring of high-security storage rooms shall be constructed of the same materials as a high-security storage warehouse.

- a. Windows - The number of windows shall be limited to those absolutely necessary. All high-security storage room windows shall be protected as described in paragraph A(l) above.

- b. Doors - The entrance door to the high-security storage room shall be constructed of solid steel or of solid wood covered on the outside with plates of at least 12-gauge steel. Door hinges shall be of a fixed-pin security type or of a type which provides equivalent security. Unless safety stud hinges are used, exposed hinge pins shall be spot welded or otherwise secured to prevent their removal. All doors except the main entrance shall be secured on the inside by deadlocking bars or bolts. Deadlocking bars shall be shielded from defeat from the exterior and drilled and pinned to their holding brackets. The locking device used on the entrance door shall be a high-security padlock and hasp.

Other doors to the high-security storage room shall be of equivalent structural strength as adjacent walls and shall be secured so as to preclude access to the locking device from the outside. Doors leading in or out of adjoining rooms shall be of equal strength and construction as the door(s) to the high-security storage room.

4. A high-security storage room shall be located as distant as is practically possible from a receiving or delivery dock.

Physical Security Measures

A. Interior and Exterior Lighting - Interior and exterior lighting shall be provided for all high-security storage rooms themselves. The lighting shall be of sufficient intensity to afford observers immediate recognition of illegal acts such as breaking and entering or unauthorized removal of merchandise during nonworking hours or reduced visibility. Areas appropriate for lighting include entrances to buildings, corridors, entrances to merchandise rooms, and interiors of storage rooms. Switches for exterior lights shall be installed only in the interior of the building. Exterior lights shall be covered with wire mesh screen or similar material which will prevent their being broken by thrown objects.

B. Guard-Protection/Surveillance

1. Operators of facilities containing a high-security warehouse or high-security storage room shall avail themselves of the services of a security or guard patrol, unless this requirement is waived by the Port director.
2. Liaison shall be established with local law enforcement agencies to assure that periodic surveillance is conducted and that a coordinated plan for security exists. Where electronic intrusion detection systems are used, arrangements shall be made to provide for notification to police in case of unauthorized entry. Customs shall be notified immediately of any theft or attempted theft at a high-security facility.

C. Electronic Intrusion Detection System

3. Intrusion detection alarms are an essential adjunct to the physical security system. These devices, however, are not a substitute for the basic requirements of barrier protection and administrative control as outlined in these standards.
4. High-security warehouses and high-security storage rooms, when actually employed as such, shall be protected with electronic intrusion detection systems when they are not under guard. Procedures shall be established to assure that the alarm system is engaged properly when the building is not under guard.
5. Intrusion detection systems shall have electronic line supervision to assure that they are operating properly, shall be subject to periodic routine maintenance, and shall be monitored continuously when they are in operation. Response time to alarms shall not exceed 5 minutes.

D. Key and Lock Controls

Keys to high security warehouses shall be issued only to the facility manager and one assistant, and to the supervising Customs officer of the facility. Both Customs and the zone operator shall establish a key control plan that identifies and records where keys are at all times, who has physical possession, and for what purpose. There shall be no master key, and only one key or its duplicate shall fit each keyway. Locks shall be rekeyed at least annually at a random unannounced time. Combinations for combination locks shall be memorized, and shall be divulged on at least as limited a basis as keys are issued. Locks, keys, and combinations shall be changed whenever it is known or suspected that they have been compromised.

E. Security of Tools

Tools located in the vicinity of high-security storage areas shall be secured in a locked container and removed from the vicinity of the high-security warehouse or storage room. When a high-security warehouse or storage room is the only secure location available, the tools shall be stored within a locked container in that warehouse or room. When the access door to a high-security storage room is located within an adjacent room, tools shall not be stored within that adjacent room. Examples of such tools are hammers, bolt cutters, chisels, crowbars, and similar items which would assist in gaining forced entry to the secure areas.

F. Personnel Security

In addition to the requirements of Section 146.7(g) CR and the recommendations of TD 72-56 concerning Personnel Screening, the facility operator shall furnish Customs with the names and dates of birth of all officers and employees at the time the warehouse is considered for storage of Title II firearms. The officers and employees shall be given a background investigation consisting of at least a TECS and NCIC check before the warehouse is approved for storage of those firearms.