

# Open Storage Overview

What you need to know

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# What Are the Requirements?

- Open storage areas are to be constructed in accordance with guidance from
  - 32 CFR, Part 117 (117.15)
  - 32 CFR, Part 2001 (2001.43)
  - 32 CFR, Part 2001 (2001.53)
- Completion of the open Storage Approval Checklist (Pre-Construction)
  - Section C,D & E of the DSCA Form 147
- Completion of the Completion of DCSA Form 147, APR 2022 (OBM No 0705-0006)
- Intrusion Detection System
  - Guidance provided in IDC-705
  - Meet requirements in 29 CFR 1910.7
  - IDS equipment must be listed by a National Recognized Testing Lab (NRTL)
  - Alarm system monitored by an approved Central Monitoring station

# Construction Requirements

- Minimum construction requirements are outlined in 32 CFR 2001.53
- Understand these are the minimum requirements. Your open storage area may drive additional considerations when being constructed.
- Additional items to consider
  - Sound considerations
  - Visual access
  - Size of material
  - Movement of equipment in/out of area
- ICD-705 provides construction examples and is an excellent reference document

# Walls, floors & ceiling

- 32 CFR 2001.53 states
  - The perimeter walls, floors, and ceiling will be permanently constructed and attached to each other. All construction must be done in a manner as to provide visual evidence of unauthorized penetration.
- Remember these are only the minimum standards
- Wall thickness and insulation need to be considered based on the usage of the open storage area
- Details on the specifics will be required to complete the DCSA 147 Form
  - Walls
    - What construction material is used
    - Thickness of the wall
  - Floors
    - What is the floor construction
    - Thickness of the floor
    - What is the material if any over the floor
  - Ceiling
    - What is the construction of the true ceiling or in a multi-story building the floor above
    - Thickness of the true ceiling

# Doors

- 32 CFR 2001.53 states
  - Doors shall be constructed of wood, metal, or other solid material. Entrance doors shall be secured with a built-in GSA-approved three-position combination lock. When special circumstances exist, the agency head may authorize other locks on entrance doors for Secret and Confidential storage. Doors other than those secured with the aforementioned locks shall be secured from the inside with either deadbolt emergency egress hardware, a deadbolt, or a rigid wood or metal bar which extends across the width of the door, or by other means approved by the agency head.
- How many doors can my closed area have?
  - There is no rule that dictates how many accessible entry/exit points you can have but you should limit to only what is necessary to perform the functions for what the room was built for.
  - Doors are typically solid core wood at least 1 ¾ thick or metal clad of at least 18 gauge steel 1 ¾ thick
  - Door details will be required to be listed in section D-4 of the DCSA Form 147
  - Each door will need to be also listed on the DCSA Form 147 and will fall into one of three categories
    - Primary door
    - Secondary door
    - Emergency egress-only door
  - The type of door will determine what hardware is required

# Doors

- Primary door

- Primary doors are your main entry/exit door to your open storage area and require the following
  - 3 position GSA-Approved dial lock meeting Federal specification FF-L-2740

- Kaba-Mas CDX-10



- S&G 2740



# Doors

- Primary entry door are required to be equipped with one of the following
  - Approved access control device
    - Access control device can be an automated access control system or mechanical
  - All door hardware is required to be construction grade (heavy gauge)
  - Hinges are required to be non removal externally. These can be welded, security pinned or lift type hinges



Security Pinned



Welded



Lift hinge

# Doors

- Secondary doors
  - Require the same heavy duty hardware
  - Depending on the use could require approved access control device (secondary entrance)
  - Requires hardware to secure door internally so that it cannot be opened from exterior when area is secure
    - Heavy duty slide bolts
    - Panic hardware
  - If double doors are used and astragal is required to cover the gap between the doors



- Astragals need to be installed in a manner that prevents the removal. If screws are external facing the heads should be knurled out to prevent removal without showing evidence



# Doors

- Emergency egress-only door
  - Requires the same heavy duty hardware
  - Requires emergency egress devices
  - No hardware on the exterior of the door (handles, locksets, etc)
- Additionally depending on code requirements and occupancy levels emergency egress devices should be installed on the primary entry door that would in conjunction with the GSA approved lock



# Vents, Ducts and Miscellaneous openings

- 32 CFR 2001.53 states

- **Vents, ducts, and miscellaneous openings.** All vents, ducts, and similar openings in excess of 96 square inches (and over 6 inches in its smallest dimension) that enter or pass through an open storage area shall be protected with either bars, expanded metal grills, commercial metal sounds baffles, or an intrusion detection system.
- All HVAC penetrations into the area that exceed 96 square inches require addition protection
  - The most common solution is man bars installed inside the opening to prevent access
  - Man bars need to be installed in a manner that will preclude them from being removed (Welded in place or pop-riveted.) Screws should not be used as that could be removed without leaving evidence of tampering
  - Inspection ports are required and should be internal to the protected space. If they are external they will be required to be locked (Hasp & Staple securely fastened with approved GSA padlock)
    - This should only be done when it is impossible or impractical to installed internal to the area
  - Documents all penetrations with photos showing protection exists



1/2 " rebar on 6" centers



2" x 2" 9 gauge expanded metal mesh



Inspection port

# Vents, Ducts and Miscellaneous openings

- Intrusion detection systems can be used to protect these opening if physical barriers cannot be installed
- If Z-ducts, metal baffles or noise generators make sure to document their locations and provide details.
  - White noise systems or wall transducers if being used should be vetted to ensure there are no security risks
  - Many of these devices are foreign built and could have unintended security risks

# Windows

- 32 CFR 2001.53 states
  - All windows which might reasonably afford visual observation of classified activities within the facility shall be made opaque or equipped with blinds, drapes, or other coverings.
  - Windows within 18 feet of the ground will be constructed from or covered with materials which provide protection from forced entry. The protection provided to the windows need be no stronger than the strength of the contiguous walls. Open storage areas which are located within a controlled compound or equivalent may eliminate the requirement for forced entry protection if the windows are made inoperable either by permanently sealing them or equipping them on the inside with a locking mechanism and they are covered by an IDS (either independently or by the motion detection sensors within the area).
- While windows are permitted in an open storage area they do not come without risk
- When building a new area if windows exists considerations to remove or close off should be considered
- When not feasible in addition to ensuring that physical access protection is in place, procedural procedures should also be implemented to prevent visual barriers from being removed

# Intrusion Detection Systems

- 32 CFR part 117, 117.5
  - Intrusion Detections systems are now required to be documented in the DCSA Form 147
  - CSA approval is required before installing your Intrusion Detection System (IDS)
  - Criteria for an IDS system is provide in ICD-705
  - IDS systems must meet the following
    - All Intrusion Detection Equipment (IDE) has been tested and listed by a National Recognized Testing Lab (NRTL) in 20 CFR 1910.7
      - The most common is Underwriters Laboratories (UL), A UL 2050 Certification form will be issued documenting the space
    - Be installed by an alarm service company that is certified by the NRTL
    - Alarm system must be monitored by
      - Government contractor monitoring station (GCMS), formerly called a proprietary central station.
      - Cleared commercial central station.
      - Cleared protective signal service station (e.g., fire alarm monitor).
      - Cleared residential monitoring station.
      - National industrial monitoring station.

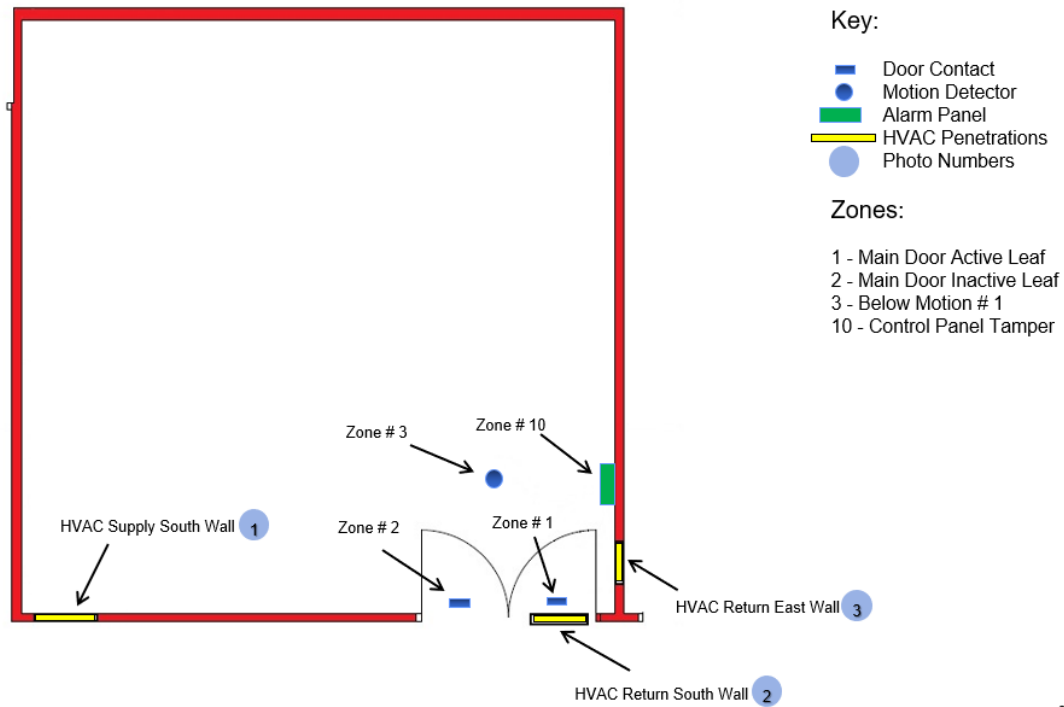
# Intrusion Detection Systems

- Security in Depth (SID)
  - Security in depth now has an increased impact on response times to alarm activation
  - If you have security in depth and have an approved open storage area your response times are
    - Top Secret – 15 minute response
    - Secret – 30 Minute Response
  - If you do not have Security in Depth
    - Top Secret & Secret – 5 minute response
  - All new areas will now be approved as open storage areas so if you do not have SID or cleared employees or guard service onsite to meet response time this will impact your approval for your area
- This is a conversation you need to have with your program Managers and Senior Management to discuss any additional costs that may be involved.

# Documentation

- Documentation required for an open storage area requires more detail
  - DCSA Form 147 is now 15 pages instead of the one page form
    - Form is similar to a Fixed Facility Checklist (FFC)
  - Several attachments will be required to complete the form which include
    - CCTV Coverage – In addition to detail on a system a map showing monitoring and coverage locations
    - Floor plan that indicates the open storage perimeter
    - Ventilation Duct sizes and locations on a floor plan for the open storage area
  - Best practice is to maintain all documentation in a binder that is available in the open storage area for inspection
- All areas previously approved still must meet all requirements documented on that previously approved DSS 147
  - Example – False ceiling inspection frequency If documented on your 147 must still be completed at the frequency approved for that room.

# Documentation



**Key:**

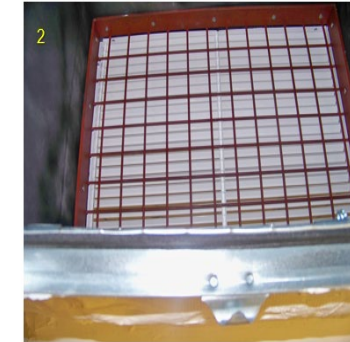
- Door Contact
- Motion Detector
- Alarm Panel
- HVAC Penetrations
- Photo Numbers

**Zones:**

- 1 - Main Door Active Leaf
- 2 - Main Door Inactive Leaf
- 3 - Below Motion # 1
- 10 - Control Panel Tamper



HVAC Supply South Wall 20" x 20"



HVAC Return South Wall 24" x 24"



HVAC Return East Wall 12" x 18"

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Example of an open storage area diagram

Example of an open storage area man bars



***LOCKHEED MARTIN***

