



TENANT DIRECTIVE

BWI 302.1
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Distribution: D

TITLE: SECURITY LOCK AND KEY CONTROL AT ALL PERIMETER GATES AND CARGO FACILITIES AT BALTIMORE/WASHINGTON INTERNATIONAL THURGOOD MARSHALL AIRPORT (BWI) ACCESSING THE SECURITY IDENTIFICATION DISPLAY AREA (SIDA)

I. REFERENCES

- A. Code of Federal Regulations 49 CFR Part 1542 Airport Security
- B. Airport Security Program for Baltimore/Washington International Airport (BWI) dated November 24, 2004, with amendments
- C. BWI Security Lock & Key Program and Policy Manual
- D. BWI Tenant Directive 400.1, Control of Keys and Locks for Leased Facilities, BWI Airport

II. DIRECTIVE STATEMENTS

- A. The use of the word “tenant” in this document means a person or entity or its authorized representative which occupies Maryland Aviation Administration (MAA) -owned land and/or space evidenced by a lease agreement, license or such other permitted use, including contractors granted access to MAA-owned property. The term Key Holder refers to an individual who has undergone the process described in this directive and has been issued a key for access to a security sensitive area of BWI Airport. The use of the word “Key” in this document may refer to standard keys in the “L” series or the “J” series, but may also refer to Electronic “Smart” keys to be used with “Smart” Cyber Locks. The method of control and issuance are the same for both types of keys.
- B. The Cyber locks and keys (also referred to as Smart locks and keys) contain microchips that make them fully programmable. Using these, the Airport Security Division is able to program the access privileges of a key holder by day, date, and time as well as number of access events. Cyber Keys, which have been reported lost, are capable of being deactivated from the base station without the need to

call in the keys of all other users of that gate or portal. The Cyber lock and keys are utilized at many remote perimeter gates leading into the BWI Airport's Air Operations Area (AOA).

- C. The BWI Airport Security Coordinator and/or designee controls all security lock and key access through portals granting Air Operations Area/Security Identification Display Area (AOA/SIDA) access. The portals include the perimeter gates and Air Cargo facilities.
- D. In accordance with the BWI Airport Security Program (ASP), tenants occupying those facilities forming the perimeter of the AOA/SIDA, including those found at the BWI Air Cargo Aprons, Elm Road, and Cargo Buildings B, C, D, E, and G, are required to comply with the BWI Security Lock and Key Program.
- E. Proprietary lock and key systems, while not under the direct control of the Airport Security Coordinator and/or designee, must be requested in writing and pre-approved by the MAA prior to installation. These systems are governed by the same rules and regulations as stated in this Directive.
- F. In accordance with MAA and Transportation Security Administration (TSA) regulations, non-compliance with the BWI Airport Security Lock and Key Program will be considered a violation of the ASP and MAA lease and/or concession contract (General Provisions) between the MAA and tenant. Such non-compliance could result in Baltimore/Washington International Thurgood Marshall Airport Identification Badge (BWI ID badge) suspensions or revocations, or termination of the lease/sub-lease agreement. Further, if tenant non-compliance results in TSA fine or penalty, the tenant shall be responsible for paying the fine.

III. DEFINITIONS:

- A. **Airport Security Coordinator (ASC):** The Airport's primary contact for security-related activities and communications with the TSA as mandated by 49 CFR Part 1542.
- B. **Badge Holder:** An individual who has been granted unescorted access to the BWI Airport SIDA or the BWI Airport Sterile Area and who has been issued the appropriate BWI SIDA or BWI Sterile Area Identification (ID) badge.
- C. **Maryland Aviation Administration:** An Agency within the Maryland Department of Transportation (MDOT) responsible for the ownership and administration of Baltimore/Washington International Thurgood Marshall Airport (BWI).

- D.** **Secure Area:** An area where the access control system meets the requirements specified in TSR 1542.201. This area is also referred to as SIDA-Secured. It is made up of the aircraft ramps and gate areas around the main terminal building where passenger-carrying aircraft are loaded and unloaded.
- E.** **Security Identification Display Area (SIDA):** Any area identified in the ASP requiring each person to continuously display an airport-approved identification badge, unless the person is under airport-approved escort. The proper way to display a badge is face out, above the waist, but below the neck and on the outermost garment. At BWI, the SIDA is considered to be everything within the airport's security fence-line.
- F.** **TSA:** Transportation Security Administration. An agency of the United States Federal Government (Executive Branch) responsible for Civil Aviation Security through the enforcement of regulations (under Title 49) designed to safeguard Civil Aviation Operations against acts of violence or acts of unlawful interference. TSA is responsible for the safety and security of passengers, flight crews, ground operations personnel and the general public.
- G.** **Unescorted Access:** Authorized to be in the SIDA, or Sterile Area for business purposes. An individual must possess and properly display a BWI SIDA Access Badge or approved air carrier identification in order to have unescorted SIDA or Sterile Area access privileges. Unescorted access requires that the individual display the appropriate BWI issued ID badge for that area. Proper display involves wearing the ID badge above the waist, and below the neck on the outermost garment.
- H.** **49 CFR Part 1542:** Section within Title 49 Code of Federal Regulations specifically dealing with Airport Security.

IV. PROCEDURES

- A.** **SECURITY KEY CONTROL AUTHORITY**
Every tenant shall designate an employee who will be its Security Key Control Authority. This person shall be designated, in writing, on company letterhead and shall include signature(s) of the tenant manager and persons(s) authorized to request BWI security keys for their company. The letters of designation will be kept on file in the Airport Security Division. Individuals designated as Security Key Control Authority must have a valid BWI SIDA ID badge. These individuals will be provided a copy of the BWI Security Lock and Key Program Policy and Procedure Manual.

B. LOST AND ADDITIONAL KEYS

Those tenants and sub-tenants occupying facilities where access is controlled by BWI-issued or -installed security locks and/or key(s) must notify the Airport Security Coordinator and/or designee in accordance with the provisions of Paragraph IV, Sections I. and J. of this Directive to report lost keys or obtain additional keys. Outside regular business hours, including weekends and holidays, contact the BWI Airport Operations Center.

C. KEY DEPOSITS

J-Series keys (perimeter gate keys) require a \$500.00 refundable deposit to the MAA and must be made by certified check or money order prior to issuance. The key deposit for Cyber Keys is the same as for standard J-Series keys. No deposit is necessary for L-Series keys (Cargo facility keys). Refunds of deposits will only be granted, provided the original receipt is presented when the key(s) are returned. All State and Federal government agencies are exempt from paying this deposit.

D. RETURN OF KEYS

BWI security keys are issued by the Airport Security Division during regular business hours, and are to be returned when no longer needed. For those unable to return keys during normal business hours, keys shall be turned in within 24 hours to the BWI Airport Operations Center.

E. EXCHANGE OF KEYS

BWI security keys may be exchanged on a one-for-one basis when written justification is provided with the appropriate endorsement of the responsible Security Key Control Authority.

F. CUSTODIAL RESPONSIBILITY DECLARATION

Individuals receiving BWI security key(s) will be required to sign a Custodial Responsibility Declaration form acknowledging the responsibilities incumbent upon them for receipt, use, and return of key(s).

G. ANNUAL RENEWAL AND PENALTIES

Individuals issued BWI security key(s) will be required to present those key(s) to the Airport Security Coordinator and/or designee during the annual renewal of their BWI SIDA ID badge. Failure to present all issued security keys may result in the termination of all security access privileges for that individual and denied renewal of their BWI SIDA ID badge.

H. TENANT RESPONSIBILITY FOR KEY CONTROL

Tenants shall collect security key(s) and all Airport-issued access media, including Airport-issued security keys, prior to the termination, transfer, or retirement of any employee. Tenants shall turn in these key(s) to the Airport

Security Division. If the key(s) are not collected, the locks shall be immediately changed by the MAA. The cost of making this change shall be charged to the tenant. During regular business hours, the tenants shall notify the Airport Security Division within one hour of all terminations/suspensions of potentially hostile employees. All other changes, including normal terminations, retirement, transfer, or change in duty no longer requiring AOA/SIDA access, must be reported to the Airport Security Division within eight hours. Outside regular business hours, including weekends and holidays, the BWI Airport Operations Center shall be notified immediately. All notifications shall be followed by written correspondence within 72 hours detailing what action was taken.

I. CIPHER LOCKS

Cipher-lock combinations will be changed by the MAA for MAA-controlled doors, when notified of the termination, suspension, retirement or reassignment of any person having knowledge of the combination, or when compromised, and at such other times as deemed appropriate by the MAA. The MAA will change cipher-lock combinations at least every six months.

J. COMPROMISE OF LOCKS, KEYS, AND COMBINATIONS

When the results of inventories, inspections, or notifications by an employee reveal there are possible compromises of combinations, lost keys, or keys unaccounted for, the tenant shall immediately report the compromise to the Airport Security Coordinator and/or designee. Outside regular business hours, including weekends and holidays, the BWI Airport Operations Center shall be notified immediately. This notification shall include a list of the areas to which the combination(s) and/or key(s) provide access.

K. PROPRIETARY SECURITY LOCK AND KEY SYSTEMS

Any tenant requiring the use of proprietary security lock and key system shall notify the MAA and receive approval before installation. Once approval is received, the tenant must follow the guidelines for Proprietary Lock and Key Programs as detailed in the BWI Airport Lock and Key Program and Policy Manual. This manual can be obtained from the Airport Security Coordinator or designee. The designated tenant employee with Security Key Control Authority shall submit a written Lock and Key Program to the Airport Security Coordinator and/or designee for approval prior to implementation. The program shall include the audit process contained in the Security Lock and Key Program and Policy Manual. Those tenants operating proprietary systems shall adhere to all guidelines in this Tenant Directive.

L. HARDWARE CHANGES OR UPGRADES

The Airport Security Coordinator and/or designee shall be notified in writing prior to the installation of any airport security-related lock and key hardware changes and/or upgrades located on BWI Airport property.

N. TENANT AUDIT RESPONSIBILITY AS THEY APPLY TO PROPRIETARY SECURITY LOCK AND KEY SYSTEMS

In accordance with the provisions of the BWI ASP, the tenant will perform a comprehensive audit annually, while ongoing checks and reviews will be conducted periodically at the MAA's discretion. These tenant-performed audits shall be accomplished using the Security Lock & Key Program Audit Guidelines outlined in this Directive. Results of annual audits and access lists/key holder lists shall be submitted to the BWI Airport Security Coordinator and/or designee upon completion of audits. Access lists and key holder lists must be kept current at all times. Failure to comply with this requirement could result in a determination of default under tenant's contract with the MAA.

O. MARKINGS OF TENANT-OWNED KEYS

Security locks and keys not the property of the MAA shall be indelibly marked or stamped and numbered by the tenant in a manner approved by the MAA for inventory, security, inspection, and control accountability purposes. All keys leading to the BWI AOA, SIDA, or Secure Area shall be clearly stamped "Do Not Duplicate."

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