

### Cal/OSHA, DOT HAZMAT, EEOC, EPA, HAZWOPER, HIPAA, IATA, IMDG, TDG, MSHA, OSHA, and Canada OHS Regulations and Safety Online Training

## Since 2008

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Be sure and consult with the appropriate governing agencies or publication providers listed in the "Resources" section of our website.

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## **SECURITY REQUIREMENTS**

and Considerations for Hazardous Materials Transportation



HAZARDOUS CHEMICAL

CLARK & Captioning

CLASS S.Fammane House

OLABS & Games

CLASS + Flammable Solids

OLASS 5-Oxidiades

OLASS 5-TOxic materials

CLASS F.Radioactive materials

CLASS 9-Miscellaneous dangerous goods

CLASS &-Corrosive materials

DANGEROUS- Indicates a mixed load of

REACTIVITY

hazardous materials

ARIAN CIRCUMATION

The following describes the required elements for a security plan (listed in § 172.802) and suggestions to bolster your facility's security. At a minimum, a security plan must address personnel security, unauthorized access, and en route security.

#### PERSONNEL SECURITY

Be aware of the possibility that your current and former staff may pose a potential security risk. You should establish a process to confirm and verify information provided by potential hazmat employees, which may include personal references.

You must ensure your employees are familiar with your security plan (per § 172.704(a)(4) and (a)(5)—see the "Training" section, below). You also must ensure your employees are properly trained to implement the plan. Training your employees on your security plan should include the following components:

- Company security objectives
- Specific security procedures
- Employee responsibilities
- Organizational security structure.

In addition, you should supplement your security plan training with these actions:

- Encourage your employees to report suspicious incidents or events.
- Implement routine security inspections.
- Convene regular employee/management meetings on security measures and awareness.
- Communicate with your staff using an *internal communication system* to provide information on facts, trends, and other security issues.



### **UNAUTHORIZED ACCESS**

You must address the risk that unauthorized persons may gain access to your hazmat, both in transportation and at your facility (§ 172.802(a)(2)). Consider using one or more of the following security measures to prevent unauthorized access:

- 1. Establish partnerships with local law enforcement officials, emergency responders, and other public safety agencies with jurisdiction over your facility.
  - Through such relationships, you can exchange information about threats, trends, and best practices of security programs.
  - Request local law enforcement and fire safety officials to review your facility and security program.
  - Keep information related to your facility and the materials you handle on a need-to-know basis. Inform all parties and individuals with this information to limit any disclosure.
  - Request law enforcement personnel to increase off-hour patrols.
  - Report any suspicious incidents or individuals to the proper law enforcement officials.
- 2. Bolster your facility's security with additional resources and processes.
  - Add security guards and increase off-hour patrols by private security personnel.
  - Conduct frequent facility site inspections.
    - Check the adequacy of locks.
  - Upgrade your facility's infrastructure.
    - Equip access gates with timed closure devices.
    - Install additional lights, alarm systems, and surveillance cameras.
  - Improve your equipment and processes to better increase the security of your hazmat.
    - Restrict access to a single entry or gate.
    - Secure hazmat in locked buildings or fenced areas.
    - Institute a sign-out system for keys.
    - Secure valves, manways, and other fixtures on transportation equipment when not in use.
    - Lock all vehicle and delivery trailer doors when not in use.
    - Use tamper-resistant or tamper-evident seals and locks on cargo compartment openings.
    - Secure all rail, truck, and intermodal containers when stored at your location.
  - Periodically take inventory of your hazmat on site and protective equipment to determine any theft.
  - Keep records of security incidents. Review records to identify trends and potential vulnerabilities.

#### **EN ROUTE SECURITY**

Transportation security is a shared function among shippers and carriers. We encourage shippers and carriers to implement the following measures:

- Assess the carrier.
  - Research carrier safety ratings, assessments, safety surveys, and audits.
  - Ask the carrier to provide information on security measures it has implemented.
- Verify information from the carrier.
  - Verify the carrier's employee hiring and review process, including
    - Employee background checks
    - Their on-going security training program.
  - Verify the identity of the carrier and/or driver when loading and off-loading hazmat.
    - Ask the driver for photo identification and a commercial driver's license for comparison with information provided by the carrier.
    - Confirm with the driver for the name of the consignee and the hazmat's destination with your own records before releasing shipments.
    - Upon delivery, check the carrier's photo identification and commercial driver's license with the shipping documents provided by the shipper.
- Plan for unexpected circumstances en route.
  - Establish a communication system with transport vehicles and operators, including a crisis communication system with primary and backup means of communication among the shipper, carrier, law enforcement, and emergency response officials.
    - Implement a system for a customer to alert the shipper for any hazmat shipment delays.
    - Use tracking and surveillance technology to your hazmat shipments.
  - Identify preferred and alternative routing and route deviations.
    - Minimize hazmat transport through communities.
    - Avoid tunnels and bridges where possible.
  - Minimize stops en route.
    - If you must stop, select locations with adequate lighting on well-traveled roads.
    - Check your vehicle after each stop to spot any tampering.
    - Consider using two drivers or driver relays to minimize stops during the trip.
    - Shippers and rail carriers should cooperate to assure the security of rail cars stored temporarily on leased tracks.

- Avoid layovers, particularly for high-hazard materials.
  - If materials must be stored during transportation, make sure they are stored in secure facilities.
  - Train drivers on how to avoid hijacking or stolen cargo; keep vehicles locked when parked and avoid casual conversations with strangers about cargo and routes.
- Secure the vehicle of transport:
  - Consider whether a guard or escort for a specific shipment of hazmat is appropriate.
  - Install tractor and trailer anti-theft devices.
  - Install tamper-proof seals on all valves, package, or container openings.
- Report any suspicious incidents or individuals to law enforcement.
  - Get to know your customers and their hazmat programs. If you suspect you have shipped or delivered hazmat to someone who may intend to use it for a criminal purpose, notify proper law enforcement officials, such as the FBI or ATF.

