

A Sample Hazardous Materials Security Plan*

Created by Cardinal Professional Products

Plan Statement

Your Company Name, (hereinafter separately or together, "the Company"), is committed to the safe and secure handling and transporting of hazardous materials products. The company is also committed to ensuring the physical safety of all hazmat employees and to reduce or prevent hazardous materials cargo theft opportunities.

Plan Objectives

The objective of this plan is to ensure the safety of our hazardous materials employees and the security and integrity of hazardous materials products from point of origin to final destination.

Scope

The company's written Hazardous Materials Security Plan will contain the following three basic areas:

- **Personnel security**
- **Unauthorized access**
- **En route security.**

Risk Assessment

We have completed our Hazardous Materials Transportation Risk Assessment as required. A copy of the assessment is attached to this plan.

Personnel Security

Security Training

The company will ensure that all employees are provided with security training. All employees will be trained in, and are expected to be familiar with, the company's security plans and procedures. At a minimum, this training will include instruction regarding our:

- Overall security objectives;
- Individual employee security responsibilities;
- Specific security procedures; and
- The organization's security structure

List of general employee security responsibilities:

- **Top management** is responsible for establishing and communicating the overall security goals of the organization.
- **Managers and supervisors** are responsible for being knowledgeable of the security issues and concerns of their area(s), departments, and employees. In addition, they are responsible for providing information on system operations including daily work processes, activities, and identifying potential security vulnerabilities. Once identified, managers and supervisors are responsible for:
 - Selecting, prioritizing, developing, and implementing strategies and procedures to meet established security goals;
 - Measuring and monitoring the effectiveness of the security strategies and procedures; and
 - Reviewing and, when necessary, adjusting the strategies and procedures. If deficiencies or other vulnerabilities are discovered in the security process, appropriate corrective action or adjustments will be made.
- **Employees** are responsible for adhering and conforming to all security-related work activities, processes, and procedures. In addition, employees are encouraged to provide feedback and suggestions on ways to improve the organization's security program.

Suspicious Activity

All employees are expected to understand and adhere to the following corporate suspicious activity reporting procedures. They are intended for all employees to follow in the event any unusual or suspicious activity that poses a threat to the safety of our employees and the security of our equipment, facilities, or hazardous materials cargo, is observed.

Employer responsibility statement

The company will provide a work environment that is reasonably free of hazards and threats of violence which may cause damage to property or harm to people. It is also our policy to establish an effective and continuous safety and security program that incorporates educational and monitoring procedures. All supervisors and managers are responsible for

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facts, and trends to their employees in a timely and accurate manner. This information can be made using a variety of company communication options including:

- Safety Meetings
- Bulletin boards in Employee Break Areas
- Inter Office memos and letters

Hazmat Personnel Screening

All applicants applying for any position involving access to, handling, storing, preparing for transport, and/or transport of hazardous materials for the company shall submit an accurate, complete, signed and dated application for employment.

An inquiry into the previous employment history shall be made for every hazmat employee applicant. Hazmat employee applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

- Names and addresses of previous employers;
- Names and titles of previous supervisors;
- Phone numbers or other contact information for both of the above.

All hazmat employee applicants applying for positions with the company shall be given an in-person interview by responsible company personnel. In-person interviews are used to determine fit for both the applicant and the company. In addition, the in-person interview should be used to verify any gap(s) in employment, reason(s) for job or career changes, or any other important or unexplained behavior or history.

Criminal Background Investigations: At this time, management has decided not to perform this type criminal background check. Thorough screening of applicants will be performed from references and previous employment history. CDL drivers are required to possess a hazardous materials endorsement which requires a background check by the state in which it is issued. The California Department of Motor Vehicles in cooperation with the Federal Transportation Security Administration will be administering the security threat assessments.

Proof of Citizenship & Right to Work: All applicants applying for any position involving the handling, storing, preparing for transport, and/or transport of hazardous materials for the company shall be required to provide either proof of U.S. citizenship or proof of their legal right to work in the United States.

Driving Qualifications and Hiring Standards (motor carrier specific)

The company's driver qualification and hiring procedures shall be in compliance with all applicable state and federal regulations, and meet the organization's security standards.

Applicants shall not be considered for employment as drivers by this company unless they meet the following minimum requirements. Persons applying for the position of driver must:

1. Meet our minimum age and experience requirements.
2. Have a driving record that is in line with the company's safety standards with regard to preventable motor vehicle accidents and violations of motor vehicle laws (all past driving information provided by applicants shall be verified).
3. Be able to read and speak English sufficiently as required by 49 CFR §391.11(b)(2).
4. Be physically qualified to drive a company vehicle.
5. Possess a current and valid commercial driver's license of the correct type and with the proper endorsements.
6. Not be disqualified to drive a commercial motor vehicle under the rules set forth in 49 CFR §391.15.

All applicants applying for the position of driver with the company shall submit an accurate, complete, signed and dated application for employment.

An inquiry into the driving record during the preceding 3 years shall be made for every driver applicant. The inquiry shall be made to the appropriate agency of every state in which the applicant held a motor vehicle operator's license or permit. The driver qualification and hiring process **shall not** continue until all driving record information for the preceding 3 has been verified as true and accurate.

An investigation into the employment record during the preceding 3 years shall be made for every driver applicant. CDL driver applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

1. Names and addresses of previous employers;
2. Names and titles of previous supervisors and dispatchers;

3. Phone numbers or other contact information for both of the above.

An investigation into the drug and alcohol history with regard to previous employers shall be made for every driver applicant per 49 CFR §40.25.

All applicants applying for the position of CDL driver with the company shall be given an in-person interview by responsible company personnel. In-person interviews are used to determine fit for both the applicant and the company. In addition, the in-person interview should be used to verify any gap(s) in employment, reason(s) for job or career changes, or any other important or unexplained behavior or history.

All applicants applying for the position of CDL driver with the company shall submit to a pre-employment drug screen as required by 49 CFR §382.301, and no driver applicant shall perform any work or activity for the company until a verified negative test result has been obtained for the applicant.

All applicants applying for the position of CDL driver with the company shall be medically examined and certified as physically qualified to operate a commercial motor vehicle by a licensed medical examiner of our choosing.

Unauthorized Access

All confidential records related to CDL driver's employment will be located in a secure location with controlled access.

External Partnerships

The company will establish a partnership and professional working relationship with local law enforcement officials, emergency responders, and other public safety and security agencies. These partnerships will include the sharing of the company's operation, work processes, and hazardous materials stored on site or transported. The Company provides basic information regarding its hazmat operation, locations, and potential threats.

Local law enforcement officials, emergency responders, and other public safety and security agencies will be periodically invited on-site to discuss and evaluate potential security risks, vulnerabilities, and to assist in the development or enhancement of our current security program.

All suspicious activities or apparent criminal acts affecting the safety or security of the company's interests are reported immediately to the proper law enforcement agencies and appropriate company officials. In addition, a detailed written report is made of any security-related incident.

A complete listing of emergency telephone numbers is provided to all staff, supervisors, and managers. This list includes the numbers for local police and fire departments and all company managers and executives.

Security Inspections

The company is committed to providing its employees a safe and secure work environment. We provide adequate security measures to ensure the safety of our employees, equipment, facilities, hazardous materials, and the general public. The following security guidelines cover safety and security issues related to external and internal security inspection procedures.

External Premises Security Inspections

Fences, Gates, and Exterior Doors: All facilities, which have perimeter fencing in place, are responsible for following a schedule of regular inspection of the fence and associated gate(s). Broken fences, walls, and other barriers shall be repaired immediately. Site Safety Supervisors are responsible for implementing and enforcing the regular schedule of inspection which includes, but is not limited to the following:

- A daily routine of securing all gates and related locks.
- A periodic perimeter fencing inspection.
- Possible entrances that go under the perimeter and could allow an unauthorized person to enter, such as culverts that pass under the perimeter, utility tunnels, or manholes leading into the facility are monitored or are appropriately sealed.

At a minimum, all perimeter fencing meets the following specifications:

- Fencing is at least six (6) feet high, securely anchored, and topped with a barbed wire section angled outward at a 45-degree angle.
- Chain-link fence shall be at least nine-gauge or heavier, with openings no larger than two inches.
- All fencing is installed in such a way so that no gaps are left between the fencing and areas where it butts up

- against a building.
- Adequate clearing on both sides of the barrier is maintained.

Any unusual or suspicious damage to fencing or gates shall be reported to the facility Safety Supervisor and the Safety Manager immediately.

Each facility will be responsible for ensuring areas adjacent to both sides (inside and outside) of the fence are properly maintained and remain completely clear of trash, debris, and all plant life (weeds, shrubs, and bushes). Fence lines shall be kept free of debris or other objects (such as trees, pallets, or skids) that could be used to allow entry over the fence. Storage of any ladders or long objects shall be kept away from fencing/barrier to prevent scaling a fence or entering a building.

Exterior security lighting

Facility exteriors, grounds, and parking lots shall be well lit by automatic security lighting devices, which may include:

- Dusk-to-dawn lighting; or
- Automatic timer activated exterior lighting; or
- Motion detector activated exterior lighting

Exterior security lighting shall be directed downward and away from buildings. This will help prevent glare and will ensure the grounds are visible.

Exterior security lighting shall be inspected at a rate of not less than once per month.

Visitor, Vendors, and Suppliers Security

Access to facilities, parking lots, and general premises shall be confined to one designated gate or entrance point at all times. After regular business hours, the entrance shall be locked; and monitored by 24-hour personnel, if applicable.

All visitors, customers, vendors, and suppliers visiting the company, shall be directed to park their vehicles in the area of the employee parking lots or areas designated as visitor parking.

Vendors and suppliers, (needing to make deliveries or pick ups), other than company personnel, shall be directed to the appropriate pick up/delivery area by responsible personnel. Once the pick up or delivery has been completed, the vendor/supplier shall depart from company grounds.

Main entrance guidelines

A single point of entry is designated for all general visitors to each facility.

All general visitors and customers shall be required to check-in/register with the on-duty receptionist or other on-duty company employee upon arriving. Under no circumstances will a visitor to the company be allowed access without first registering.

A written log will be maintained for all general visitors to the company and will include the following:

- The name of the visitor and company he or she represents;
- The date and time of arrival;
- Name of person in which he/she is visiting; and
- The date and time of departure.

The written log shall be maintained for 12 months.

General visitor guidelines on-premise procedures

After registering, and depending on the reason for the visit, the visitor shall be either be:

- Escorted to the appropriate area of the company by the responsible company employee (a copier repairperson being escorted to the broken copier for example); or
- Met by the company employee who arranged the visit in the reception area, and escorted to his or her office or workstation.

Once the work/visit has been completed, the visitor shall be guided off company grounds. At no time shall any visitor to the company be left unaccompanied or unescorted.

Employee and Visitor Parking

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Employees and visitors shall park only in areas with adequate lighting and specifically designated Employee/Visitor Parking. Unauthorized parking near a loading/unloading dock or platform is strictly prohibited.

Access to Company Property

Personnel should not enter or remain on site other than during normal business hours without the request or consent of management.

Managers and supervisors are instructed to contact local authorities if any person(s) is observed loitering on company property. This guideline applies to unauthorized or unknown person(s) as well as off-duty employees acting in a suspicious manner.

En Route Security (shipper specific)

Qualifying Motor Carriers

Before the company uses any motor carrier for the purposes of transporting hazardous materials each carrier shall be qualified as follows:

- The carrier's current safety rating (SafeStat score) shall be considered, including a detailed review of all relevant safety-related data as found in the carrier's detailed profile summary report. This report will be kept on file.

Before loading any hazardous material, the identity of the driver and motor carrier shall be verified. Drivers will be asked to produce photo identification and current operators or commercial driver's license (CDL).

In addition, before loading the driver shall be asked the name of the cargo's consignee and destination. The information provided shall be confirmed with the company's records before releasing any hazardous materials shipment.

En Route Security (motor carrier specific)

Company Assigned Equipment

A means of communication between the branch office/supervisors and the driver should be established at all times. Each truck or driver is assigned a radio and/or cell phone.

Point-of-Origin Driver Security Procedures

Upon arrival at the hazmat load's point of origin, all drivers shall check in with the responsible shipping personnel to notify them of arrival. Drivers will also be expected to produce their current operator's or commercial driver's license (CDL). While at the shipper, drivers shall follow the loading instructions and obey all customer safety and security rules and procedures.

At the designated loading location, the driver shall secure the vehicle. No company vehicle will be left unattended.

Shipper Load & Count

While at the company's office/warehouse, Drivers are expected to supervise the entire loading process. Drivers are responsible to make sure no unauthorized or unscheduled cargo is loaded on any truck/trailer.

When all loading activity has been completed, drivers are responsible for making sure the cargo is secure and to check the bill of lading or the delivery manifest to ensure cargo count is accurate.

Hazmat En Route Standard Security Operating Procedures

Drivers, together with their Supervisors, shall discuss and execute trip plans for extended hazardous materials movements that include:

- Routing schedules that avoid highly populated areas, bridges, and tunnels when possible;
- Fueling and break locations (including approximate dates and times for same);
- Dates and times of daily/routine check calls; and
- Estimated times of arrival to stop offs and final destination.

These trip plans shall also include potential alternate routes and acceptable deviations.

For all hazardous materials movements, drivers shall minimize stops en route. Proper execution of thorough trip plans will help reduce the need for unnecessary or unplanned stops.

En Route Driver Security Guidelines & Procedures

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Supervisors/Dispatch shall make every effort to minimize in-transit down time. In most cases, this means that dispatch will schedule fumigation jobs efficiently.

While in transit, drivers are **prohibited** from discussing information related to their load, route, or delivery schedule with any person(s) other than authorized company officials. Drivers failing to abide by this policy are subject to disciplinary action up to and including termination of employment. Drivers are to report any suspicious activity (including load-related inquiries from strangers) to their supervisors immediately.

Drivers are expected to take all reasonable and responsible precautions to prevent damage to company vehicles and theft of hazardous material(s) cargo while in transit.

For personal protection and safety, and the security of the cargo, drivers are expected to park in safe, well lit, designated truck parking locations only (such as reputable truck stops or high-traffic, major rest areas). When possible, trailers loaded with hazardous materials should be parked against a wall, fence, or other stationary/fixed object to enhance cargo security. At fumigation job sites, employees must keep hazardous materials under close observation during the entire stop.

In all cases, drivers are required to inspect their vehicle and trailer for evidence of tampering after each stop.

Drivers shall lock their vehicles and have all windows in the closed position at all times while in transit - especially during all time spent in urban areas, and parked at truck stops and rest areas.

Drivers are **prohibited** from taking their equipment (loaded or empty) to or through home, or parking in any unsecured area. Drivers failing to abide by this policy are subject to disciplinary action up to and including termination of employment.

Drivers are expected to maintain regular communications with the company while in transit as directed by their supervisor. Any incident of drivers failing to check in when required shall be assumed by the company to be suspicious and highly irregular. Immediate action shall be taken in such situations. Drivers are expected to fully understand this procedure and make every effort to maintain regular contact and communication with dispatch.

Hijack or Cargo Theft Driver Guidelines

Drivers who fall victim to vehicle hijackers or cargo thieves are instructed to notify local police as soon as possible. Once the proper authorities have been notified, drivers are required to contact an appropriate company official and follow all subsequent instructions.

Drivers are prohibited from picking up and transporting any unauthorized person.

In the event of an attempted vehicle hijacking or cargo theft situation while the vehicle is in motion, the company has adopted a NO STOP policy. Drivers who believe a vehicle hijacking is, or may be, in progress, are instructed to keep the vehicle moving as safely and responsibly as possible until the attempt has ceased and/or the authorities have been notified. However, in any hijack situation, drivers should use their own good judgment (whether to stop or keep moving) based on the degree to which they feel their personal safety is at risk. Drivers are not to compromise their own personal safety.

Your Company Name
HAZARDOUS MATERIALS SECURITY PLAN SIGN-OFF SHEET

I acknowledge I have been informed, and given a copy, of the company's Hazardous Materials Security Plan. Procedures contained therein have been covered with me. I understand and accept the policy as a working document that I will support and follow in my daily work.

Employee's Signature: _____

Date: _____

Supervisor's Signature: _____

Date: _____

Corporate Safety Manager's Signature: _____

Date: _____

Hazardous Materials Transportation Risk Assessment

Company Name

Office/Warehouse:

1. How secure is your facility?
 - a. Do you have an outside fence and locked gate?
 1. Do you have barbed wire on your fence?
 2. Does your fencing or other means of security totally protect your office/warehouse from outside entry?
 - b. How many entries do you have to your facility?
 - c. Are all entries lockable?
2. Do you store large quantities of Vikane™ and Chloropicrin, or other hazardous materials?
3. Is it necessary to stock such quantities?
4. How and where do you store these products?
5. Are they always under lock and key?
6. How many entrances to the storage area are there?
7. Do you have limited access to the storage area?
 - a. Vendors/suppliers
 - b. Other visitors
8. Is there always someone on the premises during regular work periods?
9. Does someone always escort visitors at your facility?
10. Do you have an alarm system?
 - a. Is it a monitored system?
 - b. Do you get reports from the alarm company?
 - c. Who has access to the alarm codes?
 - d. Do you change these alarm codes frequently?
11. Do you have video surveillance?
 - a. Is the video recorded?
 - b. Do you have adequate cameras? Cameras in the hazardous materials storage area?
12. Is it possible for a terrorist to easily gain access to the hazardous materials inventory?
 - a. Is forcible entry possible?
 - b. Can a large vehicle crash through an entry point to access the hazardous materials inventory?
13. Could a terrorist possibly gain access to radio equipment?
 - a. Could this terrorist re-direct all fumigation personnel in the field to an alternate location where Vikane™ and/or Chloropicrin could be confiscated?
14. Are all employees aware of the toxicity of Vikane™ and chloropicrin?
15. Have your personnel been trained in Security Awareness Issues?
16. Do all employees have a complete employee list that is regularly updated?
17. Do you have employee identification cards?
18. Have observations ever been made of loitering around your facility, either by foot, or by vehicle?
 - a. Would your employees even be concerned of loitering?
19. Could an outsider have access to company information regarding job locations or transportation routes? Could there be an “insider” associated with terrorists?
20. Do you thoroughly screen the background of all employees? (Not just HazMat employees)
21. Do you have reporting requirements from employees regarding any suspicious activity?
22. Do you have emergency phone numbers posted in prominent locations?
23. Is your computer system protected from “hackers”? Do you have a firewall installed?

Hazardous Materials Transportation Risk Assessment

Company Name

Transportation (en route and return):

1. Are your drivers aware of possible security issues with terrorism?
2. Have your drivers been trained in HazMat Training?
 - a. When was their last date of training?
 - b. Are you aware that the training must be done every three years?
3. Do you have any **new** HazMat Drivers (since January 31, 2005)?
 - a. Any new CDL with a HME (Hazardous Materials Endorsement) must undergo a security threat assessment by TSA (Transportation Security Administration) administered by California DMV
4. Have you performed thorough background checks on all employees, not just recent hires?
5. Do all drivers or vehicles have a means for communication?
6. Do vehicles have GPS Tracking? If not, will you consider it in order to enhance security?
7. Do your drivers make stops between job-sites?
8. Do your drivers maintain visual contact with the vehicle when they leave the vehicle?
9. Do your drivers always lock the vehicle when not in attendance?
10. Do your drivers always take the keys of the vehicle with them when they leave the vehicle?
11. Do your drivers take direct routes to the next site?
12. Do your drivers ever leave the vehicle unattended?
13. Are your drivers informed of the importance of watching for suspicious people around the loaded vehicle?
14. Are your drivers allowed to take their vehicles home?
15. Do you have quick access to vehicle information, such as the license plate number and description of the vehicle in case it is ever hijacked?
16. Is the Vikane™ and chloropicrin secure on the vehicle?
 - a. If not, can the Vikane™ cylinder(s) be locked?
 - b. Can the chloropicrin be placed in a locked box?
 - c. Do your drivers keep excess inventory on the vehicle?
17. Do you have a “hitchhiker” policy?
18. Do you have a policy regarding limiting employee interaction or conversation with people that are non-business related?
19. Are your vehicles maintained by credible businesses?
20. Do you always have emergency information in all vehicles?
 - a. Specimen labels
 - b. MSDS
 - c. Emergency Response Plan
 - d. Emergency Response Guidebook (ERG)
 - e. Emergency phone numbers