Hazardous Materials Training
Module 9 – HM Security

◆ In response to increased risks of terrorism, the U.S. DOT Pipeline & Hazardous Materials Safety Administration (PHMSA) has developed and implemented a final rule, HM-232, which requires offerors (e.g., shippers, forwarders, brokers) and transporters to:
  
  • Provide initial & recurrent hazardous materials security awareness training;
  • Develop & implement a detailed, written Hazardous Materials Security Plan, if quantities of hazardous materials requiring placards are offered; and
  • Provide initial & recurrent in-depth security plan training if the HM Security Plan applies to the facility

◆ It is the responsibility of those that offer or transport hazardous materials to 
adequately protect themselves and others from attack from the hazardous material being offered or carried in commerce. Accordingly, appropriate procedures should be taken to:

  • Ensure hazardous materials packages are properly closed and secured to prevent theft or unauthorized access to the hazardous materials while in transit or in storage incident to transportation
  • Select appropriate transportation routes that will minimize the damage resulting from use of, or damage to, the hazardous materials being carried
  • Conduct background investigations on new employees that handle, package, or prepare hazardous materials for transport at your facility
  • Conduct carrier assessments to ensure that the carriers used to transport your hazardous materials have an adequate hazardous materials security plan in place
  • Integrate the elements of the hazardous materials security rule, including personnel security, site security (e.g., preventing unauthorized access), and enroute (transportation) security, into the facility’s normal business routine or activities

◆ The PHMSA hazardous materials security rule, HM-232, requires that a facility develop, implement, and provide initial and recurrent security awareness and in-depth security training on a detailed, written Hazardous Materials Security Plan. HM Security Plans are required if a person offers or transports hazardous materials subject to the HM Registration Requirements of 49 CFR part 107, subpart G, including:

  • Table 1 hazardous materials (see Module 4) in any amount
  • Table 2 hazardous materials requiring placards in excess of 1,000 lbs;
  • Select agents & toxins regulated by the Centers for Disease Control; and
  • Bulk packaging of hazardous materials requiring placards
Hazardous Materials Security Plans must address the following elements:

- Personnel security
- Site security (e.g., preventing unauthorized access)
- En-route (transportation) security

**Personnel security** includes appropriate procedures for:

- Verifying information provided for new job applicants
- Conducting background investigations and interviews for these employees
- Verifying identities of drivers and carriers of your hazardous materials

**Site security** addresses detailed procedures and methods to prevent unauthorized access to hazardous materials in transportation or storage incident to transportation including, but not limited to:

- Segregation of hazardous materials from other substances;
- Use of locks, system interlocks, alarms, & surveillance equipment;
- Maintaining a strong facility perimeter (e.g., fence, card key access);
- Load securement (e.g., blocking & bracing, cargo nets)

**En-route (transportation) security** addresses detailed procedures and methods, including security assessments of transportation routes, to protect hazardous materials while in the care and custody of a carrier. This process may include one or more of the following elements, as appropriate:

- Conducting detailed carrier assessments
- Checking driver identification
- Selecting appropriate transportation routes
- Maintaining adequate communication systems
- Being alert with respect to global and domestic security issues

**Good personnel security practices** include procedures & methods to ensure that:

- Every employee, business partner, or temporary associate is issued a photo identification badge that is prominently displayed while on the premises;
- All visitors sign-in and sign-out and that they are escorted while on company property, and all packages & vehicles are subject to inspection;
- Unknown persons are stopped, asked for identification, and escorted to the security office or reception area (e.g., lobby); and
- All suspicious persons or activities are immediately reported to your supervisor or security personnel
Good **site security** practices include methods to ensure that:

- All buildings, parking lots, & facility grounds are monitored at all times (e.g., security camera, roving security patrols);
- Company and private vehicles are locked & alarmed when parked, and parking lots & entrances are well lit;
- All emergency exits, stairwells, & passageways from the building are well-lit, unlocked, & clear in case a facility evacuation is necessary; and
- All "secured" areas (e.g., computer rooms, hazardous materials storage areas) are only accessible to authorized persons

**Site security** also includes appropriate chemical management systems and procedures to ensure that:

- All chemicals and hazardous materials are clearly marked with appropriate part number labels and other required marks and warning labels;
- All chemicals, hazardous materials, and wastes are properly stored in appropriate receptacles and storage locations and returned to their appropriate storage locations immediately after use or at the end of the work shift; and
- All regulated medical wastes and hazardous wastes are properly stored and disposed of regularly by an authorized environmental service firm

**En-route (transportation) security** measures include procedures and methods to ensure that:

- Logistics partners and carriers are pre-qualified and comply with the HM security requirements (a periodic HM and security compliance review is suggested);
- Drivers are required to present a valid driver's license with an HM endorsement, if required, when tendering hazardous materials; and
- Vehicles and trailers are inspected by drivers prior to loading.
- Hazardous materials should be tightly secured within the trailer and security seals should be applied in the presence of an authorized and trained employee
Hazardous materials carriers should select appropriate transportation routes, taking into consideration the following:

- Quantity and nature of the hazmat being transported
- Duration of the journey
- Safe parking areas along the route
- Traveling in convoys or team driving
- Prohibiting passengers or picking up hitchhikers
- Communicating routinely with the shipper or dispatch
- Avoiding long or unnecessary stops
- Avoiding potential target areas (e.g., stadiums, schools)
- Avoiding bridges, tunnels, or other sensitive areas

All security breaches or incidents, regardless of size or severity, should be immediately reported to your facility management. Hazardous materials security incidents may also be reportable to federal, state, or local law enforcement authorities. Accordingly, it is recommended that hazardous materials drivers have and maintain a method to communicate (e.g., cellular phone, Blackberry™, CB radio) routinely, or in the event of a security incident or accident.