



DEPARTMENT OF TRANSPORTATION HAZARDOUS MATERIALS SECURITY PLAN

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DOT SECURITY PLAN

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INTRODUCTION:

The U.S. transportation Security Administration has reported that terrorist groups are interested in obtaining hazardous materials through both legal and illegal means in order to use such material *in this country* as weapons of mass destruction against both civilian and military targets. In response to this threat, the U.S Department of Transportation's Research and Special Programs has promulgated *Security Requirement for Offerors and Transporters of Hazardous Materials* as specified in 49CFR Part 172.

The University of Dayton (UD) operations include transportation of hazardous materials and wastes consisting of chemical, biological and radioactive substances conducted by UD employees. Because UD transports hazardous materials covered by the regulation, UD is required to develop and implement a written Hazardous Material Transportation Security Plan. All hazardous materials covered by this regulation are staged in a single facility while awaiting transport by authorized employees.

PURPOSE:

The transportation of certain hazardous materials by UD puts the university, its faculty, staff, students and visitors as well as external communities, at an elevated risk of terrorist attack. This written security plan has been developed pursuant to the requirements of 49 CFR 172 to address potential security risks associated with UD's transportation of hazardous materials, and to require security training for UD employees involved in the transportation of hazardous materials. UD is committed to the safety and security of the transportation all its hazardous material.

CONTENT OF SECURITY PLAN:

49 CFR 172 does not prescribe a specific format for the written plan, but it does specify that the following elements be addressed based on an assessment of security risks. Appropriate measures must be implemented to address identified risks. The elements to be addressed include: Personnel Security; Facility Security (Unauthorized Access); Information Security; and En Route Security.

Personnel Security:

Employees involved in the transportation process constitute a critical consideration in striving to improve the security of hazardous materials to be transported. At present, all job applicants and applications are routinely screened by Human Resources to verify provided information (i.e. employment history, degrees etc.). UD conducts reference checks on all potential employees, ensures applicable hazmat employees are familiar with this Security Plan and receive Security Awareness Training.

Facility Security:

Procedures are in place to prevent unauthorized access to hazardous materials in our staging/storage areas. These include:

- Restricted access to the facility with limited access points.
- Facility is equipped with card reader access and outside security lighting.
- Authorized personnel are present when hazardous materials are delivered or removed.
- The UD Police Department provides continuous security for the campus in general, and is physically located adjacent to the Shipping and Receiving Department.
- Secure cabinet to store placarded material awaiting special UD transportation requirements.

Information Security:

Information security is the protection of sensitive information, prevention of sabotage, and disruption, and keeping critical business processes operational. We have the following information security in place:

- Our computer system has anti-virus software
- Computers are networked and log on procedures require the use of passwords.
- Critical information is backed up daily at on-site and off-site locations.
- Personnel should not share passwords and should log off their computers at the end of the day.
- Sensitive files and paperwork are secured in locked files when not in use.
- The EHS/RM office is located within the same building as the UD Police Department.

En Route Security:

The responsibility for en route security rests primarily with the "carrier" (i.e. transporter/disposal company); however, UD will ensure that our carriers/disposal company(s) has (have) a security plan to address en route security issues. UD EHS/RM will request and retain a copy of each transporter's security plan.

UD En Route Security Plan

- All UD Hazmat employees will complete the UD Hazmat Employee Awareness Training and the DOT Hazmat interactive security training module (CDROM).
- Always have the required paperwork available (shipping papers and MSDS(s)) to present to public officials (i.e. police, fire department, etc.) if requested.
- Never leave hazardous materials unattended in an unsecured area.
- Close and lock any vehicle containing hazardous materials anytime you are not with the vehicle.
- Never let anyone have access to hazardous materials under your control that does not have a legitimate reason to do so.

Security Training:

All UD employees who are involved in the transportation of hazardous materials will receive initial Security Awareness and in-depth training as well as refresher training (every 3 years) as part of our regular DOT hazardous materials training as required by 49 CFR 172.700. In addition, these employees will receive any other applicable DOT, IATA, OSHA, and EPA training as required by their job duties. All records will be retained by UD EHS/RM.

SECURITY PLAN REVISIONS:

The Security Plan will be reviewed and/or revised annually or whenever any of the following situations occur:

- Applicable regulations are revised,
- The plan fails, or
- New security measures are incorporated