

9.0 TRANSPORTATION OF HAZARDOUS MATERIALS SECURITY PLAN

REFERENCES:

- 49 CFR Part 172
- Pipeline and Hazardous Materials Safety Administration (PHMSA) issued requirements for shippers and carriers of hazardous materials to develop a written security plan. These requirements apply to those who offer for transportation or transport hazardous materials in commerce; including loading, unloading, or storage operations incidental to the movement of hazardous materials in commerce.

Jefferson Lab (JLab) employees subcontract and use commercial companies to perform hazardous materials transportation functions. JLab employees who offer for transportation of hazardous materials in commerce are required to participate in this security plan and receive appropriate training to satisfy Hazardous Materials Regulations.

1.1 Purpose

Jefferson Lab is committed to the safety and security of all people at JLab and is responsible for all hazardous material shipments it plans and procedures. This security plan is developed according to requirements of 49 CFR to address potential security risks associated with JLab's shipment of hazardous materials, and to require security training for JLab employees involved in the shipment of hazardous materials.

1.2 Security Risk Assessment

In general, any quantity of Class 4.3 hazardous materials and large bulk quantities (greater than 3000L of liquid or 3000kg of solids) of other hazardous material classes could potentially be used to harm others. This plan is developed by the Jefferson Lab Facility Security Officer in accordance with PHMSA requirements to pre-plan transport of such materials.

JLab does not routinely ship large bulk quantities of hazardous materials. However, periodically Class 4.3 non-bulk materials are shipped to properly dispose of hazardous waste. These types of waste handling and shipping preparations are exclusively done by trained JLab Hazardous Waste staff.

There are certain types of crimes against people and property that are relevant to hazardous materials shipments and should be considered in shipment planning. Crimes around JLab that are reported to Newport News Police include (Most frequent to less frequent): damage to property, simple assault, possession of dangerous drugs, larceny, larceny from auto, larceny from buildings, and larceny of vehicle parts.

1.3 Personnel Security

Employees involved in the transportation process, e.g. Shipping & Receiving, Industrial Hygiene,

or Radiological Control employees are essential in planning and preparing hazardous materials for transport in and out of the Lab. At present, all job applicants for these positions are screened by the Human Resources Department and hiring officials who verify job applicant information (i.e. employment history, certifications, licenses, academic credentials etc.) Hiring officials conduct reference checks on all potential new hires, ensure all applicable staff are familiar with this Security Plan and receive Security Awareness Training. Further, JLab hiring officials may, at their discretion, implement some or all of these provisions relevant to the employment of non-driver employees who perform functions regulated by the Federal Hazardous Materials Regulations:

- To the extent possible, check for criminal convictions.
- Contact previous employers and references.
- Investigate gaps in employment.
- To the extent possible, have at least 10 years consecutive employment/education records.
- Maintain employee information in a confidential and secure manner, and in compliance with all relevant Federal and State regulations and statutes regarding confidentiality and individual privacy.
- Collect JLab badge and any other security materials when an employee leaves JLab.
- Update JLab websites and lists, and cancel passwords to prohibit computer access by former employees.

1.4 Unauthorized Access

Procedures are in place to prevent unauthorized access to hazardous materials being prepared for shipment. These measures include:

- Limiting access to the Central Material Storage Area (Hazardous materials are stored within a fenced compound with a minimum of gates)
- Limiting entry points and keeping them locked unless authorized personnel are present.
- Within the facility, segregate hazardous materials within lockable rooms, and restrict access to authorized personnel only.
- Equipping facility with alarms and limit outside entry points to a minimum based upon operational necessity.
- Ensuring authorized employees are present when hazardous materials are delivered or removed and using the two qualified person rule when warranted.
- Ensuring unauthorized personnel (Maintenance, subcontractors, etc.) are escorted during shipping preparations by authorized personnel.
- JLab Security patrols the campus and monitors the dedicated hazardous material storage buildings in the CMSA with recorded video.
- Maintaining a detailed chemical inventory at all times (Electronic database).
- Inspecting storage facilities on a routine basis by ESH&Q Division staff and additional duty safety wardens.

1.5 En Route Security Exchange of Information

JLab hazardous materials shipment planners should discuss enroute security with shipment drivers

so as to understand the drivers' plans after leaving JLab:

- Drivers should lock truck cab and truck tractor doors at all times and take keys any time the driver is not with the vehicle. They should also ensure windows are closed.
- Drivers should perform “walk around” inspections of vehicles after every stop, including deliveries and breaks.
- Drivers should prepare “parking instructions” for any locations away from home-base facilities. Areas with lighted and fenced parking, visibility, and security are preferred.
- Drivers should attempt to include security considerations in route selection and times for pickup and delivery.
- Driver “down-time” should be minimized while en route by scheduling as few stops as possible.
- Drivers should establish procedures to communicate emergency messages to all facilities and to drivers on the open road. They should communicate procedures for reporting any unexpected occurrence with equipment, load, or route.
- Drivers (and other knowledgeable employees) should not discuss any details about their load, pick-up points, or destinations with unauthorized personnel, such as over the CB radio or at truck stops.
- Drivers should not stop to help disabled vehicles or motorists. They should instead call local authorities and notify them of anyone needing assistance. Drivers should be suspicious of motorists trying to get them to pull over for an “alleged” traffic accident.
- Both drivers and companies should have procedures for detecting “late loads.” Companies should investigate any load more than an hour late for a delivery.
- Drivers should not change delivery destinations unless authorized.
- All employees should report any suspicious events to their company and local law enforcement.
- If there is an emergency situation, drivers should contact 911 or 311 immediately.
- Employees directly involved in the loading operation should not allow themselves to be distracted by others during loading/unloading.

1.6 Reporting Threats and Incidents

The following information would be helpful to note when reporting any threats or incidents:

- Description of vehicle(s): Describe the truck-size, color, markings, license, registration, and other pertinent identifying information.
- Description of the contents: Describe what the truck is carrying, and in what quantity.
 - Description of the event or observation: When did the event occur?
 - Where did the event occur?
 - What direction did the truck head?
 - Describe the individual(s) operating the vehicle?
 - Did the individual(s) involved in the event say anything about what they were doing or where they intended to go?
 - Note any additional suspects involved, e.g... a supporting surveillance vehicle.

1.7 General Security Awareness

Types of information that should be reported to JLab Security at 757-269-5822.

- Any employee or visitor making unusual or repeated requests for sensitive or important Jefferson Lab information
- Any person asking a driver to make any unauthorized movement (pick-up and delivery) for CASH.
- Any person or group loitering around the CMSA or Test Lab chemical processing facilities.
- Any person claiming to be a representative of a utility (gas, water, electric), City of Newport News, or Dept of Energy but cannot produce company identification.
- Any person carrying an exposed weapon, such as a handgun, rifle, hunting knife, bow & arrow, or sword.
- After hours, any vehicle driving on JLab property with lights off.
- Any occupied vehicle parked outside the JLab facility – especially if the vehicle has been sitting for a long period or after normal work hours.
- Any unfamiliar vehicle that appears to be abandoned at or near JLab.
- Any vehicle where a person or person(s) appear to be sleeping.

1.8 Hazardous Materials Transportation Security Training

All JLab employees who are involved in the transport of hazardous materials will receive initial Security Awareness and more in-depth training as lessons learned become available. Shipping & Receiving, Industrial Hygiene, and Radiological Control employees directly involved in shipment of hazardous materials will receive refresher training every 3-years as part of JLab's training proficiency program as required by 49 CFR 172.700. All records will be retained by JLab's training database when reported to the Training Office.

All Industrial Hygiene Staff who ship class 4.3 materials must receive training on this document.



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