



**Printers'  
National  
Environmental  
Assistance  
Center**

## **Fact Sheet**

**PNEAC**

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### **DOT Site Security Plan and Training Requirements for Printers**

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49 CFR Part 172.800

As a result of increased security concerns in the United States, the U.S. Department of Transportation (DOT) released new rules, which took effect September 23, 2003, requiring security planning and training for certain types of businesses, including printers. The purpose of developing and implementing a security plan is to identify and reduce security risks related to the transportation of hazardous materials in commerce. This fact sheet will guide the user in determining whether the rule applies to a facility and what to do if it does.

#### Security Planning and Employee Training

The new rules specify the following requirements:

1. Offerors (which may include printers) who ship enough hazardous materials to require registration (See [PNEAC Fact Sheet on DOT registration](#)) are required to develop a formal written security plan. It must include an assessment of possible transportation security risks for shipments of the hazardous materials, and appropriate measures to address these risks, including, at a minimum, the following elements:
  - a. Personnel security - Measures to confirm information provided by job applicants hired for positions that involve access to and handling of the hazardous materials covered by the security plan.
  - b. Unauthorized access - This includes preventing unauthorized access to hazardous materials on-site or on vehicles being prepared for transportation, e.g., trucks, cargo tanks, rail cars, etc.
  - c. En route security - DOT feels that en route security should primarily be the responsibility of the carrier. In this final rule DOT states that they are not requiring shippers to guarantee compliance by carriers, but they do expect shippers to confirm that the carrier does have an appropriate security program in place. It may be a good idea to prepare a statement for the carrier company to sign that certifies that they have a transportation safety plan in place and are in compliance with this set of regulations.

The security plan must be in writing and must be retained for as long as the facility meets the

requirements to comply with these regulations. Copies of the security plan, or portions thereof, must be available to the employees who are responsible for implementing it, consistent with personnel security clearance or background investigation restrictions and a demonstrated need to know.

The security plan must be revised and updated as necessary to reflect changing circumstances. When the security plan is updated or revised, all copies of the plan must be maintained as of the date of the most recent revision.

This plan must have been completed and implemented by September 25, 2003.

2. Conduct employee training in security. These two training components are in addition to the General Awareness, Function Specific and Safety training already required by DOT hazardous materials requirements in 49CFR 172.704. There are two types of training required:

- a. Security Awareness training - This training is required for Hazmat Employees. It must be completed by the first scheduled recurrent training but not later than March 24, 2006. For new hazmat employees, it must be completed within the first 90 days of employment. This training must provide an awareness of security risks associated with hazardous materials transportation, methods designed to enhance transportation security, and how to recognize and respond to possible security threats.
- b. In-Depth Security training – This training is required for Hazmat Employees of shippers and carriers required to develop security plans. This training must be completed by December 22, 2003. It must cover the security plan specifics, its implementation, company security objectives, specific security procedures, employee responsibilities, actions to take in the event of a security breach, and the organizational security structure.

### **Rule Applicability**

DOT has imposed formal security planning and In-Depth training requirements on those facilities, including printers who must register as an offeror of hazardous materials. (See [PNEAC fact sheet on DOT Registration](#)).

There are seven types of hazardous materials covered by these new rules and if shipments exceed the threshold quantities.

The seven categories are as follows with the types of materials that would most likely affect a printing facility in bold:

- 1) Highway route-controlled quantity of radioactive material.
- 2) More than 25 kilograms of Division 1.1, 1.2 or 1.3 explosive.
- 3) More than 1 liter of a material poisonous by inhalation in hazard zone A.
- 4) Bulk packaging with a capacity of 13,248 liters (3,550 gallons) or greater for liquids or gases, or more than 13.24 cubic meters (468 cubic feet) for solids.
- 5) A shipment of 2,268 kilograms (5,000 lbs.) in non-bulk packaging for which placards are required.

6) A select agent or toxin regulation by the Centers for Disease Control and Prevention under 42 CFR Part 73.

7) A quantity of hazardous material that requires placarding.

To avoid unnecessary duplication of security requirements, security plans that conform to regulations, standards, protocols, or guidelines issued by other Federal agencies, international organizations, or industry organizations may be used to satisfy the requirements in this subpart, provided such security plans address the requirements specified in this subpart. In other words you may combine the requirements of the DOT security plan into your EPA Emergency Response, the EPA Risk Management Plan and/or your OSHA Hazard Communication Plan. For more guidance on utilizing the one plan approach see the PNEAC fact sheet The Printer's One Plan Approach to the OSHA Hazard Communication Program, the EPA Emergency Response Plan, and the EPA Risk Management Plan.

### **More Information**

The DOT Office of Hazardous Materials Safety has many helpful resources available on their website. Click on the HMT Security sign and this will open a resource page has a security plan template and free training modules that for download.

## **Hazardous Materials Risk Assessment and Security Checklist for the Shipper of Hazmat**

### **Hazmat Storage and Handling**

1. How are hazardous materials secured?
2. Does your company protect hazardous materials using alarms and/or other security systems?
3. How are unauthorized personnel restricted from area?
4. How are untrained personnel restricted from the area?
5. What records are maintained to inventory hazmat?
6. How often is the inventory audited?
7. What is the reporting procedure if material is missing from the inventory?
8. Do your employees have a checklist for packaging and transferring hazmat?
9. Do they use the checklists effectively?
10. Does your company implement routine security inspections?

### **Training and Personnel**

11. How are shipping personnel trained?
12. How are training records kept?
13. Are handlers of hazardous materials trained in the recognition and disposal of suspect packages?
14. Are all personnel trained in recognizing and dealing with aberrant behavior?
15. Are employee background checks being conducted?
16. Are background checks periodically reviewed and/or updated? How often?
17. Does your company hold regular employee/ management meetings to discuss security measures and awareness?

### **Carrier Safety**

18. How is the carrier's identification matched to shipping records?
19. What program do you have to audit your carrier's security procedures?
20. What procedure do you have to verify if the carrier is authorized to carry your hazmat?
21. How is the carrier's equipment checked for safety?

#### Loading and Securing Shipments

22. What procedures do you have to verify that your hazmat has been securely loaded and properly labeled?
23. How do you track the shipment after it has left your facility?
24. When is the receiver notified that the shipment is en route?
25. What information is provided to the receiver?
26. Is this information adequate?
27. What procedure do you have to follow up on the safe arrival of hazmat?

#### Other questions

28. What is the site security for your facility including the location, access points (how many), barriers to entry (fences, guard stations, etc.), and procedures for entry and exit including drivers.
29. Unauthorized access controls (to avoid tampering with packages), engineering devices such as alarms, cameras and lighting as well as how do they log unauthorized entries.
30. What is their hazmat security, specifically for products that will be shipped out (waste). Access control, training for authorized employees, inventory control, packaging and marking (to comply with RCRA requirements)
31. Do they have specific procedures for responding to threats.
32. Personnel security, do they perform background checks or any other pre employment screening for employees who will handle or manage hazardous materials?
33. What do their DOT HazMat training programs cover, can employees recognize a container that has been tampered with?
34. To whom should employees report unusual behavior?
35. Are hazardous wastes shipped? If so, are there any other procedures for verifying the completion of the shipment besides the return of the HazWaste manifest as required by RCRA?

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